RedQuadrant

Welsh Government: Becoming an anti-racist organisation – an HR systems, processes, practices and policy review

Report of the review

May 2025

For Welsh Government

Prepared by RedQuadrant

This report has been prepared independently by RedQuadrant. The views, analyses, and conclusions expressed herein are solely those of the authors and do not necessarily reflect the views, analyses, and conclusions of Welsh Government.

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A. Executive summary

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A1.   Introduction

RedQuadrant was commissioned to undertake an independent review of the Welsh Government's HR policies and processes, supporting the organisation to reach its goal of becoming truly anti-racist. This review was a key milestone in the Anti-racist Wales Action Plan for the Welsh Government in its role as an employer.

A2.   Overall summary

The Welsh Government has set itself the ambition to become a wholly anti-racist organisation with systems, structures and processes in place that ensure equality of outcomes for ethnic minority staff. You want to foster an ethos of anti-racism and a culture of inclusion across all that you do, and act as an exemplar in your approach across Wales.

However, this independent review has identified that your work to become a leading anti-racist organisation is less developed than we would have expected to match the level of ambition. In order to reach your goal, a range of fundamental systemic, structural and process changes will need to be implemented. This will take time but is an essential part of your maturity as an anti-racist organisation.

We can see that some aspects of this work - 'getting the basics right' - are underway.

It is crucial that when you address these fundamentals, you do so through an anti-racist lens. We have identified a number of actions that you will need to consider in order for your HR policies, procedures and practice to become explicitly anti-racist.

It is only once these elements are in place that the Welsh Government will be able to take greater strides towards becoming a fully inclusive organisation - one in which anti-racism really has shaped its strategy, its work, its management and operating systems, and its core values and norms for success. An organisation where you are "Actively identifying and eradicating the systems, structures and processes that produce radically differential outcomes for ethnic minority groups" (Your definition of an anti-racist organisation, from the Anti-racist Wales Action Plan).

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Doing so will be of benefit not just to ethnic minority staff but to all staff because often race inequity arises not *because* of negative policies, procedures or practices aimed specifically at ethnic minority groups. Instead, inequity arises because they are disproportionately *impacted* by poor practices, policies and procedures than the majority group because they have less access to informal mechanisms within organisations. These informal mechanisms support majority group members to progress independently of formal mechanisms. One example that is commonly found in organisations is that promotion is often about *who* you know rather than *what* you know. This may be an oversimplification, but consistently managers will turn to those they feel more comfortable with, to take over a vacancy when there is an urgent need – for example an extended period of sick leave. And indeed our research found that ethnic minority respondents to our survey were half as likely as the majority group members that responded to our survey to be offered a temporary promotion. Getting a temporary promotion then increases the likelihood of getting a permanent promotion.

The Welsh Government, like the rest of the Civil Service, prides itself on the principle of appointment by merit – because it needs the best person to be fulfilling the complex and challenging roles required for effective government. Increasingly people are being asked to do more with less. So, it is vital that the best person gets the job, and this will not necessarily be the case if 'like me' bias is a significant determining factor. It is not just the individual that loses out if they are treated unfairly, the organisations does as well. Research demonstrates that when employees feel valued, treated fairly, and have a positive experience within their organization they demonstrate organisational citizenship[1]. They are more likely to engage in discretionary behaviours that go beyond their required job duties; in other words - going the extra mile - that doing more with less often requires. When people are treated unfairly or witness their colleagues being treated unfairly, then people will be far less willing to give discretionary labour to their organisations[2].

Robust research consistently finds that inclusive leadership, is a determining factor for high performing teams[3] and increased innovation and creativity[4]. In the same way that 'a rising tide lifts all boats', improving outcomes and the experience for the most disadvantaged

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[1] Ndoja, K., & Malekar, S. (2020). Organisational citizenship behaviour: a review. *International Journal of Work Organisation and Emotion*, *11*(2), 89-104.

[2] Tsai, Y., & Wu, S. W. (2010). The relationships between organisational citizenship behaviour, job satisfaction and turnover intention. *Journal of clinical nursing*, *19*(23-24), 3564-3574.

[3] Javed, B., Fatima, T., Khan, A. K., & Bashir, S. (2021). Impact of inclusive leadership on innovative work behavior: the role of creative self-efficacy. *The Journal of Creative Behavior*, *55*(3), 769-782.

[4]

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parts of an organisation result in better outcomes for the majority of organisational members.

Definition of anti-racism that guides the creation of an anti-racist organisation.

You have defined anti-racism as:

"Actively identifying and eradicating the systems, structures and processes that produce radically differential outcomes for ethnic minority groups. It involves acknowledging that even when we do not regard ourselves as 'racist' we can, by doing nothing, be complicit in allowing racism to continue. It is not about "fixing" ethnic minority people or communities, but rather about fixing systems that have not benefited and at times even damaged ethnic minority people. It is about working with the considerable strengths and leadership of ethnic minority people and using their lived experiences in how we, collectively, shape and deliver. It is about making a positive and lasting difference."[5]

Where Welsh Government is now

We asked staff about your progress in becoming an anti-racist organisation and examples of anti-racist behaviour that they could cite. Whilst staff were able to give examples of externally facing policy work, it seemed harder for respondents to identify specific, internally facing anti-racist activities. One interviewee noticed recent improvements.

"I believe the organisation is on a journey of improvement to becoming anti-racist. I have seen a significant shift in recent years, with discussions about anti-racism becoming a common part of everyday business. I also see a visible commitment to action from our most senior leaders."
Interviewee

In our all staff survey, we asked respondents to rate at what stage they thought the Welsh Government was at in becoming an anti-racist organisation. More than 1000 staff responded to the survey.

Most respondents rated the Welsh Government as a non-racist or anti-racist organisation with only 7% of staff rating the Welsh Government as a racist organisation.

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[5] [Anti-racist Wales Action Plan](#)

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Perception / experience of race equality at the Welsh Government
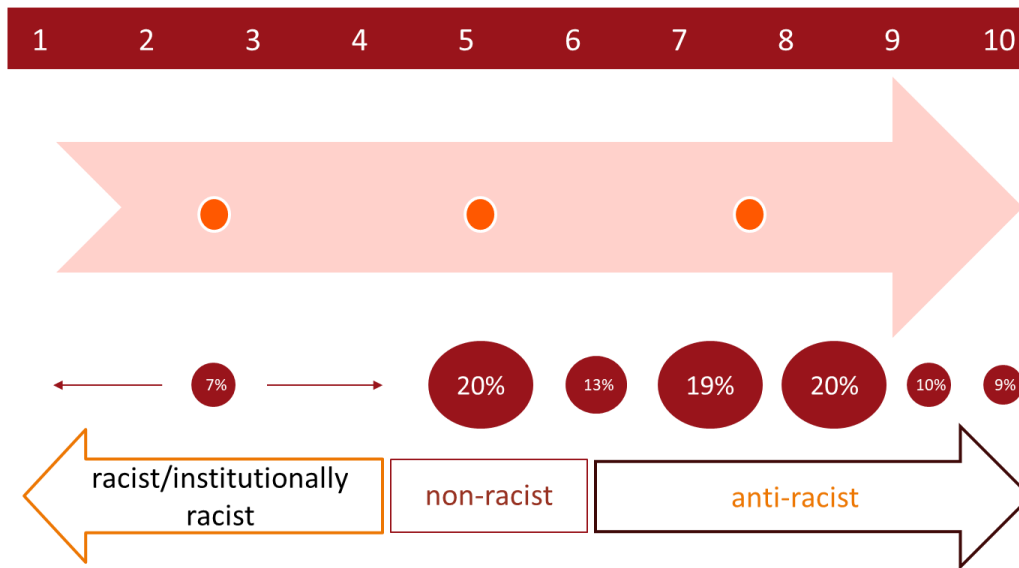
1	2	3	4	5	6	7	8	9	10

7% **20%** **13%** **19%** **20%** **10%** **9%**

racist/institutionally racist

non-racist

anti-racist

Whilst this appears to be a positive statistic, we suggest that these ratings do not match the evidence of systemic and structural inequality that our review unearthed. These are hard messages to hear – one interviewee suggested that it can be particularly difficult for the Welsh Government to acknowledge these issues.

"There is a narrative that Wales is extremely progressive, it's had an administration in charge for over 100 years which has always been identified with the progressive side of politics. As a result, it's seen that it's illogical for this progressive organisation to be capable of discriminatory behaviour or poor practice. I think that has to be challenged… That misnomer still continues."
Interviewee

People and organisational structures interact to maintain inequitable systems.

Racism, and its opposite anti-racism, are typically conceived of as a characteristic of individuals and therefore reflective of their commitment and values. However, we would argue that both are largely not a reflection of individual characteristics, but of organisational and societal systems of inequity. By ascribing inequity to individual beliefs in respect to racism, people believe that having the right values, beliefs and commitment will be enough to ensure anti-racism.

Whilst it is extremely positive that senior leadership in the Welsh Government are totally committed to anti-racism and see it as something very important, this will do little to change

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the systems of inequity that are embedded in the formal and informal culture of the organisation. Equally, good will and commitment offer little protection from the powerful cognitive process that determines the way the brain unconsciously processes perceptions of members of different groups. Ironically the more managers believe they are part of a meritocratic organisation, the more it licences their unconscious biases, because when people believe themselves to be unbiased the less likely they are to scrutinise their behaviour.[6]

There is a systemic interaction between the formal, informal aspects of an organisation and the conscious and unconscious behaviours of individuals and groups in organisations. These act to sustain the status quo unless data driven interventions based on the evidence of what actually works are implemented strategically, consistently and sustainability.

Structural inequities **Produce** → Inequitable outcomes **Reinforce** → Harmful stereotypes **Justify** → Inequitable practices **Perpetuate** → (cycle)
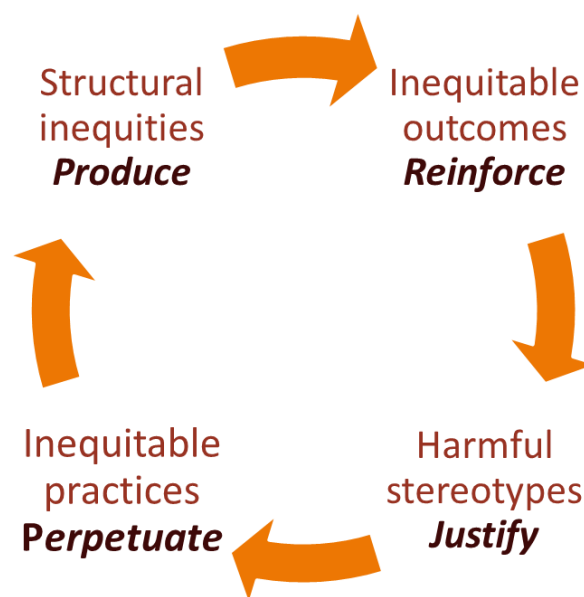
For this reason, our review focused on triangulating evidence from across the organisation, and outside it. We incorporated primary sources with strong practitioner knowledge and external research.

One staff member noted that whilst your stance is vocally anti-racist, this does not yet translate into consistent anti-racist behaviours underpinning your organisation.

"What I have noticed is the Welsh Government is very vocal in its rejection of racism per se but struggles to cope with conversations relating to racism. The same could be said for all

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[6] Castilla, Emilio J., and Stephen Benard. "The Paradox of Meritocracy in Organizations." Administrative Science Quarterly 55 (2010)

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the protected characteristics. The impact of racism on an individual is rarely considered beyond its offensiveness; learnt responses and actions are addressed in isolation and often regarded as individual characteristics, rather than outcomes of racist abuse."
Interviewee

Lack of equitable outcomes

This review has found a number of data points that demonstrate a lack of equitable outcomes for ethnic minority staff:

- some ethnic minority staff shared experiences of racism and the need to move around the organisation to avoid 'career-blocking' managers and find career-enabling managers;

- recruitment data shows that ethnic minority applicants are often less likely to be successful at interview phase, and our survey data showed that ethnic minority respondents were less likely to receive temporary promotions;

- we found that overall staff do not have confidence in your 'raising a concern' processes and therefore they are not often used; and

- staff told us about toxic pockets or parts of the organisation where they feel ethnic minority staff are excluded and/or are not able to thrive.

In order to achieve your ambition, a range of fundamental systemic structures will need to be in place. They will be facilitated by implementation of a comprehensive change programme across the whole of the organisation. There is a need for an appropriately senior leader, with experience of progressing equality, diversity and inclusion (EDI), including anti-racism, in complex organisations, in order to 'shift the dial' alongside appropriate governance throughout your organisation. Having policies and appropriate monitoring and evaluation that reflect the organisational shift is an important part of this process, but one that is required after you have a clear plan in place for this organisational change.

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A3.   Priority areas

With our focus on strengthening your foundations, we identified four priority areas for investigation in this review:

1. Governance, policy-making and strategic leadership

2. Progression and development

3. Culture, behaviours and retention, and

4. Recruitment and selection

1.   Governance, policy-making and strategic leadership

Leadership and accountability from the very top of the organisation is of the upmost importance in driving cultural change[7]. It is clear that the Welsh Government has established senior level commitment to becoming an anti-racist organisation. The Anti-racist Wales Action Plan is supported at the highest organisational level and has its own governance structure.

However, we have found much of the good work being undertaken internally is siloed, with duplication and lack of clarity within the governance mechanisms. Without the right infrastructure – including a sufficiently senior and experienced professional equality, diversity and inclusion (EDI) lead, accurate and timely data and a SMART action plan - the Welsh Government is at risk of impeding its anti-racism progress within the organisation.

Strategic leadership

Because of the systemic nature of race inequity, senior leaders at the Welsh Government need to move from values and commitment, as the basis for their anti-racist work, to taking a strategic approach to anti-racism. Director Generals need to receive data enabling them to understand the pattern of race inequity within their own departments, and hold themselves accountable for addressing the issues within their departments on the basis of a SMART action planning.

It is important that achieving race equity is not seen as something that is the responsibility of HR. With the move to manager led recruitment, all managers at the Welsh Government

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[7] Dobbin, F., & Kalev, A. (2007). The architecture of inclusion: Evidence from corporate diversity programs. *Harv. JL & Gender*, *30*, 279.

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will need to accept responsibility for improving the rate of appointment and promotion of ethnic minority staff.

In previous research of exemplar organisations, we were able to identify six fundamentals that they all had in place that underpinned their effectiveness. Our six fundamentals demonstrate how resources have been effectively applied.

EDI exemplar organisations have these factors in common

- Strategic leadership
- Expert lead and well-resourced EDI team
- Strategic SMART Action plan
- Active and involved networks, Trade Unions and advocates
- Data, analysis, targeted response, evaluation
- Policies and policy-making
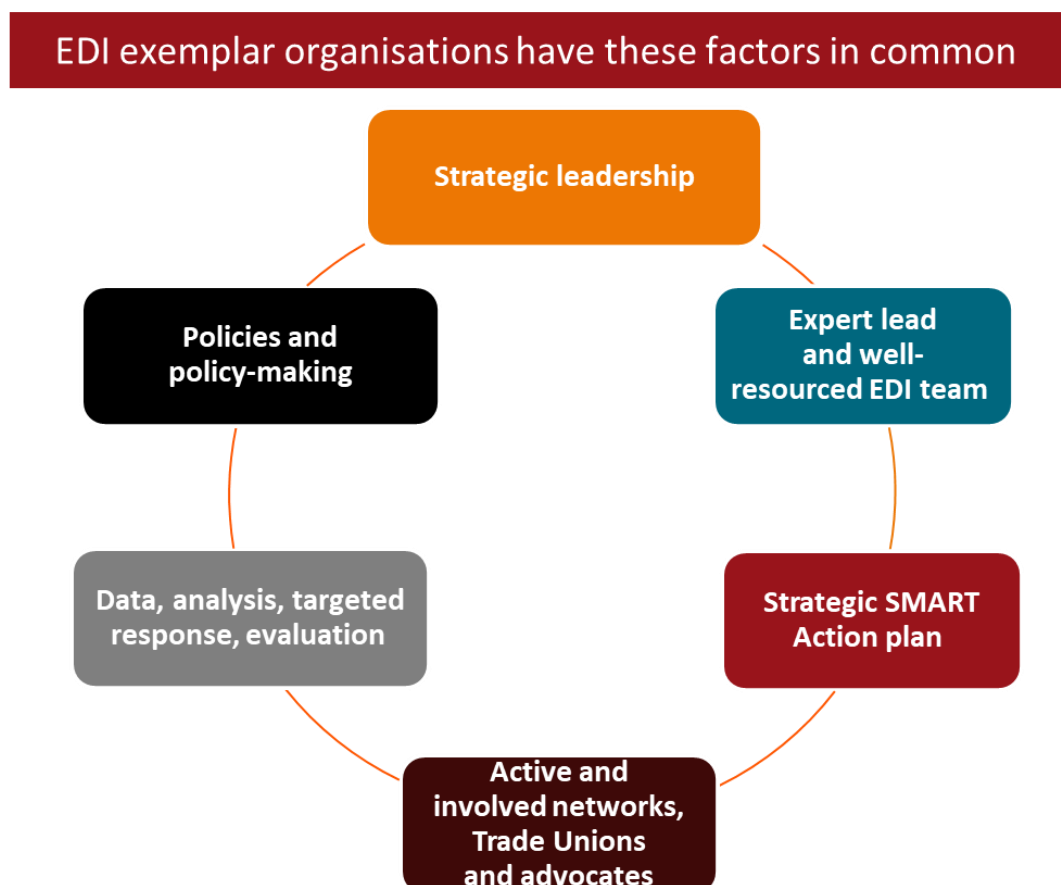
Our assessment against some of these key elements is outlined below:

Expert lead and well-resourced EDI Team

Our review has found that, however committed, the current level of resourcing for EDI has struggled to achieve the basic foundations for an effective anti-racism strategy. If the Welsh Government wants to achieve its ambition to become an anti-racist organisation, it needs to be realistic about the need for an exceptional EDI senior lead to deliver the major programmes that are required to implement the recommendations in this report.
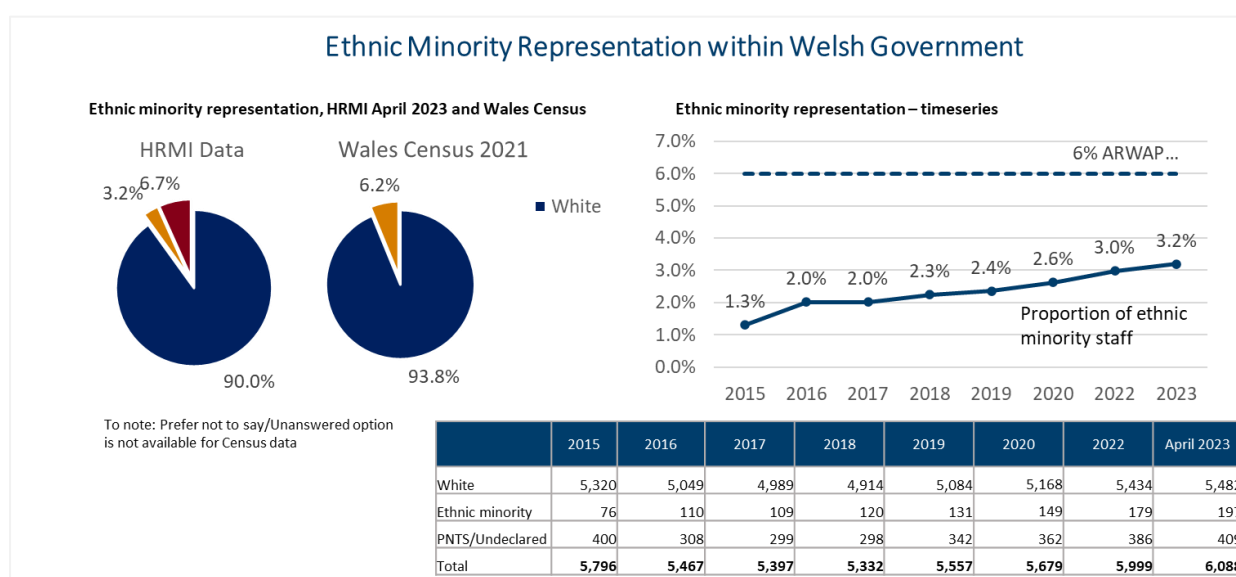
Active and involved networks, Trade Unions and advocates

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You have a positive history of engaging with your staff networks and Trade Unions. It is critical to continue engaging appropriately with networks and Trade Union representatives, whilst the responsibility for design, delivery and evaluation of anti-racism work sits within the appropriate work team.

Data and analysis

You are starting from a positive point in relation to the data and associated analysis needed for you to progress as an anti-racist organisation. You have developed an 'Ethnicity Dashboard'.

Ethnic Minority Representation within Welsh Government

	2015	2016	2017	2018	2019	2020	2022	April 2023
White	5,320	5,049	4,989	4,914	5,084	5,168	5,434	5,482
Ethnic minority	76	110	109	120	131	149	179	197
PNTS/Undeclared	400	308	299	298	342	362	386	409
Total	**5,796**	**5,467**	**5,397**	**5,332**	**5,557**	**5,679**	**5,999**	**6,088**

You are accustomed to collecting and analysing data in order to measure and monitor. Although you have a good data and analysis base, there are a number of limitations to the way in which your data supports you to monitor your anti-racist ambitions. In particular, timely access to live, or at a minimum quarterly, recruitment data would be of considerable assistance, as would your development of an approach to collecting and analysing intersectional data, even whilst the numbers of ethnic minority staff remain low.

Our first 'High impact recommendation' is for you to recruit a Strategic EDI Lead.

Without the right infrastructure – a sufficiently senior and experienced professional EDI lead, well-resourced data team, SMART action plan and so on - the Welsh Government is in danger of just talking about what needs to be done rather than actually being in a position to get things done.

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For this reason, our highest priority recommendation of all our recommendations is that you appoint a sufficiently senior person with the required experience to oversee this work. It will be almost impossible for you to maintain real progress without this dedicated resource.

2. Development, promotion, progression and inclusive leadership

We explored ethnic minority staff experiences of progression and promotion alongside an analysis of key data points. We highlight key findings below:

Career-enabling and career-blocking managers

We found examples of ethnic minority staff able to progress successfully to senior roles, and we heard positive stories of managers who have been instrumental in developing the careers of ethnic minority individuals within the organisation. Our research also found that some ethnic minority people's careers had stalled for a number of reasons. Unfortunately, our research found that both groups experienced 'bad' managers either at the start of their careers or at pivotal points in their careers. We heard testimonies of ethnic minority staff who felt they had to work harder and overcome more barriers than their non-ethnic minority colleagues to succeed.

'Bad managers' were described as managers that did not see their potential and therefore did not provide opportunities for their development and stretch projects. These managers also did not connect them to key organisational colleagues who could enable them to function in an effective and highly visible way.

There is an urgent need to achieve consistent good management practice across the whole of the Welsh government. We have suggested that to develop this process all managers over a specific time frame carry out a scripted career development and wellbeing conversation. The results of this are to be collated by HR to help inform policy, training needs and a formal talent development programme.

Given your desire to represent the Welsh population throughout all levels, it will be critical that ethnic minority staff are able to progress in the same way, on merit, as non-ethnic minority staff. Ability to progress is also tied closely to retention, therefore this has particular importance to your long-term ethnic minority representation.

"I think the reality is, as someone who's in the underrepresented group, they have less 'luck'. For example, it might take me longer to get favours, or it might take me more interviews to get through to the next level."
Career trajectory interviewee

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"If you're in the inner circle, you're in. I feel I'm not in that circle. So, you know, it feels very impenetrable for me, and I think that that's partly why, you know, some of my (ethnic minority) colleagues who joined externally have left."
Career trajectory interviewee

Promotions and progression

We explored the data behind promotions and found that 4% of those who were promoted in 2022 (and had shared their ethnicity via the workforce information system) were ethnic minority people. This is slightly higher than the proportion of ethnic minority staff.

In order to explore further, we asked questions via the all staff survey to gain an understanding of who had received permanent and temporary promotions. Comparing the proportion of survey respondents who have received at least one temporary or permanent promotion since working at the Welsh Government, we see that ethnic minority respondents were are less likely to have had a promotion, especially a temporary promotion.
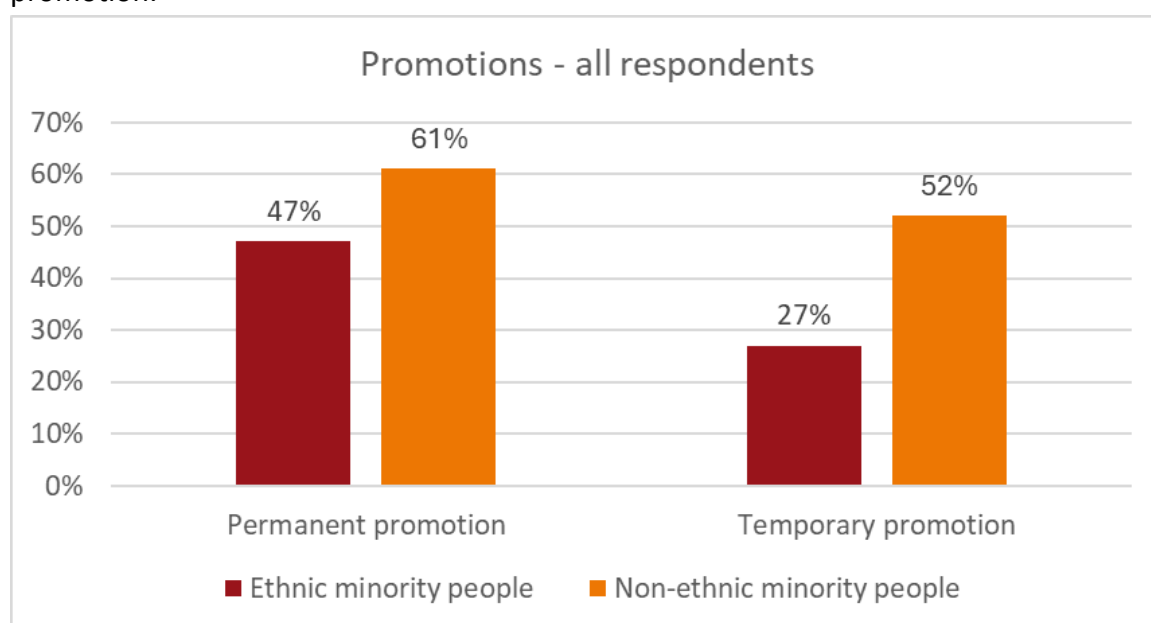
Inclusive leadership

Inclusive leaders manage diversity effectively, providing leadership which fosters innovation and creativity, high performing teams and psychological safety[8].

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[8] https://www.cipd.org/uk/knowledge/evidence-reviews/building-inclusive-workplaces/

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The Civil Service Success Profiles assessment framework contains a range of criteria that can be mapped onto the characteristics of inclusive leadership. Our recommendation is that these are prioritised in recruitment and promotion to ensure that you are selecting managers and leaders that will be competent in these qualities.

In order to address the most critical elements in relation to development, progression and promotion, our next high impact action is to develop a formal sponsorship programme for ethnic minority talent.

Research shows that formal sponsorship programmes, when introduced appropriately – to redress unconscious bias and historic under-representation – can be extremely effective to level the playing field and ensure that ethnic minority staff have access to the same level of sponsorship as is provided via the informal sponsorship more likely to be accessible to majority groups.

3. Culture, behaviours and retention

We explored the culture of your organisation, including experiences of racism and comparing ethnic minority experiences with non-ethnic minority staff's experiences. We used a number of data points, including the Civil Service People Survey and a bespoke staff survey specifically focused around this topic as well as targeted conversations with staff. We note key opportunities for improvement below.

Experiences of racism

Our review has found that despite your commitment to anti-racism, ethnic minority staff are less likely to feel that they belong within Welsh Government, and are more likely to be looking to leave the organisation. Experiences of both explicit and especially subtle racism at work remain.

> *"I've never seen any overt discrimination. But it feels like there's an assumption that white culture is the default culture, I suppose, and… people who wear different clothes or talk different languages are somehow, sort of funny foreign people, I suppose."*
> **Culture interviewee**

34% of respondents said they experienced subtle racism sometimes, often or every day. The breakdown of results is below. This concurs with what we heard via interviews, that subtle racism is more prevalent in the Welsh Government than overt or explicit racism.

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Experiences of overt racism

- Sometimes/often/every day, 18%
- Rarely, 20%
- Never, 62%

Experiences of subtle racism and/or micro-aggression

- Often/every day, 15%
- Sometimes, 19%
- Rarely, 25%
- Never, 41%
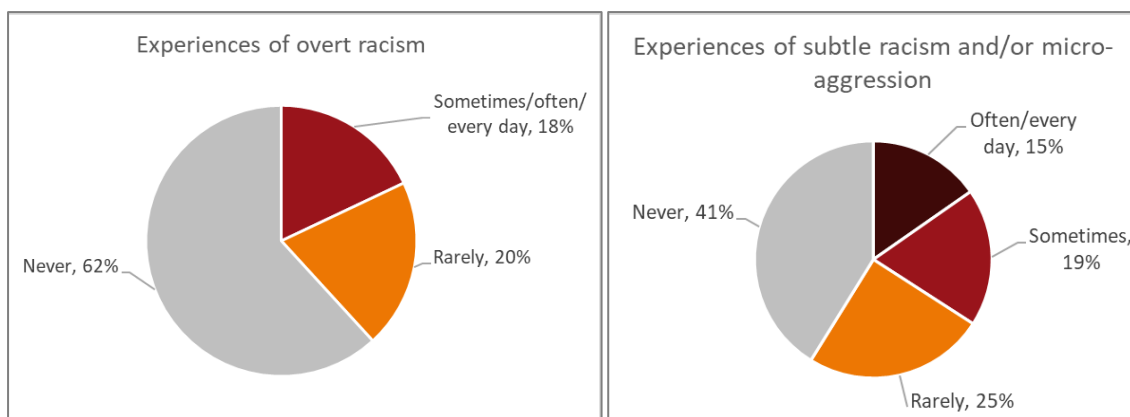
Interviewees were significantly more likely to talk about experiences of subtle racism than explicit racism. Some said they weren't sure whether racist comments or actions were conscious or unconscious. Staff also highlighted the way that these experiences could gradually erode their confidence.

Civil Service People Survey

When comparing the Welsh Government People Survey results with Civil Service wide data, we note that whilst ethnic minority responses are lower than white staff on most topics, average scores from both ethnic minority and white staff are higher than the average across the Civil Service as a whole.

One area that stands out as difference between ethnic minority and non-ethnic minority staff in your People Survey results is the questions around how long people want to stay at the Welsh Government. A significantly higher proportion of ethnic minority staff said they wish to leave the organisation 'as soon as possible' – 7.3% of ethnic minority respondents compared to only 2.2.% of non-ethnic minority respondents.

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How long do you want to stay working at the Welsh Government?

| Ethnic minority staff | Non-ethnic minority staff |

I want to leave my organisation as soon as possible

7.3%

2.2%

I want to stay working for my organisation for at least the….

…the next year

38.7%

25.2%

…next three years

46.0%

65.5%

Developing a culture of dignity and respect

In order to progress to becoming an anti-racist organisation, you will need to focus on developing a culture of dignity and respect. The contributing factors are outlined below:

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Developing a culture of dignity and respect

Advisers, coaches and mediators

Bystander anti-discriminatory training

Management skills development

Inclusive and respectful senior leader behaviour

Team dignity, respect and civility training

Compassionate and psychologically safe HR

Effective policy and reporting

Training and development

There are a number of steps to achieving this, but one of the most important is that all staff have opportunity to learn and practice how to be consciously inclusive and how to react appropriately when incidents of bad behaviour and/or racist behaviour occur. We have suggested that some learning for all staff should be compulsory, via its inclusion in other mandatory 'mainstream' development sessions. A focus on micro-aggression and more subtle forms of racism makes sense because these are the most common in your organisation (and our society), and can be harder to 'pin down'.

Effective policy and reporting

Our review found a lack of trust in both the formal and informal reporting processes for raising a concern. Numbers of reports are much lower than we would expect given the feedback from ethnic minority staff around their experiences of racism.

We recommend that you continue to develop in line with a compassionate approach to HR, but we also acknowledge the need for an effective formal reporting mechanism.

We have highlighted a need to review the current process, and publicise the reporting mechanism and the associated support provided. For further strengthening, we have highlighted the need to use data from reporting mechanisms combined with other

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organisational data in order to identify those areas within the organisation which need more targeted work related to unsafe cultures.

We have selected a cluster of priority recommendations to enable your culture to become anti-racist. We focus on:

- further developing your compassionate approach to HR;

- making your reporting mechanisms fit for purpose;

- using organisational insight in order to identify and appropriately manage parts of the organisation where toxic and/or unsafe cultures exist; and

- embedding anti-racist learning in mandatory training.

4. Recruitment and selection

The Welsh Government's recruitment process, aligned to the Civil Service Recruitment Principles, is thorough. There is a clear commitment to fair and equal process. You have put ambitious recruitment goals in place, demonstrating your desire to increase diversity in the workforce so that you better represent the communities you serve in Wales.

Increasing representation

The proportion of ethnic minority staff has increased from 1.3% in 2015 to 3.2% in 2023. You have set a target that the proportion of ethnic minority staff will be 6% for all staff at all levels by 2026. Whilst there have been increases in representation since 2015, you will need a step change in representation in order to meet this 6% target.

We have identified a number of areas where the process could be improved to ensure all candidates are given a level playing field from the outset. Some of these relate to where ethnic minority candidates could inadvertently be disadvantaged, and we have put forward recommendations that could help to prevent unconscious bias.

Interviews

When we examined your recent recruitment data for an external campaign, we saw that 18.9% of applicants were ethnic minority applicants – this is nearing the 20% target for all external appointments at Welsh Government. This is positive and suggests that on average you were able to attract ethnic minority candidates to apply for these roles. Ethnic minority candidates maintain their representation percentage in the progress to sift stage (18.9% to 19.2%). Since this sift is anonymous, it suggests that the applications you receive from ethnic minority applicants are on par with the applications you receive from non-ethnic minority applicants. However, ethnic minority staff are less likely to pass the recruitment

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process (which could be sift and interview, or could have other phases) (19.2% of candidates reduces to 13.6% after interview).

CAIS - External recruitment phase outcomes July 2023-March 2024
(Applicants with known ethnicity)
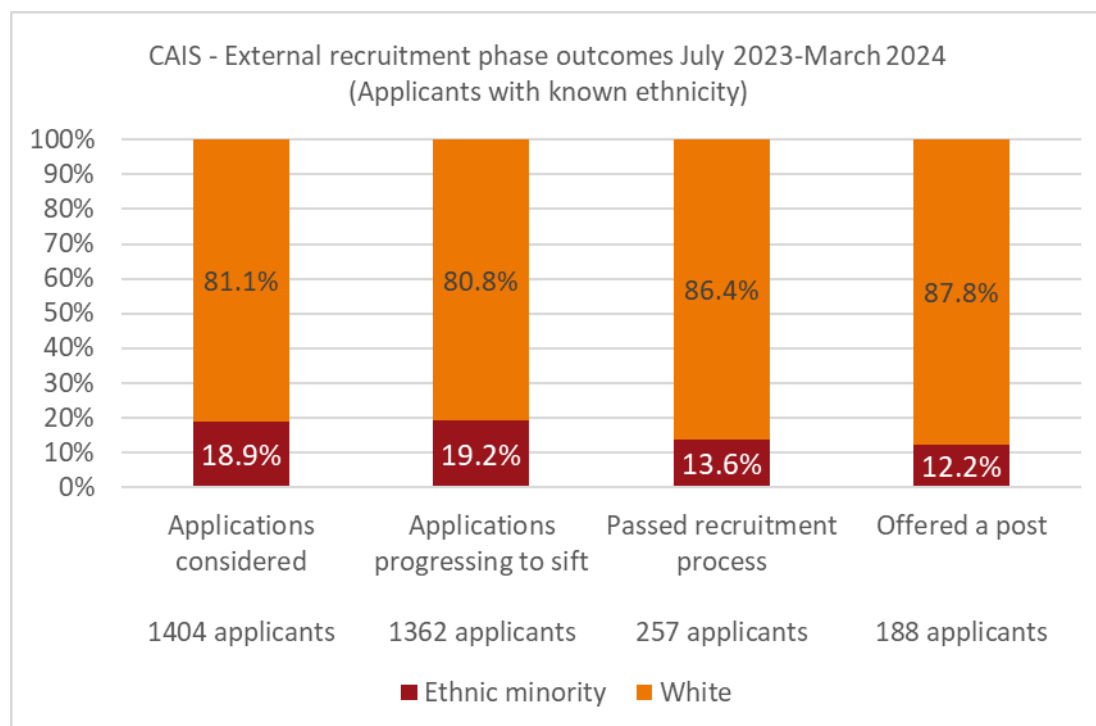
The data suggests that something is happening at interview stage which is leading to ethnic minority applicants being less likely to be successful at the interview stage. A similar pattern of results also appeared in historical data of internal recruitment.

Strength-based questions

Our observation was that it may be the use of strength based questions which was having an adverse impact on ethnic minority candidates. These are questions that are meant to be answered in a 'quick fire, top-of-your-head' way but that language and other challenges could be preventing ethnic minority candidates from doing so effectively, which resulted in them being marked down. We have recommended that apart from for entry level roles, recruiters should focus on using the behavioural, experiential and technical aspects of the civil service success profiles.

Equity advocates

This review has highlighted areas of the recruitment process where implicit bias may be influencing outcomes for ethnic minority staff. Equity advocates participate in the recruitment process as full panel members with a specific role to hold the process to

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account. The power of veto over any recruitment panel decisions is seen as pivotal to the effectiveness of the equity advocate's role.

Our final high impact recommendations relate to internal and external recruitment.

We are prioritising our recommendation to carry out further research into the reasons for lower success rates of ethnic minority candidates in interviews**.** In order to minimise implicit bias, we are also prioritising deployment of trained equity advocates.

A4.   Next steps and priority recommendations

Through this review, we have identified a large number of recommendations (see Appendix 1) in order for your HR policies, procedures and practice to become explicitly anti-racist. You will need to work through these recommendations and consider how you can best operationalise them.

In order to support this process, we have prioritised the recommendations in the following way:

- **High impact** – those recommendations which we strongly feel are most likely to shift the dial in terms of people's lived experiences within the organisation, but require significant investment. These recommendations will not only improve experiences for ethnic minority staff, but all staff as they reflect excellent practice for organisations.

- **Priority** - those recommendations that we feel are of particular priority – either because they are both urgent and important, or because we believe they will unlock your ability to deliver real change. By implementing the full set of these recommendations and more, as you develop your anti-racist knowledge and practice, you will be able to make real and visible progress.

- **Quick wins** - We have also identified a number of smaller recommendations, with a requirement for very low or no additional people resource, and no anticipated additional cost. We have described these as quick wins. We recommend you implement these as soon as possible to make positive progress and maintain momentum in this work.

The first step is for the Welsh Government to develop an achievable SMART action plan for these recommendations, laying the foundational fundamentals for becoming an effective anti-racist organisation over the next year and fully embedding them within three years.

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B. Introduction

This review sought to consider organisational priority areas for the Welsh Government, in line with the current Anti-racist Wales Action Plan and Welsh Government's own aspirations to become an anti-racist organisation. We were commissioned by the Welsh Government, specifically in response to this organisational action from the Anti-racist Wales Action Plan:

"Engage expert consultancy support with appropriate lived experience and experience of working effectively in a government context to review Welsh Government's HR policies, procedures and practices (entry to exit) to ensure they are explicitly anti-racist."

The purpose of this work was to review your HR policies, processes and most critically your organisational practice. Subsequently we were to develop meaningful and evidence-based recommendations to support your progress in becoming an anti-racist organisation.

Background

Welsh Government Anti-racist Wales Action Plan context

The Anti-racist Wales Action Plan, published in July 2022, sets out a vision in which the Welsh Government and the public services it funds are anti-racist, and there is a culture of zero-tolerance of racism throughout the public sector.

The plan commits the Welsh Government, as an employer, to be an exemplar to other organisations in Wales. It must also create a sizable momentum for the changes needed across the public sector. To achieve this, you will need to weave anti-racism through all of your policies and practices.

The Welsh Government is currently a long way from being representative and appropriately serving the communities of Wales in your organisation. You are seeking not just to increase the number of ethnic minority colleagues at all levels of the organisation, but also to understand people's experiences of working in the Welsh Government. This will enable the development of robust policies to facilitate progression, and processes for calling out racism.

Your overarching aim is to become a wholly anti-racist organisation, with systems, structures and processes in place that ensure equality of outcomes for ethnic minority colleagues. You want to foster an ethos of anti-racism and a culture of inclusion across all that you do, and act as an exemplar across Wales.

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Legislative and policy context

The Welsh Government's ambition to be an anti-racist organisation is driven by -- and supports – key legislation and policy. This includes:

The **Well-being of Future Generations Act**

The Well-being of Future Generations Act sets out the ambition, permission and legal obligation to improve social, cultural, environmental and economic well-being.

The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

The Act offers a huge opportunity to make a long-lasting, positive change to current and future generations.

There are seven connected well-being goals for Wales. They are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of more cohesive communities
- A Wales of vibrant culture and thriving Welsh language, and
- A globally responsible Wales

The Act identifies five ways of working that must be adhered to.

- take account of the **long term;**
- help to **prevent** problems occurring or getting worse;
- take an **integrated approach;**
- take a **collaborative** approach; and
- consider and **involve people** of all ages and diversity

The goals and ways of working are central to the way in which the Welsh Government will take forward its anti-racist ambitions.

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Social Partnerships and Public Procurement Act

This Act is about working together to improve public service delivery and well-being in Wales.

The Act provides a framework to promote the well-being of the people of Wales by enhancing sustainable development (including by improving public services) through social partnership working, promoting fair work and socially responsible procurement. The Act includes provisions for, amongst other provisions:

- a statutory duty on certain public bodies to seek consensus or compromise with their recognised Trade Unions or, where there is no recognised Trade Union, other representatives of their staff when setting their well-being objectives and delivering on those objectives under the Well-being of Future Generations (Wales) Act, 2015;

- a statutory duty on the Welsh Ministers to consult social partners, employers and worker representatives through the Social Partnership Council when delivering on their well-being objectives;

- a statutory duty on certain public bodies to consider socially responsible public procurement when carrying out procurement, to set objectives in relation to well-being goals, and to publish a procurement strategy; and

- certain public bodies to carry out contract management duties to ensure that socially responsible outcomes are pursued through supply chains

The Act provides Welsh Government with a framework for working with partners to take forward its anti-racist ambitions. Within Welsh Government, the Partnership Agreement informs the way that business is conducted between Welsh Government management and Trade Unions. Trade Unions officials can play an invaluable role in the taking forward of an anti-racist role within Welsh Government. The TUC Cymru Anti-racism in the workplace - a toolkit for union reps and the TUC anti-racism tracker provide valuable support to Trade Unions in supporting anti-racism.

Fair work

The Welsh Government is committed to fair work both at Welsh Government and in organisations across Wales. Every organisation has its own fair work challenges and opportunities, and Welsh Government is no different. However the Welsh Government's aim to be an anti-racist organization works mutually with the commitment to support fair work ..

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Fair work is the presence of observable conditions at work which means workers are fairly rewarded, heard and represented, secure and able to progress in a healthy, inclusive working environment where rights are respected.

Fair work enables a working environment which is attentive to the well-being of workers. The actions deployed by an organisation in their pursuit of fair work will depend on the specific circumstances of that organisation. Some actions may not be appropriate or feasible for all organisations, it is therefore up to each organisation to determine which actions are.

Practical examples of what fair work look like in a working environment:
- offering workers the opportunity and choice to be represented collectively, ensuring workers are informed about proposed decisions that may affect them, and providing workers with the means to participate in and influence those decisions;

- delivering inclusive opportunities to obtain work, to acquire and develop skills and learning, and to progress in work;

- ensuring work is carried out within a safe and healthy environment, where bullying, harassment and all forms of discrimination are tackled; and

- guaranteeing that rights and obligations are recognised and adhered to at all times

The development of an anti-racist organisation clearly supports the goal of fair work.

The Equality Act 2010
- [The Public Sector Equality Duty and specific duties for Wales](#)

- [Socio-economic Duty](#)

The public sector equality duty (PSED) is a legal requirement for public authorities and organisations carrying out public functions. The purpose of the PSED is to make sure that public authorities and organisations carrying out public functions think about how they can improve society and promote equality in every aspect of their day-to-day business. The three aims of the general duty are to make sure that public authorities have due regard to the need to:

1. put an end to [unlawful behaviour that is banned by the Equality Act 2010,](#) including discrimination, harassment and victimisation;

2. advance equal opportunities between people who have a protected characteristic and those who do not; and

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3. foster good relations between people who have a protected characteristic and those who do not

The specific duties for Wales help public authorities improve their performance on the general duties.

The Equality Act's Socio-economic duty for Wales aims to deliver better outcomes for those who experience socio-economic disadvantage. The Socio-economic Duty does this by placing a duty on public bodies that when making decisions of a strategic nature about how to exercise functions, they have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.

The creation of an anti-racist organisation plays a central role in both your compliance with the Equality Act's duties and in the fulfilment of its aspirational aims.

Racism

It is helpful to understand some of the theory and background information about how systems of racial inequity operate, how these issues may show up at the Welsh Government, and how interventions may bring the changes desired.

Racism: is the belief – consciously or unconsciously - that one racial group is superior to another racial group. This belief is coupled with and supported by structural systems of unequal power. These structural systems are multi-dimensional and ensure unequal distribution of resources through laws, policies and behaviours amongst racial groups. This applies to a range of issues including education; employment opportunities; finances; criminal justice outcomes and healthcare.

Racism shows up on different levels. In order to address issues of racism, we need to understand these levels so that we can create specific interventions.

Internalised racism: lies within individuals. These are our private beliefs about racism that may have arisen from the extensive negative messaging about different groups that we experience from the outside. Regardless of whether or not we agree with this messaging, it can still influence our unconscious beliefs either about members of our own group, or about members of other groups.

Interpersonal racism: occurs between individuals, when we bring our private beliefs about race into our interactions with others through actions and behaviour. These actions and behaviour can be conscious such as public expressions of hate and prejudice; white

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solidarity; upholding a select version of history. They can be unconscious actions which nevertheless influence actions and behaviour. These may exclude, cause hurt and offence, and damage people's experience and opportunities; actions such as not taking questions form people from a certain background, not inviting them to lunch, passing them over for promotion and so on.

Institutional racism: occurs within institutions. Based on the report into the murder of Stephan Lawrence it is defined as 'The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin'[9] It involves discriminatory treatment, unfair policies and practices, inequitable opportunities, and then different outcomes based on race . This can result, taking one common example, in under-funded inner-city schools with more Black children and less experienced teachers.

Structural racism: racial bias and inequalities across institutions and society. It is the legitimisation of racism through the systems it operates within. It has a cumulative effect that systematically privileges white people and disadvantages more marginalised groups e.g., poorer areas with fewer services, fewer jobs and environmental toxins.

Unconscious racism: we are all socialised and conditioned in the dynamics of racism. Both from what we have absorbed in our environment and the way we often gravitate towards those that are more like ourselves. Unconscious race bias and stereotyping are therefore very likely to be at play in all organisations and in society. Because of the unconscious nature of these processes, this will be despite an individual's or organisations' values and firm commitments to the opposite. Unconscious bias will interact with and reinforce structural racism, creating a system of race in equity in organisations that maintain the status quo. This is despite organisational effort to address these inequities.

Racism as a good bad/binary: racism is often seen as something that 'bad people', consciously decide to exhibit through their language and behaviour. So, if an organisation is experienced as racist, this must mean there are bad people in the organisation, the so-called 'few bad apples'. 'Good people' on the other hand, having the right commitment and values could therefore not be racist. This good/bad binary is often a misconception. Often, the experiences of racism in an organisation are not to do with conscious racist beliefs, but how institutions and systems are set up to support the status quo, which is often oppressive.

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[9] Stephen Lawrence Inquiry Report: Publication (Hansard, 24 February 1999)

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The good/bad binary creates a limited, oversimplified view of racism, which fails to recognise the more subtle, systemic ways in which racism operates. This blocks self-reflection, as individuals are unwilling to examine their own biases as they don't want to appear to be bad and racist. It; ignores structural racism because the binary view focuses on individual actions rather than on the larger systems that sustain racial inequality. Individuals can react defensively to suggested changes in behaviour because they feel they are being seen as bad, rather than seeing the feedback as an opportunity to improve outcomes.

Anti-racism

Definition of anti-racism

The Welsh Government's definition of anti-racism as contained in the [Anti-racist Wales Action Plan](#):

"Actively identifying and eradicating the systems, structures and processes that produce radically differential outcomes for ethnic minority groups. It involves acknowledging that even when we do not regard ourselves as 'racist' we can, by doing nothing, be complicit in allowing racism to continue. It is not about "fixing" ethnic minority people or communities, but rather about fixing systems that have not benefited and at times even damaged ethnic minority people. It is about working with the considerable strengths and leadership of ethnic minority people and using their lived experiences in how we, collectively, shape and deliver. It is about making a positive and lasting difference."

Systems, structures and processes produce differential outcomes for ethnic minority groups

In order to carry out an anti-racist review we have to allow for the systemic nature of race inequity and look at both formal and informal organisational processes, procedures and practises. To assess whether a policy is anti-racist for example, we have to examine the content of the policy, and also determine whether there is any objective evidence that the policy is having a differential impact on different groups. The Equality Act 2010 differentiates between direct and indirect discrimination, where a policy applied equally to all groups may disadvantage some. We also need to determine if an effective policy is inconsistently implemented across groups, resulting in a different experience for members of that group as well as differential outcomes.

Racism is both individual and organisational, so we also must explore what is happening at the level of the individual, including their lived experience at the level of the group, as part of a team, of being managed, and at the level of the organisation. The latter pertains not only to organisation-wide policies but also the experience of being led. Where there is a lack of congruence between the espoused values of senior leadership, the policies in an

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organisation and senior leaders' behaviour, minorities are less likely to experience that diversity is valued and that they are in an inclusive organisation[10].

Key sources for inquiry

To identify the systems, structures and processes that produce differential outcomes for ethnic minority groups, we take a data-driven and evidence-based approach to review organisational systems. We base our findings, analysis, and recommendations on four sources of information:

a. **Data** – we start with a systematic gathering and analysis of organisational data, facts, indicators and metrics to understand more accurately what is happening in your organisation

b. **Stakeholders** - evidence (qualitative data) from stakeholders and those affected by the issue. We carry out interviews, focus groups and run surveys so that we can hear about the lived experience of your organisation members. We are interested in hearing from minority and majority staff, enabling to enables us to make comparisons such as:- does a policy cause issues for all staff or just minoritised staff, or if it is worse for minority staff.

c. Use of the **best available scientific evidence** from peer-reviewed sources. Academic research that uses robust methodology, such as systematic and metanalytical reviews enables policy makers to obtain robust evidence of what works outside of their sphere of experience[11].

d. Evaluated **best practice and practitioner judgement** resulting in procedures, practices and frameworks that reduce bias, improve decision quality, and create more valid outcomes. We draw on the NHS and the Higher Education Sectors in particular because the publicly available detailed equality data means it is possible to assess the impact of EDI initiatives, providing objective evidence of good practice.

Root Causes vs 'solutioneering'

The avoidance of 'solutioneering' is one of the principal benefits of using a data-driven and evidence-based approach. We diagnose organisational issues and then develop interventions and changes to address those issues

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[10] Mor Barak, M. E., Luria, G., & Brimhall, K. C. (2022). What leaders say versus what they do: Inclusive leadership, policy-practice decoupling, and the anomaly of climate for inclusion. *Group & Organization Management*, *47*(4), 840-871.

[11] https://www.gov.uk/guidance/what-works-network#:~:text=What%20Works%20is%20based%20on,to%20find%20out%20what%20works.

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'Solutioneering' is the term used to describe the practise of working up a solution prior to really understanding the problem that the solution is set to solve. EDI interventions can often be expensive both in terms of time resources and people. If they do not work, they can actually make the situation worse. Not only does the intervention target's situation remain the same, morale and cynicism are deepened. This can lead to a 'revolving door' where the minorities that the organisation has worked so hard to recruit or promote leave the organisation in frustration.

EDI challenges are complex in nature because of the interaction between conscious, unconscious, and structural organisational elements (both formal and informal). Understanding the root causes of an issue enables the design of more sophisticated interventions and changes better able to address the range of interacting factors involved, resulting in better outcomes for all concerned. In the Anti-racist Wales Action Plan, the Welsh Government has set out an ambitious vision for race equity in Wales. This review has been undertaken to ensure that Welsh Government has the organisational requirements in place work effectively towards achieving that ambition.

Structure of the report

We are not presenting our findings in the chronological order in which we carried out the review (as described in the methodology). We present the findings in order of importance of the issues most vital to the organisation as prioritised by your stakeholders.

Governance, policy-making and strategic leadership: research and best practice from exemplar organisations concur - leadership and accountability from the very top of the organisation is of the upmost importance in driving cultural change. We share our findings on the organisational building blocks that need to be in place if the Welsh Government is to achieve the fundamentals necessary for race equity.

Development, promotion, progression and inclusive leadership: there is little point increasing the proportion of ethnic minority people entering the organisation if you are then unable to help them to progress and to fulfil their full potential within the organisation. We share our findings of an innovative research study that compared career barriers and career enablers for ethnic minority people. We spoke to ethnic minority staff who believe that their careers have flourished, and those who believe their careers have stalled.

Organisational culture, behaviours and retention: over one thousand staff responded to our culture survey. We present the results of that survey and discuss the changes that the Welsh Government will need to put in place if it is to achieve a safe workplace in which all members are treated with dignity and respect.

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Recruitment and selection: The data suggests that whilst the Welsh Government is attracting and shortlisting ethnic minority candidates, ethnic minority people are less likely to be successful through the interview process. We present the findings of our in-depth look at recruitment and suggest concrete ways it can be improved to become anti-racist.

A note on language

Throughout this report we have used the language most commonly used by the Welsh Government in relation to ethnicity. Specifically, we refer to Black, Asian and Minority Ethnic people or staff, shortened to ethnic minority people or staff.

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C. Methodology

In December 2023 we were awarded the contract to review the HR policies, procedures and practices of the Welsh Government to ensure that they are explicitly anti-racist in Our work commenced in January 2024.

We used an eight-step process:

- Project initiation and planning

- Desk review

- Data analysis

- Stakeholder engagement

- All staff questionnaire

- Development of a theory of change

- Draft report

- Final report and presentation

On initiation, we agreed to work with a dedicated working group, including Minority Ethnic Staff Network (MESN) representation, and this group was our organisational reference point throughout.

Focus of the review

The initial starting point for this review was the Anti-racist Wales Action Plan action:

"Engage expert consultancy support with appropriate lived experience and experience of working effectively in a government context to review Welsh Government's HR policies, procedures and practices (entry to exit) to ensure they are explicitly anti-racist."

We agreed with you on initiation that whilst the policies may have an impact, it was more critical to review the organisational practice, culture and governance within which anti-racism is embedded.

Review prioritisation

During project initiation, it became evident that completing a review of all potential areas for consideration was unfeasible. We therefore agreed to prioritise our work topics in order to focus on the areas which were most useful to the Welsh Government and to those who would be tasked with implementation of any actions. This was achieved through a series of

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meetings with our working group and MESN, via discussion and informal polls to establish the areas key staff believed were priority. More detail of this process is provided in Appendix 4.

The prioritisation and discussions continued through January and February. In March, we began a deeper analysis of the areas agreed as priorities. These key areas are:

1. **Recruitment – both internal and external:** this area examined the recruitment processes for external and internal candidates. We began our review with a document and data review alongside assessing the applicant experience. We aimed to carry out live recruitment observations but since this was not possible, we instead observed some mock interviews. Insight on recruitment also came from the all staff survey, and culture interviews with ethnic minority staff. Additional perspectives were gained from interviews with a small number of Anti-racist Wales Action Plan External Accountability Group (EAG) members, which focused on the perception of Welsh Government and recruitment-related outreach.

2. **Progression, promotion and development**: this involved a review of process and policy documentation, alongside progressions outcomes data. We studied the current progression, development and promotion processes as well as the historic Gateways process. Interviews were conducted with ethnic minority staff to assess career trajectories and barriers. This was supplemented by questions in the all staff survey which related to promotion, progression and development.

3. **Behaviours, culture and retention:** the policies, processes and practices impacting Welsh Government culture and individual staff behaviour were examined. A significant component of our findings for this priority area came from responses to the all-staff online survey. We also held culture interviews with ethnic minority staff to understand more about their experiences in the Welsh Government. This was supplemented by consideration of your complaints procedure and interviews with Trade Union representatives and other stakeholders.

As our review progressed, it was recognised that a fourth area, was essential:

4. **Governance**: we focused on the governance structures related to the Welsh Government's anti-racist plans and operations. Interviews were carried out with relevant stakeholders including senior leaders, and the equality, diversity and inclusion (EDI) board champion, alongside HR and MESN representatives. Comparisons were made with the governance arrangements based on previous research on exemplar organisations in the NHS and higher education sectors.

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The research and analysis of these areas extended into June 2024, resulting in an agreed date to finalise in Autumn 2024. We held a deliberative workshop to test and validate our early findings and recommendations in June 2024. At this workshop, we facilitated small groups of attendees who worked up an initial 'Theory of Change' for a number of key recommendations. More detail is provided in Appendix 7.

Given the agreement to focus on the current state and practices, we agreed not to carry out a detailed review of all of your policies as part of this project. Key policies were reviewed in our desk review, but our findings relating to policies primarily focus on the policy-making process that will need to reflect the required changes in your current practice.

More detailed methodologies for each area are outlined in their respective sections below. We identified data and monitoring as a crucial component to all initial avenues of consideration as well as the conclusions in all four priority areas.

Methods

We used the following methods:

- **Desk review** - this involved review of policies and procedures as well as content such as websites and social media on the basis of representation, best and good practice and the risk of bias or adverse impact.

- **Data analysis** – this included a review of all available data on representation, experiences and outcomes of Welsh Government staff, both those who are employees and through the recruitment process.

- **Mystery shopping** - this is a process in which the researchers engage in an event, activity or process as though they were a potential applicant. This enables the comparison with competitor organisations, an assessment against good and best practice, the identification of areas at risk of bias and adverse impact. This approach was used to review applicant areas of the website and the process of completing an application form.

- **Observation** - this enables the researcher who is not immersed in the organisation's perspective to assess performance against good and best practice and to identify practice at risk of causing bias or adverse impact. We used this method to observe the recruitment process via mock interviews.

- **Interviews** – this enables the researcher to sample the experience of stakeholders who are impacted by the issue. Interviews were carried out with a range of leaders, HR professionals, MESN members, Trade Union representatives and two external organisations in relation to experience of external recruitment. We also carried out interviews with ethnic minority staff which focused on experiences of recruitment and progression, as well as the culture of the Welsh Government.

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- **All staff survey** – this enables collation of comparison of majority and minority experiences and perceptions, as well as rich qualitative evidence through a small number of open questions. The staff survey focused particularly on the culture and experiences in the Welsh Government, including specific questions for ethnic minority and non-ethnic minority staff. Questions also covered anti-racist progress and experiences of recruitment and progression. 1159 responses were received which relates to a 19% response rate [12].

- **Deliberative workshop and theory of change development** – an interactive session where findings and recommendations are not only tested but also worked through in practice. We held a deliberative workshop with over 30 attendees, made up of a wide range of staff including ethnic minority leaders, senior leaders, MESN members and those likely to be responsible for implementation.

Why do we start with data analysis?

Data analysis means we can pinpoint where specific issues lie so we can then focus our investigation on understanding what is causing those issues. We then recommend research, evidence-based and best practice solutions to address those issues.

A key element of data analysis is looking at the representation of different groups at each stage of the recruitment process in comparison to a relevant benchmark.

Why is identifying under-representation important?

- Enables you to identify if and where you have a problem to address;

- Provides the legal basis for using positive action and targeted approaches to recruitment, selection, progression and training; and

- Enables appropriate targets to be set to monitor and report progress

Engagement and governance

We worked closely with our working group throughout, holding regular project meetings which enabled us to make shared decisions about the right direction for this work. The working group included representation from the following areas of Welsh Government: the Equality and Diversity in the Workplace Team, the Anti-Racist Wales Action Implementation Team, the Minority Ethnic Staff Network, the Women Together Network and the Race Disparity Evidence Unit. We also had monthly meetings with senior HR colleagues.

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[12] Using headcount of 6086 ay 31 May 2024

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Limitations

We have outlined limitations to our findings in each methodology section. As is to be expected due to this time-limited research and the small proportion of ethnic minority staff at the Welsh Government, these limitations mainly relate to:

- limited ability to draw conclusions based on small numbers;

- data availability; and

- self-selection of research participants – both interviewees and survey respondents were more likely to respond if they felt particularly strongly about the topic

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D. Findings

1. Governance, policy-making and strategic leadership

1.1. Aim

Measurable change in diversity has been driven across a variety of sectors through the use of evidence-based frameworks to identify what needs to be changed, to put in place a plan to change, and then to manage the implementation of that plan. Perhaps most relevant to the Welsh Government is the NHS's [Workforce Race Equality Scheme (WRES).](#) The WRES has nine indicators that NHS organisations use to identify if and where there are gaps between the experience of ethnic minority staff and White staff. Where there are gaps and differences, NHS organisations are required to report on how they are closing those gaps. In the higher education sector the [Race Equality Charter (REC)](#) helps institutions in their work to identify and address the barriers facing Black, Asian and minority ethnic staff and students, while also providing a framework for action and improvement. Institutions can apply for a bronze or silver award, depending on their progress. In the private sector, Business in the Community has initiated the [Race at Work Charter](#) with five calls to action to improve race equality, inclusion and diversity in the workplace. In 2021, the charter was expanded to include allyship and inclusive supply chain commitments.

Although there are differences between the frameworks, they all encourage organisations to adopt a similar data-led and evidence-based methodology. They all highlight data collection and data analysis – identifying the reasons for the issues in the data, designing appropriate interventions, planning the implementation of SMART objectives to realise interventions and measuring and evaluating the impact of interventions.

A number of these frameworks have been in place for a decade or more, and within these sectors we have seen them recognise – often the hard way – that to implement these approaches, the organisation must not only supply adequate resources but that these resources must be applied effectively.

1.1.1. Six fundamentals for effectiveness

In a previous piece of research, we were tasked to identify how NHS trusts were making measurable increases in the diversity of their talent pipelines. Through this in-depth study of exemplar organisations, we were able to identify six fundamentals that they all had in place that underpinned their effectiveness. The six fundamentals demonstrate how resources have been effectively applied in exemplar organisations.

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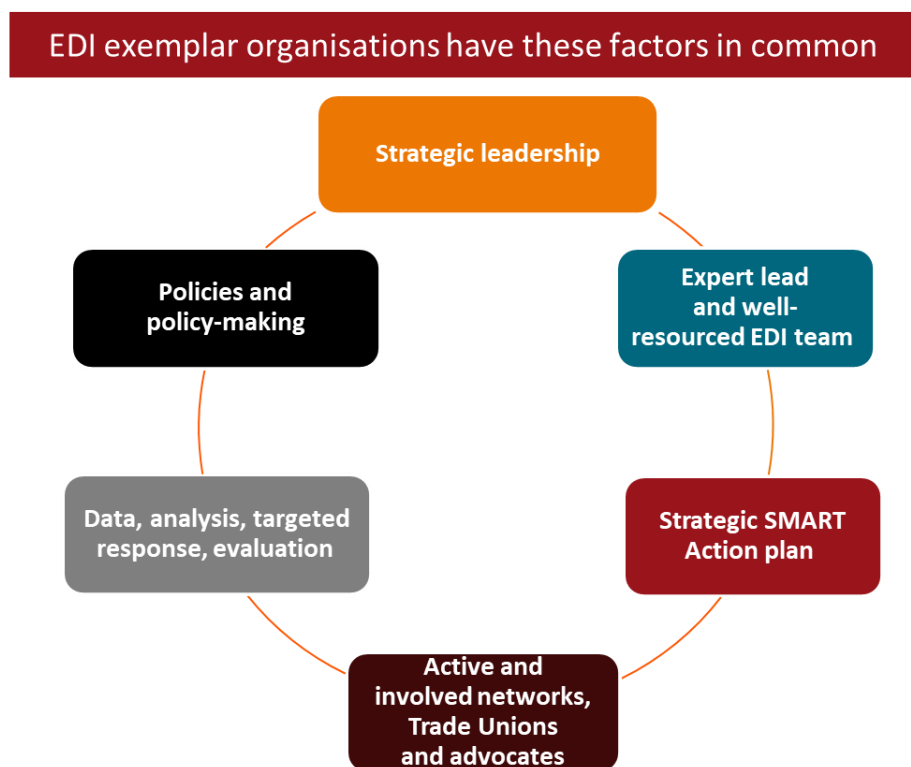
EDI exemplar organisations have these factors in common

- Strategic leadership
- Expert lead and well-resourced EDI team
- Strategic SMART Action plan
- Active and involved networks, Trade Unions and advocates
- Data, analysis, targeted response, evaluation
- Policies and policy-making

Figure 1: Factors present in exemplar organisations in relation to EDI and anti-racism

What we see in EDI exemplar organisations are these six things.:

Effective, strategic governance of EDI – this is explicit and clear about which parts of governance connect with others, and how they relate.

Secondly, the work needs to be led by someone with a specific type of EDI expertise. This doesn't refer to senior sponsorship, though that is a very helpful addition. For example, in your context, though you have the most senior sponsorship for this work, we believe that it is not enough on its own. What you also need is a lead for this work who is an expert with a track record of delivering measurable improvements in EDI and anti-racism in a complex organisation. This is what we see in exemplar organisations, that their EDI leads do not just have a consultancy, academic or policy background, they have gained their EDI experience from *within* organisations.

Action plans need to be strategic and SMART, with clear ownership. There needs to be accountability through the EDI governance structure – with cascaded action plans down from the top to Director Generals and down through the organisation. In your context, these are different from the *personal* anti-racist objectives – such as committing to have a reverse mentor.

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To measure and drive progress on these action plans, meaningful targets need to be set, data collected and analysed effectively, with regular reporting to the accountable bodies. Policies need to reflect the target organisational culture.

Exemplar organisations have active and involved staff networks that are engaged and consulted in appropriate ways. They are not overly relied upon to drive action and innovation on EDI but are seen as critical to ensuring that the 'voice' of underrepresented groups is really heard across all of the organisation's activities.

1.2. Methodology

We carried out a number of activities in this area:

1.2.1. Document review

To understand your governance structures, we carried out a document review of your relevant governance structures, strategies and action plans alongside guidance and policy papers.

1.2.2. Interviews

We held a number of interviews with key stakeholders, including your Board Equality Champion and the Chief Operating Officer, who also chairs the Anti-racist Wales Action Plan External Accountability Group Sub-Group on Leadership. We attended a Sub-Group meeting in May. We are grateful to all the individuals who took the time to speak to us about their experiences, and their involvement with the Welsh Government around the history and development of the Anti-racist Wales Action Plan, as well as efforts to ensure the Welsh Government becomes an anti-racist organisation. The interviewees were candid and thoughtful in their responses.

1.2.3. Sector comparison with NHS and HEI

In order to support you to identify the enabling factors which need to be in place for an anti-racist organisation, we compared your governance structures with exemplar organisations within the NHS and higher education who have a longer history of systemic anti-racist work.

1.2.4. Deliberative workshop

On June 25th, we held a deliberative workshop with wide membership including representation from Human Resources, MESN, Trade Unions along with senior ethnic minority colleagues from within Welsh Government.

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At this interim phase of the project, we held the deliberative workshop to enable the Welsh Government to make positive progress towards becoming an anti-racist organisation. In that workshop, we worked together to:

- Identify what needs to be in place to become an anti-racist organisation

- Identify the specific activities and actions needed to make progress, and

- Identify organisational enablers and barriers, and explore how to progress effectively given this context

At this workshop, we used a Theory of Change approach[13]:

- A Theory of Change is a specific and measurable description of a social change that forms the basis for planning, ongoing decision-making and evaluation

- Theory of Change encourages you to reflect on your goals and plans (your strategy), to discuss them with others and to make sure they're clearly understood

In facilitated groups, attendees worked on the steps to build a Theory of Change for some specific recommendations (below) and provided examples of SMART action planning:

- Senior Director of Culture and Inclusion to lead this work internally (Governance)

- Trained equity advocates for recruitment and promotion panels (Recruitment)

- Formal sponsor and talent management programme (Progression)

- How reporting can support better experiences for individuals and promote organisational learning (Culture)

- An anti-racist and EDI governance structure that is fit for purpose (Governance).

1.3. Findings

Our findings below are based on what we observed in your organisation, compared with the factors in place within exemplar organisations in relation to anti-racism and EDI:

1.3.1. Effective governance

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[13] https://www.ncvo.org.uk/help-and-guidance/strategy-and-impact/strategy-and-business-planning/theory-of-change/

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Governance structure

In order for the Welsh Government to become a truly anti- racist organisation it will need to be able to manage a comprehensive and complex range of innovation and change across all of its activity. For organisations to make progress in any area, especially those based on complex cultural change, they need the appropriate governance in place. Therefore, as part of our review, we explored the current governance for anti-racist work at the Welsh Government within the wider context of equality, diversity and inclusion.

Your current workforce EDI governance is summarised in the slide below. This shows a simple structure at a high level, with little detail to determine how it works in practice. It is also lacking detail as to how groups interact, and the connection with the Anti-racist Wales Action Plan governance system.

Workforce EDI governance summary
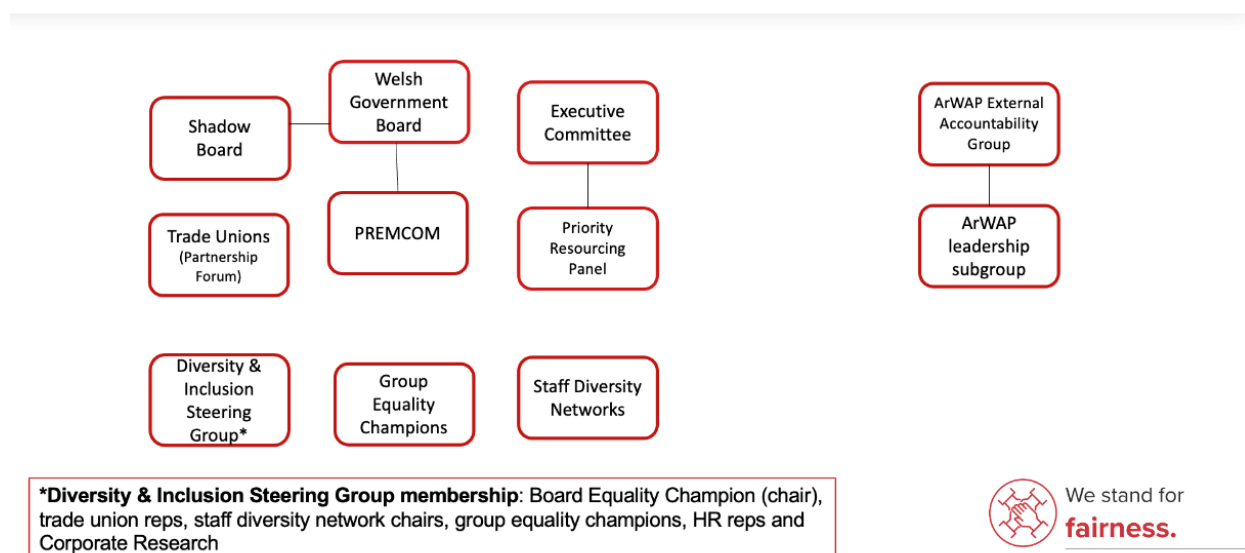
Figure 2: Welsh Government Workforce EDI governance summary

We compared this governance structure with large and complex exemplar organisations. Their governance structures are likely to be illustrative of the level of bodies and interconnections that the EDI governance structure at the Welsh Government will need to have if it is to be fit for purpose.

In the higher education sector, Nottingham University was the first university in the UK to be awarded a Gold Athena Swan award (the highest level) recognising their commitment, action and impact to advance gender equality in higher education and research in November 2023.

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Example of complex EDI governance – Nottingham University

Figure 3: Nottingham University EDI governance diagram

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Some key points here:

- There is a very senior EDI role, that of Pro-Vice Chancellor for EDI, which reports directly into the University Executive Board. This provides seniority, EDI expertise, accountability and responsibility at a high level within the organisation.
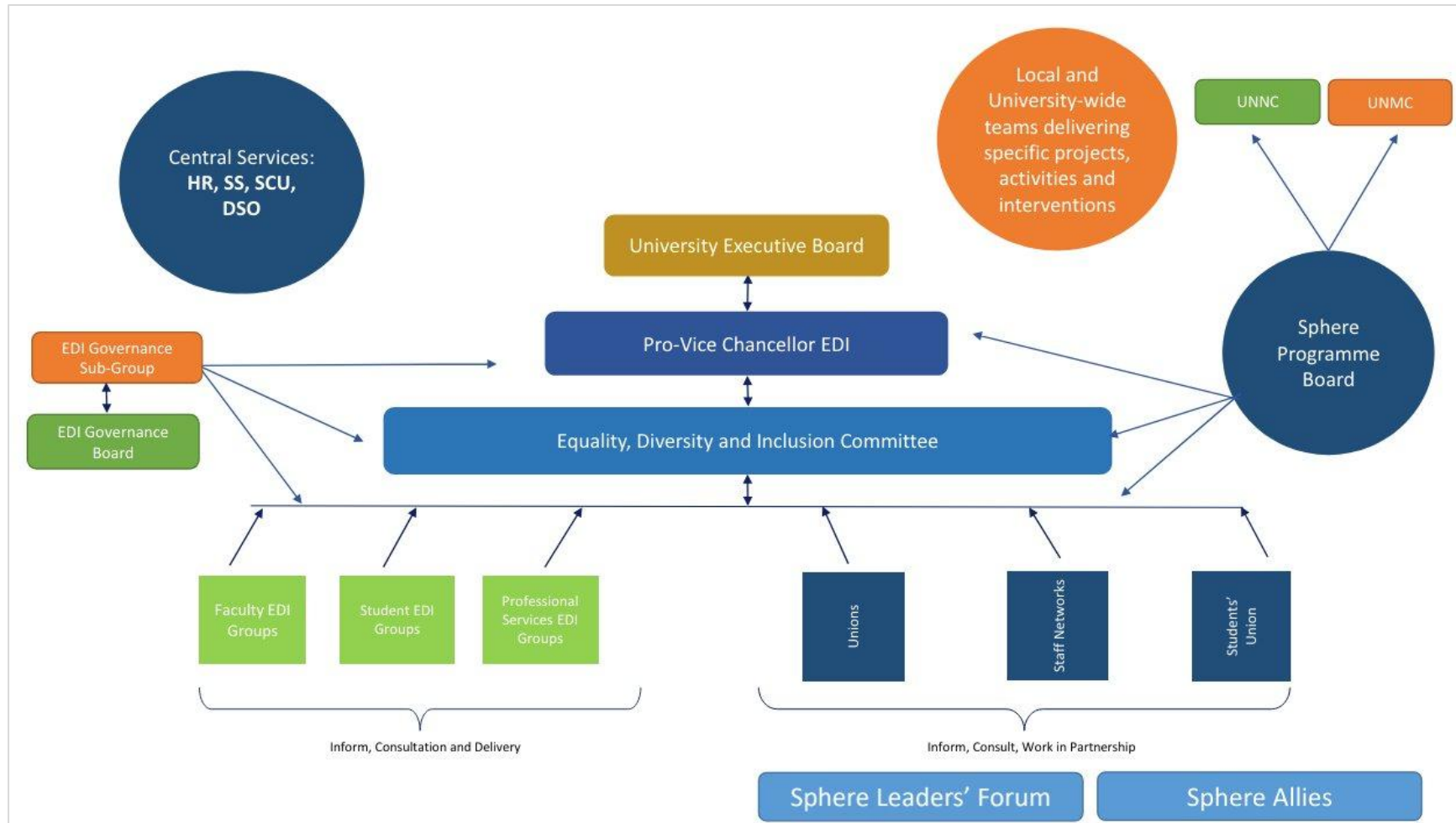
- Engagement and involvement are structured throughout the whole organisation

- There are clear hierarchies and connections, identifying how groups within the university engage with each other.

Diversity and Inclusion Steering Group (DISG)

You shared the terms of reference for DISG which outline its purpose, to 'drive forward the Welsh Government's workforce equality, diversity and inclusion priorities (aligned to the current Workforce Equality, Diversity and Inclusion Strategy)'. We understand from discussions with you that there is also a connection between DISG and the Welsh Government Board, via regular updates from the Board Equality Champion.

We observed that DISG appeared disconnected from your organisational governance structure. Given that DISG didn't feature strongly in our conversations – even those relating to governance – we feel that its position and participation within the organisation is not working effectively. We believe that elevating DISG to become a sub-committee of the board, with a closer relationship with ExCo and PREMCOM and an expert co-chair alongside a senior leadership sponsor, will ensure that EDI has appropriate accountability and priority.

Lack of cohesion

So much of the good work being undertaken is siloed, with a lack of formal structure and communication to join everything together. There is no role or individual with overall oversight of all the EDI initiatives and actions taking place, not just the anti-racism ones. Currently the responsibility for the Anti-racist Wales Action Plan lies with the Permanent Secretary, Andrew Goodall, and operationally the implementation lies with the Chief Operating Officer. You also have an Equality Champion at the Board. However, the reality is that the Anti-racist Wales Action Plan is just one of many projects for which these roles are responsible. Whilst these individuals are supportive and have the necessary seniority in the organisation to drive change, they do not have the deep anti-racism expertise needed, nor sufficient time to lead anti-racist actions across the Welsh Government. Whilst there is a clearly defined Anti-racist Wales Action Plan governance structure, it is not clear how other anti-racism work, particularly Welsh Government internally focused work, is involved and

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included in this. For example, the Running Against the Wind recommendations, or relevant actions from the Workforce EDI strategy.

Interviewees highlighted that there is some resistance to change within the Welsh Government, alongside a lack of understanding around how big the task is of becoming anti-racist. One person also questioned whether you are appropriately using the expertise and experience in the Welsh Government itself to progress anti-racism:

"You've got a small number of blockers in any organization, and then you've got probably the majority who don't quite get it, you need to bring along and you could bring them along, and I think telling them what they need to do to really drive anti-racism is where they're probably struggling."

Strong governance and clear accountability will support the organisation and individuals in both why this work is necessary and what their role is.

1.3.2. Strategic leadership

An inclusive organisation is one where:

"…the diversity of knowledge and perspectives that members of different groups bring . . . **has shaped its strategy, its work, its management and operating systems, and its core values and norms for success;** . . . [and where] members of all groups are treated fairly, feel and are included, have equal opportunities, and are represented at all organizational levels and functions." (Thomas & Ely 1996[14]). Managing diversity, equity and Inclusion, therefore is not just about behaviours or making specialist provision, it is about the orientation and method of operating of the whole organisation. Responsibility for EDI cannot be simply seen as the provenance of HR, but needs to be actively led and managed by the senior leadership of the organisation.

We found that the requirement for SCS staff to have an anti-racism objective tended to focus on personal objectives rather than strategic objectives. Whilst we encourage all people to develop themselves in this area, leaders must also be held accountable for their directorate/departments/team's progress in this area in order for the whole organisation to progress. Objectives should not be for personal reflection but in order to hold the

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[14] https://hbr.org/1996/09/making-differences-matter-a-new-paradigm-for-managing-diversity

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organisation to account for progress. Objectives will need to be not only be SMART but tided to a specific area of anti-racist strategy.

Director Generals and Directors should be provided with metrics that enable them to see how their departments are performing on relevant matters.. They can then assess the diversity climate of their particular department, and develop specific interventions and changes to address the issues they identify. Where there is inconsistency across their departments, Director Generals would take responsibility for challenging the directors with poorer metrics, and sharing the good practice of the directors with the better metrics. Staff members we spoke to shared their concerns about inconsistent practices by managers in terms of supporting the career development of ethnic minority staff, and toxic pockets of bullying and harassment. There are plans to develop a 360 degree type assessment of managers' inclusive leadership behaviour and performance.

Performance on the objectives will need to feed into the appropriate governance mechanisms. (We understand relevant guidance on setting anti-racist objective has now been issued.)

1.3.3. Expert lead and well-resourced EDI team

Currently your anti-racism resources are embedded within the Equality and Diversity in the Workplace Team (EDWT) with support from an equality champion. We do not feel that this structure provides sufficient experience and proven expertise in navigating complex culture change relating to embedding a culture of anti-racism.

EDI needs to be seen as a professional discipline in its own right. An expert in this field will be able to bring a more sophisticated approach, specific to the challenges you face within the Welsh Government. Interviewees highlighted a need for a more comprehensive approach to address inequality and inclusion within the organisation, alongside acknowledgement of the challenges faced by marginalised voices.

Organisations with measurable achievements in anti-racism are employing people with a social science background to lead and work on those programmes, and they will have experience in a range of relevant roles. Often, they will also have lived experience which has resulted in some form of community development and engagement. These individuals' credibility and performance is underpinned by a depth and breadth of academic scholarship, relevant and specific experience, excellent project management skills, and a leadership capability forged in challenging environments. They will have a proven EDI track record of delivery in a complex organisation.

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Interviewees also concurred with our findings that the level of commitment, accountability, engagement and resourcing from the Welsh Government needs to be clearly articulated on a practical level, not merely at a policy level.

"The organisation has got to really clearly articulate [that] it is a priority and free up resources to do it"

[Many people are] "really trying to do Anti-racist Wales Action Plan alongside all their other work"

Our review has found that however committed, the current level of resourcing for EDI has struggled to achieve the basic foundations for an effective internally-focused anti-racism strategy. If the Welsh Government wants to achieve its ambition to become an anti-racist organisation, it needs to be realistic about the need for an *exceptional* EDI senior lead to deliver the major programmes required to implement the recommendations in this report. In order to be credible, you will need to achieve real progress on the recommendations of this report over the next year (see 5 Conclusion and recommendations). As a minimum you will urgently need to:

- draw up a Strategic SMART Action plan for the work;

- rollout a comprehensive career development and wellbeing one-to-one programme for all staff;

- prioritise developing a senior leader sponsorship scheme for ethnic minority members on the Aspire programme;

- establish a comprehensive and effective data gathering, monitoring, reviewing and reporting mechanism;

- support development and maintenance of an effective EDI governance system;

- review and develop an effective and compassionate approach to grievance and discipline and complaints;

- conduct further research into why qualified ethnic minority candidates have poorer outcomes from the interview process for both external and internal appointments; and

- develop and implement a pool of trained equity advocates for recruitment and promotion

To achieve these aims you will need the right strategic lead with a realistic budget.

1.3.4. Strategic SMART Action Plan

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The documents reviewed do not demonstrate actions and action plans being consistently SMART (Specific, Measurable, Achievable, Relevant, Time-Bound), as they are often lacking defined/numerical targets and clear ownership.

None of the documents we reviewed had a clearly defined vision of what success looks like, in terms of the Welsh Government becoming an anti-racist organisation. This is very much linked to the points above around a lack of oversight and project management, as well as the siloed work going on. It is unclear how the Welsh Government will determine whether, when and how you reach your goal of becoming an anti-racist organisation.

A number of people highlighted the lack of progress against existing action plans. We believe that what's holding back your progress is the lack of ownership and commitment for specific actions, and operational resource to deliver them.

A key priority will be the development of a SMART action plan to ensure the implementation of these six fundamentals to ensure you have the right structures, systems and resources in place to become an anti-racist organisation.

1.3.5. Active and involved networks, TUs and advocates

Whilst MESN is involved in anti-racism work –one of our key engagement routes –, we heard that there may be an over-reliance on MESN and its members to *design* anti-racist interventions, rather than merely being engaged for *input*. It is critical that networks and Trade Union representatives are appropriately engaged with, whilst the responsibility for design, delivery and evaluation of anti-racism work sit within their own work team.

You have three active Trade Unions in the Welsh Government, with differing numbers and seniority of membership. The Social Partnerships and Public Procurement Act lays out your relationship with Trade Unions, specifically that there is a statutory duty on the Welsh Ministers to consult social partners, employers and worker representatives through the Social Partnership Council. We carried out interviews with two Trade Union representatives and all were invited to our deliberative workshop. Their insights were valuable, especially in relation to the complaints process, governance of equalities work and organisational culture.

It will be critical to ensure continued engagement from MESN, your other staff networks and all Trade Unions in order to support progress to your becoming an anti-racist organisation.

1.3.6. Data, analysis, reporting and accountability

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Data and analysis

You are starting from a positive point in relation to the data and associated analysis needed for you to progress as an anti-racist organisation. You have the Knowledge and Analytical Services team, and have recently temporarily enhanced your reporting capacity with a dedicated Workforce Equality Analyst .

In recent times, you developed an 'Ethnicity Dashboard' which is presented at the Diversity and Inclusion Steering Group (DISG) and focuses on ethnic minority representation in the organisation and through the employee lifecycle. This is further referenced below and an example is shown below.

Ethnic Minority Representation within Welsh Government

Ethnic minority representation, HRMI April 2023 and Wales Census

HRMI Data: 3.2%, 6.7%, 90.0%
Wales Census 2021: 6.2%, 93.8%
■ White

To note: Prefer not to say/Unanswered option is not available for Census data

Ethnic minority representation – timeseries

6% ARWAP…

Proportion of ethnic minority staff: 1.3% (2015), 2.0% (2016), 2.0% (2017), 2.3% (2018), 2.4% (2019), 2.6% (2020), 3.0% (2022), 3.2% (2023)

	2015	2016	2017	2018	2019	2020	2022	April 2023
White	5,320	5,049	4,989	4,914	5,084	5,168	5,434	5,482
Ethnic minority	76	110	109	120	131	149	179	197
PNTS/Undeclared	400	308	299	298	342	362	386	409
Total	5,796	5,467	5,397	5,332	5,557	5,679	5,999	6,088

Figure 4: Extract from 'Ethnicity Dashboard'

Equality analysis of recruitment outcomes has been carried out regularly, including analysis of big schemes, annual reporting and other ad-hoc requests. You report annually on the recruitment targets that you have set relating to ethnicity.

The data we requested and reviewed related to:

- workforce make-up and representation
- recruitment –both internal and external, and
- employee lifecycle.

There is a small proportion of ethnic minority staff at Welsh Government at present, so you do not routinely analyse data combining ethnicity with other characteristics. The low numbers also mean that it is not possible to draw conclusions from experiences by ethnic group i.e. Black, Asian etc. In our analysis therefore, we also focused on data segregated by

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those who identified as ethnic minority people, and those who did not. As the number of ethnic minority people grows, you will have more ability to analyse experiences by ethnic group and by combining ethnicity with other characteristics which will allow a more nuanced and intersectional view.

As discussed elsewhere, although there is a focus on data, we observed a lack granularity of some specific and necessary data, alongside a lack of evidence that actions were taken based on ethnicity data analysis.

We also experienced delays in data requests because of reliance on one individual or a team with limited capacity for providing the data that was requested. We also note the need for a more nuanced approach for example by job, family and/or directorate.

Some NHS Trusts have developed a strong data monitoring approach, in many cases to supplement the required reporting in the Workforce Race Equality Standard (WRES) (a Workforce Race Equality Standard is being developed for Wales) For example, we saw a simple chart that highlighted both the number and proportion of ethnic minority people at target grades, which are the most senior and have historically had significant under-representation of ethnic minority staff. The chart shows annual, then monthly figures and this is reported at the relevant board on a quarterly basis. This chart provided a clear message and was combined with a culture where managers understand that they are responsible for increasing representation and are held to account for their performance. In particular, this data was provided by month for the current period. Your equivalent analysis is annual, and is shared some time after the fact. This lessens its impact as it is less connected to the current work that is being done to increase representation.

Although you have a good data and analysis base, there are a number of limitations to the way your data supports you to monitor your anti-racist ambitions:

- Your current ethnicity dashboard analysis includes those who 'prefer not to say', and also those for whom you have no information. This masks the ethnicity data as this proportion is often higher than the proportion of ethnic minority people. This is an increasing problem since the rate of declaration for new starters has recently been lower than the current employee base.

- Because of the small proportions of ethnic minority people at particular grades and or parts of the organisation, much of the analysis that is shared has to be suppressed based on small numbers. Whilst this makes sense to protect individuals, and we understand that the unsuppressed data is available to key staff who need to understand this greater level of detail, suppression may limit your ability to demonstrate progress across the organisation and externally. It may be helpful to

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consider other ways of presenting data to avoid sharing details unnecessarily whilst still demonstrating progress. Using trend data over three to five years may help.

Evaluation and accountability

Another critical area is the need to evaluate the effectiveness of interventions in order to focus your limited resources on those that are the most impactful. For example, the guaranteed interview scheme is offered to internal ethnic minority candidates who meet the minimum criteria for a post . Since it focuses on the phase of recruitment where we saw no evidence of differential outcomes and it has been used very rarely, it suggests that it may well be unnecessary.

Evaluation of other positive action and other interventions (including but not limited to outreach, training, development) is important. In this way, you will be able to continue to improve your methods, and ensure that you make positive progress. For example the organisation-wide Respect programme (discussed in the Culture section below) appears to have faltered

The adage 'What gets measured gets done' has been found to be the main driver for ensuring managers increase diversity in their organizations.[15] When designing interventions and changes there will be agreement of the metrics to be used to measure process, outcomes and impact of the project at the onset. These metrics should be included in the SMART plan for the initiative and progress against the RAG rated plan, with reporting to the relevant EDI governance body.

1.3.7. Policies and policy-making

|We committed to focussing our review on the current state and practices of organisational culture, progression and recruitment. We therefore did not carry out a detailed review of the rest of your policies as part of this project. Key policies were reviewed in our desk review, but our findings relating to policies primarily focus on the policy-making process that will need to reflect the required changes in your current practice.

There are a number of specific actions to be taken, and a need for a shift in organisational culture in order for the Welsh Government to be a truly anti-racist organisation. Having policies that reflect this shift is an important part of this process, but first there must be a clear plan in place for this organisational change. It may be the case that some changes need to be accelerated to reflect priority areas.

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[15] Dobbin, F., & Kalev, A. (2022). *Getting to diversity: What works and what doesn't*. Harvard University Press.

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In order to make your future policies relevant to your future state, you will need to carry out research and stakeholder engagement. Your equality, diversity and inclusion policy references your approach to inclusive policy-making. It will be important to ensure that:

- all policies are rooted in rigorous evidence-based research. Rapid Evidence Reviews (RER) can be integrated into the policy-making process to provide timely and relevant insights. This aligns with the CIPD's vision for the 'HR and people profession to be *principles-led*, *evidence-based* and *outcomes-driven*.'[16];

- all stakeholders are actively involved. MESN will be key stakeholders, alongside other staff networks and senior leaders. We also note the requirement to consultant with Trade Unions. Appropriate engagement will ensure that diverse perspectives are considered and that the policies are inclusive and practical. Regular consultations can also help in identifying potential issues and refining policy proposals;

- you maintain transparency throughout the policy-making process by clearly communicating the rationale behind any policy changes, the evidence used, and the expected outcomes. This fosters trust and accountability, both of which are essential for the successful implementation of policies; and

- the impact of policy changes is evaluated, especially for disproportionate impact on ethnic minority staff

Whilst there will need to be ongoing reviews of your policies, procedures and guidance documents, we highlight some considerations below:

- ensure diversity and inclusion, and specifically ethnic minority inclusion, is stated clearly in your policies. In addition, ensure this is also clear in the shorter procedures, (which those actively involved in enacting the policy are more likely to 'review' regularly) for example the 'playlists';

- review policies for potentially biased language or potential assumptions – for example in relation to recruitment – review language such as past 'careers' rather than 'roles';

- review for access and plain English, especially for documents that are used externally;

- encourage self-reflection within any 'quick guides' or 'playlists' as well as the main policy documents by including a reminder at relevant points to be aware of bias,

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whether conscious or unconscious, and how it might play out in relation to this specific activity or policy; and

- consider the use of the term 'intersectionality' (and the associated analysis) where the focus is on the intersection of identities that create compounded forms of discrimination, not merely the fact that all people have intersecting identities[17.]

1.4.   Discussion

Measurable change in diversity has been driven across a variety of sectors through the use of evidence-based frameworks to identify what needs to be changed, to put in place a plan to change and to then manage the implementation of that plan. Perhaps most relevant to the Welsh Government is the NHS's Workforce Race Equality Scheme (WRES) . (We understand a Workforce Race Equality Standard is being developed for Wales) The WRES has nine indicators that NHS organisations use to identify if and where there are gaps between the experience of ethnic minority staff and White staff. Where there are gaps and differences, NHS organisations are required to report on how they are closing those gaps. In the higher education sector the Race Equality Charter (REC) helps institutions in their work to identify and address the barriers facing Black, Asian and minority ethnic staff and students, while also providing a framework for action and improvement. Institutions can apply for a bronze or silver award, depending on their progress. In the private sector, Business in the Community has initiated the Race at Work Charter with five calls to action to improve race equality, inclusion and diversity in the workplace. In 2021, the Charter was expanded to include allyship and inclusive supply chain commitments.

Although there are differences between the frameworks, they all encourage organisations to adopt a similar data-led and evidence-based methodology. They all highlight data

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[17] **Intersecting identities** refer to the various social categories (e.g., race, gender, class, sexuality) that a person occupies. Everyone has intersecting identities, and they shape our experiences in unique ways.

Intersectionality is a term coined by legal scholar Kimberlé Crenshaw in 1989, rooted in Black feminist thought. It refers to the specific ways in which systems of oppression—like racism, sexism, and classism—intersect to create unique and compounded forms of discrimination. It's not just about holding multiple identities; it's about how those identities are situated within power structures and the resulting experiences of marginalisation.

(Definitions from Dr Muna Abdi)

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collection and data analysis – identifying the reasons for the issues in the data, designing appropriate interventions, planning the implementation of SMART objectives to realise interventions, and measuring and evaluating the impact of interventions.

A number of these frameworks have been in place for a decade or more, and within these sectors we have seen them recognise – often the hard way – that to implement these approaches, the organisation must not only supply adequate resources but that these resources must be applied effectively. six fundamentals demonstrate how resources have been effectively applied in our exemplar organisations.

Leadership and accountability from the very top of the organisation is of the upmost importance, as it is with any major change programme[18]. It is clear that the Welsh Government has stated senior level commitment to becoming an anti-racist organisation. The Anti-racist Wales Action Plan is supported at the highest organisational level and has its own governance structure. This review has been prioritised at a senior leader level and the DISG has been established to monitor anti-racism and other EDI work. You have an EDI champion who regularly reports to the Board on EDI matters.

However, without the right infrastructure – a senior experienced professional EDI lead, timely and responsive data analysis capacity and SMART action plan –the Welsh Government is in danger of just *talking* about what needs to be done rather than being in a position to get things done.

1.5. Recommendations

These recommendations focus on steps you will need to take in order to progress in this area:

1.5.1. Effective governance

R1.1. Elevate the position of the Diversity and Inclusion Steering Group (DISG) to be a committee to the executive committee, jointly chaired by the permanent secretary and an EDI subject matter expert. Its role will be focused on assurance in relation to anti-racism and other priority focuses for EDI within the Welsh Government.

R1.2. DISG and anti-racism work to be supported by strong programme and project management.

1.5.2. Strategic SMART action plan

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R1.3. Develop a SMART action plan to establish the six fundamentals over the next year to ensure that the work is fully embedded within three years.

1.5.3. Expert-led and well-resourced EDI team

R1.4. Create a new role at Grade 6 (or above) to oversee this work, including the implementation of the recommendations from this report. The post-holder is required to have a proven track record of facilitating measurable progress on EDI and anti-racism within a complex organisation.

R1.5. The recommendations in this report should be reviewed, approved and synthesised with any current and related action plans. They should then be converted into a strategic action plan with SMART actions.

1.5.4. Active and involved networks and advocates

R1.6. Ensure that MESN is sufficiently resourced and that they are consulted on plans, rather than responsible for working up the detail of anti-racist work.

1.5.5. Data, analysis, targeted response, evaluation

R1.7. Use targeted data analysis to isolate problems and opportunities. For example, when looking at annual workforce make-up, separate data by region and compare to local population data.

R1.8. For all data reporting, exclude the undeclared/PNTS people from the overall proportions. Provide as a separate data point.

R1.9. As soon as data allows, bring in analysis by ethnic group and other identities in order to carry out intersectional analysis.

R1.10. When planning anti-racist initiatives, build in evaluation. This will rely on robust, up-to-date data. Use these evaluations to understand which initiatives are most effective in order to target investment.

1.5.6. Strategic leadership

R1.11. Develop a departmental data score card so that senior leaders can take responsibility for addressing race equity in their own departments.

R1.12. Develop SMART objectives for the changes and interventions for which senior leaders will be held accountable when delivering in their departments.

1.5.7. Policies and policy-making

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R1.13. Once sufficient progress has been made on these and associated recommendations, carry out a full review of all policies to ensure that they reflect your target organisational culture.

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2. Development, promotion, progression and inclusive leadership

2.1. Aim

The aim of this section of the review was to identify whether there was evidence of differential promotion rates and experiences between ethnic minority and non-ethnic minority staff, and to explore what might be the factors resulting in these differences. Based on the premise that both formal and informal aspects of the organisation would interact to sustain any inequity, we used a mixed method approach to identify what these could be.

2.2. Methodology

2.2.1. Desk review

We studied the Civil Service Success Profiles as part of the recruitment and selection review. Since these are also relevant to identifying staff eligible for promotion, they were considered in this section both in relation to the current internal promotion process and the assessment centre (Gateway) that was previously used as the method for identifying a pool of staff eligible for promotion up to 2022. In addition, we examined the Moderation and the Performance Rating documents.

2.2.2. Data review

We made a number of initial data requests, then subsequent data requests as we progressed through our discovery phase. We reviewed a range of data points relating to progression and development. The most important points are listed below:

- outcomes from internal recruitment (phase), outcomes for the current and historic process by ethnicity;

- promotions analysis by ethnicity; and

- analysis of temporary promotions preceding permanent promotion by ethnicity

2.2.3. Career trajectory research

Based on research[19] that identified the differences in career trajectories of minority executives whose careers progressed and those whose careers had stalled, semi-structured

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[19] Thomas, D. A., & Gabarro, J. J. (1999). Breaking through: The making of minority executives in corporate America. *(No Title)*.

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interviews were carried out with a small sample of ethnic minority staff who experienced their careers as stalling. A copy of the questionnaire used is available in Appendix 6.

2.2.4. Survey

Questions assessing the experience and perceptions of promotion and progression were also included in the all staff survey. This included questions which allowed for analysis of number of promotions by length of service.

2.2.5. Limitations

Our findings were impacted by a number of limitations:

- Due to the small numbers of ethnic minority staff members, we were unable to draw significant conclusions from the internal recruitment outcomes data, representation by grade or promotions data;

- You were unable to provide summarised conversations/themes/reasons for leaving from exit interviews. Currently, you have little information from exit interviews, which are usually carried out by the leaving staff member's line manager. You have a commitment to improve exit interview process and are keen to learn more from this process;

- Our qualitative research, based on the career trajectory conversations, was carried out with a small sample – the results should be seen as suggestive rather than definitive

2.3. Findings

We combine organisational data, quantitative, and qualitative data from the all staff survey with career trajectory findings in the below section.

2.3.1. Representation by grade

When we reviewed the proportion of ethnic minority staff by grade, we noted that the proportion of ethnic minority EOs is higher than other grades and that the proportion of HEOs is lower than other grades.
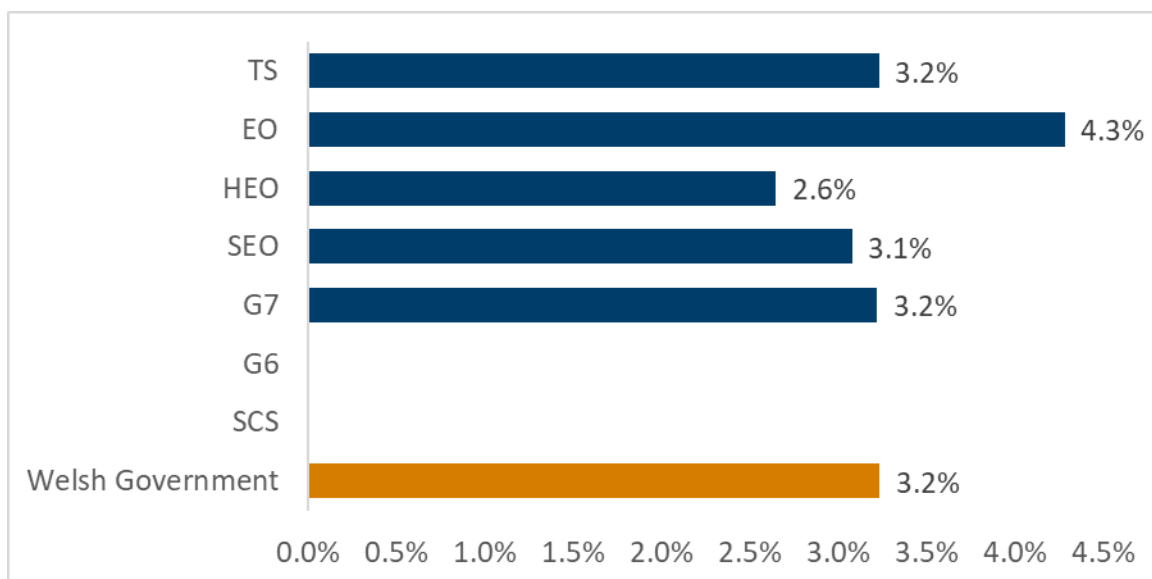
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Figure 5: Extract from WG Ethnicity Dashboard – Ethnic minority representation by grade

Due to low numbers of ethnic minority staff in the organisation overall, this may not be a major differential. However, we suggest that you continue to monitor representation by grade so that you can identify where there may be particular barriers to ethnic minority progression. Organisations often identify career 'ceilings' for ethnic minority staff, and that sponsorship or development programmes are best focused on entering these priority grades in order to be most effective. This data suggests that the movement from EO to HEO may be an area to focus on.

Internal promotions by grade

We reviewed your analysis of the proportions of staff internally promoted, by grade from 2020-2022. Due to small numbers of ethnic minority staff, we are not able to share data but from this data, we found the following:

- there is variation in the proportion of ethnic minority staff promoted to each grade. This will of course be influenced by the ethnic minority representation in the previous grade;

- the grades where the highest proportion of promoted staff were from an ethnic minority appear to be SCS and G6; and

- promotion from EO to HEO had amongst the lowest proportion of ethnic minority staff being promoted. This supports the argument that EO/HEO promotion may be a level in the organisation that should be considered for further analysis.

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2.3.2. Internal recruitment – types of roles

After some initial difficulties, you were able to provide data around internal adverts and progression.

CAIS Jul 2023 -Mar 2024

In this period, you advertised the following adverts internally:

Type of recruitment	No. of adverts	% of adverts
Lateral	206	33.8%
Promotion and Lateral	343	56.2%
TPA and Lateral	61	10.0%
Grand Total	**610**	**100.0%**

Figure 6: Number of opportunities advertised internally July 2023 to March 2024

We can see the number of interested applicants below:

	Lateral	Promotion and Lateral	TPA and Lateral	Total
Ethnic minority	21	70	11	102
White	432	2667	255	3354
PNTS/Unanswered	151 (25% of applications for lateral)	561 (17% of applications for promotion and lateral)	61 (19% of applications for TPA and lateral)	773 (18% of all applications)
Grand Total	**604**	**3298**	**327**	**4229**
Proportion of applications	**14%**	**78%**	**8%**	

Figure 7: Number of interested applicants for all internally advertised posts July 2023 to March 2024

We can see that there is a greater proportion of promotion and lateral applications than either lateral or TPA and lateral – 78% of all applications, whilst 56.2% of roles advertised were 'Promotion and lateral'.

We also looked at the proportion of interested ethnic minority candidates compared to all applications.

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Lateral	Promotion and Lateral	TPA and Lateral	Total
4.6%	2.6%	4.1%	3%

Figure 8: Proportion of interested ethnic minority applicants (with known ethnicity) for all internally advertised posts July 2023 to March 2024

We can see that 'lateral' and 'TPA and lateral' moves had a higher proportion of ethnic minority applicants than their organisational representation (3.2%).

In the table below, we compare numbers of submitted and unsubmitted applications:

Ethnicity	Applications considered(i.e. submitted)	Unsubmitted applications
Ethnic minority	65 (3.5% of applicants with known ethnicity)	37 (36% of ethnic minority applications not submitted)
White	1797 (96.5% of applications with known ethnicity)	1,557 (46% of White applications not submitted)
Prefer not to say /not completed	117 (6% of all applications)	656 (85% of PNTS applications not submitted)
Total	**1979**	**2250**

Figure 9: Comparing submitted ad unsubmitted applications by ethnicity

As with external recruitment, applications that are not taken forward are most likely to have no ethnicity provided.

2.3.3. Internal recruitment outcomes – new process

We received data on the historic recruitment process (Gateway) initially, then some months later received the more recent CAIS data.

CAIS outcomes data (July 2023-March 2024)

Since CAIS is now the current recruitment system, and recorded the majority of recruitment outcomes from July 2023, we consider this to be the most representative data.

We reviewed internal recruitment data from CAIS (July 2023 - March 2024) for 1979 applications. This includes applications from 65 ethnic minority staff.
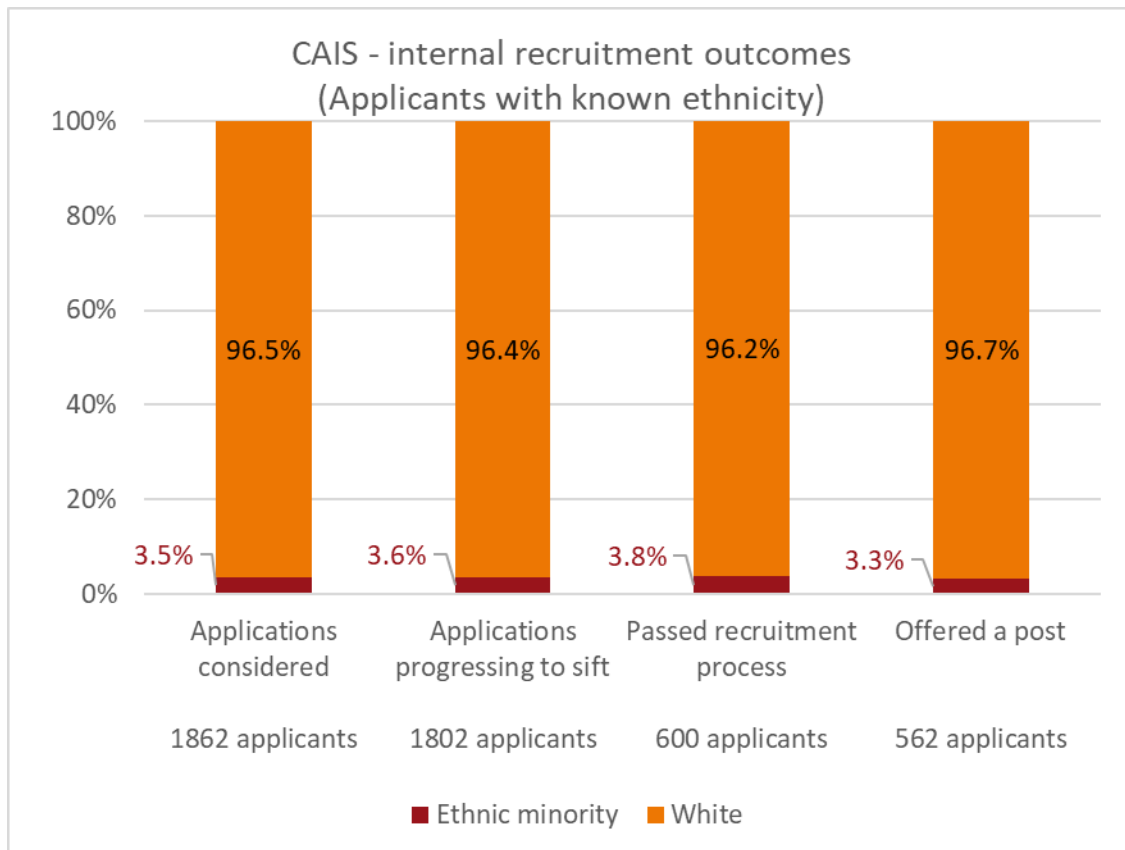
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CAIS - internal recruitment outcomes (Applicants with known ethnicity)

Stage	Ethnic minority	White	Applicants
Applications considered	3.5%	96.5%	1862 applicants
Applications progressing to sift	3.6%	96.4%	1802 applicants
Passed recruitment process	3.8%	96.2%	600 applicants
Offered a post	3.3%	96.7%	562 applicants

■ Ethnic minority ■ White

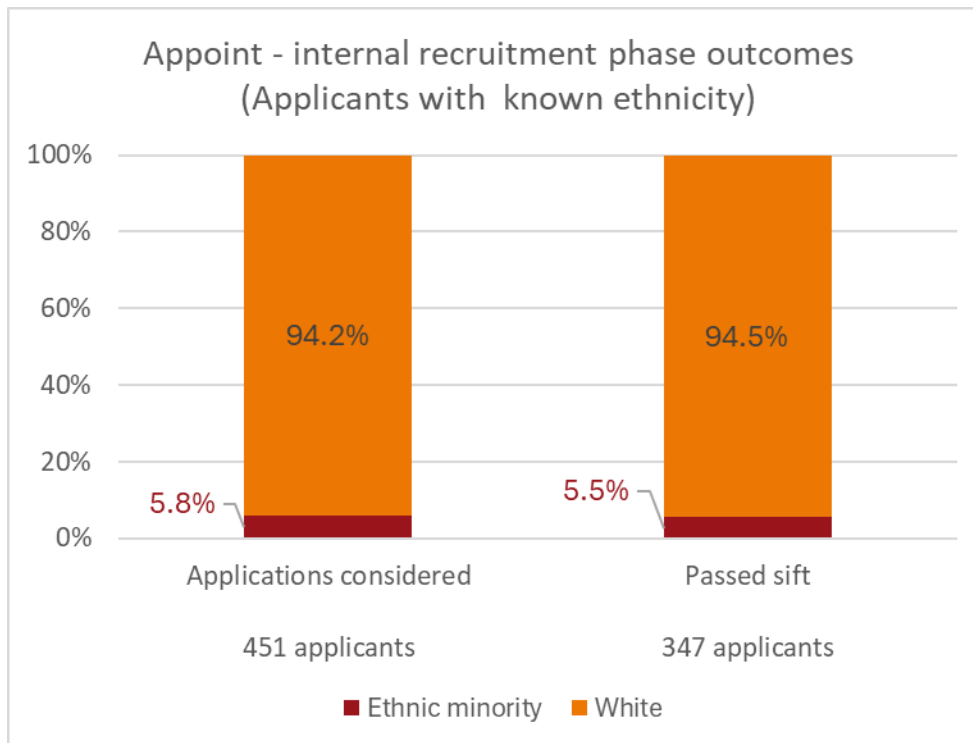*Figure 10: CAIS internal recruitment phase outcomes by ethnicity*

*Stage category descriptions are provided in Appendix 3.

This data snapshot suggests that during this period , ethnic minority candidates performed at a relatively similar level to white candidates throughout the process. This is positive, and may suggest an improvement on previous phases of internal recruitment. It is important to review this outcomes data regularly, especially as the number of ethnic minority staff remains relatively small and therefore swayed significantly by individual experiences. The key is to ascertain whether the proportion of ethnic minority and white staff remains consistent throughout the recruitment process, and if not, why not.

2.3.4.   Internal recruitment outcomes 2023 and earlier

Appoint outcomes data by phase (2023)

We reviewed internal recruitment data from Appoint (2023) for 468 applications. This includes applications from 26 ethnic minority staff.

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Figure 11: Appoint internal recruitment phase outcomes by ethnicity

The data from Appoint for ethnic minority candidates post-sift is required to be suppressed due to numbers lower than ten.

This chart shows that ethnic minority candidates have a similar likelihood of passing the sift to White candidates. If the 19 ethnic minority candidates had had the same likelihood as White candidates to pass interview and be offered a post, twelve candidates (i.e. over ten and therefore not suppressed) in total would have been offered.

Outcomes for the Gateways (internal promotion to grade campaigns) in 2022 are shown below.

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Pass Rates, by Ethnicity (Assessment Gateways January 2022)

- <u>Overall pass rates</u> for **Black, Asian and Ethnic Minority** applicants were **higher** than for White applicants (30% compared to 26%)
- <u>Stage 1 pass rates</u> for **Black, Asian and Ethnic Minority** applicants were **higher** than for White applicants (85% compared to 77%)
- <u>Stage 2 pass rates</u> for **Black, Asian and Ethnic Minority** applicants were **higher** than for White applicants (68% compared to 55%)
- <u>Stage 3 pass rates</u> for **Black, Asian and Ethnic Minority** applicants were **lower** than for White applicants (53% compared to 62%)
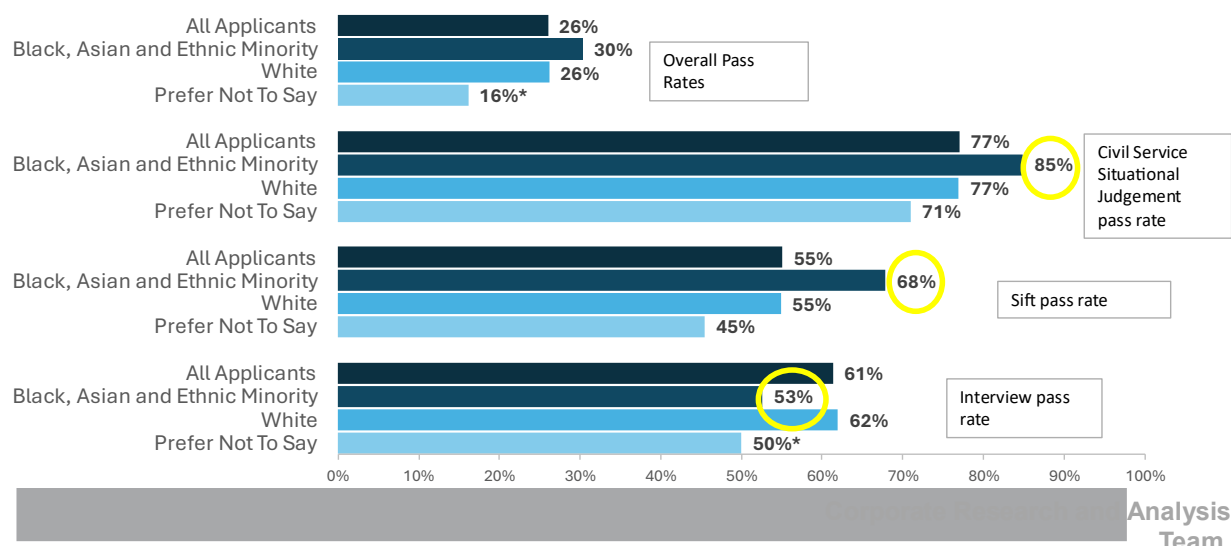

Figure 12: Gateway internal recruitment phase outcomes by ethnicity

As with the Appoint data above, and the most recent external recruitment outcomes, the interview phase appears to be causing this difference in success rates. We discuss our recommendations around interview in more detail in the section above.

2.3.5. Promotions by ethnicity

Organisational data

The data on promotions included in the ethnicity dashboard is shown below. We have added the third column, which excludes the data for people with an unknown ethnicity in order to allow for more accurate comparison.

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Ethnicity	Promotion 2022	Promotion 2022 (excluding PNTS/undeclared)
Ethnic minority	3.8% (14)	4.0% (14)
White	89.8% (334)	96.0% (334)
PNTS/Undeclared	6.4% (24)	
Welsh Government total	100% (372)	100% (348)

Figure 13: Extract from WG Ethnicity Dashboard – 2022 promotions with RQ addition of data excluding undeclared ethnicity

The proportion of promotions in 2022 for ethnic minority staff slightly exceeded the proportion of ethnic minority staff at Welsh Government. This is one of your recruitment targets, and you met it in 2021 and 2022, but not 2023.

We requested analysis of the proportion of people who had a temporary promotion (TPA) in the year before they received a permanent promotion in 2023.

2023 promotions	TPA	No TPA	Grand Total	% TPA
Grand Total	153	58	211	72.50%

Figure 14: WG analysis – proportion of people who were promoted in 2023 with and without a temporary promotion (TPA) prior

We see that 72.5% of people who received a permanent promotion had a temporary promotion at some point in 2023 prior to their promotion. This demonstrates that, as would be expected, achieving a temporary promotion often precedes a permanent one. The number of ethnic minority staff who received a promotion in 2023 is too low to draw any specific conclusions on the basis of ethnicity.

Self-reported data

As an alternate data point, we asked questions via the all staff survey to gain an understanding of who had received permanent and temporary promotions. We analysed the proportion of people who had had temporary and permanent promotions and also considered how many permanent promotions they had had, by length of service.

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Promotions – all respondents
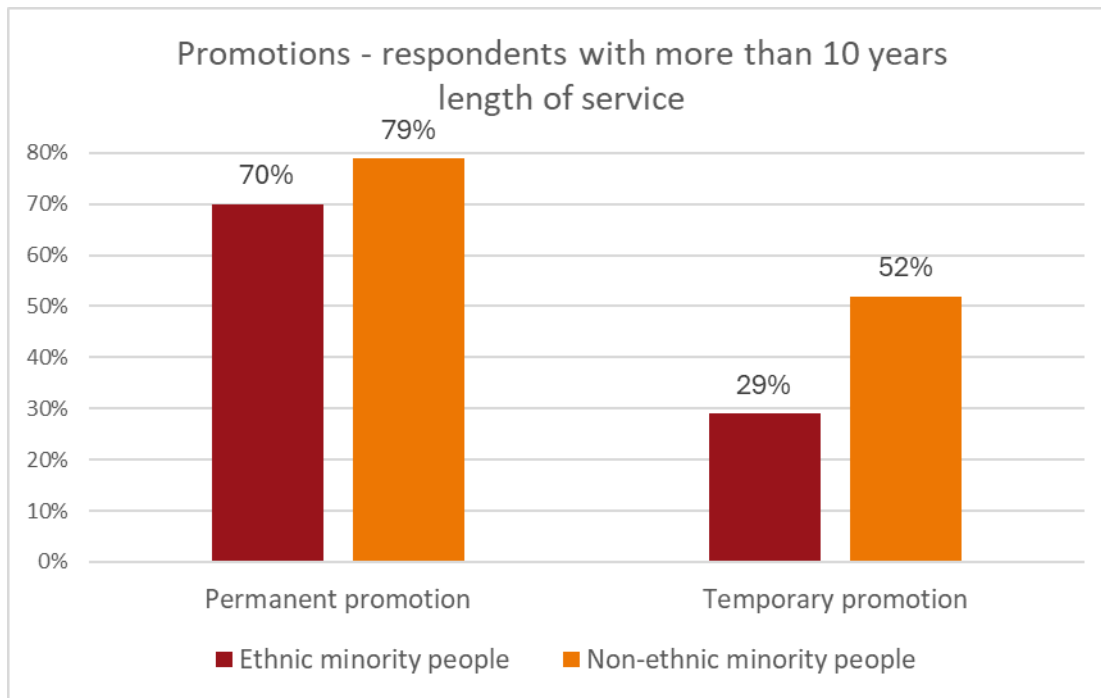
The results are shown below:
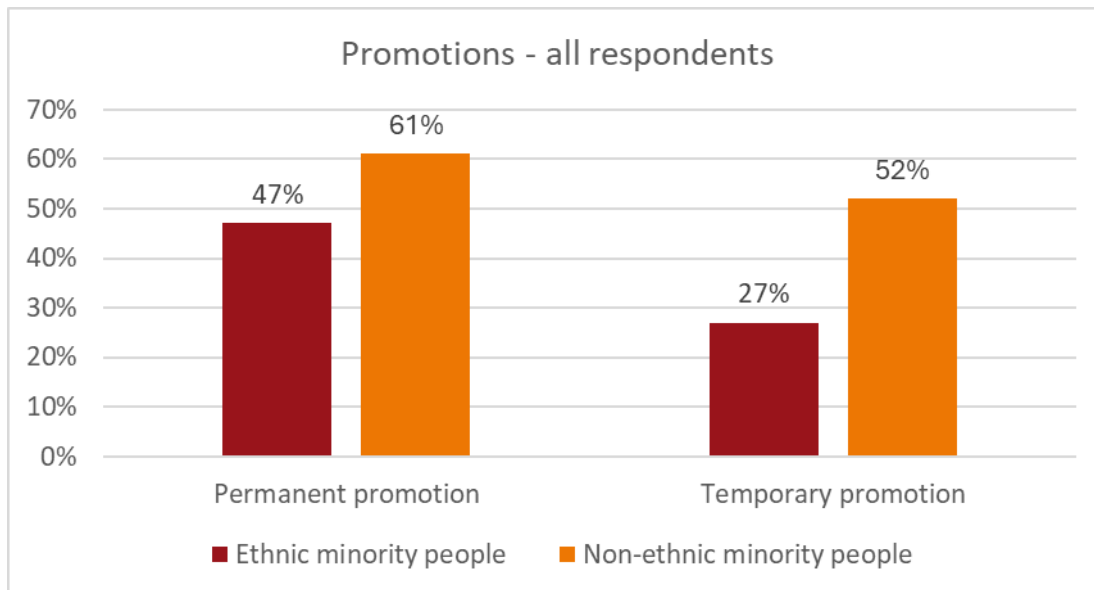
Figure 15: Proportion of survey respondents, by ethnicity, who received a permanent or temporary promotion within their career at WG n= 1062

Comparing the proportion of survey respondents who have received at least one temporary or permanent promotion since working at the Welsh Government, we see that ethnic minority respondents were are less likely to have had a promotion, especially a temporary promotion.

Promotions – 10+ years length of service

We then analysed the data for people with a length of service of more than 10 years.

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Promotions - respondents with more than 10 years length of service

Figure 16: Proportion of survey respondents with more than ten years of service, by ethnicity, who received a permanent or temporary promotion within their career at WG n= 540

When we look at the data for those survey respondents who have a length of service of more than ten years, this difference by ethnicity remains. We note though that there is less observed difference between ethnic minority and non-ethnic minority staff in relation to permanent promotions.

Average number of permanent promotions

From the data in the survey, we also looked at the average number of permanent promotions staff had received, compared to their length of service.
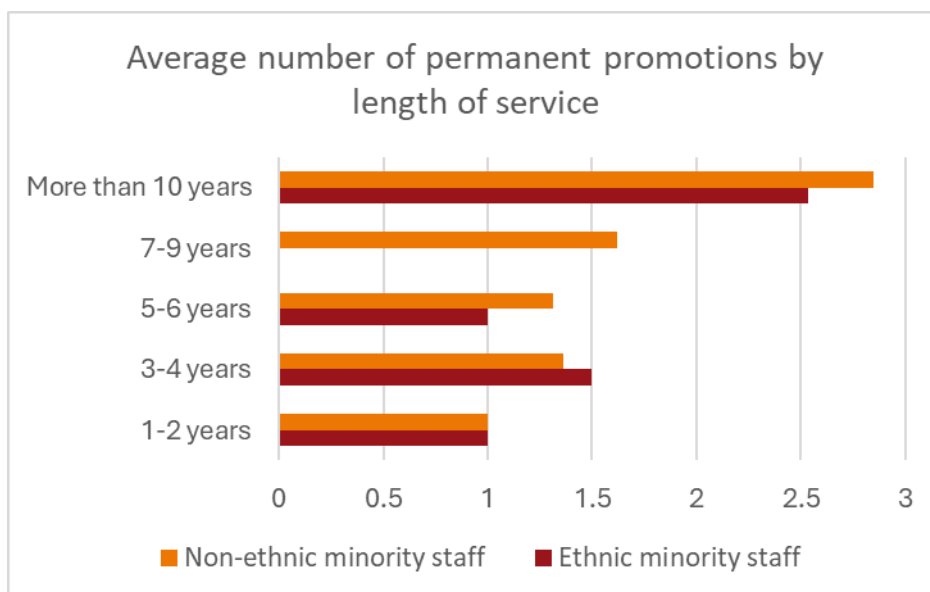
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Figure 17: Number of permanent promotions, by length of service and ethnicity n=464

The data is inconclusive here, and we recommend that you continue to monitor this. One way to do this is to measure length of time for people to progress from one specific grade to another selected grade, then analyse this by ethnicity to review whether there are any trends which need to be explored. It may be that monitoring promotion from EO to HEO is a useful starting point for analysis, given our findings above.

2.3.6. Access to opportunities

In relation to development and progression, we asked the following questions via the all staff survey and found a significant difference in the level of agreement for ethnic minority staff:

Question	Ethnic minority respondents	Non-ethnic minority respondents	Total number of respondents
Q13. I believe that I have a fair opportunity to develop my career at the Welsh Government.	44%	67%	1090
Q14. I have found it easy to access development opportunities such as training, mentoring or stretching projects.	41%	63%	1089
15. I have been supported by my line manager in terms of my development.	56%	75%	1088

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Figure 18:Survey respondents: Access to opportunities and development by ethnicity n=1090

This is a critical area to consider as it suggests a lack of equitable opportunities for ethnic minority staff, especially combined with analysis of promotions and internal recruitment outcomes.

2.3.7. Recruitment and progression barriers

Ethnic minority survey respondents were more likely to say they had experienced barriers to career progression. 40% of ethnic minority respondents (29 out of 66) said that they had experienced barriers compared to 25% of non-ethnic minority respondents (226 out of 680).

Barriers that were highlighted were as follows:
- **The recruitment process itself,** as discussed in detail in Section 4 Recruitment and selection which is very specific to the Welsh Government and the Civil Service context. Interviewees and survey respondents highlighted the need to understand the process and be able to engage with it in order to succeed. For internal candidates, this remained a challenge, though those who were supported by managers were likely to have more success.

"Civil service recruitment is deliberately and structurally biased in order to favour specific bits of verbal reasoning and interview performance in order to create a 'fair' system, without properly considering how that impacts those who are not neurotypical and strong on verbal reasoning."
Culture interviewee

- **Accent and language barriers** - ethnic minority, and non-ethnic minority candidates emphasised two areas:
    - Some non-Welsh speakers feel that this is now a significant barrier to their ability to progress within Welsh Government;
    - Some ethnic minority candidates whose first language is not English highlighted experiences where they feel that their accent and/or their proficiency when speaking English had been a barrier to recruitment. This is especially emphasised when combined with the interview process itself which includes multi-part questions:

"Often panels ask multiple questions in one, and for some people this may be confusing, particularly for those who speak more than one language"
Culture interviewee

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- **Identity and representation** – perceptions of the 'typical successful employee' were felt to be a barrier – particularly in terms of socio-economic background as well as other elements such as race and ethnicity, gender and disability. Respondents mentioned that a lack of representation of 'people like them' on recruitment panels strengthens this impression.

- **Line managers** were highlighted as a potential barrier since they can choose to encourage and support their staff to progress, but that this is not consistently the case.

This element was raised in a number of interviews with ethnic minority staff:

"It's about who you know in the Welsh Government and how good they are as a manager and whether you can build a relationship. And so, they'll tell you how things work inside and help you broker things."

"I need someone to champion me and get me over my sticking points, because I almost have this imposter syndrome thing where I'm from a big ethnic family. I grew up in a big, you know, six siblings. My parents didn't have time to helicopter parent and say, you're going to be a doctor, you're going to be a nurse. It was just 'go to school and then you're going to get married'.(…) and that kind of follows you."
Culture interviewees

- **Exclusive organisational culture - in group/out group** – some respondents felt that 'cliques' can be either supportive or a barrier to internal progression. This also extended to some respondents feeling they had not been promoted as they were seen as someone who may challenge the status quo, and that this is not valued.

"I think when I have been promoted, it has been because people have known me. People have worked with me previously, so there isn't a barrier there. They already know me. They know what I was capable of, I worked."

"I've sometimes felt I'm not in the in group"

"Our starting point is not equal, and we need that champion to bring us forward and give us belief in ourselves, because we might not have that. We might have had knocks, knock backs, or things said to us, or subtleties of behaviour that causes us to push us back again. It grinds you down. It is tiring. It's very mentally difficult. You end up becoming this irritable person. You [don't] want the label of having a chip on your shoulder playing the race card (…) then you just shut up so you end up just being a mute "
Culture interviewees

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- **Caring responsibilities and part-time working** were raised, especially in terms of the limited time available for researching and preparing for applications;
- **Structural barriers** such as recruitment or promotion freezes were also mentioned.

2.3.8. Career trajectory findings

A note of caution before discussing the findings: the sample size is small, so the results need to be seen as suggestive rather than definitive and it will be important to develop metrics, surveys and focus groups to build upon and confirm these findings.

Start of the career

Although the sample size was small, an unexpected finding was that there was little difference between the career starting points between the career progressors and the career stallers. Both groups had started their careers at entry level roles in the main, such as an administrative officer. A few just failed being selected for the fast stream or another assessed entry point, and therefore started as an executive officer. For professionals, they had started their career in their professional role and then joined the Welsh Government or the Civil Service from that profession. Not even one person in our sample had entered the Welsh Government via the Fast Stream.

What this suggests is that everyone in this sample could be seen as possessing a similar level of capability at the start of their careers, and that therefore contextual factors were important determinants in establishing the different career outcomes. That is not to say that the career progressors were not clearly talented, but that talent alone is not enough to explain the different outcomes.

"I joined the organisation as in today's language a team support. So clearly, progression from there is going to be slow and less linear than people who kind of join on the Fast Stream. They tend to be given priority assignments, that provide them with lots of stretch opportunities…it is a basically an accelerated development program."

"When I joined, in [xx], I was probably the equivalent of a team support in current speak, I was an administrative officer. I quickly recognized I needed to move around the organization. I didn't have the across-government knowledge that they were looking for. So, I moved to a number of lateral posts."
Career trajectory interviewees

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Career-blocking managers

Another surprising similarity between both the career progressors and the career stallers is that both groups experienced 'bad' managers either at the start of their careers or at pivotal points in their careers.

'Bad managers' were described as managers that did not see their potential and therefore did not provide opportunities for their development and stretch projects. They also did not connect them to key organisational colleagues who could enable them to function in an effective and highly visible way. From the experiences that were shared it was clear that these managers did not see their potential because they were probably viewing them through the lens of some form of stereotype or unconscious bias. For example, one respondent shared:

"There's a layer (of behaviour) saying 'I don't trust you' and this layer of asking whether you're okay, which your colleagues don't get asked because there's a presumption that they're capable and they're skilled. When you achieve the thing (objective), there's a tendency to not want to acknowledge what you've done"
Career trajectory interviewee

Similarly, from another respondent:

"There was one situation where I would be describing ideas or presenting certain solutions to a problem. They were almost kind of dismissed out of hand for one reason or another. But within a matter of weeks, I will see that idea being looked at and accepted because it was presented by someone else."
Career trajectory interviewee

Response to career-blocking manager

Where the career progressors and the career stallers differed is the response they made to having a career-blocking manager. Career progressors moved to a new position as quickly as they could when they realised that they were in a situation with a manager who was likely to derail their career progression. They did not try and stick it out in the hope that things might improve. Nor did they try and challenge or argue with the manager, realising that it was likely to get them labelled a troublemaker. A number of respondents also echoed the findings above in the survey – that the impression they had was that in general challenge was not welcomed at the Welsh Government. If necessary, the career thrivers would keep on making lateral move after lateral move until they had the luck to end up with a manager who did want to support their career progression. This could involve up to four moves before that happened.

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"I applied for a different job in a different part of Welsh Government. So, I had to do like a sideways move. Otherwise, would I have still been stuck? Inevitably"

"I think a lot of others might get stagnant and get stuck in a role. If I'm not getting on with someone, you know, or I feel there's something wrong in that team or something. I would make a decision to leave."
Career trajectory interviewees

The career stallers, when they encountered a bad manager, were more likely to stay and try and improve the situation. Or if they moved, would do it by raising the issue with HR and having a managed move. The drawback of either tactic is that that would cause them to have a reputation of raising issues which would potentially be passed on to the next manager that they worked with. This negative reputation would mean that their new manager would be less likely to give them the fresh start they were looking for. As a result, they never ended up with a career-enabling manager.

"I was hoping to go up to the next grade for a number of years now, to [xx] but I've faced a number of challenges and a lot of this I think is down to unfairness in some ways. The way the system works in Welsh Government works against people. I've never personally been encouraged by a manager or anything like that."
Career trajectory interviewee

Experience across government

Apart from escaping a bad situation, lateral moves yielded a career enabling bonus. Within this organisation's context, having a breadth of experience across government is valued. This tactic therefore supported the respondents' career progression when they eventually found a good manager, because they had gained a breath of experience in the process.

"I quickly recognized by myself, that I needed to move around the organization."

"It dawned on me that I didn't have that cross-government knowledge that they were looking for. So, I moved to a number of lateral posts."
Career trajectory interviewees

Some of the career stallers did not have the same flexibility to move from their current situation because they are part of a specific profession.

"The way my profession works is they have their own recruitment. So it was interesting on one part, I can't pass the sift (for my profession), and on the other side I passed the sift fine (for the Gateway)…. I've lost faith in being assessed fairly."

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Career trajectory interviewee

Character

Both career progressors and career stallers reported the need to be resilient in the face of setbacks:.

"I think definitely if I wasn't resilient, and just get myself up from the floor and beat this, I wouldn't be where I am."

"I think the reality is, as someone who's in the underrepresented groups - they have less luck. For example, it might take me longer to get favours, or it might take me more interviews to get through to the next level. So yes, definitely the mental attitude is important. But also, to be positive about it. It's not just me against the world. I feel in a way, the system is trying to do this thing to make it fair, right for the for ethnic minority,"
Career trajectory interviewee

However, the career stallers' tactic of challenging or seeking help was compounded by not only dealing with the stress of having a career-derailing manager, but also the added stress of being seen as 'difficult'. The combination of both would increase the frustration and other emotional distress they were displaying, which could cement or reinforce a reputation of being difficult.

"I didn't get back to them because in my head, I really wanted to be confrontational and be like, I understand you're busy and you've given me time, but if you've given somebody a bit of hope, you should respond to their emails."
Career trajectory interviewee

The career progressors describe needing to be resilient and determined to keep on pushing themselves forward despite repeated setbacks, but because they were not trying to fight or change the system at the same time it meant that that resilience and determination was more likely to last through successive moves.

Confidence was another key factor:

"I think the other thing that really matters is confidence. If you'd spoken to me when I was an AO, I would have thought being an HEO would have been a fantastic career achievement for me. I wouldn't have had the confidence at that stage to kind of go any further. And for a long period of my career, I actually got stuck firstly at [xx grade]. And a big part of that was me just not having the confidence to apply for jobs, which I maybe could have been capable of doing. So, I think confidence is a huge element in all of this."

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Career trajectory interviewee

Career-enabling managers share a number of commonalities. Some of the career progressors saw these managers as having cultural competence in that they recognised difference and responded it to it appropriately.

"I was fortunate to have managers who had some sort of cultural competency. So, what I mean by that is, they understood very early on, that I'm a practicing Muslim, that I go to the mosque on Friday and I needed some adjustments in work. And their cultural competency was they did those things without it being a hassle or an issue, … they just did those things."
Career trajectory interviewee

Culturally competent managers were also described as those that did not let diversity differences impact on the way that they perceived their staff member. In other words, they do not perceive their staff member through the lens of a stereotype or bias, whilst the culturally less competent do. For example, an Asian member of staff being told that they needed to be more 'visible', thereby triggering the stereotype of the quiet and passive Asian.

Career-enabling managers recognise the talent and potential of the career progressors and respond to this by providing them with stretch opportunities and appropriate development. A crucial area of support is that they actively coach and instruct career progressors on how to approach the application and interview for promotion, and any advise them on other strategies that they would need to in order to get promoted. Another characteristic is that with these managers, the career progressors had the potential for positive friendly collegiate relationships, so more social connection or a more long-lasting connection would arise as a result of them working together. Many of the career progressors therefore, were able to establish positive and effective networks across the organisation enabling them to be aware of opportunities when they arose.

"Promotion wise, I guess I've been lucky. Because I've had really good kind of managers and coaches that kind of supported me in terms of like, doing the right application, saying the right things, etc. And also, being in the right place at the right time as well"
Career trajectory interviewee

Stretch projects

Stretch projects have played a vital role in the career trajectories of the career progressors. One described that they typically find themselves setting up new initiatives which were naturally stretching as they was no existing process in place. Another respondent identified that it was a new unit - so there would have been no one doing the role previously, and that

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provided them with the opportunity to get promoted. Another approached senior leaders to be given additional projects to provide that stretch for them.

In contrast, the careers stallers were not given stretch projects because of the negative perception of their line managers. Instead, they would have to endure seeing colleagues who had started at the same time as them being given such projects and therefore progressing their careers. In the Welsh Government context, temporary promotions provide such stretch opportunities, and so it is a concern that the data from the survey is suggesting that ethnic minority staff are less likely to be able to obtain such opportunities.

"None of my managers have ever said to me, would you like a stretch project or we know that you're really talented, we can see that you're an aspiring leader, you're our new emerging leader. Other people got them. And I started to see this quite early on and thought that's not okay, it's not acceptable. So, I asked for a stretch and they said, the normal thing is you got to do another year. So, I just decided I'm not going to do that and I spoke to a senior leader said I'm available, I have a fulltime job, but I can carve out some capacity. And I'd like to support you with this thing that you have a problem with. So, I've taken on stretch projects after stretch projects after stretch projects through most of my middle to senior career."
Career trajectory interviewee

Sponsor and mentor

A key difference between the progressors and the stallers is that the progressors all had sponsors or mentors making a pivotal difference in their careers. Although the terms sponsors and mentors are often used interchangeably, they do have quite different meanings. The etymology of the word mentor is 'wise counsellor' and mentors focus on development and skills. Sponsors (to promise solemnly) on the other hand, promote, protect, prepare, and push their protégées (one who is protected).

"Sponsorship is focused on advancement and predicated on power. It involves active support by someone appropriately placed in the organization who has significant influence on decision-making processes or structures and who is advocating for, protecting, and fighting for the career advancement of an individual." (Ibarra, Carter and Silva, 2010)[20]

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[20] Ibarra, H., Carter, N. M., & Silva, C. (2010). Why men still get more promotions than women. *Harvard business review*, *88*(9), 80-85.

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All of the career thrivers had mentors. These were individuals who would provide them with key advice about dealing with any challenging situations with which they were faced. They also provided coaching on getting through the recruitment process successfully.

"People who've either had successful careers or doing well in their careers, who are able to almost kind of take you under their wing and give you advice and guidance and encouragement. And when you have got an interview, they're able almost to kind of coach you with some of that. I think that is hugely important. And that has been a critical factor, I know, in my career."
Career trajectory interviewee

For some, these mentors were formal in that they were provided as part of a leadership programme. Mentors could be within or without the organisation and they could be of the same or different ethnic background, but the key defining factor is that they were providing wise counsel.

"I was also fortunate very early on to receive some excellent coaching and mentoring. Coaching and mentoring came from someone from a minority ethnic background. So, there was a construct of somebody who had gone very far in their career in the public service. And understood how you manage micro-aggressions, how you deal with self-doubt how you deal with a lack of confidence."
Career trajectory interviewee

Not all the career thrivers had sponsors, though some would describe their career-enabling line managers acting as sponsors by advocating for their careers. Where there was a separate sponsor, that individual would be someone who was working behind the scenes to ensure that the career thriver would have opportunities, or would be able to access the opportunities that were next in line for them.

"It's (sponsorship) been fundamental …My progression has relied on a lot of that as well. Being able to get my name out there and …then establishing that that kind of trusting relationship that'll sponsor my brand. So having someone when I am not in the room, will go; 'Actually XXX might be a good fit for this piece of work. XXX might be able to do that.' I think that's been vital."
Career trajectory interviewee

In contrast the career stallers lacked even basic mentorship such as providing good effective advice and guidance on how to tackle the recruitment or promotion process. They also lacked mentors to provide them with wise counsel about how to deal effectively with the

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discriminatory contexts in which they might find themselves. Most certainly they lacked individuals acting to advocate for their career progression.

"I do not have a coach, it's just me sort of trying to 'flap' in my own way through [the promotion process] which if I had somebody as a mentor a higher up, it would be easier to navigate."

"I went through very carefully the relevant guidance or any HR [material] that was online or what have you. But like I said, when you're a minority you don't always have people you can turn to. But I know speaking to other [majority group] people ……they have had like numerous contacts they could go to. Often mothers and fathers or brothers in the place who could help them. But then minority staff don't have that."
Career trajectory interviewees

Networking

Career progressors were also effective networkers. For some, networking was seen as a key strength underpinning their success because they had the ability to connect people across the organisation to implement an initiative.

"It's that point I keep making about the kind of social capital in the in the organization. I think it's vital to kind of have those networks, particularly including people who are more senior than you. I think the best way of getting into that next role, if you're kind of serious about progression, is talking to somebody who's actually doing that role, or talking to somebody on that grade anyway……….because that gives you the best insight into what actually working in that grade is like, the requirements that are needed, some of the challenges, what they went through in terms of how they got recruited into that position."
Career trajectory interviewee

For others it was the ability to maintain across sectors and over time those networks that ensure that they had access to information, support and opportunities.

"Networking has been very important to me because it's where I found my strength. I have seen other Black leaders, Asian leaders, so I know that it can be done. So, people have given me confidence. People have made me aware of jobs that are available. They've let me know of training opportunities, and a host of other development opportunities that I wasn't aware of. So, networking has really been invaluable to me, really at each and every stage of my career."
Career trajectory interviewee

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For the career stallers, the challenging context they were experiencing was what made it difficult to make positive connections. Where they had an opportunity for a positive connection, expressing the distress they were experiencing as a result of that challenging context would disengage the individuals that they were talking to. As a consequence, they were unable to leverage the benefits of networking in the way that the career progressors were able to.

"If you're in the inner circle, you're in. I feel I'm not in that circle. So, you know, it feels very impenetrable for me, and I think that that's partly why you know, some of my colleagues (ethnic minority) who joined externally have left."
Career trajectory interviewee

We also heard similar views about the 'in group/out group' effect from ethnic minority colleagues via the all staff survey, and through the culture interviews.

Training and development

Another key distinction between the career progressors and the career stallers is that the careers progressors had all been on some form of high-quality national leadership training programme. These programmes really helped them to understand the role of the leader on a deep level, and therefore how to be effective in that role. Further, because the programmes were national, they had the opportunity to engage with others in different organisations which expanded their understanding of a variety of organisations. Finally, attending these programmes has the added bonus that the reputation of these programmes is such that simply being a participant becomes an indicator that one is a 'high flyer'.

"They taught me about things like communication. They taught me about looking into myself and what type of a leader I want to be. They taught me about introspection. They told me about speaking up for the things that matter. They taught me how to navigate complex environments and complex landscapes where people are blinded to equity, race, gender, all of those things. They taught me how to have a voice, hold my voice, and know how to follow something when you're the only person of colour. Those programs that have taught me how to land something, how to write a paper. Those leadership programs have taught me how to step into leadership. And it's taught me how to manage up because that's one thing you have to learn. Like you've got to manage up."
Career trajectory interviewee

In contrast none of the career stallers had been on a national training programme, and they reported finding the internal leadership training offered by the Welsh Government underwhelming. In addition to missing out on the opportunity to develop basic leadership

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competency, they lacked that wider perspective gained by the progressors from their national programmes.

"I've never personally been encouraged by a manager (to apply for a national training programme) or anything like that…………It was definitely a case of not favouritism, but managers would have their sort of favourite members of staff. And you know, they go for a drink on a Friday afternoon or lunchtime, so, you know, you knew your place."
Career trajectory interviewee

2.4. Discussion

Our research has found examples of ethnic minority staff able to progress successfully to senior roles, as well as examples of managers who have appropriately supported ethnic minority staff's career development. However, our survey data suggested that ethnic minority staff are less likely to have temporary and permanent promotions and that they are less likely to agree that they have the appropriate support to develop within the Welsh Government.

Given your desire to represent the Welsh population throughout all levels of government, it will be critical that ethnic minority staff are able to progress in the same way, on merit, as non-ethnic minority staff. Ability to progress is tied closely to retention, therefore this has particular importance to your long-term ethnic minority representation.

Statistical analysis of national samples of hundreds of US employers over several decades enables us to reach conclusions about the impacts of different approaches to increasing managerial diversity[21]. Findings from case study organisations broaden and deepen our understanding. We can see that initiatives designed to diminish managerial bias through diversity training have been broadly ineffective. By contrast, initiatives designed to engage managers such as formal mentoring (sponsorship) programmes, diversity task forces and full-time diversity staff have resulted in increased diversity in management.
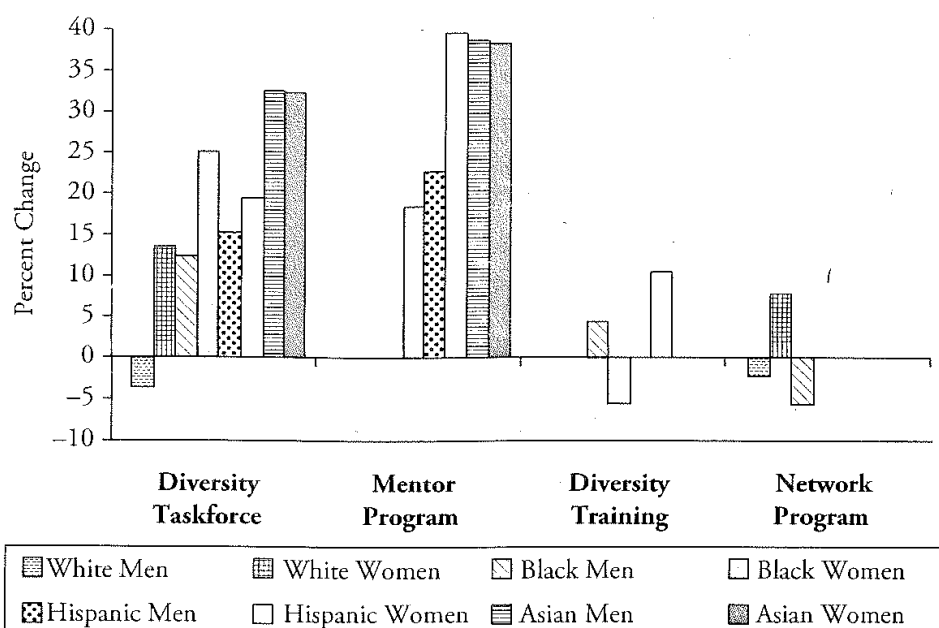
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[21]

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Figure 19:The impact of interventions on management diversity [22]

Diversity leads and task forces have been found to have significant impact because they can identify specific problems and appropriate solutions, developing approaches such as targeted recruitment programmes. They also use data to monitor the effectiveness of their actions. Mentoring programs work because promotions often depend as much on who you know as what you know. As such, the personal guidance and support of a sponsor results in career development across all the protected characteristics.

Any impact of diversity training on attitudes has not been shown to result in long term increases in the proportion of diverse managers. In our experience, this is because without the personal connection with a career-enabling manager, any improvement in attitudes does not address the systemic career barriers experienced by a minoritised individual. However, pairing the training with a formal sponsorship programme increases the sponsors' understanding of how they need to carry out their roles. This is why we have recommended including relevant and specific anti-racist content int mainstream leadership, recruitment, selection, performance and training. When designing anti-racist training, and training in general, different aspects of behavioural science research are relevant for the specific topics. Research evidence does not prove the efficacy of generic one-size-fits-all training, rather quite the opposite. Such training is therefore less likely to provide the practical

[22] Dobbin, F., & Kalev, A. (2013). The origins and effects of corporate diversity programs. *The Oxford handbook of diversity and work*, 253-281.

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guidance which participants are looking for. Further, when the anti-racist element is perceived as relevant and appropriate to the content, it is less likely to provoke the backlash effects found in a review of unconscious bias training[23].

Minority networks on their own, whilst having positive impacts on individual wellbeing, often do not have enough managers in them to result in the type of informal sponsorship activity which leads to promotions. The women's networks were thought to be the exception as they would generally include a higher proportion of senior individuals. This is why we have recommended the immediate development of a formal sponsorship scheme for participants on the Aspire programme followed by the development of a comprehensive talent development programme in due course.

Management and leadership

Clearly, there are some career--enabling managers in the Welsh Government. However, it is notable that some of the career progressors have made several lateral moves before finding themselves with a career--enabling manager. This suggests that it is often a matter of luck or chance whether an individual finds a career-enabling manager, and that good practice across the organisation is not consistent. The ethnicity of the manager did not emerge as a key factor in whether or not they were an enabling manager.

The career progressors and the career stallers that took part in our research started their careers at entry level roles, therefore not benefitting from the formal career development afforded by schemes such as the Fast Stream. Consequently, they were dependent on finding a career-enabling manager who would recognise their talent, and put in place the conditions (good quality feedback, stretch projects, and connection to influential networks) that would help their careers to progress. If the Welsh Government wants to become an anti-racist organisation, you must ensure that *all* managers provide a context in which *all* staff can reliably receive a quality of management that ensures that every individual can reach their fullest potential.

It is the quality of the relationship that determines the quality of management that individual staff members receive, rather than any specific capabilities of the manager[24].

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[23] https://www.equalityhumanrights.com/sites/default/files/research-report-113-unconcious-bais-training-an-assessment-of-the-evidence-for-effectiveness-pdf.pdf

[24] Graen, G. B., & Uhl-Bien, M. (1995). Relationship-based approach to leadership: Development of leader-member exchange (LMX) theory of leadership over 25 years: Applying a multi-level multi-domain perspective. *The leadership quarterly*, *6*(2), 219-247.

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Based on our experience of exemplar organisations in the NHS, specific and accountable expectations of the management processes and procedures need to be in place for this management context to occur. If managers are left to their own devices, the pressure of the demands upon them will increase the potential for unconscious affinity biases influencing the perception of – and therefore the quality of relationship with – different staff members. Affinity bias means that we feel more comfort with and more trust for people who are like us, and that we see them as more capable. This makes it easier to establish a rapport with that individual, which in turn makes it easier to give performance feedback if needed. When a new staff member joins a team, managers can find it easier to delegate a business-critical output such as a project to someone from a similar background to their own rather than a different one. Clearly the new staff member will have to perform well on the assignment, but if they do it signals to the manager that they are someone worth investing their organisational capital into. This takes the form of the next stretch project, good quality feedback and introduction into relevant networks and contacts. In contrast, staff members who stand out less are given routinised tasks, resulting in never having the chance to demonstrate their potential[25]. To break this cycle, managers need a mechanism that ensures they have an in-depth and authentic conversations with staff members, and the time to do so. Having authentic conversations will facilitate moving past the surface diversity of staff members and getting to know them as individuals. [26].

In our exemplar organisations, every line manager is required to conduct a scripted career development and well-being conversation with every member of staff within a restricted time period. The results are recorded and systematically fed back to HR and organisational development. Crucially the compliance with this requirement is monitored all the way up to the board level to ensure that it is happening. There is a lack of similarly managed and monitored expectations of management practice across the Welsh Government. Although an initiative such as this could be seen as simplistic, it could have a profound impact, unlike the current leadership training, which managers do not put into practice. Managers cannot lead inclusively if they do not put in place the time and mechanisms that actually enable staff to experience that leadership in practice.

We cannot stress enough how impactful these conversations could be, if implemented systematically and with accountability and follow up.

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[25] Wu, K. (2010). *The dark side of LMX: variances among out-group members in growth need and work outcomes* (Doctoral dissertation, University of Alabama Libraries).

[26] Pettigrew, T. F. (1998). Intergroup contact theory. *Annual review of psychology*, *49*(1), 65-85.

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Inclusive leadership

Inclusive and culturally competent leadership are two sides of the same coin. Research has identified that for individuals to feel included, they need to feel both that they belong, and that they can do so whilst being their unique selves[27]. Inclusive leaders are not just important to organisations because it means that they manage diversity more effectively, but because it is the type of leadership that fosters innovation and creativity, high performing teams and psychological safety[28]. Research exploring the characteristics of inclusive leaders across six countries identified the following characteristics of inclusive leaders which were related to innovation and organisational citizenship behaviours by their staff:

Empowerment

- enabling direct reports to develop and excel; and

Accountability

- demonstrating confidence in direct reports by holding them responsible for performance they can control;

Humility

- admitting mistakes, and learning from criticism and different points of view; and

- acknowledging and seeking contributions of others to overcome one's limitations

Courage

- putting personal interests aside to achieve what needs to be done; and

- acting on convictions and principles even when it requires personal risk-taking

The Civil Service Success Profiles assessment framework contains a range of criteria that could be mapped on to these characteristics. We recommend that you prioritise these in future recruitment and promotion, ensuring that you are selecting managers and leaders competent in these qualities. Some of the examples of inclusivity criterion in the success profiles:
- take into account different individual needs, views, and ideas, championing inclusion and equality of opportunity for all'

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[27] Shore, L. M., Randel, A. E., Chung, B. G., Dean, M. A., Holcombe Ehrhart, K., & Singh, G. (2011). Inclusion and diversity in work groups: A review and model for future research. *Journal of management*, *37*(4), 1262-1289.
[28] https://www.cipd.org/uk/knowledge/evidence-reviews/building-inclusive-workplaces/

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- recognise and praise the achievements of others to drive positivity within the team; and

- invest time to develop a common focus and genuine positive team spirit where colleagues feel valued and respect one another

Based on these criteria, interview questions should be designed to draw out examples of manager competency in these areas. The figure below provides some examples.
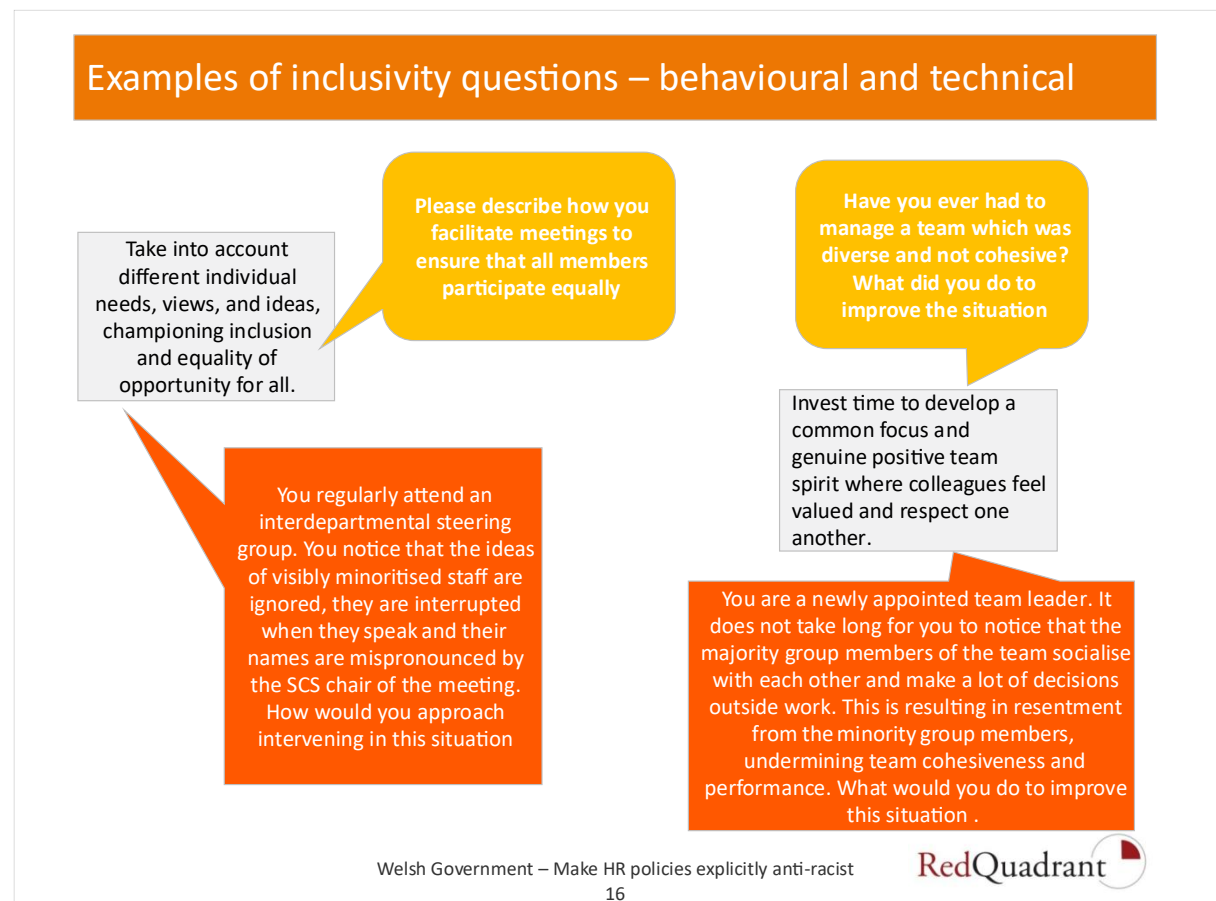
Figure 20:Examples of inclusivity questions – behavioural and technical

Sponsorship

Many organisations across all sectors have recognised the importance of having formal sponsorship schemes. Formal sponsorship schemes are based on the recognition that talented individuals need someone to advocate and provide opportunities for their careers. Informal sponsorship happens when a senior individual (someone who is at least two levels above the talented individual's line manager) spots someone – perhaps who reminds them of themselves when they were at a similar point in their career – and they become invested in that individual. This happens more naturally where people share a similar background and

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a similar identity. It is more difficult across diversity, because 'protective hesitation'[29] may come into play. Protective hesitation is when a senior person worries about saying or doing the wrong thing to someone from a different group, meaning that the natural rapport-building process is interrupted. Without rapport between the two individuals, informal sponsorship is unlikely to develop. A formal sponsorship scheme ensures this connection will happen across diversity in a way that it would not spontaneously happen otherwise. Formal sponsorship schemes ensure that sponsorship relationships are transparent and accountable. The expectation is that sponsors will use their organisational capital and influence to advocate and defend their protégés' careers, as well as creating opportunities for stretch projects and connecting them into their wider networks.

"Sponsorship is focused on advancement and predicated on power. It involves active support by someone appropriately placed in the organization who has significant influence on decision-making processes or structures and who is advocating for, protecting, and fighting for the career advancement of an individual"
(Ibarra, Carter and Silva, 2010)

A New Way of Thinking About Sponsorship
Sponsorship is not an either/or role—either committing fully or not at all. It's a spectrum of different kinds and degrees of support.

Private relationship ←——————————————————→ Public relationship

① Mentor	② Strategizer	③ Connector	④ Opportunity giver	⑤ Advocate
Provide advice, support, or coaching.	Share "insider information" about advancing; strategize getting ahead.	Make introductions to influential people; talk her up with your peers.	Provide a high-visibility opportunity.	Publicly advocate a promotion; fight for her in settings where she can't fight for herself.

From: "A Lack of Sponsorship Is Keeping Women from Advancing into Leadership," by Herminia Ibarra, August 2019 ▽ HBR

Many organisations have also recognised the importance of a dedicated minority ethnic talent development programme to offset past discrimination. These talent development programmes typically combine a number of elements such as executive sponsorship, access to stretch projects, and attendance at high quality leadership development programmes.

You are in the process of implementing the Aspire development programme aimed at promoting Ethnic Minority talent. The Aspire programme includes:

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[29] Thomas, D. A. (2001). The truth about mentoring minorities. Race matters. *Harvard business review*, *79*(4), 98-107.

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- panel discussion of how two ethnic minority leaders countered workplace discrimination;

- matching with a mentor – though this is not guaranteed;

- introduction to a leadership effectiveness approach; and

- attendance at an ethnic minority leadership conference

Key to the success of this programme will be ensuring that participants are tied in closely to influential managers and leaders in the organisation, through having an executive sponsor – someone who is not there just to mentor and develop the participant, but who has accepted responsibility for addressing any career barriers that are blocking the participants' progress. This avoids a deficit mindset, and recognises that ethnic minority staff are not progressing. As our review has found, this is largely because of the impact of career-blocking managers, and lack of stretch opportunities. In addition to a sponsor, participants should also be involved in a high profile stretch project over the course of the programme so that they can demonstrate their capability at a higher level than their current role requirement.

Development without a sponsor can often make matters worse. Participants emerge from these programmes highly motivated, but are met by the same career-blocking context they had before they started the programme. The context therefore must be changed at the same time as the participant is engaging in the programme. The most effective way to do this is through a contemporary sponsorship programme. Sponsors are typically two levels in seniority above the individual, in the same directorate they are in, or a directorate the participant wants to move to, so that they have the authority to override a career-blocking line manager if required. In the long term the aim should be to ensure that all line managers are trained to be career-enabling managers.

Stand-alone ethnic minority leadership develop programmes can have an important role to play in increasing knowledge and sharing leadership journeys. However, they must not be seen as an alternative to the national, high profile leadership development programmes that signal to the wider Civil Service that one is someone to watch on the talent horizon. Part of the Aspire programme should include supporting participants to apply for these national programmes and ensuring line managers endorse their applications.

Promotion panels

Individuals need to be held accountable for the performance of their role on promotion panels, particularly temporary promotions, since our self-reported survey found that there is disparity in the proportion of ethnic minority staff getting temporary promotions (see *Figure 29* above). It is therefore equally important to have equity advocates on promotion

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panels as well as recruitment panels. This would be an individual – of any identity - trained and able to challenge conscious and unconscious bias and other cognitive errors that affect assessment. Further, where a minoritised individual failed to gain promotion, this would be immediately followed up and an individualised one- or two-year plan put in place to ensure that they are able to gain an opportunity for promotion within a suitable time frame.

The promotion panel guidance suggests that panel members will be provided with data and other information so that they are clear about representation at the level at which they are seeking to promote. It has been discussed elsewhere that you are not yet in a position to provide this data on promotion in a timely fashion, but this would need to become a priority.

Temporary promotions

Stretch opportunities – such as acting up and involvement in significant projects – give aspiring talent the opportunity to gain new experiences and challenges above their current role. They are a very important way of developing careers, because they provide the individual with concrete evidence that they can achieve the requirements of a role above the level they are currently in. Applicants for promotion with such experience will therefore be at an advantage and will be more likely to be preferred for promotion.

However, some groups are less likely to get these opportunities because getting them often depends on the staff member having a good quality relationship with the manager[30]. The manager has to feel that they can trust the individual with a business-critical opportunity, though they may not have performed at that level before. That ability to feel trust, and the quality of relationship, are both affected by affinity bias, and so managers are more comfortable giving stretch opportunities to people who are like them[31]. Your own data shows that ethnic minority staff are less likely to secure temporary promotions at the Welsh Government. Since temporary promotions are a major way that individuals gain stretch opportunities at the Welsh Government, a focused effort needs to be put in place to ensure equitable access to temporary promotions for ethnic minority staff within the Welsh Government.

[30] Anand, S., Hu, J., Liden, R. C., & Vidyarthi, P. R. (2011). Leader-member exchange: Recent research findings and prospects for the future. *The Sage handbook of leadership*, 311-325.

[31] Randolph-Seng, B., Cogliser, C. C., Randolph, A. F., Scandura, T. A., Miller, C. D., & Smith-Genthôs, R. (2016). Diversity in leadership: Race in leader-member exchanges. *Leadership & Organization Development Journal*, *37*(6), 750-773.

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Another benefit of having a diverse pool of trained equity advocates is that it removes the burden of fair selection or promotion from the shoulders of visible minorities. This could enable minority ethnic staff members to spend more of their time focusing on supporting each other around effective career progression mentoring.

2.5. Recommendations

2.5.1. Data and research

R2.1. Monitor temporary promotions by ethnicity, including whether or not the person successfully secures achieves a permanent promotion following the TPA.

R2.2. Carry out further analysis of the temporary promotions data by directorate to identify specific trends. Research the reasons for those trends.

R2.3. Measure length of time for people to progress from one grade to another selected grade. Analyse by ethnicity to assess where interventions may be needed.

2.5.2. Inclusivity criterion

R2.4. Focus on the inclusivity criterion within the Civil Service Behaviours to establish and measure all managers' inclusive leadership capability when recruiting and promoting managers.

2.5.3. Management skills development

R2.5. Establish mandatory 'becoming an effective manager' type training for all first time managers with core anti-racist components.

R2.6. Promotion criteria must include the expectation that applicants for be able to demonstrate that they have attended relevant management and leadership training, and have applied what they have learned to their practice, including evidence that they have supported their direct reports' development. (Reference - Civil Service Behaviour Developing self and others.)

R2.7. Revise existing leadership training to include a specific module on anti-racist and inclusive leadership and management behaviours and practice.

R2.8. Hold managers to account for their ability to promote equitable and inclusive work environments. (Reference - Civil Service Behaviour – Leadership.)

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2.5.4. Sponsorship programme

R2.9. Develop a formal sponsorship programme for ethnic minority talent at the grade level(s) (suggested EO/HEO) before there is a significant drop in representation at a particular grade. This will ensure that ethnic minority staff have had the appropriate stretch and other relevant experience so they can compete equally to majority group staff who are benefiting from informal sponsorship.

R2.10. Urgently recruit and train a pool of sponsors to sponsor participants on the proposed Aspire programme who will be two grades above the level of the group of ethnic minority staff who will be targeted to be their protégées.

R2.11. Use this group of sponsors on the Aspire programme instead of mentors to ensure that career barriers are addressed as an outcome of the programme.

2.5.5. Career development plan

R2.12. Develop and roll out a scripted career and well-being conversation for staff to be delivered over a specific period. Hold Directors responsible for ensuring that all of their managers comply within the time frame. Record findings centrally, and analyse for training and development needs. Conversations should include the potential for stretch projects and/or other development opportunities.

2.5.6. Promotion policy and process

R2.13. Develop a structured process, with associated policy in place, to ensure that temporary promotions are fairly awarded, including ambitious targets for improvement.

R2.14. Recruit and train a pool of diverse equity advocates to be part of promotion panels with a focus on the levels with significant underrepresentation of minority ethnic staff. Equity advocates to be given the power of veto over any decision they feel may be unsafe.

R2.15. Ensure that promotion panels are provided with relevant and up to date data on the difference in levels of representation and rate of promotion in a particular division at a specific grade.

R2.16. Develop guidance for promotion panels on the use of the tie-breaker provision in the positive action legislation.

2.5.7. Ethnic Minority Talent development programme

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R2.17. Ethnic Minority Talent development programme aimed at key shortfall areas (we suggest HEO, SCS). Key components of the programme could be:

a. core leadership & management workshops;

b. career and selection coaching;

c. executive sponsor for each participant;

d. national level leadership programme or MBA or similar; and

e. facilitated action learning sets

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3. Organisational culture, behaviours and retention

3.1. Aim

The aim of this section of the review was to identify whether there was evidence of differential experiences between ethnic minority and non-ethnic minority staff and to explore what might be the factors resulting in these differences. We also sought to understand how racism and anti-racism play out at the Welsh Government, and whether this, along with the culture in general, influences retention. On the premise that both formal and informal aspects of the organisation would interact to sustain any inequity, we used a mixed method approach to identify what these could be. Responses to the all staff survey and interviews were our primary methods.

3.2. Methodology

We carried out a number of activities in this area:

3.2.1. Desk review

We carried out a desk review which incorporated relevant policies, the Civil Service Code, your Values and Behaviours framework, and Respect campaign resources.

3.2.2. Data review

Your WIS allows analysis by protected characteristics for elements of the employee lifecycle.

We reviewed a number of data points relating to culture, behaviour and retention. The most important points are listed below:

- employee lifecycle data – we used this to look at employee relations cases and organisation leavers, and whether this was disproportionately impacted by ethnicity;

- anti-racism training attendance data;

- Welsh Government Civil Service People survey with analysis by ethnicity. The annual Civil Service People Survey data allows for analysis of responses based on ethnicity. Equality analysis of this data is published internally, and key measures by ethnicity are included in the ethnicity dashboard.

- RedQuadrant all staff survey with analysis by ethnicity.

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3.2.3. All staff survey

Our bespoke all staff survey, with over 1000 responses[32], was one of our main sources of information. Questions related to Welsh Government culture, experiences of racism anti-racist actions, and allowed for comparison between ethnic minority and non-ethnic minority staff. We did this by not simply asking for demographic information but also by asking people to identify whether or not they are an ethnic minority person. We did this so that we could review whether there are any differences in perception and/or experience for ethnic minority staff where the same questions were asked. We also used this branching to focus particular questions for ethnic minority and non-ethnic minority staff.

725 respondents shared their ethnicity via the survey. The ethnicity breakdown of these respondents is shown below. This demonstrates that ethnic minority staff were more likely to respond than non-ethnic minority staff since they form a higher proportion of responses than their equivalent workforce proportion.

Ethnic group	Number of responses	Proportion of responses	Welsh Government workforce
Asian / Asian British	11	1.5%	1.2%
Black / African / Caribbean / Black British	7	1.0%	0.3%
Mixed / multiple ethnic groups	19	2.6%	1.2%
Other ethnic group	12	1.7%	0.4%
White	676	93.2%	96.8%

Figure 21: Shared ethnicity responses in staff survey n=725

3.2.4. Culture interviews with ethnic minority staff

We carried out fourteen semi-structured interviews with ethnic minority staff where we explored their experiences within the Welsh Government. We recruited interviewees via the all staff survey and through the MESN and other informal ethnic minority networks. These interviews particularly focused on the culture of the organisation, seeking to strengthen our understanding of ethnic minority staff experiences of the Welsh Government. Interview

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[32] More information on survey respondent characteristics is provided in Appendix 5.

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questions are available in Appendix 6. All interviews were crafted to enable a safe space, including that all interviews were taken by ethnic minority consultants. Interviews were recorded and transcribed then analysed. Whilst interviewees were a self-selecting group, their insights provide strong evidence of negative experiences and lack of inclusion for ethnic minority staff in the Welsh Government.

3.2.5. Limitations

Our findings were impacted by a number of limitations:

- conclusions from the Civil Service People survey, and our own survey have relatively small proportions of ethnic minority staff respondents (due to the small number of ethnic minority staff). It is therefore important to continue to analyse these results over a number of years to identify whether there are consistent trends showing more negative or more positive scores;

- response rates for both the Civil Service People survey (69%) and our online survey had good response rates but do not include responses from everyone in the organisation;

- our qualitative research, based on the culture interviews with fourteen ethnic minority staff, were carried out with a small and self-selecting sample - the results should be seen as suggestive rather than definitive; and

- the following could be useful data points for the future, but you were unable to provide:

    o summarised conversations/themes/reason for leaving from exit interviews (as mentioned above); and

    o number of informal conversations which may have otherwise led to formal processes such as grievance or disciplinary.

3.3. Data

3.3.1. Workforce makeup and representation

Your workforce information system (WIS) holds data on employees' characteristics. From your WIS, you can extract data on your staff make-up including detailed ethnicity recording.

You have set a target that 6% of your staff will be ethnic minority people by 2026. This is close to the current Welsh population – the 2021 Census states that 6.2% of the Welsh population are ethnic minority people.

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You are starting from a positive point – you have a robust Electronic Staff Record system and therefore access to the data you need to understand your workforce's make-up, and employees with capability to share and analyse this data. You told us that sometimes your ability to provide this analysis is limited by access restrictions and capacity . Historically, you have had good to reasonable levels of disclosure for demographics but have seen a drop in disclosure rates since introduction of a new system and method of sharing characteristics.

The ethnicity dashboard includes the following analysis:

- Performance against recruitment targets

- Workforce make-up, by Group, grade, office location, employment type and over time – reported as 'White' and 'Ethnic Minority' categories.

- Ethnic minority staff breakdown – i.e. representation by ethnic group

- Ethnic minority staff by sex, age and disability status

- Ethnicity pay gap

- Inclusion and Fair Treatment and Employee Engagement scores from the People Survey

- Joiners, promotions and leavers by ethnicity

We discuss some of these elements below and elsewhere:

Ethnic minority representation – timeseries

You analyse your organisational ethnic minority representation over time. This is included in your ethnicity dashboard and is shown below.
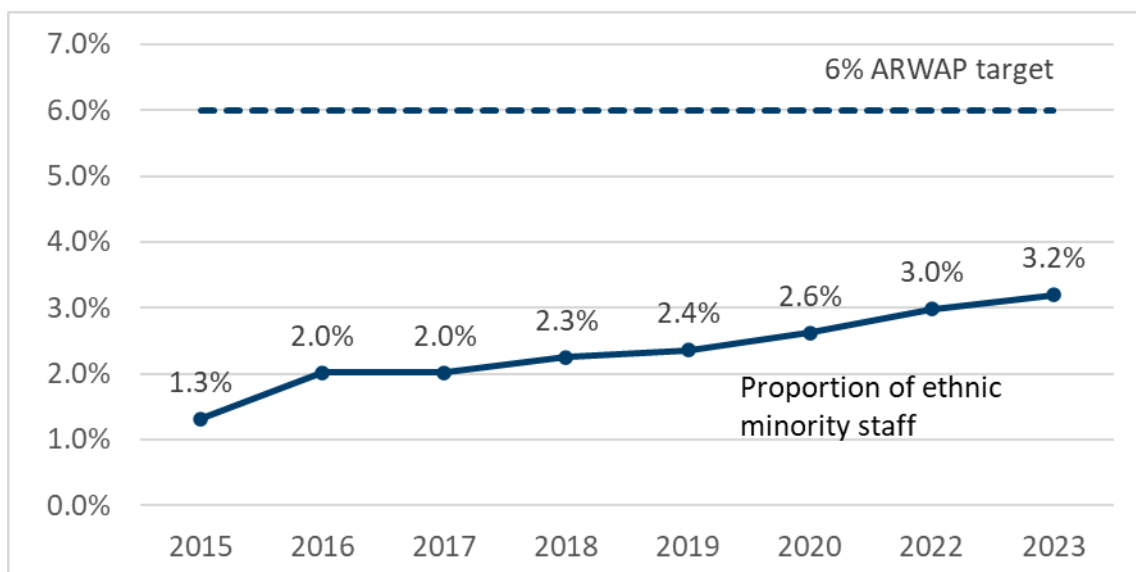
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Figure 22: Extract from WG Ethnicity Dashboard – ethnic minority representation - timeseries

The proportion of ethnic minority staff has increased from 1.3% in 2015 to 3.2% in 2023. You have set a target that by 2026, the proportion of ethnic minority staff will be 6% for all staff at all levels. Whilst there have been increases in representation since 2015, you will need a step change in representation in order to meet this 6% target.

Ethnic minority representation – forecasted time series

We believe you would benefit from having a more robust rationale for the degree of over-representation in recruitment that is needed in order to meet your representation targets. An example calculation is included below and we have recommended that you calculate this with your own data.

Assumptions:

- 5800 staff

- 175 appointments per year

- 175 staff members leave each year (equally across ethnicities)

Proportion of ethnic minority staff appointments	Ethnic minority appointments per year	2024	2025	2026	Reach 6% goal by 2026	2030	2050
6.30% (As 2023 recr)	11	3.29%	3.38%	3.47%	No	3.80%	4.94%
10.40% (As 2022 recr)	18	3.42%	3.63%	3.83%	No	4.59%	7.25%

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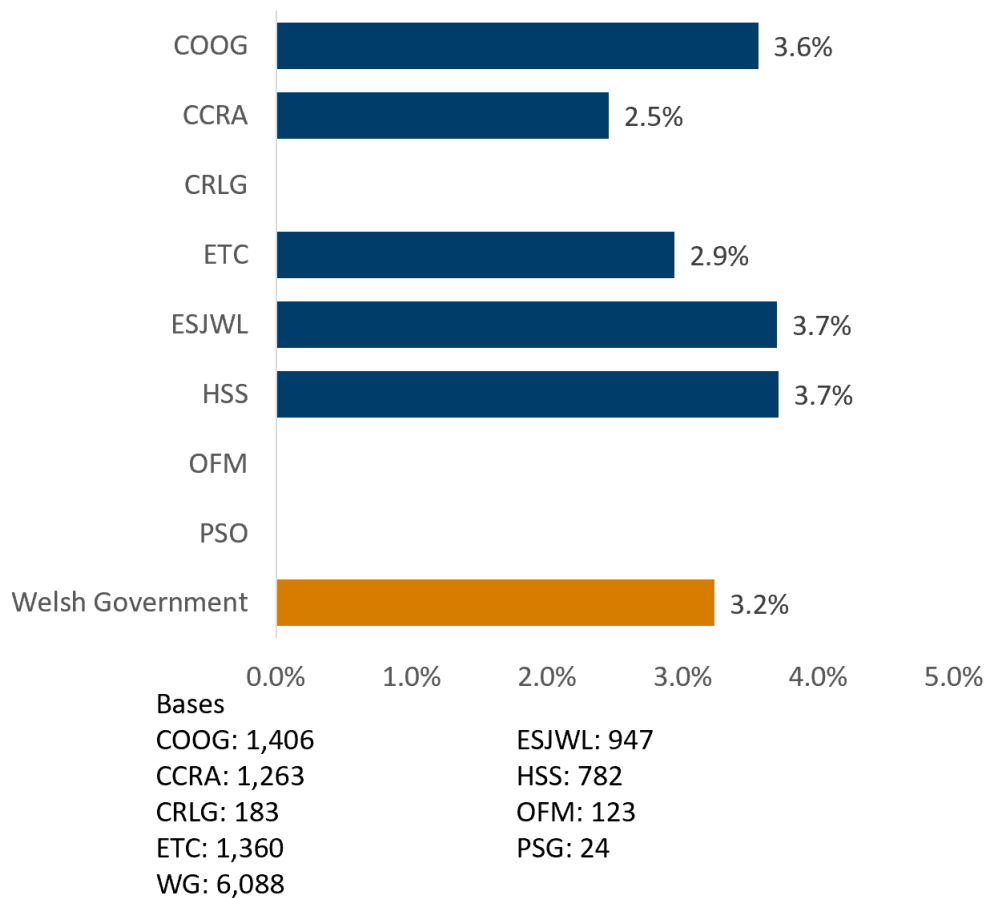|							
20% (As Cardiff population)	35	3.71%	4.20%	4.68%	No	6.44%	12.65%
40% (Over-representation)	70	4.31%	5.39%	6.43%	Yes	10.30%	23.91%

Figure 23: Ethnic minority representation – forecasted time series

Using this example calculation, it is clear that the 6% representation target by 2026 is highly unlikely to be reached with the current reduced volume of external recruitment. You can see also that if external recruitment remains at low levels, even if 20% of new appointments are ethnic minority appointments, it will take until around 2030 to match the current proportion of ethnic minority people in the population of Wales.

Ethnic minority representation - by group

This chart is part of your ethnicity dashboard. It details ethnic minority representation by Group. (Group descriptions are provided in Appendix 2).

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Ethnic minority representation by Group, April 2023

Bases
COOG: 1,406   ESJWL: 947
CCRA: 1,263   HSS: 782
CRLG: 183   OFM: 123
ETC: 1,360   PSG: 24
WG: 6,088

To note: Groups below 10 have been suppressed.

Figure 24: Extract from WG Ethnicity dashboard April 2023 – Ethnic minority representation by group

We note that the 2023 proportions of ethnic minority staff varied between 1.7% and 7% for each directorate. Declaration levels also vary, with the highest non-declaration rate being 11.6% for CRLG.

Ethnic minority representation – by region

You do not, as standard, compare workforce make-up by home address across Welsh regions. Given the wide variation of proportion of ethnic minority people across Wales, we consider that this is one aspect of ethnic minority representation that is useful to consider. This may help you to recognise where you need to focus your effort, what reasonable targets might be and also where progress is being made. This is not a straightforward comparison as some of your staff are based outside of Wales, and many work remotely for much of their working time. In addition, many of your roles are advertised across all of

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Wales. In spite of this, we believe that this analysis is useful in order to focus on where you are likely to be able to make the most impact.

We compared your staff make-up (office location with known ethnicity) with the relevant Welsh population (Census 2021) which is represented in the chart below.

We found that there is under-representation across all regions compared to the population, and that staff representation in all regions are below the 6% Anti-racist Wales Action Plan target. This is particularly marked in Cardiff, which has the highest proportion of ethnic minority population at 20.8% but only 5.1% of ethnic minority staff.
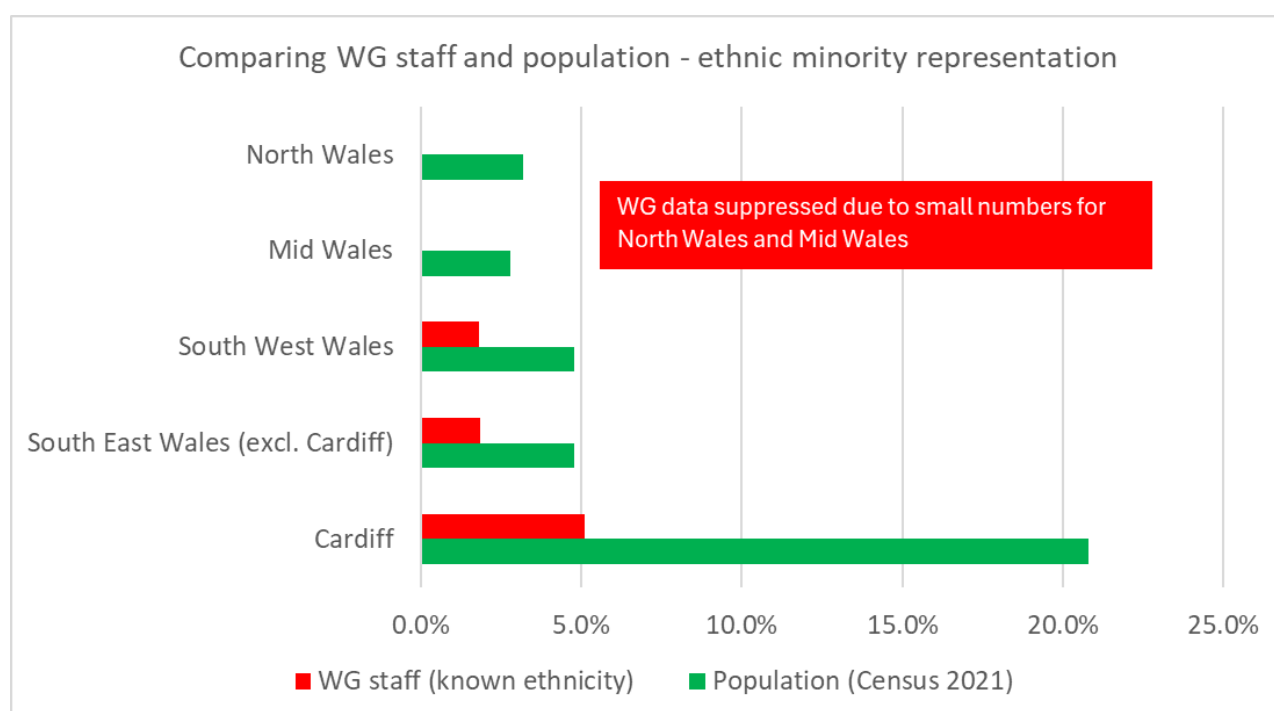

Figure 25: Ethnicity representation by region - WG staff (office location, known ethnicity, as at April 2023) and population (Census 2021)

Ethnic minority representation – by grade

We reviewed your analysis of ethnic minority representation by grade, which is included in the ethnicity dashboard.
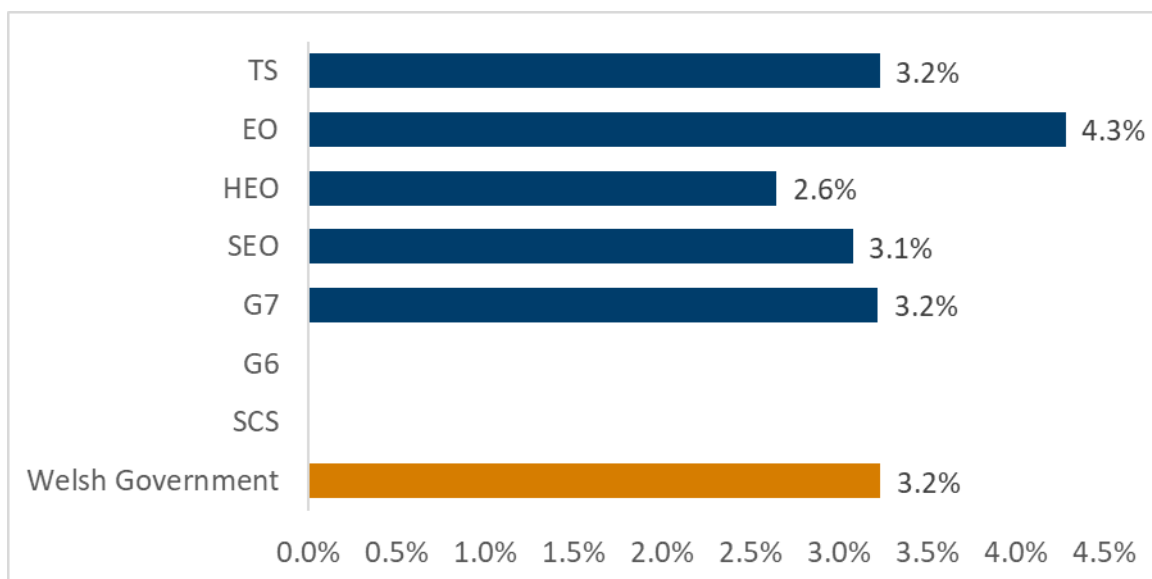
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Figure 26: Extract from WG Ethnicity Dashboard April 2023 – Ethnic minority representation by grade

Interestingly, percentages of ethnic minority staff are fairly similar across all grades, apart from G6 and SCS where a data point is not shown.

We note that there are ethnic minority people at grades G6 and SCS but since groups under ten people are suppressed to avoid the risk of identifying individuals, this is not represented in the chart. It is therefore difficult to understand from this chart how you are doing in relation to representation in more senior roles.

Those with access to the suppressed data will be able to understand ethnic minority representation in these roles. Given the numbers of people in G6 (261) and SCS (194), representation would need to be over 4% and 6% respectively, for it to be reportable.

We note also that the proportion of ethnic minority EOs is slightly higher and for HEOs is slightly lower than other grades – this is discussed in 2.3.1.

3.3.2.   Ethnicity pay gap

Though not a legal requirement, you have committed to publish your ethnicity pay gap since 2022. You have made progress on this metric - the mean ethnicity pay gap has narrowed from 5.38% in March 2022 to 4.13% in March 2023. The median ethnicity pay gap is 0%.

3.3.3.   Welsh Government Civil Service People survey

For the first year, you carried out equalities analysis on all of your 2023 Civil Service People Survey responses by gender, ethnicity, age and sexual orientation. In previous years, this analysis has been limited to particular clusters of questions based on need, focus at the

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time, and resources within the team, so the approach has changed from year to year. The questions focused on are the questions deemed to be most important for those groups. This analysis has allowed a greater understanding of any differences in perspectives and experiences.

We reviewed your analysis and explored areas where responses between ethnic minority and non-ethnic minority staff differed. The analysis includes grouped questions/themes as well as analysis by individual question responses.

There were 124 (3.2%) ethnic minority respondents out of 3914 respondents who shared their ethnicity. (The total number of respondents was 4327 – meaning that 10% of people did not share their ethnicity.) . Given that in 2023 3.2% of staff were ethnic minority people, the number of responses is representative.

We reviewed the ethnicity analysis for your 2023 results and found that for most (seven out of ten) themes scores, you observe more negative average scores from ethnic minority staff than for white staff, especially in relation to pay and benefits, inclusion and fair treatment and leadership and managing change. The learning and development theme score is notably more positive for ethnic minority staff.

Theme scores	Welsh Government			Civil Service average	
	Ethnic Minority	White	Percentage points difference	Ethnic Minority	White
Count*	124	3,790			
Pay and benefits theme score (% positive)	49.2%	53.8%	-4.6%	30%	34%
Inclusion and fair treatment theme score (% positive)	84.3%	87.4%	-3.2%	79%	82%
Leadership and managing change theme score (% positive)	54.6%	57.7%	-3.1%	53%	50%
My manager theme score (% positive)	80.0%	81.7%	-1.7%	78%	78%
My team theme score (% positive)	85.2%	86.4%	-1.2%	83%	83%

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Theme scores	Welsh Government			Civil Service average	
	Ethnic Minority	White	Percentage points difference	Ethnic Minority	White
My work theme score (% positive)	83.2%	84.2%	-1.0%	76%	77%
Resources and workload theme score (% positive)	79.6%	80.1%	-0.6%	77%	75%
Employee engagement score	67.0%	67.0%	0.0%	66%	61%
Organisational objectives and purpose theme score (% positive)	86.3%	85.9%	0.4%	85%	83%
Learning and development theme score (% positive)	60.7%	57.7%	3.0%	61%	59%

Figure 27: 2023 People Survey theme scores, by ethnicity

*The 'count' for each question may vary slightly as not all people complete all questions.

It is notable though, that in almost all areas, scores from both ethnic minority and white staff are higher than the average across the Civil Service as a whole.

A difference can also be seen between ethnic minority staff responses and White staff responses in relation to the grouped discriminated against and bullied groups scores.

Grouped scores	Ethnic Minority	White	Percentage points difference	Civil service benchmark
Count*	124	3,790		
Experienced discrimination (grouped) (% yes)	10.5%	4.4%	6.1%	7%
Experienced bullying and/or harassment (grouped) (% yes)	8.9%	4.8%	4.0%	8%

Figure 28: 2023 People Survey grouped results, by ethnicity

We do not have a Civil Service comparator for ethnic minority and white experiences of discrimination and bullying and/or harassment separately. However, it can be seen that

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ethnic minority staff are more likely to experience these matters than the Civil Service benchmark.

Looking at individual questions, we saw a mixed picture, with ethnic minority staff more likely to answer positively in relation to:

- I have an acceptable workload (% strongly agree or agree) (6.5 percentage points higher)

- learning and development activities I have completed in the past 12 months have helped to improve my performance (% strongly agree or agree) (4.3 percentage points higher)

- I understand how my work contributes to my organisation's objectives (% strongly agree or agree) (4.2 percentage points higher)

And more likely to answer negatively in relation to:

- retention (see section below)

- I am satisfied with the total benefits package (% strongly agree or agree) (10.1% percentage points lower)

- my organisation is committed to creating a diverse and inclusive workplace (% strongly agree or agree) (8.3% percentage points lower)

- I have the opportunity to contribute my views before decisions are made that affect me (% strongly agree or agree) (7.4 percentage points lower)

We note that you have observed large fluctuations in ethnic minority responses due to the current relatively small sample size of ethnic minority staff. These data points should therefore be viewed over a longer period of time to see whether consistent differences are observed over time. The People Survey is particularly useful as you have the ability to compare results across the Civil Service.

3.4. Findings

Our findings are divided into three sections. Firstly, we share findings around ethnic minority staff experiences and the prevalence of racism within your culture. In the following section, we consider culture more broadly, including retention, then in the third section we explore perceptions of race equality and anti-racism progress within the Welsh Government.

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3.4.1. Ethnic minority experiences of racism

Whilst we heard from a number of ethnic minority staff that the Welsh Government has become more inclusive over the last 20 years, including lower likelihood of hearing racist comments, there remain significant examples of ethnic minority staff experiencing exclusion, explicit racism and more subtle micro-aggressions. This impacts their ability to perform well in their roles as well as causing potential harm. Some interviewees mentioned that this interview experience was a rare opportunity to speak about their experiences in a safe and supportive space – especially for those whom it was the first time they had ever discussed their racialised experiences. Interviewees also mentioned situations occurring outside of work time that had an impact on relationships within the Welsh Government.

In the all staff survey and culture interviews, we asked ethnic minority staff about their experiences of both explicit, overt racism and subtle racism and/or microaggressions. Some people made the point that a) the Welsh Government is to a certain extent reflective of the Welsh population at large and so a wide range of views are exhibited, and b) that many staff come from ethnically homogeneous environments and therefore may not have an understanding of ethnic minority people and their experiences and/or have very few or no relationships with ethnic minority people.

"I think a lot of the time, there's just a lack of understanding about these issues, because people come from very ethnically homogeneous environments."
Culture interviewee

We also heard differences in the extent to which people felt that experiences of racism come from particular individuals as opposed to being systemically embedded within the organisation.

Experiences of racism for ethnic minority survey respondents were as follows:

- 15 out of 89 (16%) respondents sometimes or often experience overt racism
- 28 out of 89 (31%) respondents sometimes or often experience subtle racism and/or microaggression

Ethnic minority and non-ethnic minority staff observed examples of racism including:

- Inappropriate language/use of racial slurs
- Inappropriate jokes and banter
- Lack of cultural awareness and/or religious observation such as prayer time and Ramadan

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- Assumptions about language ability and/or personality based on race

- Ethnic minority staff being talked over; not being invited to contribute

- Not trying to pronounce someone's name correctly

- Mismanagement from line manager

- An expectation for people to work harder than others to reach a goal they have already reached.

During in depth interviews, ethnic minority staff were open and honest, sharing their experiences of racism, sometimes for the first time. Many noted that the racism they experienced was more likely to be subtle and/or disguised as opposed to use of overt racist slurs or comments.

Explicit racism

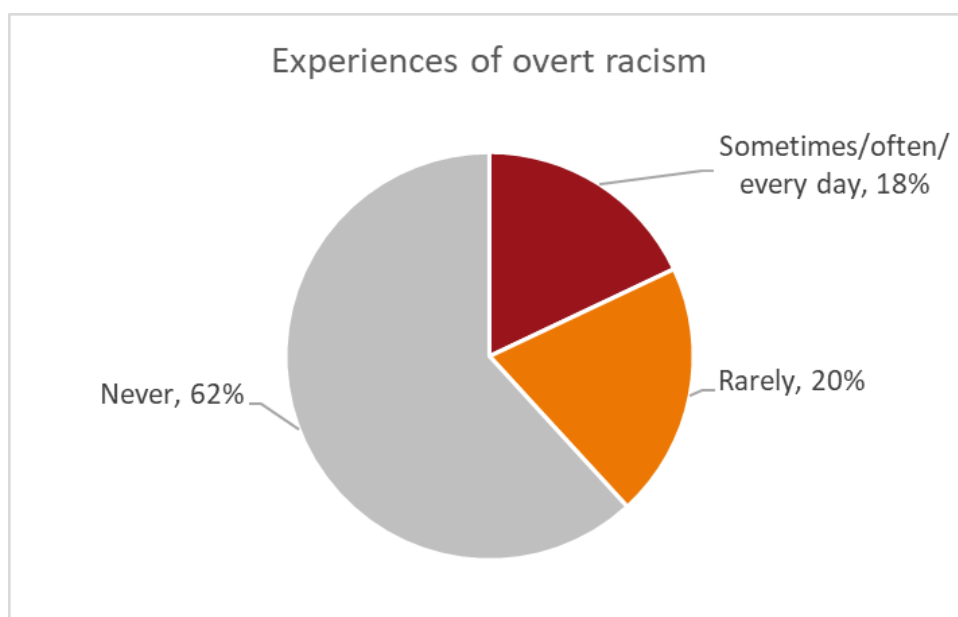In the survey, ethnic minority staff were asked how often they experience explicit racism.

Figure 29: Survey respondents: Experiences of explicit racism n= 89

18% of respondents (16 out of 89)said they experienced it sometimes, often or every day. In the survey, many of the racist experiences cited were current, or recent. People used language such as ;routinely; or 'often'.

Examples of overt racism included:

- "Can I have number 24 [referring to Chinese takeaways]"

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- "I was in a team and someone had returned from holiday and was tanned. A member of staff openly shouted out "oh you look like a foreigner"

- [Someone] wearing a hijab was described as a 'suspect' and the response given [to their complaint] was "Oh, I'm so sorry that you felt like that." There was no acknowledgement of fault.

We also asked how often ethnic minority people observed racism – results were similar to the level experienced:

- "I have heard comments about people being promoted 'because they are Black' - although I rarely hear of Black colleagues actually getting promoted."

- We were told about supposed 'humour' or 'banter' relating to calling a place of worship a pub.

Explicit racism experienced and observed

In the all staff survey, we asked all staff how often they observed explicit racism. We then compared this with how regularly ethnic minority staff experienced racism.

	Ethnic minority experiences	Ethnic minority observed	Non-ethnic minority observed
Sometimes/often/ every day	18%	16%	4%
Rarely	20%	21%	10%
Never	62%	63%	87%
Totals	89	87	729

Figure 30: Survey respondents: Comparing experienced and observed explicit racism

Comparing ethnic minority and non-ethnic minority responses, we can see that ethnic minority staff are more likely to say they observe explicit racism. 87% of non-ethnic minority respondents said they had never observed explicit racism, as opposed to 58% of ethnic minority respondents. This may be partly during to the low numbers of ethnic minority staff across the organisation, but also may suggest that there is a lack of awareness about the broad nature of racism amongst survey respondents.

Subtle racism

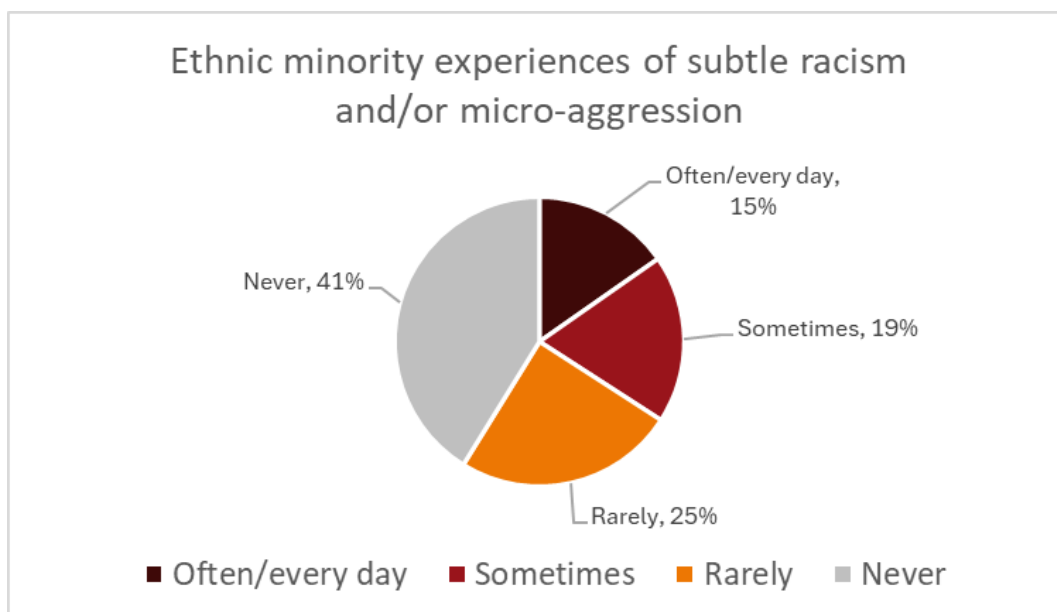In the survey, ethnic minority staff were asked how often they experience subtle racism and /or micro-aggression.

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Figure 31: Survey respondents: Experiences of subtle racism and/micro-aggression n=85

34% of respondents (29 out of 85) said they experienced subtle racism and/ or micro-aggression sometimes, often or every day. This concurs with what we heard via interviews, that subtle racism is more prevalent in the Welsh Government than explicit racism (18% experience explicit racism sometimes/often/every day).

Interviewees were significantly more likely to talk about experiences of subtle racism than explicit racism. Some said they weren't sure whether racist comments or actions were conscious or unconscious. Staff also highlighted the way that these experiences could gradually destroy their confidence.

Below, we explore some of the themes represented in ethnic minority experiences of subtle racism:

Othering

Many staff highlighted the ways in which they are 'othered' or where their difference is made to feel unusual or 'foreign'. One interviewee said:

"I've never seen any overt discrimination. But it feels like there's an assumption that White culture is the default culture, I suppose, and… people who wear different clothes or talk different languages are somehow, sort of funny foreign people, I suppose."
Culture interviewee

Ethnic minority staff shared the following examples of racism via the survey:
- Being asked "Where are you from, where are you 'really' from;"

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- Somebody dodging a handshake from somebody who's of a different ethnicity

Stereotyping and identity

As already referred to in the progression section, we were told of experiences where their appearance and/or religious observance appeared to influence people's perceptions of them, their personality and their capabilities. Ethnic minority staff shared the following examples of racist comments relating to identify:

- [To a Muslim woman wearing a hijab] – "You're much brighter and more assertive than I thought you'd be"

- "Your English is very good"

These experiences support a message that ethnic minority staff need to continually prove themselves and, unlike non-ethnic minority staff, cannot rely on an assumption that they are capable and able to complete their work to a high standard.

Oppressive management

Interviewees shared some examples of current line managers and team members who have been very supportive and championed ethnic minority staff, including calling out unacceptable behaviours. However, interviewees also shared a number of examples where managers were not supportive and were putting what appeared unnecessary and inequitable pressure on their ethnic minority staff.

One staff member outlined behaviour they felt was to "keep them in their place". They felt that managers, through their actions were saying "Look, this is what you need to do. Don't step above that...". One individual reported that when they spoke, they were accused of 'pushing back' whilst non-ethnic minority colleagues were able to respond without these same assumptions and treatment.

The following examples demonstrate where ethnic minority staff feel they have experienced unequal treatment from managers, especially around the level of pressure and unnecessarily high levels of accountability for ethnic minority staff.

"I felt I was subject to unreasonable pressures from colleagues demanding answers, whereas putting it bluntly, a White senior colleague would never be subject to those kinds of behaviours."
"There is definitely a racial component in it that it's a much higher accountability, no understanding of the impacts of their words… They're saying they're being inclusive, but (their) language is saying something very, very different. You know, (their) language is excluding me."

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"…but they're not saying how it should be done… so it's like (they're) saying I'm wrong, but (they're) not telling me how I'm wrong or how to do it right. So, that to me feels like (they're) just wanting to break my confidence… because what other objective is there?"
Culture interviewees

One person felt that these behaviours and aggressions increased during the pandemic, when people were under particularly high pressure.

"I experienced an increased level of microaggressions because I think during times of stress, true behaviours come out. I saw behaviours exhibited to me that are I didn't see exhibited towards others, a lot of aggression in tone."
Culture interviewees

There was not enough data to draw any conclusions about whether ethnic minority staff are more likely to be in the formal HR case load (see Employee Relations Cases data above), but this is often the case in other organisations. For this reason, we have suggested that you continue to monitor this by ethnicity, especially as the number of ethnic minority staff increases.

Not valued

We heard from ethnic minority staff that they felt that their input was not valued as highly as non-ethnic minority staff.

"My input was dismissed but acknowledged when rephrased and brought by colleagues of non-ethnic heritage"
Culture interviewees

Exclusion

As mentioned in the progression section above, ethnic minority staff talked about the way in which they are excluded – one example related to a WhatsApp group to which a number of staff were invited, but they were not.

"A WhatsApp group is a very good example of exclusive communications really… an invitation to a WhatsApp group is very much you're on the inside track…there were many around… I didn't receive an invitation"
Culture interviewees

Another person mentioned the disconnect between the policy of zero tolerance to abuse, but then not taking action when abuse is observed.

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"I've seen my managers saying we do not tolerate abuse, you know... I've witnessed that, but I've also seen other colleagues (…), having that attitude about you, I found that quite interesting and shocking."
Culture interviewees

Racism and other discriminatory behaviour

Some interviewees discussed other forms of discriminatory behaviour, this included misogyny and anti-English sentiment.

"So, the racism is just like the rancid icing on a nasty cake… an edible cake, the racism is there because there's all kinds of bad behaviours there, misogyny and such like"
Culture interviewees

Via the survey, a number of staff members raised their experiences of anti-English sentiment within the Welsh Government.

"I have experienced more racism because I'm from (a major city in England) than because I'm an ethnic minority."

Welsh language policy

An important element that was raised by a number of individuals was the impact of the Welsh language policy. This was raised in three different ways:

- for staff whose first language is neither English nor Welsh, the impression from some that they will need to learn another additional language (Welsh) is particularly burdensome – this is more likely to be relevant to ethnic minority staff;

- for some Welsh staff who are not from a Welsh-speaking background, they feel that their 'Welshness' is called into in question; and

- for some English staff, this requirement is seen as another part of the 'anti-English sentiment' raised above

We suggest that additional internal exploration is done in order to understand more around responses to, and potential misunderstandings of, your Welsh Language Policy.

Subtle racism experienced and observed

In the all staff survey, we also asked all staff how often they observed subtle racism and/or micro-aggressions. We then compared this with how regularly ethnic minority staff experienced racism.

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Regularity	Ethnic minority experience	Ethnic minority observed	Non-ethnic minority observed
Sometimes/ often/every day	34%	33%	7%
Rarely	25%	22%	13%
Never	41%	46%	80%
Total	85	85	720

Figure 32: Survey respondents: Comparing experienced and observed subtle racism and/or micro-aggression

The same is true when comparing observed experiences of subtle racism as for explicit racism above. Ethnic minority staff were more likely to observe subtle racism than non-ethnic minority staff.

Research[33] demonstrates that these forms of subtle racism can have a damaging effect on ethnic minority people's wellbeing and performance at work. This is demonstrated strongly by these concerns shared by ethnic minority staff:

- "I wonder - do they think that I'm a diversity hire?"

- "Are people just smiling at me because they don't want to get in trouble?"

One respondent highlighted the importance of not accepting subtle racism in this way:

"When I didn't experience racism 'in my face', I thought it's not a big problem. I had situations where I felt really bad about myself. If I teach [my child] that racism is only when someone says the N word to you, for example, then I'm teaching her that everything else is okay to put up with."

Another person suggests that there are culturally appropriate ways of being curious and getting to know each other better – which is one building block to promoting an anti-racist culture:

"I do not count mispronunciation of my name or questions about my origin as microaggression. People are just being curious and friendly and I reserve the right to make mistakes with names and ask people the origin of their English/Welsh names and their family history too! Goodwill goes a long way and that is a gentle culture that needs nurturing - let's not be heavy handed."

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[33] Costa, P. L., McDuffie, J. W., Brown, S. E., He, Y., Ikner, B. N., Sabat, I. E., & Miner, K. N. (2023). Microaggressions: Mega problems or micro issues? A meta-analysis. *Journal of community psychology*, *51*(1), 137-153.

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Challenging inappropriate behaviour

In relation to racism, but also poor behaviour in general, we heard from some staff that there is general unwillingness to 'tackle' poor behaviour on any topic. One interviewee said:

"They don't do conflict management in the Welsh Government"

In the all staff survey, we asked all respondents more generally about the ability to challenge inappropriate behaviour.

For all three questions, ethnic minority staff were less likely to agree that they are able to challenge, or that they are confident that they will be taken seriously if they do raise something. Only 61% of ethnic minority felt they would be listened to if they raised something (57 out of 93).

For all staff, the level of agreement that derogatory jokes and inappropriate banter are challenged is very low at 32% for ethnic minority staff and 43% for non-ethnic minority staff. For this reason, we believe this is an important area for you to focus on.
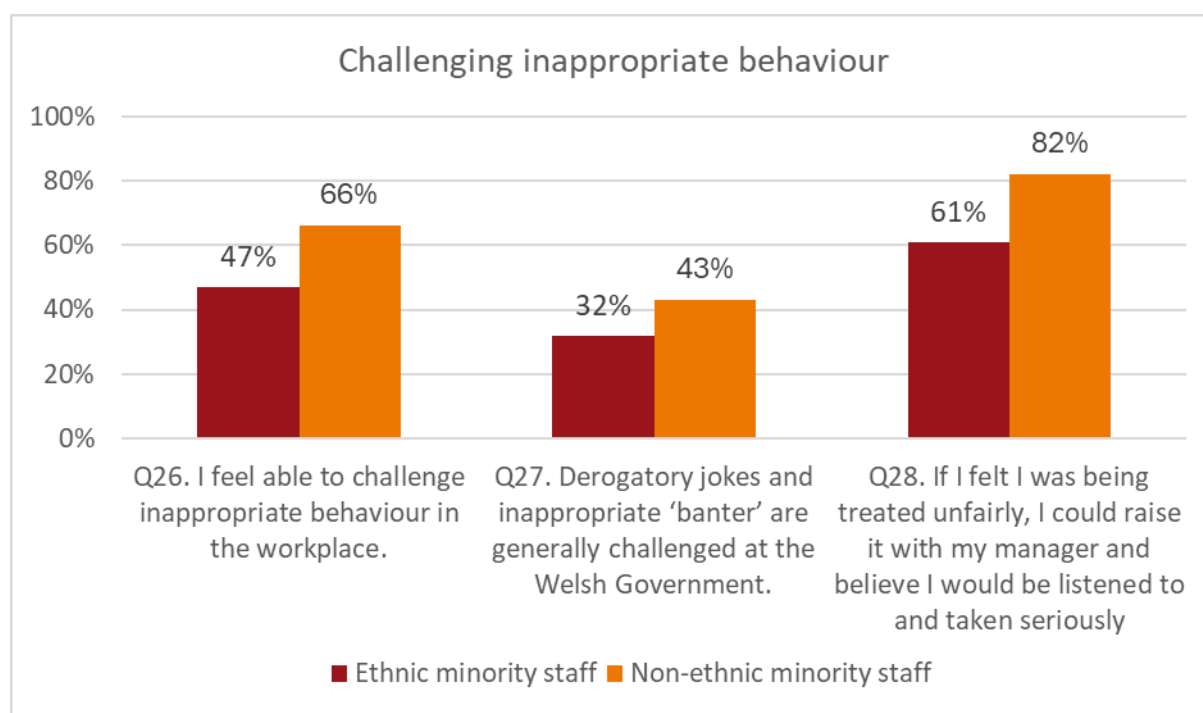

Figure 33: Survey respondents: Challenging inappropriate behaviour

Ethnic minority staff n=93, non-ethnic minority staff n=844

3.4.2.   Reporting racist incidents

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Dignity at Work policy

We reviewed your Dignity at Work policy. The policy outlines its appropriate use and that complaints should be dealt with 'promptly and without unnecessary delay'. It also notes that it may be appropriate to treat complaints under the grievance or disciplinary procedures.

"The Welsh Government expects staff during the course of their work to behave in a manner which respects the dignity of others at all times. If a member of staff or an external contact behaves in a way which does not respect the dignity of another employee or could be considered to constitute harassment or bullying, that person is entitled to ask for the issue to be addressed fairly, consistently and as quickly as possible, taking into account the particular circumstances of each case. Depending on the nature of the issue, this could result in disciplinary action."
Dignity at Work policy

Informal process

We note that your policy suggests that employees should always try to resolve situations informally, and this approach represents good practice[34]. This is discussed elsewhere alongside compassionate HR more widely.

Independent support

We also note that employees are able to access confidential advice via your Employee Assistance Programme (EAP), and that employees do not have to share their name. Another offer, via the EAP, is an Unwanted Behaviour Support Line. The policy outlines that employees can use this service for a confidential conversation about their experiences with an independent, trained adviser. This can include the adviser acting as an impartial sounding board or a way to understand their options and extends to both those who experienced inappropriate behaviour and those who have observed it happening to others.

These are helpful offers to employees, but unfortunately weren't mentioned in any of the comments, or conversations around reporting racism and other inappropriate behaviour, suggesting that this provision is not well-known.

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[34] https://www.acas.org.uk/acas-code-of-practice-on-disciplinary-and-grievance-procedures/html; https://www.cipd.org/globalassets/media/knowledge/knowledge-hub/reports/managing-conflict-in-the-workplace-2_tcm18-70655.pdf

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Union members can also contact their Trade Union representative for advice and one interviewee shared that support from MESN and Trade Unions has been positive and helpful in relation to formal complaints.

Incidence of reporting

Employee relations cases

You include data by ethnicity for employee relations cases in your Equality Employer Report.

Grievance and dignity at work cases 01/04/2022 - 31/03/2023	ROUNDED
Other Ethnicity	*
White	20
Prefer Not to Say	*
Not Declared	*
	20

Figure 34: WG analysis: employee relations by ethnicity (01/04/2022 - 31/03/2023)

These figures combined numbers relating to both the complainant and subjects of complaints across grievance and dignity at work cases. As can be seen, due to low numbers (below ten represented by the * in the table), most of the data has been suppressed. In addition, because this data includes both the complainant and the subjects of complaints, and because of the very small numbers of people involved in general, it is difficult to draw any conclusions.

Formal and informal cases are recorded for disciplinaries, grievances, and dignity at work cases. This data was not provided with associated ethnicity.

Case Type	Formal	Informal
Discipline	18	*
Grievance	10	*
Dignity at Work	*	*
Subject of Dignity at work case	*	*

Figure 35: WG analysis: employee relations by type and formal/informal (01/04/2022 - 31/03/2023)

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You were able to extract the number of cases where racism was explicitly mentioned but since the number of cases was below ten for each reported year, it has not been possible to share these numbers.

Reporting of experiences of racism is discussed below. Evidence from our all staff survey and culture interviews suggests that incidents relating to racism are significantly more common than the number of complaints which explicitly mention racism.

We encourage you to continue to monitor employee relations cases by ethnicity, especially as the number of ethnic minority staff increases. Research and organisational experience shows us that organisations often observe disproportionality in this area – particularly due to the higher likelihood seen in many organisations of ethnic minority staff being immediately moved to more formal processes.

Reporting to Trade Unions

One Trade Union representative told us that during their tenure, there had been no incidents raised that related to racism. Another Trade Union representative said that at one point around a third of their cases were ethnic minority people. We heard from Trade Unions that there was a reticence for people to report issues of any kind, whether informally or formally, or to seek mediation, not just in relation to racism. Concern was mentioned around the impact on the complainant themselves as an individual and also the amount of time that raising a complaint can take.

All staff survey

In the all-staff survey, we asked about whether racist incidents had been reported. Comparing the number of employee relations cases, especially those that explicitly mention racism, with the regularity of experiences of racism, we found that very low proportions of incidents were reported. This was further supported by what we heard from ethnic minority staff in interviews and the survey.

In the all staff survey, only 51% of all respondents (389 out of 732) agreed that "All Welsh Government staff I know respond in a constructive way when concerns around racism are raised".

In the survey, we tested this further, following each question around experience of or observing a racist incident, with questions about whether the incident had been reported.
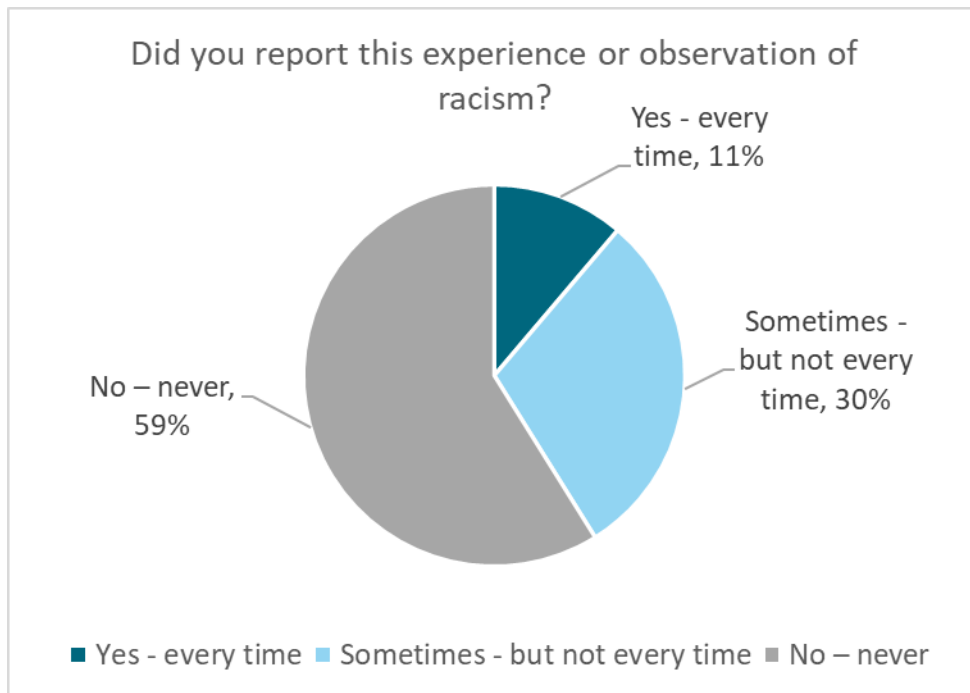
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Figure 36: Survey respondents: Reporting racism n=107

As can be seen, more than half of people never reported these incidents.

Furthermore, we found that for:

- experiences of explicit racism – 56% of ethnic minority respondents (45 out of 83) said they have **never** reported (48% of non-ethnic minority respondents); and

- experiences of subtle racism – 79% of ethnic minority respondents (66 out of 83) said they have **never** reported (53% of non-ethnic minority respondents)

Of those who did report and provided further information (only twelve incidents), we asked whether they were aware of any action being taken. If action was being taken, we asked whether it was effective. In most examples, people did not know whether any action had been taken and therefore were not able to comment on effectiveness.

Intervening when racist incidents are observed

In the all staff survey, we asked non-ethnic-minority staff about situations when they had observed racism and whether they had ever taken any action.

52% of those who answered (101 out of 194) said they had never intervened after observing racism.

Those who had, gave examples of 'interventions' around corrections in language, 'calling in' the error, highlighting the mistake for correction and/or recording the incident to offer as

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evidence. One survey respondent suggested that the majority of staff could take a more active role in reporting incidents, or offering to be a witness if the person would like to take forward a complaint.

We note that the Dignity at Work policy also outlines its use for examples where employees have witnessed inappropriate behaviour even if the behaviour is not directed at them.

Reporting process not fit for purpose

The extremely low numbers of Dignity at Work cases (less than ten in a twelve month period, so not reportable) and the extremely low incidence of cases where racism is mentioned explicitly, contrast with the number of ethnic minority people who shared that they have experienced racism during their time at Welsh Government. This suggests that the reporting process is not being used appropriately.

Survey respondents provided these reasons for not reporting due to their past experiences:
- "Past experience proved no action will be taken"

- Bad experience of reporting before – situation worsened (2 examples shared)

- "It is not safe to report such things as one finds themselves ostracised or even victimised."

- "I have become accustomed to this experience."

- (My colleague said the perpetrator] was very high up in [department], and their basic statement was - nobody's going to touch [the perpetrator]."

- Long, protracted timelines (as below)

"People go around in circles…. That's another thing that's a part of the culture. So, if you do put a complaint in, good luck. Good luck. Are they being resolved? They never follow their own timelines …"

We heard directly from ethnic minority staff that they did not feel that the current reporting process is fit for purpose. The following information was shared to demonstrate this:
- there were examples when people had been dissuaded from formally reporting by their line manager;

- when formal reports were made, either no action was taken or there were so many delays in the process that it appeared that there was no positive benefit to reporting; and

- here formal reports were made, the person making the report was moved out of the 'problematic situation', and this negatively affected their reputation.

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This final example was supported by what we heard via the career trajectory study described above. Ethnic minority staff members who progressed successfully spoke of moving away from career-blocking managers and *not* making any kind of formal report as this was seen as damaging to someone's career.

MESN were clear that there is a need for independent support for those who wish to report something formally, and that this support isn't contingent on being a union member. We note that the Dignity at Work policy says that independent support is available via the EAP. This therefore suggests that it is important to make this offer much clearer and more accessible to staff.

Reasons for not reporting

Expanding on the above point, we found via the staff survey and individual interviews, a number of other reasons for not reporting incidents relating to fear of potential negative impact:

- "HR protect the manager and organisation, not the person "

- "Don't want to 'play the race card'"

- "Don't want to rock the boat"/"too much fuss"

- "I don't believe Welsh Government would back me up"/" I know it won't get anywhere"

- "I don't believe that the relevant people would understand my concerns."

- "People gossip, and career wise it's not the done thing."

- "No point as its your word against theirs and then you need to gather more evidence."

- "It is not safe to report such things as one finds themselves ostracised or even victimised."

- "How can you feel safe reporting when we have a distinct lack of ethnic diversity at all grades!"

We heard from ethnic minority staff that some would prefer to take an individual approach directly with the person so that they can try to improve the situation that way.

We heard from some interviewees that instead of using formal complaint mechanisms or direct approaches, some staff have opted to support each other in small groups.

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"So, the other culture is that when people have a bad time in the Welsh Government, they turn to two or three of us who've been there for a long time, and so we end up doing [that] and that's fine with me, because, you know, that's the history of us as [ethnicity] people… I didn't have anybody in the organization to turn to. Luckily, I had about three people."
Culture interviewee

3.4.3. Culture and belonging

Our review of culture did not only focus on experiences of racism, we also looked at the wider context of organisational culture in the Welsh Government through the perspective of how this can support your progress to become a truly anti-racist organisation.

We heard from some ethnic minority staff that the culture within their department was particularly caring. The fact that the Permanent Secretary takes the time to check in with people was also noted by one interviewee.

In the all staff survey, we asked a number of questions about the culture in Welsh Government. Our findings are presented below, comparing ethnic minority respondents and non-ethnic minority respondents.

Figure 37: Survey respondents: Culture and trust
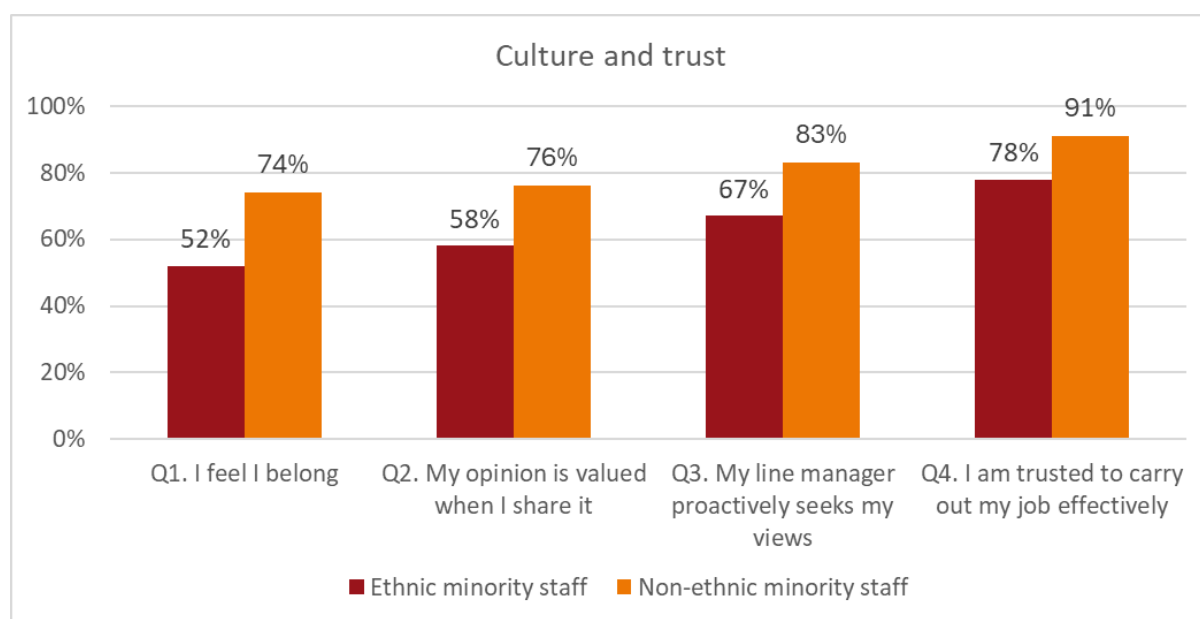
Ethnic minority staff n=77, non-ethnic minority staff n= 962

We found that ethnic minority respondents had lower levels of agreement to all questions related to belonging, how their opinions and views are sought or valued, and whether they

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feel trusted. Q1 around belonging was the question that showed the biggest difference between staff based on their ethnicity.

As mentioned above, we heard from a Trade Union representative that a lot (around one third at one point in time) of the people that come to them are ethnic minority people, and that they feel these cases are an indication that 'the culture isn't right.

These measures, alongside targeted data from the annual People Survey, may be a useful benchmark going forward in order to measure your progress in anti-racism. An improvement in ethnic minority responses could demonstrate effective progress.

We asked additional questions to ethnic minority staff only (n=89), and found the following:

- 79% of ethnic minority staff agreed that they are "socially isolated or excluded at work"

- 47% of ethnic minority staff said that they "downplay certain aspects of themselves for fear they will be negatively interpreted".

When these results are combined with the experiences of racism highlighted from staff above, we believe these results demonstrate low levels of inclusion for ethnic minority staff. Some of these measures may be useful as baseline indicators and used to measure your anti-racist progress over time.

More positively, though with room for improvement, in the survey:

- 66% of ethnic minority staff felt that they can bring their true self to work; and

- 69% of ethnic minority staff felt they can disclose their identify as an ethnic minority openly

We heard that there are pockets of good, inclusive practice in the Welsh Government. Conversely, we also heard that there are parts of the organisation where toxic behaviour is allowed to continue and that in those areas very few ethnic minority staff, or those with other protected characteristics, remain. We have made a number of recommendations relating to increasing level of management competence, through mandatory management training with anti-racist components, and holding managers to account for supporting their direct reports to develop. In addition, in the section below on reporting, we highlight a number of ways that the organisation can triangulate evidence via individuals reporting inappropriate behaviour, combined with other metrics, so that HR can take more detailed investigative action.

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Cultural competence

Cultural competence was raised by interviewees as having an effect on their experiences at Welsh Government. This relates both to managers and to colleagues' cultural competence. Ethnic minority staff regularly mentioned the apparent lack of exposure of some staff to people with different cultural backgrounds from their own. This lack of exposure can lead to a lack of understanding.

"So, I am quite aware of differences in culture. But even though you're aware, sometimes, I mean, it's just automatic. You do things, the way you talk…. It's either you're policing yourself all the time, or it comes out even if you're aware of it. So, I feel there is a lack of awareness from people that deal with people from here. Let's say of people that were brought up here that had never really had the chance to [understand] the perception of cultural differences of expression."
Culture interviewee

Interviewees felt that a greater opportunity to understand diversity of cultures, including communication styles, would support greater understanding.

"My feedback would be that that I think that other people should have a widening of their cultural awareness to cultural diversity and variety."

"People should also be aware of the of the diversity of cultures, not just that they exist, but how they exist, how people can express themselves differently without being offensive. Maybe have sessions where those things are talked about, something like that, differences in that way, so that you can appreciate that diversity, and then, because you know feeling offended is a matter of your own thoughts, not necessarily what the person is intending."

"I always say you do not have to call someone the N word or tell them to sit on their own for you to be racist, but it's how you think about people, even when you know no one is looking at you like - It's that unconscious bias. Like, what do you have against you know, people of a different background, what do you have against different cultures? Why do you not want them to have equal opportunities as you or why do you not want to know about the things that they go through?"
Culture interviewees

Appropriate challenge and hierarchy

As mentioned above, we heard from staff that not challenging the status quo, toeing the line and maintaining hierarchy is valued at Welsh Government. Examples of appropriate challenge not being welcomed were cited by a number of interviewees:

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"My manager said…. 'Oh, you, you challenged my authority', and basically told me that I should be leaving."

"When she asked for support to challenge people and things like that, she was not given support. She just had a really bad time."

"I feel this hierarchical structure is taken rigidly by some teams and it fosters injustices. The strength of 'voices' seemed to be associated with the grade, in my case. The system still allows for an apparent 'duty of care' that can be a form of bullying in and of itself. That was my clear experience: being harassed with 'duty of care'."

Culture interviewees

The RedQuadrant survey also asked questions about whether people are comfortable and able to challenge or disagree without fear of negative consequences.
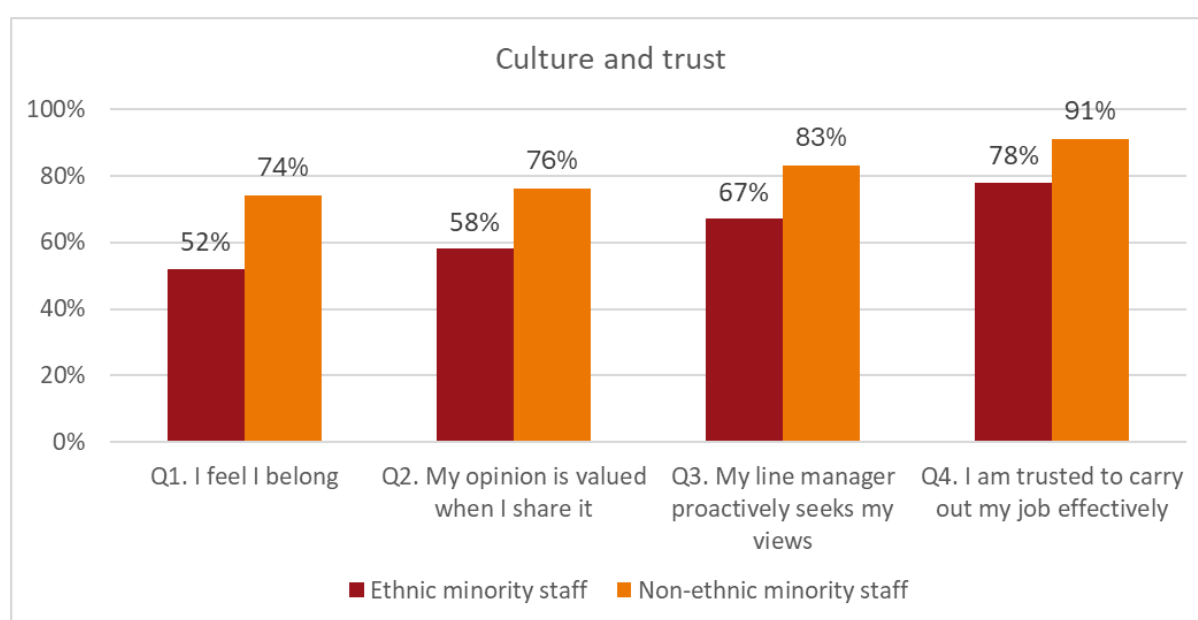
Figure 38: Survey respondents: Appropriate challenge

Ethnic minority staff n=93, non-ethnic minority staff n= 843

Whilst for some questions (Q23 and Q24) we found relatively high levels of agreement from non-ethnic minority staff, the results show that ethnic minority staff were less likely to feel comfortable disagreeing with colleagues or managers and raising issues with those more senior than them.

We feel that perhaps this inability to challenge and/or disagree well may be inhibiting your organisational ability to have open, and potentially uncomfortable conversations about race and ethnicity, which are key to your becoming an anti-racist organisation. You told us that

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you're currently carrying out research on 'safe to challenge' and that you expect to carry out further work in this area in the coming months.

3.4.4. Retention

In order for the Welsh Government to meet its targets around representation of ethnic minority staff, it is critical that ethnic minority people are not only recruited but also retained and developed.

Leavers

In order to understand more about how inclusive your culture is for ethnic minority people, and how this might impact on retention, we initially looked at the data you collate on leavers. Your leavers data from 2022 shows that a slightly higher proportion of ethnic minority people left the organisation (4.1%) than the comparator staff population (3.2%). Since any single year's data relates to relatively small numbers of people, it is critical that you continue to monitor this to review trend data over three to five years to understand whether this is a consistent pattern. Retaining ethnic minority staff will be key in order to reach the ethnicity representation you are aiming for.

Ethnicity	Leavers 2022	Leavers 2022 excluding PNTS/Undeclared	Staff population 2022
Ethnic minority	3.8% (13)	4.1% (13)	3%
White	87.8% (301)	95.9% (301)	97%
PNTS/ Undeclared	8.4% (29)	-	
Welsh Government total	100% (343)	314	

Figure 39: Extract from WG Ethnicity Dashboard – 2022 leavers with RQ addition of data excluding undeclared ethnicity and staff population data

Employment type

Your ethnicity dashboard represents ethnicity representation by employment type.

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Employment type by Ethnicity, April 2023

■ Permanent   ■ Temporary

	Permanent	Temporary
White	94.5%	5.5%
Ethnic minority	82.2%	17.8%

Bases
White: 5,482
Ethnic minority: 197
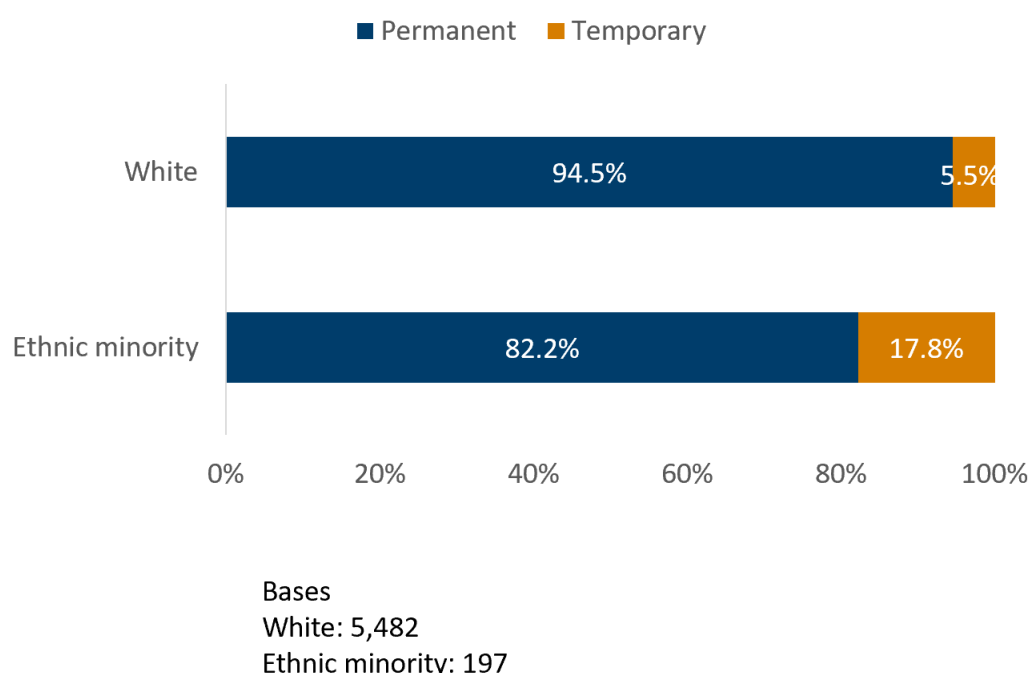
Figure 40: Extract from WG Ethnicity Dashboard April 2023 – Ethnic minority representation by employment type

From the chart above, we see that ethnic minority staff are more likely to be on temporary contracts: 17.8% of ethnic minority staff compared with 5.5% of White staff. You told us that in recent years, you have predominantly appointed people on fixed term contracts (FTC) rather than permanent contracts due to your budgetary position. In that same period, you have made increased effort, via outreach, to attract people from under-represented groups. This has resulted in a higher proportion of recent appointees being from under-represented groups and therefore a higher likelihood that they will be on FTC. Where the budget position has allowed, individuals on FTC have been converted to permanent contracts.

It is therefore critical that you monitor these conversions to permanent contracts to ensure that ethnic minority staff have the same likelihood of receiving a conversion to a permanent role as non-ethnic minority staff. Examples elsewhere, predominantly in the higher education sector, has consistently found that affinity bias with the decision-maker and/or budget holder has been a significant factor in the conversation to permanent contract rates. In many cases that budget holder is not an ethnic minority person, therefore ethnic minority staff have not experienced the same likelihood of conversation as their non-ethnic minority

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colleagues. Employment type inevitably influences retention and in order to meet your representation targets, ethnic minority staff will need to be retained.

You told us that your approach/resourcing strategy has changed over the last twelve months, and that you have moved away from fixed term contracts to offering permanent contracts where the roles are expected to exist for longer than one year. This, combined with your approach to convert all eligible fixed term contracts to permanency, will have had an impact on the data we reviewed, as people on FTC (at different times) move to permanency.

It is also worth noting that the 'temporary' employment type include loans, secondments and apprentices as well as FTAs. Looking at more recent data (October 2024), you told us that whilst it looks like the proportion of FTAs is slightly higher for ethnic minority staff, that you also see greater proportion of ethnic minority staff who are on secondment. This will be an important area to fully understand, when considering action on retention.

Civil Service People survey

One area that stands out as different between ethnic minority and non-ethnic minority staff in your 2023 Civil Service People Survey results is the questions around how long people want to stay at the Welsh Government. A significantly higher proportion of ethnic minority staff said they wish to leave the organisation 'as soon as possible' – 7.3% of ethnic minority respondents compared to only 2.2.% of non-ethnic minority respondents.

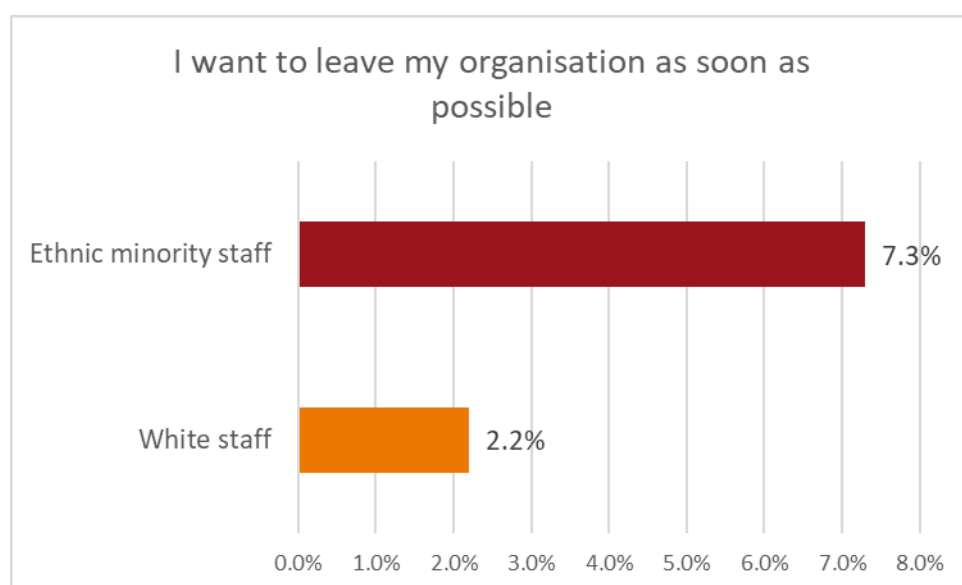*Figure 41: WG Civil Service People Survey results: I want to leave my organisation as soon as possible*

We also see a lower proportion of ethnic minority people (46% compared to 65.5%) wanting to stay at least the next three years. (Though this is partially balanced out by a higher

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proportion of people wanting to stay for at least the next one year – 38.7% ethnic minority respondents compared to 25.2%)
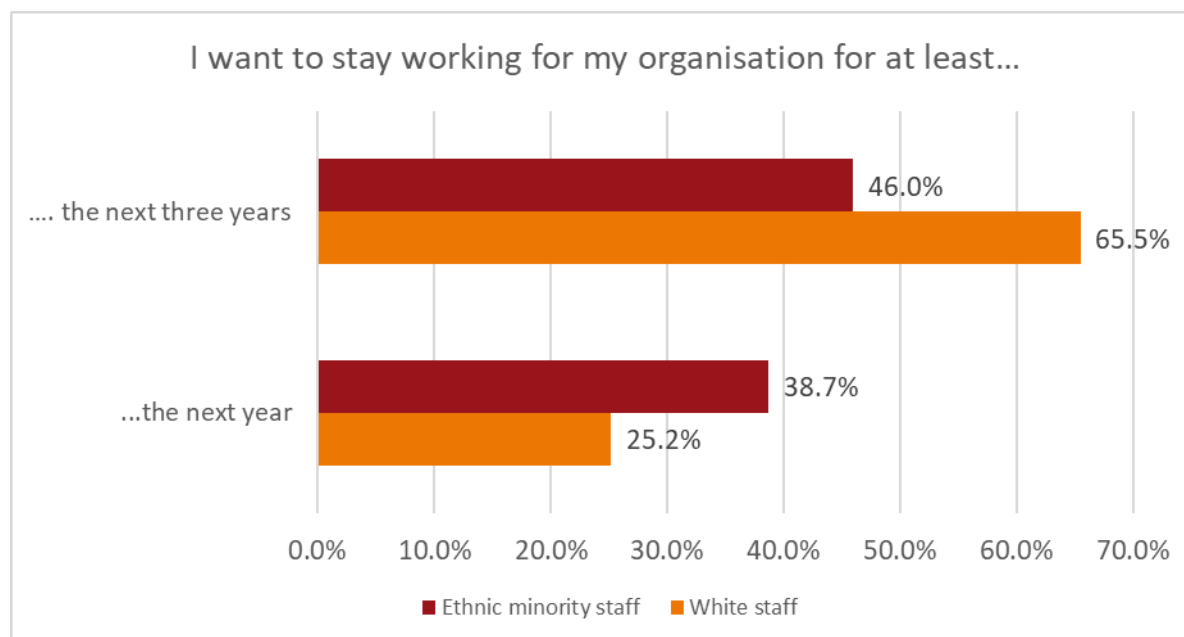
Figure 42: WG Civil Service People Survey results: I want to stay working for my organisation…

We acknowledge the relatively small proportion of ethnic minority staff at present means that a small number of people leaving, arriving or changing views will significantly influence these results. Nonetheless, we suggest that this question set is a critical one to analyse by ethnicity going forward.

Examples of lack of retention

We heard examples of a small number of ethnic minority staff who had left the organisation. In general terms, these leavers' experiences related to perceptions of:

- lack of cultural awareness from their line manager;

- inability from the organisation to respond positively to challenge;

- unwillingness for their team to 'give them a chance' to prove themselves; and

- racist experiences

Given that the data in the 2023 Civil Service People Survey shows that ethnic minority staff are more likely to be looking to leave the Welsh Government as soon as possible (7.3% compared with 2.2% of non-ethnic minority staff), this is a critical area.

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This example of someone who left the organisation, raises the importance of avoiding a deficit model in relation to increasing the proportion of ethnic minority staff. Where staff are not valued, feel (or are told) they are tokenistic hires, they will not be able to perform at their best and in fact are more likely to leave the organisation – as in this example below:

"[xx] commented to them, 'you're only here because you've got the 'brown vote''. They got the job of somebody else, because it was a tick box certainly was what they were inferring. Yes, so obviously the individual didn't feel welcomed from day one, and to be honest I think it went downhill from there."
Culture interviewee

In another example, an interviewee told us of an occasion when they felt that a difficult staffing issue was not dealt with in a culturally sensitive way. That whilst the manager was seen to have followed the policy, perhaps more understanding would have facilitated a different and more positive, result.

"Well, it makes me wonder whether or not there's sufficient understanding in terms of the impact assessment of some of these policies, and whether people are culturally aware enough."
Culture interviewees

Exit interviews

You told us that you currently offer exit interviews to leavers, carried out by their line managers, but that you do not collate information or themes from these interviews centrally. Critical information from leavers about their reasons for leaving, especially from ethnic minority people, is being lost after people leave the organisation. These insights may be key to enabling you to identify where you need to progress as an anti-racist organisation.

3.4.5.   Race equality and anti-racism progress

Both the all staff-survey and culture interviews asked staff about the current state and progress that the Welsh Government has made so far in relation to anti-racism and race equality.

Perception of race equality at Welsh Government

We asked survey respondents to rate the level of race equality at Welsh Government:

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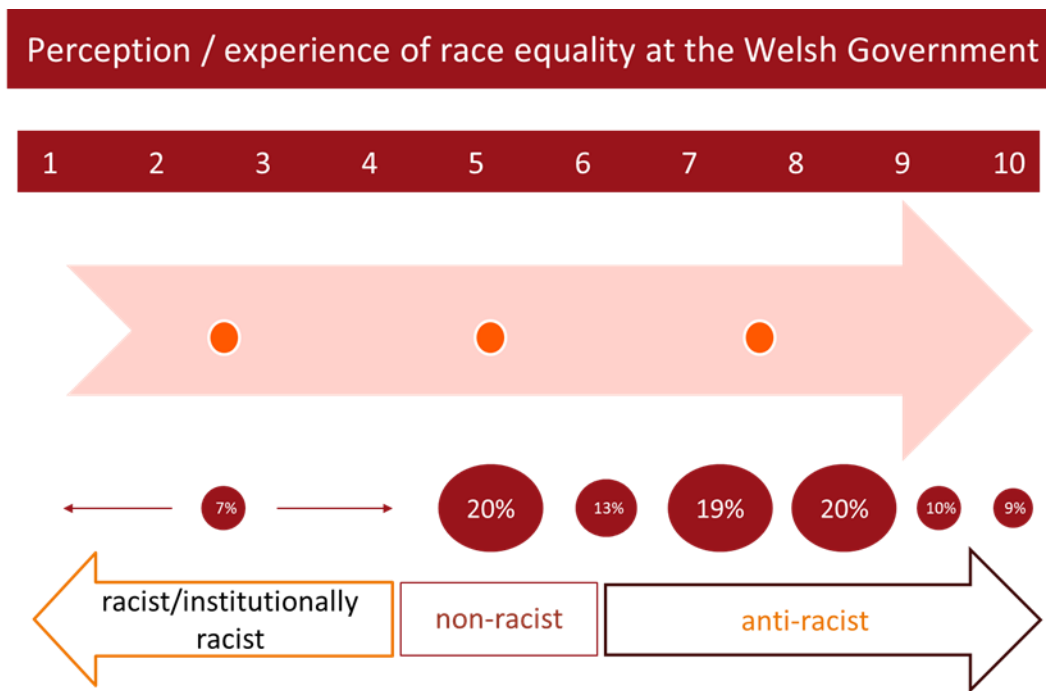
Figure 43: Survey respondents: Perception and experience of race equality at Welsh Government

Most survey respondents (93%) rated the Welsh Government as a non-racist or anti-racist organisation with only 7% of survey respondents rating the Welsh Government as a racist organisation.

Whilst this appears to be a positive statistic, we suggest that these ratings do not match the evidence of systemic and structural inequality that our review unearthed. We heard in two interviews that there may be over-reliance of the fact of the Welsh Government being 'progressive', with policies on racism and diversity, but that this doesn't necessarily translate into concrete actions with relation to systemic racism and institutional racism and overt racism".

> *"There is a narrative that Wales is extremely progressive, it's had an administration in charge for over 100 years which has always been identified with the progressive side of politics. As a result, it's seen that it's illogical for this progressive organisation to be capable of discriminatory behaviour or poor practice. I think that has to be challenged… That misnomer still continues."*
> **Culture interviewee**

We suggest that this measure is used as a baseline for future progress measurement although we note that greater awareness may initially lead to a higher incidence of lower ratings for the organisation.

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One interviewee highlighted the organisation's journey to become anti-racist, highlighting improvement thus far.

"I believe the organisation is on a journey of improvement to becoming anti-racist. I have seen a significant shift in recent years, with discussions about anti-racism becoming a common part of everyday business. I also see a visible commitment to action from our most senior leaders."

Role of leaders and managers

The role of leaders and managers was highlighted as critical for any form of cultural change. We agree that this is a key component of any organisational culture change. We heard that whilst there is significant and vocal support from senior leaders, some felt that there is a gap in commitment and understanding between senior leaders and middle management.

"So, in terms of a culture change, and there's always a lot of focus on leadership and leadership goals and something in their objectives and all of this sort of stuff. But it's not filtering down to the middle level."

"The lack of relationship between middle management and the senior leadership...It's a, it's a very, very big gap. And I just don't think that that respect exists, or acknowledgement of the work that the middle management tier does, and I think that's hindering the progress of the culture change that is very much clearly needed. "
Culture interviewees

Another individual felt that the role of the individual in culture change should not be ignored, that for cultures to change individuals need to change.

"The individuals with power and influence, you create that culture. Yes, it's at an individual level, not at an organizational level."

In the staff survey, we asked a number of questions around how line managers and staff at G7 grade and above support the behaviours needed for anti-racism to progress throughout the organisation.

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The staff at Grade 7 and above in my area are....

- ...role models for promoting an anti-racist environment: Ethnic minority staff 42%, Non-ethnic minority staff 65%
- ...knowledgeable about the barriers often faced by ethnic minority people: Ethnic minority staff 27%, Non-ethnic minority staff 44%
- ...able to demonstrate that they have considered potential differential impact on ethnic minority staff in their decision making process: Ethnic minority staff 22%, Non-ethnic minority staff 37%

■ Ethnic minority staff   ■ Non-ethnic minority staff

Figure 44: Survey respondents - Anti-racism and staff at Grade 7 and above

Ethnic minority staff n=93, non-ethnic minority staff n= 805

The data shows that ethnic minority have lower levels of agreement with these statements and that for all respondents, levels of agreement are below half for the following two elements:

- Senior staff's knowledge about the barriers often faced by ethnic minority people; and

- Senior staff's ability to demonstrate that they consider potential differential impact on ethnic minority staff in their decision-making process.

We found that responses to the same questions relating to line managers show a similar profile of responses, but that respondents are more likely to agree that their line managers exhibit these behaviours. We note there is some overlap between line managers and staff at Grade 7 and above.

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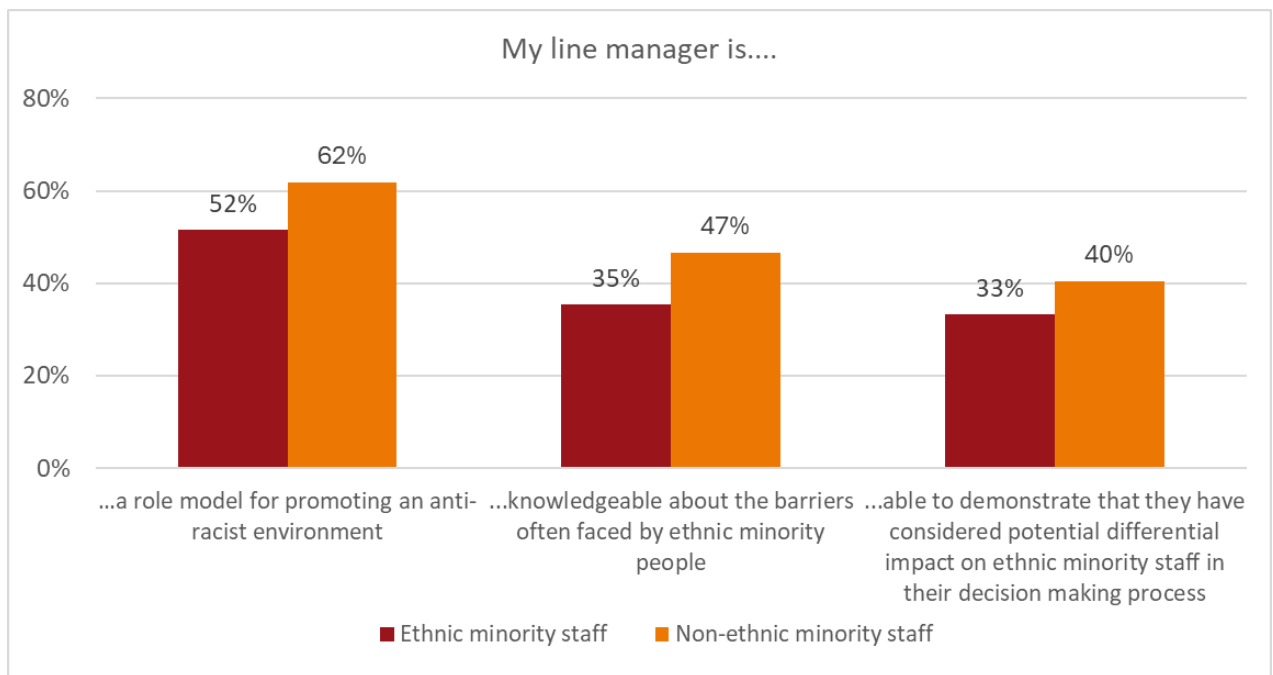
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Figure 45: Survey respondents - Anti-racism and my manager

Ethnic minority staff n=93, non-ethnic minority staff n= 803

In both cases, the levels of agreement from all staff respondents are relatively low. We suggest that these will be useful benchmarks to use to measure your anti-racism progress going forward.

Anti-racism within Welsh Government

The Welsh Government has made a clear stance on anti-racism – that of seeking Wales to be anti-racist by 2030. However, the work to become an anti-racist organisation is at its beginning. The findings in this report demonstrate that there is more that needs to be done. One interviewee noted that:

"People are still experiencing those things working for us, but all of the other stuff that sort of lies underneath that, the sort of assumptions"

Anti-racist training attendance

One of the mechanisms to build anti-racism within an organisation is through training and development. Elective anti-racist training has been available to staff since 2022.

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Course	Courses run	Delegates	Proportion of Welsh Government staff
Conversations on Anti-Racism	19	181	3%
Identifying and Challenging Discriminatory Behaviour	6	56	1%
Identifying and Understanding Microaggressions	6	61	1%
Safe Space Conversations	5	37	1%
Inclusive Workplaces	7	56	1%
Totals	**43**	**391**	

Figure 46: Anti-racism training attendance (April 2022 – December 2023) – EDI training summary

The table above shows the number of courses run, and attendees since it was offered in 2022 until the end of 2023. It can be seen that the proportion of staff who have attended this training is very low – between 1% and 3% of staff. We note that this is partly limited by the maximum attendance due to commissioned capacity is 43 sessions x twelve attendees = 516 per annum, and that some staff have observed waiting lists for anti-racism training.

We heard from staff that there is significant resistance from many in the organisation to attend this training and / or get involved in anti-racist work.

"But when they hear about a racism training, or, you know, anything relating to diversity, you can see their faces, sort of like you're wasting our time"

Understanding of anti-racism and individual differences

Questions in our all staff survey relating to anti-racism – both whether respondents understand what anti-racism is (90-95% agree) and having objectives related to anti-racism (75-76% agree) – exhibit high levels of agreement from both ethnic minority and non-ethnic minority staff – see chart below.

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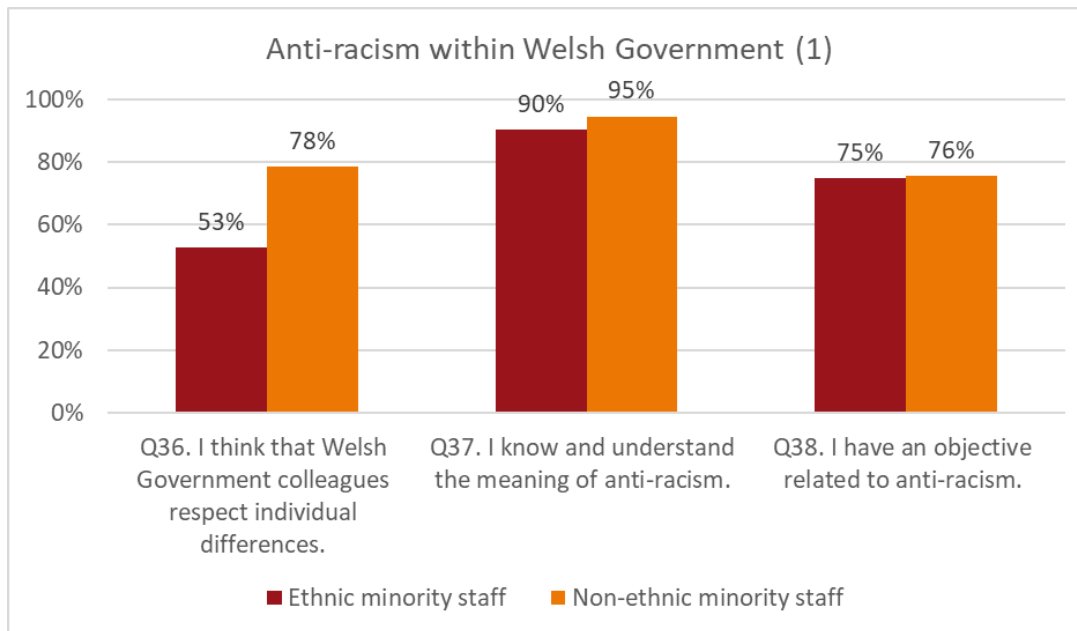
Figure 47: Survey respondents – Anti-racism progress (1)

Ethnic minority staff n=93, non-ethnic minority staff n= 734

That Welsh Governments respects individual differences has lower levels of agreement from ethnic minority staff responding to the survey. Only half (53%) of ethnic minority staff responding agreed with this statement about their colleagues at Welsh Government.

Further exploring this, we found that surveyed ethnic minority staff were less likely to agree that Welsh Government is making tangible progress in anti-racism as an employer but more likely to agree that they regularly see colleagues being anti-racist.

Figure 48: Survey respondents – Anti-racism progress (2)

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Ethnic minority staff n=93, non-ethnic minority staff n= 732

Examples of anti-racist actions or behaviours

In the all staff survey, we asked respondents to identify anti-racist actions they had taken or observed that were both externally facing and internally focused.

External-facing

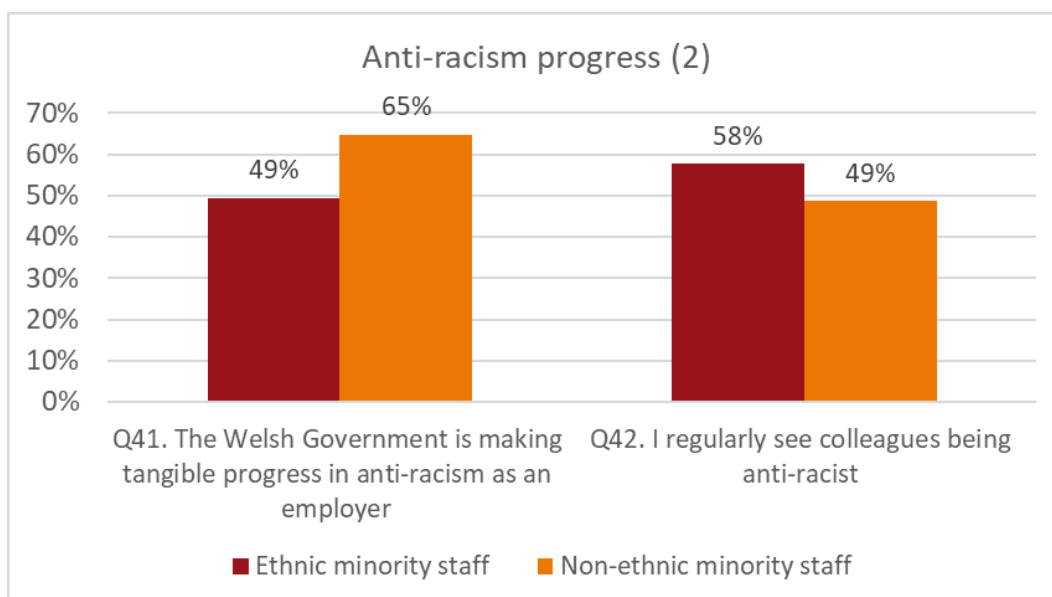Some examples of anti-racism related to policy development and external-facing activities:

- "I've definitely seen a difference in terms of policy-making and what we're doing for the people of Wales. [I'm not sure I've seen much of a difference internally]"

- "When discussing policy and evidence I and my colleagues are very conscious of intersectionality when considering the needs of children and young people, and the impact of policy."

- "Asking questions at senior policy discussions about how a proposed plan of action might affect people from ethnic minority backgrounds specifically and how any negative impacts could be lessened or removed"

- "Teams challenging policy areas to pro-actively seek out if/how changes support our Anti-racist Wales Action Plan ambitions"

- "Consideration of different housing need and barriers faced by individuals and families with a Black, Asian, Minority Ethnic heritage"

- "We have undertaken recently a project where we intentionally targeted ethnic groups, and asked them to undertake their own research in their own communities without the traditional heavy and prescriptive Welsh Government requirements!"

- "When I worked on a specific project, the lead actively sought advice from Black and ethnic minority experts in the field to ensure other voices were heard"

- "Creation of a decolonisation group."

Internal-facing

It seemed harder for respondents to identify specific, internally-facing anti-racist activities.

- "Challenging unintentional and intentional inappropriate word use and stereotyping and unconscious bias."

- "Being actively aware of unconscious bias risks in decision making"

- "Discussions re how people may feel disadvantaged and how the balance can be redressed."

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- "Staff descriptions of certain groups of people are called out and corrected"

- "Mentoring/coaching ethnic minority colleagues"

- "Colleague joined who was from an ethnic minority and she was encouraged and supported in taking forward positive steps to address barriers within Welsh Government both corporately and with policy colleagues."

- "Ensuring voices from the MESN group are heard and their ideas actioned"

Some of the examples above demonstrate a potential reliance on ethnic minority people to energise anti-racist progress for the organisation. This was supported by examples of ethnic minority staff being added to Anti-racist Wales Action Plan-related meetings without any explanation from their manager or any discussion. It felt to them like "oh, there's a brown person on the team, just put them on". We have also heard of meetings/projects around anti-racism that have been done with no participation from ethnic minority staff which may be perceived as decisions being made without inclusion of ethnic minority voices.

Individual actions to progress anti-racism

In the survey, we also asked people to identify actions that they have personally taken to advance anti-racism in the Welsh Government. Examples covered the following themes:

- Challenging or calling out racist behaviour or assumptions about cultural difference

- Acknowledging personal privileges

- Attending anti-racism training

- Joining MESN as an ally

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We asked non-ethnic minority people some questions to further assess the level of anti-racism we can observe.
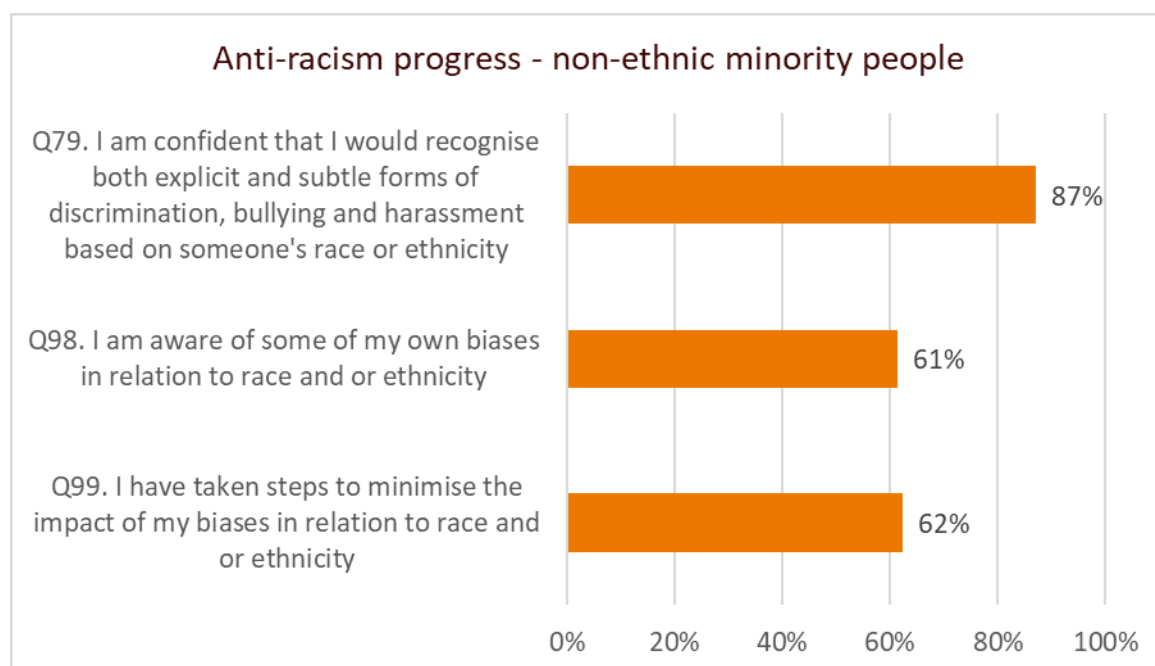
Figure 49: Survey respondents – non-ethnic minority staff personal anti-racism progress n=832

We found that 87% of survey respondents felt that they would recognise racism.

Whilst a proportion of survey respondents felt that they didn't have any biases in this area, over 150 responses gave examples of actions they had taken to minimise their biases. Examples included:

- reading and training and awareness sessions around race;

- considering own experiences and privilege;

- engaging with a wider forum of people to hear diverse viewpoints; and

- pause and question my own responses/avoiding snap judgements

One interviewee gave non-ethnic minority staff this advice to make a real difference, especially for those living and working in primarily ethnically homogenous spaces:

"You know, it's just about being curious. Be curious about your work. Be curious about other people. And it all will enrich you. You will find out lots of things, and you will think more globally, and you will think wider."

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A small number of survey respondents communicated a range of views criticising the Welsh Government's anti-racism approach and progress, and the Anti-racist Wales Action Plan specifically:

- **Lack of progress and actions** "Managers talk the talk, but I see no tangible outcomes" "Everything is very tick box here, nothing has any depth and there and non-ethnic minority people benefiting from this system."

- **Objection to the anti-racist approach** "As a civil servant, I object to the idea of being asked to sign up to a contentious and incoherent political agenda"

- **Anti-racist Wales Action Plan is unnecessary** "I've never seen people being racist or anti-racist at Welsh Government. People seem to crack on and get things done without a lot of specific visible actions."

For those who do not believe an anti-racist approach is needed, we encourage them to read our findings and consider whether there may be some more work to be done to ensure all staff have access to equitable opportunities and treatment within the Welsh Government.

One interviewee felt that the approach needs to be more specific in relation to the impact of racism, not just rejecting it for its 'offensiveness'.

"What I have noticed is the Welsh Government is very vocal in its rejection of racism per se but struggles to cope with conversations relating to racism. The same could be said for all the protected characteristics. The impact of racism on an individual is rarely considered beyond its offensiveness; learnt responses and actions are addressed in isolation and often regarded as individual characteristics, rather than outcomes of racist abuse."
Culture interviewee

Further actions to progress anti-racism

The following are the areas that ethnic minority survey staff prioritised in terms of further actions to progress anti-racism:

- **Increasing representation** – specifically ethnic minority leaders and reflecting the local population. In the meanwhile, ensuring that ethnic minority people are hired on the basis of their expertise, not as tokenistic appointments.

- **Increasing knowledge of racism, bias and conscious inclusion** – for example highlighting everyday racism so those who do not experience it can understand what it is and providing appropriate training on anti-racism – "start from the basics"

  o What is racism?

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o   Why does it exist?

o   Whom does it serve?

o   Why is it so hard to dismantle?

- **Enabling reporting to increase learning** – including more safety and effectiveness in reporting racist incidents

- **More visible celebration of different cultures** – not as a replacement for celebration of Welsh culture, but in addition.

3.5.   Discussion

The Anti-racist Wales Action Plan is a clear government priority, and there is commitment to anti-racism at the highest level in the organisation. Whilst this doesn't automatically translate into all staff being anti-racist in their approach, it does make it more likely that anti-racist behaviour will be embedded and supported within the Welsh Government. Having spent time with many of your staff, both ethnic minority staff and non-ethnic minority staff, alongside the responses in the all staff survey, we have seen that there is a real commitment to anti-racism from some staff. This is a positive foundation from which to build.

Culture interviews with current ethnic minority staff highlighted positive experiences:

- Recognition that that Welsh Government has changed significantly over the past thirty years for the better

- A feeling of positivity about the future as the younger generations coming through are speaking out about unacceptable behaviours which is helping to drive the positive evolution and hope that this current momentum will continue and lead to demonstrable and meaningful change

- There are examples of positive diversity, for example, in the apprenticeship programme.

Overwhelmingly though, this review has found that ethnic minority staff are less likely to feel that they belong within Welsh Government. They are more likely to be looking to leave the organisation, and many have experienced both explicit and subtle racism at work. Whilst not unlike many organisations who have carried out race equality reviews, there is clear evidence that there is a gap between the aspirations of the Anti-racist Wales Action Plan and the actual experiences of ethnic minority staff in the Welsh Government.

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Specifically, the level of racism currently experienced within the organisation, along with the findings around the lack of reporting, suggest that the Respect work currently being delivered has not 'filtered down' throughout the organisation.

3.5.1. Creating a culture of respect

The types of behaviour highlighted by staff can be seen as a form of harassment, and therefore fall within the remit of the Welsh Government's approach to bullying and harassment.

The Welsh Government has rolled out a programme called 'Respect – Give it, Get it, Lead it' designed to address the finding in their People Survey that the number of colleagues who reported feeling able to challenge inappropriate behaviour was below the UK civil service benchmark, and that female colleagues less likely to respond positively. This programme, designed to ensure that staff feel confident to challenge inappropriate behaviour, entails managers using a resource pack to conduct a conversation on the issue with their teams. There was also a two-hour Respect Leadership event, the aim of which was to send a strong message to staff from senior leadership that the Welsh Government is committed to addressing any unwelcome behaviour.

Relying on formal approaches for resolving issues is problematic as they do not suit more relational conflicts, and commonly result in complex and protracted grievance and disciplinary processes at great cost to all the individuals involved, and for the organisation[35]. The Welsh Government is to be commended for seeking to move towards a more informal approach to resolving these issues, and there is a strong consensus in the research literature that early and informal intervention is critical to both preventing and managing bullying and harassment[36]. However, individuals can encounter obstacles to raising issues informally:

- it can be particularly difficult when the accused is their direct manager, or a senior manager;

- managers and HR can still insist on a formal route because of the perceived 'protection' it offers; and

- managers can be reluctant to engage in informal resolution because they lack confidence or skills

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[35] https://www.acas.org.uk/seeking-better-solutions-tackling-bullying-and-ill-treatment-in-britains-workplaces

[36] Illing, J. C. C. M., Carter, M., Thompson, N. J., Crampton, P. E. S., Morrow, G. M., Howse, J. H., … & Burford, B. C. (2013). Evidence synthesis on the occurrence, causes, consequences, prevention and management of bullying and harassing behaviours to inform decision-making in the NHS.

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Accordingly, the problem with individualistic approaches to resolving disputes, even informal ones, is that they rely on individuals to raise the issue and managers to handle them well, which typically results in low levels of reporting[37].

A comprehensive and whole-organisation approach is therefore needed to create a culture of respect and civility in which issues are less likely to arise in the first instance. Where they do arise, both the person raising the complaint and those receiving the complaint need to have the confidence and skills to resolve the issue informally. A comprehensive review of the evidence identified a range of factors that are needed to create this culture[38].

3.5.2. Developing a culture of dignity and respect

In order to progress to becoming an anti-racist organisation, you will need to focus on developing a culture of dignity and respect. The contributing factors are outlined below:

Developing a culture of dignity and respect

Advisers, coaches and mediators

Bystander anti-discriminatory training

Management skills development

Inclusive and respectful senior leader behaviour

Team dignity, respect and civility training

Compassionate and psychologically safe HR

Effective policy and reporting

Figure 50: Organisational factors to be addressed to develop a culture of dignity and respect

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[37] Caponecchia, C., & Wyatt, A. (2011). *Preventing workplace bullying: An evidence-based guide for managers and employees*. Routledge.

[38] Jones, L., Boesten, J., & Riazuddin, H. (2019). Bullying and Harassment in Research and Innovation Environments: An evidence review

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Inclusive and respectful senior leader behaviour

Inclusive leadership is key to preventing issues arising in the first instant. It is predicated on behaviours which enable staff to feel empowered and to excel. Inclusive leaders acknowledge and welcome the contribution of others, and act on convictions and principles even when it requires personal risk-taking.[39] Senior leaders also have a responsibility for moderating the pressures they put on the rest of the organisations, as this can reinforce a pressurised climate.

Management skills development

Line managers need to be given explicit responsibility for preventing conflicts from arising and then to be given the skills they need in order that they can deliver this responsibility (Lipsky et al 2003).

Managers often lack basic training on how to listen and provide support, how to delegate, how to give feedback, how to manage performance and how to run consciously inclusive meetings.

Research demonstrates that in order for individuals to engage effectively with race inequity they need to feel that they have the positive capacity to do so[40]. It is therefore fundamental to ensure that participants understand the psychological, emotional and structural barriers to engaging effectively with race equity. They must also accept the practical changes to their perspective and behaviour which they can implement to overcome these barriers. A no-blame, no-shame approach is needed which promotes compassion and understanding and empowers meaningful action.

It is critical for managers to take the responsibility to develop their direct reports. We suggest that this is included as a topic in line managers' appraisals and should be included in promotion criteria.

Compassionate and psychologically safe HR

HR can be more effective in encouraging early and informal resolution if they treat an incident of bullying or harassment as a 'risk'. They can then take a systems approach which

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[39] Prime, J., & Salib, E. R. (2014). Inclusive leadership: The view from six countries. *Catalyst*, *120*.

[40] Trawalter, S., Richeson, J. A., & Shelton, J. N. (2009). Predicting behavior during interracial interactions: A stress and coping approach. *Personality and Social Psychology Review*, *13*(4), 243-268.

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seeks to understand all the factors that have helped to create the situation, rather than focussing on identifying an individual to blame (or defend)[41].

Effective policy and reporting

An effective Dignity at Work policy is one that enables the majority of issues to be dealt with informally. Though this is well known, research by the CIPD in 2020 found that amongst the members who completed the survey, the use of informal approaches had not increased in the past five years. Your Dignity at Work policy describes an informal process as the first step, where this is possible. You also note that 'In some cases, help from an independent mediator can help resolve problems especially those cases involving working relationships.'

Whilst we recommend that you continue to develop in line with a compassionate approach to HR, we also acknowledge the need for an effective formal reporting mechanism when needed.

We note that there is not much understanding of how and why to use the formal reporting mechanism, and that the support available does not appear to be well-known in the organisation. For this reason, we are recommending that you publicise the reporting mechanism laying out how to report – the informal approach, the formal process, and the support you provide – more widely. It may be helpful to provide a simple step-by-step guide and/or educational materials.

Given the weight of concerns over the current process, we also recommend that you carry out a case review of the existing complaints system, in order to understand why some people have experienced it as a protracted process that does not have clear, positive outcomes. Whilst we understand that decisions and processes relating to another individual will not be able to be shared in detail, it is important for the complainant to have some understanding of how the organisation has responded.

Reporting mechanisms

In order for a formal reporting mechanism to be used, there has to be confidence in this process. We have heard from many of your ethnic minority staff that this is not currently the case. Given the lack of confidence in the current process and the fear of reprisal or other negative effects when reporting an incident formally, we recommend that you pilot an anonymous reporting scheme alongside your existing process. This is strongly supported by MESN.

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[41] Reason, J. (2000). Human error: models and management. British Medical Journal 320(7237), 768-770

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The Civil Service whistle-blowing scheme found the following reasons for people wishing to use anonymous reporting:

> *"Almost two-thirds of the 78 people who gave reasons for raising their concerns anonymously said they did so out of 'fear of reprisal, recrimination or victimisation.*[42]*"*

Some examples of anonymous reporting mechanisms are The Bar Council ([Talk to Spot)](#) which has had success in collating serious misconduct[43] or the well-established Freedom to Speak Up Guardians system in NHS Trusts. We note though that an anonymous reporting mechanism is not a solution in and of itself. A review of the Freedom to Speak Up Guardians identified the following as being needed in place in order for the scheme to be successful[44]:

1. an early, collaborative and coherent strategy congruent with the values of Freedom to Speak Up;
2. policies and robust, yet supportive, practices; and
3. frequent and reflexive monitoring of implementation so that it is underpinned by sufficient time and resource allocation.

In order to use the information from an anonymous reporting system successfully, we suggest you use this mechanism to identify not only individuals who are acting inappropriately, but also parts of the organisation where more work needs to be done to develop a positive and inclusive culture. Considerations could be:

a) a minimum number of anonymous reports to 'trigger' an investigation;
b) triangulation with staff survey for that department, directorate, or group of direct reports;
c) staff absence rates; and
d) leavers/retention data;

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[42] https://www.nao.org.uk/press-releases/investigation-into-whistleblowing-in-the-civil-service/

[43] https://www.barcouncil.org.uk/resource/bar-council-response-to-serious-misconduct-findings-against-jo-sidhu-kc.html

[44] [Implementation of 'Freedom to Speak Up Guardians' in NHS acute and mental health trusts in England: the FTSUG mixed-methods study](#)

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Alternative mechanisms for ethnic minority staff experiencing racism

Two interviewees suggested offering an independent 'safe space' opportunity for people to discuss their experiences – critically, *external to* Welsh Government, as an alternative (or precursor) to the current reporting mechanism.

Placing this outside of the organisation removes the risk of people being labelled as a 'troublemaker' and also allows an informal mechanism before any further decisions are made in terms of escalation. Whilst this is offered via your Dignity at Work policy, this is not well-known in the organisation.

The fact that a number of our interviewees had never discussed their experiences of racism suggests that something needs to be done. Compulsory annual wellbeing conversations can also support a culture where people have a space to be heard.

Exit interviews

In order to ensure you gain insight from ethnic minority people who choose to leave the Welsh Government, it is important that you offer confidential, 'consequence free' exit interviews facilitated by people such as Dignity and Respect Advisers or relevant network or Trade Union representatives. You can then ask these advisers, networks and Trade Unions to provide themes for organisational exit on an annual basis.

Team dignity and respect and civility training

A systematic review[45] of interventions for bullying and harassment identified that a team-based more longitudinal approach was measurably successful in bringing about sustainable culture change. The Welsh Government approach of using line managers to facilitate a conversation with their team could be a very effective one. However, our findings suggest that these conversations may not have been happening consistently across the Welsh Government. Any training needs to cover what to say and how to behave when giving and receiving feedback. No mention is made at any point of racial microaggressions, although we recognise there is a separate training module entirely dedicated to microaggressions, although with a relatively small number of staff being able to participate due to its design as a small group session. Whilst it is helpful to have scenarios to provoke discussion, managers leading the session could be provided with examples of how to handle the scenario

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[45] Jones, L., Boesten, J., & Riazuddin, H. (2019). Bullying and Harassment in Research and Innovation Environments: An evidence review

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effectively. This could be available to share following the session so that staff across the organisation are receiving good quality and effective guidance.

Bystander anti-discriminatory training

Inaction by bystanders can lead to a perception that there is tacit support for the perpetrator. Bystanders therefore can play a vital role in addressing and managing bullying behaviour. Part of any staff training should be a strong emphasis on speaking up and speaking out. This though is dependent on staff having a perception of psychological safety in doing so.

"Team psychological safety is a shared belief held by members of a team that it's OK to take risks, to express their ideas and concerns, to speak up with questions, and to admit mistakes — all without fear of negative consequences. Psychological safety is very much influenced by inclusive leadership behaviour.[46]"

Whilst we understand that bystander training is already available, the uptake from within the organisation has been very low. For this reason, we suggest that this is integrated into other mandatory training so that its coverage is more consistent.

Advisers, coaches and mediators

Non-HR Dignity and Respect Advisers can either be an initial point of contact, or support during the informal / formal process. Having someone outside HR can make it easier for individuals to raise concerns and explore the best approach without having to be official. Properly trained mediators can be an alternative to formal complaints in more complex cases.

3.6. Recommendations

3.6.1.   Data and analysis

R3.1.   Explore how to capture a higher proportion of new-starters' ethnicity, including a targeted campaign to encourage people to share their ethnicity and other monitored characteristics, highlighting the significance of race and ethnicity due to the Anti-racist Wales Action Plan.

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[46] Edmondson, A. C. (2018). *The fearless organization: Creating psychological safety in the workplace for learning, innovation, and growth*. John Wiley & Sons.

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R3.2. Consider how workforce make-up reporting for higher grades (G6 and above) can be made more meaningful without sharing data unnecessarily, whilst low numbers of ethnic minority staff remain.

R3.3. Monitor the trends in leaver data, over three to five years, to identify whether retention of ethnic minority staff requires greater focus.

R3.4. Continue to monitor employee relations cases by ethnicity in order to identify where there may be any differences in experiences and/or process that need to be addressed.

R3.5. Continue to carry out equalities analysis on all annual People Survey questions and use this data to implement actions which ensure equitable experiences..

3.6.2. Compassionate approach

R3.6. Continue to promote and use informal resolution wherever appropriate, including encouraging open conversations in teams and between individuals. Where appropriate, offer mediation to support finding agreement on acceptable future behaviours.

R3.7. Encourage managers to seek support and guidance on diversity issues in confidence, from an appropriate coach, before the issues become more serious.

R3.8. Update the Dignity at Work policy to reflect the compassionate approach, for example the independent support available. Revise the language as appropriate, for example change 'complaint' to 'concern'.

3.6.3. Effective policy and reporting

R3.9. Review the existing complaints system in order to identify improvements to the process

R3.10. Publicise the reporting mechanism more widely, and the anonymous and confidential support available.

R3.11. Synthesize learning from informally and formally reported racist incidents in order to reduce their incidence.

R3.12. Pilot an anonymous reporting tool for reporting inappropriate behaviour.

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R3.13. Use data from multiple sources (reporting, anonymous reporting, absence, retention, staff survey) to triangulate potential areas of the organisation which require more targeted action around racism and inappropriate behaviour.

R3.14. Offer confidential 'consequence free' exit interviews facilitated by people such as Dignity and Respect Advisers or relevant network or Trade Union representatives. Ask interviewers to provide themes for organisational exit on an annual basis.

3.6.4. Anti-racist training, cultural awareness and Respect campaign

R3.15. Assess the impact of the Respect Campaign, and identify any shortfalls and/or where it can be improved or changed

R3.16. Ensure that anti-racism is threaded through all mandatory training and induction. Consider whether a specific focus on cultural awareness should also be included.

R3.17. Consider where specific anti-racist training with individual directorates or policy areas, is needed – either in response to a specific incident/group of incidents or feedback or because of its relevance to policy area. Commission anti-racist experts to design bespoke training specific to their context.

3.6.5. Promote internal capability to reduce racist behaviour

R3.18. Include explanation of micro-aggressions, how to respond when you experience or observe micro-aggressions and how to be an active bystander in all compulsory training such as induction and ongoing training around culture and inclusion.

R3.19. Design or commission a specific intervention to reduce the incidence of banter/inappropriate jokes. Consider using the real-life examples included in this report, and via experiences of ethnic minority staff, to demonstrate that 'this happens here'.

3.6.6. Increase comfort and knowledge around race and ethnicity

R3.20. Educate line managers about the barriers often faced by ethnic minority people, especially in relation to recruitment and progression (reference this report) and how to monitor potential differential impact on ethnic minority staff in their decision-making process.

R3.21. Include an inclusive leadership, with core anti-racist components and cultural competence knowledge and skills development module in all leadership training, including increasing comfort to have conversations about race.

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3.6.7. Showcase ethnic diversity

R3.22. Pro-actively showcase ethnic minority career progressors, role models and senior ethnic minority staff to combat unconscious biases around successful leaders being older, White and male.

3.6.8. Culture and engagement role

R3.23. Consider creating an internally focused role that is specifically focused on internal cultural change and engagement

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4. Recruitment and selection

4.1. Aim

The purpose of this area of the review was to ascertain if aspects of the Welsh Government's recruitment and selection processes could disadvantage ethnic minority applicants, thereby undermining your aim to reflect the population of Wales, and maintaining the historic underrepresentation of ethnic minority staff. In addition, your recruitment targets require you to attract ethnic minority applicants at higher proportions than their representation in Wales. It was therefore essential that we engaged with as many aspects of the recruitment process as possible to ensure a thorough understanding of where good or best practice already occurs and where changes could support the Welsh Government's aims of being actively anti-racist.

Specifically, we sought to:
- assess the extent to which your practices are aligned with good practice; and

- to what extent your practices have potential to either trigger bias, stereotype threat or other cognitive errors

4.1.1. Unconscious bias in selection

Many recruiters will be familiar with the concept of unconscious bias. Unconscious bias (UB) arises because of the way in which people's evaluative judgements about social groups result in stereotyping. Stereotyping is the process in which a subjective set of characteristics becomes associated with a particular group. The strength of the implicit associations which individuals may hold between particular social groups and positive or negative ideas or constructs can affect the decisions they make about people who belong to those groups. In selection settings, unconscious bias may be impacting most stages of a process, from the establishment of selection criteria, the content of tests, telephone interviews, face-to-face interviews, and assessment centres. In fact, any selection process in which people are involved in the design or operation of assessment may have some degree of unconscious bias in the decision-making.

There is a considerable body of research of the specific risks of bias affecting the different aspects of the selection process and the approaches that need to be put in place to mitigate this risk. In carrying out our review and in making our recommendations we have [drawn upon this body of evidence.](#)

4.1.2. Stereotype threat in selection

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Whilst many recruiters are familiar with the concept of UB, they are often less familiar with the concept of stereotype threat. **Stereotype threat** (ST) refers to *"being at risk of confirming, as self-characteristic, a negative stereotype about one's own group."* Research shows that performance can be harmed by the awareness that one's behaviour might be viewed through the lens of a group stereotype, because the attention and internal focus required to self-monitor to ensure that one's behaviour does not confirm the stereotype uses up cognitive capacity that should be focused on the actual performance requirements.

Stereotype threat can impact both participant and assessor. In an interview, a participant from a minority group may fear that they will be judged as being less able or verbally fluent, for example, whilst the assessor from a majority group may be concerned about being seen as biased – for example when having to pronounce a name that is unfamiliar to them. This leads both parties to be anxious and self-focused, affecting the performance of both. Stereotype threat can increase the anxiety in a situation that in and of itself is already anxiety-proving, and therefore doubly affecting performance.

For participants where there are positive stereotypes about their group, the reverse can happen – this is called **stereotype lift**. If the context signals that people like them do well here, then they relax and feel confident, which enhances their performance; for example a person whose gender and ethnicity matches the portraits of former and current board members.

Within the selection process there are opportunities for the unintentional triggering of ST in the way the organisation markets the role, communicates with participants, and carries out assessments. ST is triggered by anything that makes minority status salient, and this can include something that is said or done, but also being numerically underrepresented so that the individuals feel that their difference stands out.

4.2. Methodology

Initially, we had envisaged a review of key recruitment policies and procedures, as well as observation of the full recruitment process by following one or two 'live' recruitments through the process from advertising and application to shortlisting, interview and appointment. Unfortunately, it was not possible to follow all aspects of any 'live' newly advertised roles. Using the methods below, we were still able to gain a good understanding of the areas for improvement in recruitment and selection.

4.2.1. Data review

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We reviewed a range of data points relating to recruitment. The most important points are listed below:

- the numbers of roles, completed and non-completed applications;
- outcomes data for recruitment phases (where available) for historic and current recruitment processes; and
- performance against recruitment targets.

4.2.2. Desk review

We carried out an extensive desk review which incorporated:

- recruitment policy and related policies;
- all guidance/training for panel chairs and attendees;
- Civil Service guidance and background around recruitment;
- example job descriptions;
- candidate application form; and
- informal complaints about the recruitment process.

Feedback from this desk review is integrated into the findings section below.

4.2.3. Applicant experience review – desk review

To evaluate the experience of applying for roles at the Welsh Government, we 'completed' two application forms for live positions at different levels – the applications were completed as far as possible without submitting; insights were then gathered from that experience as well as from internal and external stakeholders who shared their knowledge, thoughts and experiences.

A member of our team 'applied' online for the following roles:

- Deputy Head of Health Economics
- Social Research Undergraduate Placement

Further information was requested on other 'live' recruitments after the application process. Additional information was supplied for the following posts; the depth of information varied however all had already been through the interview process:

- Deputy Chief Dental Officer

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- Regional Assistant Manager

- Senior Manager (Adults and Children Services)

4.2.4. Applicant experience – internal and external interviews

We wanted to obtain the perspective of individuals who had applied for positions within the Welsh Government. We were not able to talk to external candidates who had been unsuccessful in their recruitment attempts. We therefore gained insight from two routes: insight on internal processes from ethnic minority staff via culture interviews and in addition, we spoke with two individuals who are external to the Welsh Government but who have considerable connections with the Welsh Government in relation to external recruitment.

4.2.5. Interview observation

Six mock interviews were observed to help us understand the interview process in action and ascertain whether any aspects of the interview could be improved to make the procedure actively anti-racist and more accessible for ethnic minority applicants.

4.2.6. Survey

Questions assessing the experience and perceptions of recruitment were included in the all-staff survey.

4.2.7. Limitations

Our findings were impacted by a number of limitations:
- as discussed elsewhere, full recruitment outcomes data was not available for every phase of external recruitment. Granular analysis around success likelihood by interview question and/or exercise can be particularly useful to understand where disproportionality may exist;

- due to the small numbers of ethnic minority staff members at final recruitment stages, we were unable to draw significant conclusions from some historic external recruitment campaigns; and

- we were only able to observe mock interviews, not 'live interviews' and were also not able to observe a recruitment process from start to finish as hoped. We therefore relied on the mock interviews. This is discussed further below.

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4.3. Data

The ethnicity dashboard includes performance against recruitment targets.

4.3.1. Recruitment targets

Welsh Government External Recruitment target for ethnic minority people

You have set an ambitious target that 20% of new hires are ethnic minority people. Whilst the proportion of ethnic minority people recruited increased from 2020 to 2022, you remain some way from this target.

EXTERNAL RECRUITMENT	2020	2021	2022	2023	Total
Ethnic minority recruitment (incl. PNTS/Unanswered)	5.1%	5.4%	7.5%	3.7%	5.3%
Ethnic minority recruitment (excl. PNTS/Unanswered)	5.6%	6.0%	10.4%	6.3%	6.9%

Figure 51: WG analysis – performance against external recruitment target

We have raised some questions as to whether a 20% recruitment target is appropriate, given that it is only in Cardiff that this relates to the population. Calculating a realistic target based on the over-representation needed to increase historic under-representation will give a more robust rationale (see section on ethnic minority representation – forecasted time series above).

You have noted the difference in data when PNTS (prefer not to say)/unanswered is excluded. We recommend that for all data reporting, you exclude the undeclared/PNTS people from the overall proportions and provide it as a separate data point. We believe this will give you more reliable comparative data.

In addition, we suggest that waiting for annual monitoring is insufficient to make the step change in representation that you seek. For this reason, we have recommended quarterly (or in an ideal world - live reporting data) so that you always have a good feel for the direction of travel - making it quicker and easier for you to identify a need to intervene if you see a reduction in representation.

Internal Promotion Target for people from an ethnic minority background

You have also set a target around your internal promotion rate – to promote ethnic minority staff at a level which exceeds their Welsh Government population share, to address current under-representation at all levels of the organisation. You achieved this target in 2021 and 2022 but not in 2023.

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INTERNAL RECRUITMENT	2020	2021	2022	2023	Total
Ethnic minority recruitment (incl. PNTS/Unanswered)	3.6%	3.6%	3.8%	2.4%	3.4%
Ethnic minority recruitment (excl. PNTS/Unanswered)	3.8%	3.8%	4.0%	2.5%	3.6%

Figure 52: WG analysis – performance against internal promotion target

We also reviewed your internal recruitment by grade and ethnicity. This is discussed in 2.3.1 below.

4.3.2. Joiners/recruitees

Joiners by ethnicity is part of your Ethnicity Dashboard.

Ethnicity	Joiners /Recruitees 2022	Joiners /Recruitees 2022 excluding PNTS/Undeclared	Staff population 2022
Ethnic minority	7.5% (36)	10.3% (36)	3%
White	64.5% (312)	89.7% (312)	97%
PNTS/ Undeclared	28.0% (135)	-	
Welsh Government total	100% (483)	348	

Figure 53: Extract from WG Ethnicity Dashboard – 2022 Joiners with additions of data excluding undeclared and staff population comparator

We note that 28% of the joiners have undeclared ethnicity. On joining Welsh Government, staff are asked to share their information via a self-service HR system. We understand that since the implementation of the new HR system, declaration rates have reduced, and this may be due to a less intuitive mechanism for declaration. Lower declaration rates for new staff will impact on overall declaration rates and will also mean that accurate analysis of your progress will not be possible.

This is an important area, as low declaration rates will impact on all areas of monitoring. In addition, since the undeclared/PNTS people are included within the data, it is hard to see what proportion of people are from an ethnic minority as a proportion of all those who have shared their ethnicity. This is a general point that, in our view, it is always more helpful to include the undeclared/PNTS as a data point *outside* of proportions. If included within the data, especially where there are a high proportion of PNTS responses (as above), it can be misleading. The implications of the data above are discussed in the relevant sections below, alongside recalculations to exclude people with unknown ethnicity.

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Using your 2022 data, and removing the PNTS /undeclared people, we have calculated that 10% of the new starters (who shared their ethnicity) in 2022 were from an ethnic minority. This is higher than the equivalent staff population but lower than your 20% target for appointments. Over-representation in recruitment will consistently be needed in order to make significant progress on representation.

4.3.3. Recruitment phase outcomes data

Due to the lack of recent recruitment data available in the early months of this project, we initially reviewed historical outcomes analysis carried out on Promotion Gateways in 2021 and 2022 (for internal progression) and bulk recruitment events in 2020-2022 by ethnicity and other protected characteristics.

There were challenges and delays in getting data on the more recent recruitment processes, due to the implementation of a new recruitment system (CAIS) in 2023. After several months' delay, some data was provided for recruitment outcomes by ethnicity for recruitment in 2023 and early 2024

Because of the changes in recruitment systems in recent years, we reviewed outcomes data from three different systems. We discuss the data from each source below.

4.3.4. External recruitment – unsubmitted applications (new process)

CAIS Jul 2023-Mar 2024

In this period, you advertised the following types of vacancy externally:

Type of recruitment	No. of adverts	% of adverts
Fixed Term	16	13.2%
Permanent	54	44.6%
Public Appointment	47	38.8%
Secondment	4	3.3%
Grand Total	**121**	**100.0%**

Figure 54: Number of opportunities advertised externally Jul 2023 to March 2024

In the table below, we compare numbers of submitted and unsubmitted applications:

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Ethnicity	Applications 'considered'[47]	Unsubmitted applications[48]
Ethnic minority	266 (18.9% of known ethnicity)	44 (13.3% of known ethnicity)
White	1138 (81.1% of known ethnicity)	288 (86.7% of known ethnicity)
Prefer not to say /not completed	317 (18.4% of applications)	1573 (82.5% of all applications)
Total	1721	1905

Figure 55: Comparing submitted ad unsubmitted applications by ethnicity

We can draw a number of conclusions from this data:

- Roughly half of people who begin applications, complete them and submit

- Since the monitoring form is the last phase of the application, many of the applications which were not submitted unsurprisingly do not have an ethnicity entered.

- We know that 44 ethnic minority potential applicants did not complete their application or withdrew their application. Given that there were 1573 uncompleted applications with unknown ethnicity, this number is likely to be higher.

We believe it would be useful for you to have some insight into *why* around half of people do not complete the application – changes to the application process or support to complete the applications might increase the proportion of people completing which will offer you greater access to potential employees. At a minimum, it would be helpful for you to have visibility of that point at which people are 'dropping out' of the application process. This will indicate what you should review as a priority.

You have already identified one potential reason for application drop-outs. When it was first launched, adverts on CAIS could not be fully viewed (specifically the details of the behaviours being tested) until potential applicants were logged into the system, so anyone viewing the full advert would have been considered to have started an application. This issue has now been resolved.

We also believe that it would be particularly useful for you to gain this information from ethnic minority candidates. This could potentially be done by pop-up boxes asking for

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[47] Applications considered: all applications that were submitted, excluding those that were withdrawn.

[48] Unsubmitted applications i.e. all applications that were started, whether or not they were submitted minus applications considered.

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feedback, or asking for contact details at the beginning of the application form, with permission for Welsh Government to contact even if they do not decide to pursue the application.

Consideration could also be given to asking for demographic information earlier in the application process meaning that it would be possible to analyse whether and which minoritised groups are more or less likely to discontinue the application process.

Appoint 2023

We note the following similar findings from the Appoint data set. Of the 6393 applications started on Appoint, 2820 (44%) applications were completed (and therefore 'considered'). Of these 6393 applications started, only 40.4% provided their ethnicity. Of those who shared their ethnicity, 11% of applications were from ethnic minority applicants.

4.3.5. External recruitment outcomes – new process

CAIS – new recruitment system

CAIS was in use for most recruitment from July 2023 and all from July 2024. This data only became available in June and July 2024.

Full recruitment phase outcomes were not possible for CAIS within this report's timeline. We understand this was due to a combination of:

- access being limited to individual employees in certain roles;

- knowledge of the new recruitment system;

- initially also reliance on one person's expertise; and

- the complexity of connecting individual recruitment phases to phase outcomes. This complexity has increased since you have moved to a manager-led recruitment approach where a range of different approaches can be taken for each recruitment exercise. This, combined with how this information is recorded in the system makes it difficult to provide outcomes data for any steps between sift (iii) and overall pass rates (iv) such as specific interview type or test.

You were therefore only able to provide recruitment phase outcomes for:
  i.   Applications started
  ii.   Applications considered
  iii. Applications progressing to sift
  iv.   Passed recruitment process

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v. Offered a post

You think that it may be possible to pull these together into an overall picture in the future, but the complexity in the data requires resource (people and time) to help understand that complexity in order for analysis to be meaningful. We have recommended that you ensure that this is in place and that a potential solution, given the differences in individual recruitment exercises, might be a parallel analysis that allows outcomes data by recruitment activity.

It is critical to monitor the missing recruitment outcomes data to identify what targeted activities might be needed to ensure equity, and as a check on where biases might exist within your recruitment process –in particular, interviews and the role of testing. This is especially important given the significant changes in the recruitment process since the end of recruitment to grade processes, now replaced by recruiting to role.

CAIS outcomes data (July 2023-March 2024)

Since CAIS is now the current recruitment system and recorded the majority of recruitment outcomes from July 2023, we consider this to be the most representative data.

We reviewed external recruitment data from CAIS ((July 2023-March 2024) for 1721 applications. This includes applications from 266 ethnic minority people.
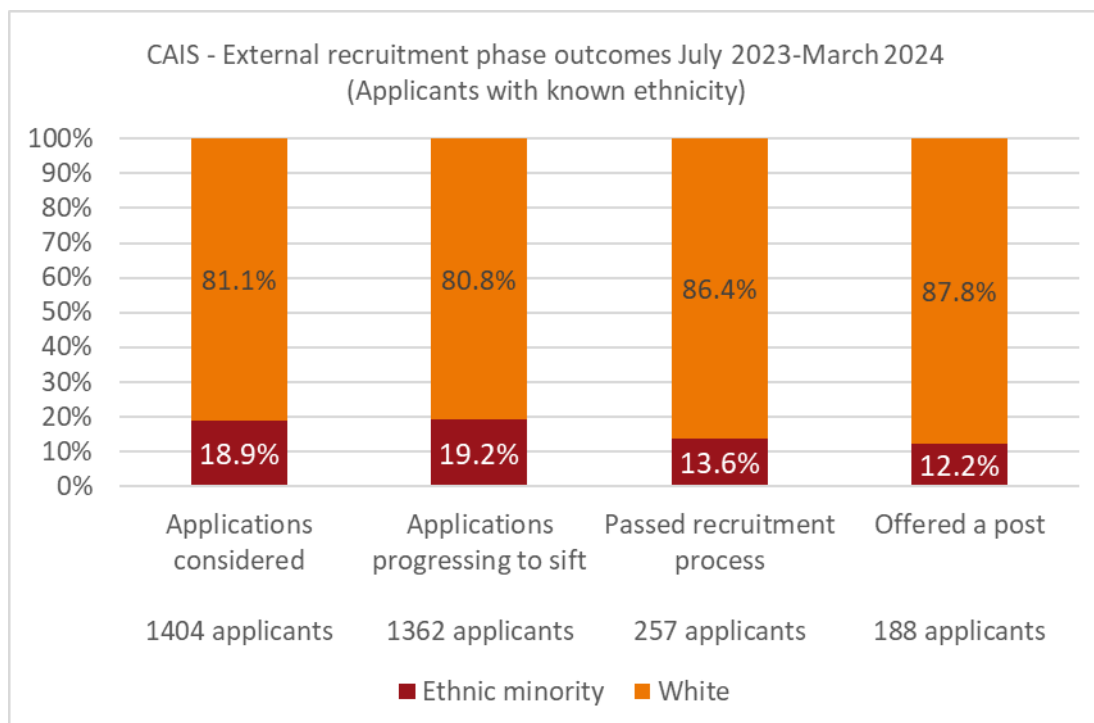

Figure 56: CAIS external recruitment phase outcomes by ethnicity

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18.9% of applicants were ethnic minority applicants – this is nearing the 20% target for all external appointments at Welsh Government. This is positive and suggests that on average you were able to attract ethnic minority candidates to apply for these roles.

This data shows that:
- ethnic minority candidates maintain their representation percentage to White candidates in the progress to sift stage (18.9% to 19.2%);

- are less likely to pass the recruitment process (which could be sift and interview, or could have other phases) (19.2% of candidates reduces to 13.6% after interview); and

- have a slightly reduced likelihood of being offered the post i.e. were unlikely to be the highest scoring candidate who passed at interview (13.6% of candidates reduces to 12.2%).

In the data we reviewed, 261 ethnic minority people progressed to sift and 35 passed the recruitment process. If the same proportion of ethnic minority people had passed the recruitment process as White candidates, this would have resulted in a total of 53 ethnic minority candidates passing.

Representation by grade

We reviewed your analysis on the proportions of staff externally recruited, by grade from 2020-2022.

Due to small numbers of ethnic minority staff members in some grades, we are not able to share this data. However, some broad conclusions can be outlined:
- 2022 saw the highest proportion of recruitment of ethnic minority staff in more than half of all grades.

- External recruitment of ethnic minority staff was below the 20% target at almost all grades for each year.

This demonstrates that whilst there appear to be some positive progress, there is more consistent work needed to continue to meet your aims.

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4.3.6. External recruitment outcomes – 2023 and earlier

Appoint outcomes data by phase (2023)

Your previous recruitment system, which was no longer used from July 2024, was only used for SCS and some other types of recruitment from July 2023 onwards, and therefore the conclusions we can draw for all recruitment are limited.

Appoint data did allow analysis by all recruitment phase outcomes. We understand that processes around the Appoint system were actively managed by the HR team so there was the ability to ensure that data quality was consistent.

We reviewed external recruitment data from Appoint (2023) for 2820 applications. This includes applications from 259 ethnic minority staff.
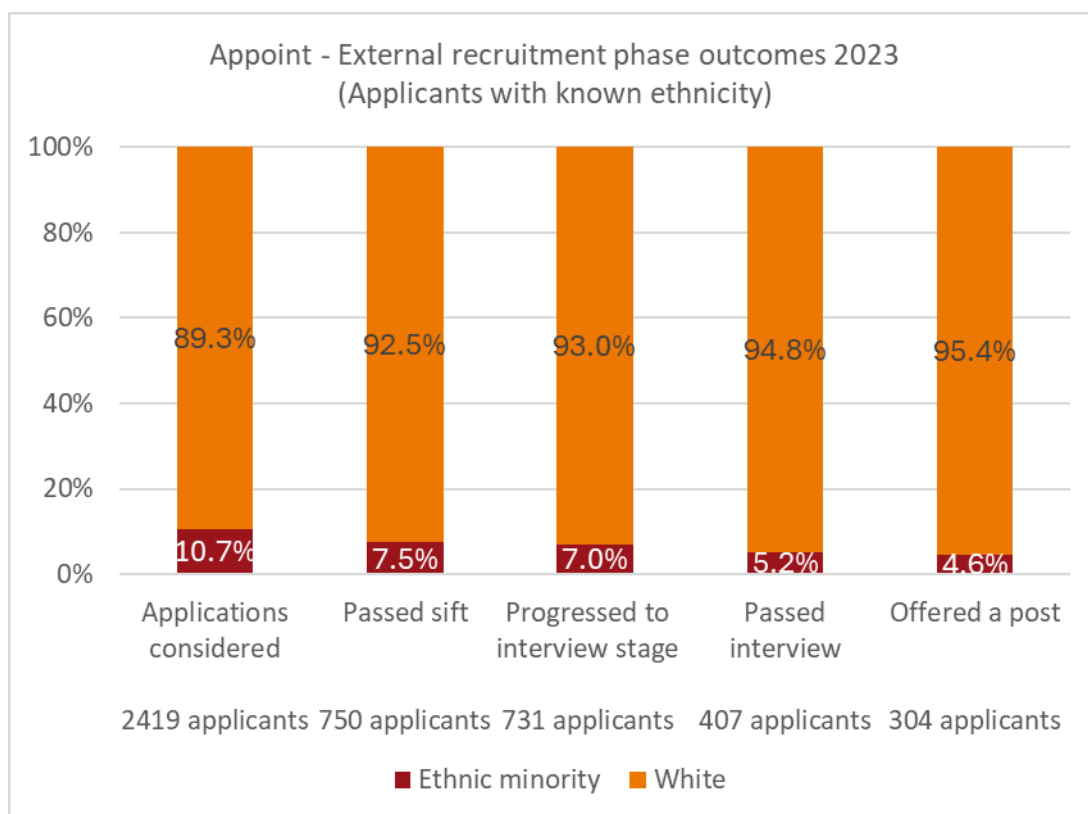
Figure 57: Appoint external recruitment phase outcomes by ethnicity

Outcomes data provided from Appoint has a little more granularity than CAIS as it separated sift, interview, and offer phases more straight-forwardly than CAIS was able to when it was bedding-in. Data was not available on test or assessment pass rates. This data is for a different period and shows a lower starting proportion of ethnic minority candidates

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(10.7%) than CAIS data. This difference may well be as a result of the type of recruitment activity that Appoint was used for.

Using this data, we see a greater proportional drop-off of ethnic minority candidates, both at sift (10.7% to 7.5%) and interview stage (7.0% to 5.2% of candidates), and a smaller drop-off from interview to offer (5.2% to 4.6%). In the data we reviewed, 51 ethnic minority people progressed to interview and 21 passed the recruitment process. If the same proportion of ethnic minority people had passed the interview as White candidates, this would have resulted in a total of 29 ethnic minority candidates passing interview.

Historic bulk recruitment campaigns

For these processes, recruitment phase outcomes were recorded and analysed. Data was provided for recruitment outcomes for three external recruitment campaigns from 2021-22:

- Fixed Term Appointments

- Apprenticeships

- Senior Civil Service recruitment

Some overall conclusions, that should be tested in future recruitment phases, are as follows:

- for these campaigns, 12% to 14% of applicants were ethnic minority applicants. This is lower than your most recent recruitment analysis (where 18.9% of considered applicants were ethnic minority people) suggesting that you have improved your ability to attract ethnic minority applicants; and

- for some campaigns, the numbers of ethnic minority candidates at later recruitment phases were too low to draw conclusions

The main conclusion drawn from analysing your recruitment outcomes data over time is that a more granular approach is needed to understand fully what is happening through recruitment processes.

For example, the data for your historic SCS campaign and your more recent Generic Team Support (TS) roles, suggest that targeted campaigns can enable you to attract appropriately high-quality ethnic minority candidates when a specific effort is made. In particular, in this recent campaign, you used strengths questions for four of the interview questions so that candidates didn't have to rely on their previous work experience. We note that whilst we have recommended you not using strengths questions where candidates have relevant work experience, this method may be useful for entry-level roles.

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We have observed that in some campaigns there has been a lower likelihood for ethnic minority candidates to take up posts, or lower proportions of ethnic minority applicants in the first place.

These findings suggest the importance of analysing recruitment by campaign and/or job family. This will also allow you to develop a more nuanced approach to recruitment targets and recruitment phases. For example, for some roles or specialisms, benchmark ethnic minority population may be higher than the 20% target you set, for other roles, 20% may be inappropriately high.

4.4. Findings

Our findings work through the recruitment and selection process, starting at outreach and adverts, moving through to interviews and feedback. After this, we address some overarching elements such as training for panel members.

4.4.1. Outreach activities

You are committed to taking proactive steps to increase the extent to which you represent the diverse communities of Wales.

> *"Fairness is one of the Welsh Government's values and underpins our approach to recruitment and development. Fundamental to this is equality, diversity and inclusion (EDI). We are committed to ensuring our workforce represents the diverse communities we serve… We know that the Welsh Government Civil Service is unrepresentative of people and communities in Wales. By 2026 we aim for 20% of people we appoint externally will be from ethnic minority backgrounds."*
> **From: Outreach guidance for external recruitment 2023**

The Welsh Government Outreach guidance for external recruitment 2023 states the job advert "must be drafted in a way that ensures it attracts the widest possible pool of candidates". It sets out clearly that the Welsh Government has targets for recruitment in relation to disabled people, ethnic minority people and women in senior civil service roles, making it clear that recruiting managers have a major role to play in the Welsh Government achieving those targets.

The responsibilities of managers in the recruitment process are significant, and we heard that some of the actions set out in the 'External recruitment outreach standards checklist' were not consistently completed by recruiting managers (Appendix A of the Outreach Guidance). In addition to the usual expectations for recruiting managers in many sectors of

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drafting a job advertisement, considering and discussing marketing, choosing an appropriate panel and ensuring appropriate adjustments are in place; the outreach guidance checklist also states the Social Model of Disability guidance and Anti-racist Wales Action Plan should be read with possible additional training on Learning Lab, that virtual and face to face recruitment information sessions should be considered, decided beforehand and included in the advert.

Given this, not only will it be important to ensure recruiting managers have the skills and confidence to assess the diversity of their teams, and having done that, be able to be specific about which groups are under-represented in their department/team; more managers will also need to seek advice about their strategy from the Equality and Diversity in the Workplace Team (EDWT). It is noted that currently, one of the roles of the EDWT is to advise and/or support recruiting managers to carry out their own outreach, though we understand not all managers contact them. We suggest that the EDWT are resourced to take a more pro-active approach, where they can highlight the following to recruiting managers:

- information about under-representation specifically related to their new role or specialism;

- what type of outreach and/or other adjustments will support them to design an effective recruitment process that will be most likely to attract the most diverse groups of applicants; and

- The Civil Service Commission (CSC) requirement that the "Panel Chair approves an advertising strategy that sets out how a strong and diverse field of applicants will be sought" is a necessary one that should be encouraged and monitored for impact.

Information sessions

The EDWT currently runs information sessions for candidates (both in person and online) during recruitment campaigns and before application deadlines.

The sessions, which are advertised by local stakeholders, take the potential candidates through the recruitment stages so that they know what to expect from a process that may be very different from anything many have previously encountered. The sessions are based on the External Applicant Guidance but go beyond that document by giving the potential applicants an opportunity to ask questions.

It is believed internally that the sessions do increase applications from ethnic minority groups, which was echoed by external stakeholders. Having someone to speak to from the Welsh Government seemed to be a critical factor as well as that individuals leave knowing

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how to structure the application, what's important within the application, understanding the behaviours needed for a role, and how to draw them out in the application. We heard from one of your local stakeholders that individuals never name the Welsh Government as an employer of choice. They felt that there is very little understanding of the range of opportunities available in the Welsh Government, unlike many of the local employers where the types of job, particularly starting positions, are more obvious. This underlines the importance of information sessions for attracting those who would otherwise not have considered the Welsh Government as an employer.

Unfortunately, due to resources, these sessions organised centrally usually only happen for larger recruitment campaigns, and 'in-person' sessions often only take place in Cardiff. In addition, these information sessions are often primarily advertised via the Civil Service website and may not be found by potential candidates unless they are directed there.

In the Outreach Guidance, Managers are encouraged to hold their own information sessions, but given the time investment this appears to be rare. The answer to this seems to be that the EDWT organises and advertises information sessions, then recruiting manager/s can 'just show up' at the end of a smoothly organised process. However, we note that the EDWT is a small team and is likely to need more resources to coordinate more outreach activities.

During the application process, a question is asked about where people heard about the vacancy, listing various avenues. This list does not currently reflect your wider outreach approach, so we have suggested that you review that list to ensure that you can measure the impact of the information sessions and other outreach activities.

Spreading the word

The EDWT shares job adverts with several equality-focused local organisations, as well as Careers Wales. During a recruitment campaign, the adverts are shared several times with these external stakeholders, and the organisations are actively encouraged by the EDWT to share the adverts with their customers/contacts. The EDWT also supplies them with the External Applicant Guidance so their advisers and workers, such as the Employment Advisers at Careers Wales, can share the information in a similar way to the information sessions delivered by the EDWT.

As all public sector organisations are trying to advertise widely and recruit diverse staff, the idea of shared outreach has been discussed. This could mean Welsh Government jobs being advertised across the public sector – everyone promoting each other's jobs – allowing the

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most to be made of resources. This was proposed in the recent Wales Centre for Public Policy paper [Increasing workforce diversity across public services | WCPP](#).

The **Ffair Jobs Community Jobs Compact** is one of the initiatives the Welsh Government connects with to support individuals in getting jobs in the Welsh Government. They bring local people and employers together with the aim of "tackling poverty, unemployment, and underrepresentation in the workforce". One of the CIC's main areas of work is building relationships with local employers to give local people the best chance of getting employment with those organisations.

Increasing access

External stakeholders perceive a lack of flexibility in the Welsh Government recruitment process. It is seen as a system where 'one size fits all' which, given the range of jobs and the differing levels of knowledge, skills and experience required, does not seem appropriate. We echo these findings and are recommending a more nuanced approach where the type of recruitment process (including outreach and selection) differs based on the seniority and type of role.

We heard that feedback is often positive from those who have gone through the Welsh Government recruitment process and received a job offer, though some of those individuals have also shared challenges which nearly stopped them from applying.

External applicants highlighted the following in relation to the application process:

- applying to Welsh Government is a long and arduous process;

- it seems like people have an advantage if they know someone who is working in the Welsh Government or Civil Service;

- it is difficult to meet the expectations of the Civil Service Behaviours (Success Profiles framework) unless you have someone to advise you from within the Welsh Government or Civil Service;

- the application and the evidence levels required put off individuals from applying as it feels like there is a low probability of getting through the first stage;

- the language and terms used are often unnecessarily complex, when the expectation of criteria is simple (and could be easily met); and

- key skills needed are not stated clearly (there is sometimes a level of detail included in the criteria list which is unnecessary).

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In summary, the aspects above make it less likely for individuals to complete an application, as the effort involved and their confidence level may be reduced even for jobs which they should have a very good chance of getting shortlisted for. This is summarised by the following quote:

"Jumping through hoops for the lowest band jobs"

External Stakeholder Ffair Jobs CIC would like to see those applying for work in the Welsh Government not need the level of support currently required for the lowest band jobs available. The issue being that they can apply for jobs at similar levels elsewhere without having to "jump through all the hoops" that are needed for the Welsh Government. We heard about how much time and effort it takes to complete a Welsh Government application and the 'what's the point?' feeling when you are already unsure if you could even 'get in'. The logical solution being to spend the time going for multiple roles, in the time it takes to complete one Welsh Government application.

We heard from external stakeholders that changes to the recruitment process, some quite small, could potentially open up many opportunities for greater numbers of ethnic minority people to apply and subsequently be employed by the Welsh Government. We are aware that some of the other employers Ffair Jobs works with don't just hold an initial event, but follow up with active encouragement towards individuals to put in applications and, some with interview practice by organising mock interviews. However, external stakeholders recognise that would mean a much more resource-heavy arrangement, which could be difficult for the Welsh Government to achieve.

The rigidity of the process, particularly for lower band jobs, stops some people applying and certainly puts people off who haven't previously considered the Welsh Government as an employer. This includes those who are least likely to see themselves reflected in the current staff of the Welsh Government; for example, ethnic minority people.

You told us that you had used a simplified application process for your recent entry-level recruitment and that you felt this had been a success in terms of diverse applicants and appointments.

Welsh language

Though there is no requirement to speak Welsh in most jobs in the Welsh Government, and we believe that the *Welsh Government jobs: External candidate recruitment guidance document (July 2023*), could state this more clearly.

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The 'Welsh language' section rightly sets out the ambitions for increased numbers to speak Welsh, and the importance of the Welsh language in Wales generally and the Welsh Government particularly. It would be easy to miss the words "for our staff to *start learning*…" which indicates that speaking Welsh or speaking Welsh well is *not* a prerequisite to getting a job with the Welsh Government:

*"We want to support our employees to improve their language skills at all levels. We have many opportunities for our staff to **start learning** or brush up on skills they already have."*

We heard that a perception around the level of Welsh required to work at the Welsh Government may be putting people off from applying for roles.

"I wasn't going to apply for the Welsh Government because I don't speak Welsh, I think they should make it clear you just have to be willing to learn Welsh. It was because of friends who work for (the Welsh Government) that I applied".
Interviewee in a culture interview

This could be stopping many people from applying for Welsh Government jobs, but for ethnic minority people who already experience reservations in applying to the Welsh Government, this could cement the belief that there is 'no point applying'. We understand from you that speaking multiple languages (including Welsh, but not exclusively Welsh) is seen as a positive benefit. It would be helpful to make this clearer in your external communications and outreach.

You have used, and plan to use a number of activities which relate to pro-actively increasing the proportion of ethnic minority staff. Many of these relate to increasing the number of ethnic minority candidates via outreach and targeted support for ethnic minority staff through the recruitment process.

As we have explored in the section above, you have been carrying out a number of outreach activities to increase the number of ethnic minority candidates. Your most recent data (2023-24) shows higher proportions of ethnic minority candidates applying for roles. This proportion (18.9%) is approaching your overall recruitment target (20%). Your recent entry-level roles recruitment campaign saw 15% of applicants and 19% of successful applicants being ethnic minority candidates.

However, you do not consistently monitor how effective your outreach activities are, and which activities are more impactful than others. We recommend that you begin monitoring via the application process so that you can you analyse and better understand the most successful outreach initiatives (such as information sessions), and enable resources to be targeted at those most effective methods.

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We note that in order to address wider questions of attraction, you will need to consider how to respond to feedback from one of your outreach partners that Welsh Government is not mentioned as an employer of choice, and that people are not aware of the diverse range of opportunities available. They would also support your proposal and consideration of providing more support to applicants throughout the application process.

4.4.2. Applicant experience review

Having reviewed the applications process as an applicant and via desktop review, we note that there are several aspects of the application itself that may be off-putting or that are unhelpful for people who are applying for the first time, or those who have little prior experience of Civil Service or similar roles. Given that ethnic minority people are under-represented in the Welsh Government (compared with the population), ethnic minority people are less likely to have this prior experience.

"I don't really want the stress of (applying for another promotion). Trying to go through an application which is so, so very involved... and, it's emotionally a lot, it's very involved."
Culture interviewee

This quote is from a current member of Welsh Government staff. Though not the issue for this individual, it reflects the feelings of many people who would like to join the Welsh Government but due to a lack of confidence of 'fit', do not consider the time investment worthwhile.

The main areas of concern:

Referees and Employment History

The request for "two referees covering at least the previous three years of employment" and "detail your employment experience starting with your current or most recent (maximum of five)" will create a difficulty for some. Two referees covering three years alongside a maximum of five employers over three years will not be possible for everyone, particularly those who have had less stable employment or short contracts. Given the current situation in the UK with high levels of zero-hours contracts, part-time work and short contracts, which are often over-represented by roles ethnic minority people, these requirements could be overtly exclusionary.

The requests themselves could feel like judgments. The External Candidate Guidance appendices on completing the application form cover a number of potential circumstances, such as never having been employed, but do not include this scenario.

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We recommend that you consider what is needed in terms of referees and employment history and compose these questions appropriately to avoid limiting the ability for these sections to be filled in by everyone.

Education and professional qualifications

It would be helpful to state a little more about what qualifications are needed. As it currently stands, every GCSE could require the candidate to "add another instance," which would be a very repetitive and time-consuming exercise. If every instance is required, the fact that you need to enter each qualification and place of study separately would be a tiring start to a long application especially if someone has ten or more GCSEs.

Equality and diversity data monitoring

Welsh Government follows Civil Service guidelines and the equality and diversity monitoring questions are set by the wider Civil Service to allow for comparison. Monitoring is aimed at increasing the proportion of staff from under-represented groups.

However, the outstanding feature of the Equality and Diversity Data form is the number of questions asked to ascertain socio-economic background.

While we understand the reasoning behind asking these questions, we feel that the benefit of comparison through monitoring may be limited as compared to the potential impact on candidates.

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Figure 58: Screenshot of extract from Equality and diversity data form

The sheer number of questions suggests a major level of importance is being placed on this particular aspect of an applicant's background. Some of the questions are also potentially difficult to answer with regard to memory and communications within a household. If someone was brought up by grandparents or others who were not working, or was brought up in care, this level of questioning could be considered traumatising. They certainly will embed any belief that your class/socio-economic background is central and the likelihood of the need to 'fit' the stereotype view of those who work in Government office is true – 'White and middle class is the right fit'.

If these questions are to be included, a clear rationale should be included and assurances that their responses (or lack of responses) will not impact on assessment. This also applies to questions relating to caring responsibilities and national identity to ensure that they do not imply to candidates that there is a 'correct answer' and therefore can be off-putting.

Civil Service

The early reference to whether or not you are or have ever been employed as a civil servant is potentially off-putting. We understand that this question is sometimes needed to exclude existing civil servants depending on the type of role. However, as this reasoning is not explained and the question comes before the individual has had the opportunity to list their employment history, it can appear to the applicant that answering "No" to that question will be a disadvantage. Ideally, the form would ask about employment history and then, ask if any of those jobs would fall under the Civil Service, with the definition and rationale provided.

"As much information as possible"

The request to provide 'as much information as possible against each field' in reference to areas which were not mandatory, because they may not be relevant to candidates, did not seem helpful for those not used to completing applications like this.

There were other concerns about different aspects of the monitoring form which were outside of the scope of this report.

4.4.3. Shortlisting

"It's done properly here. I've had private sector experience too. The private sector goes by (a person's) name. Here it's name-free, all can apply, (it's) a fair and open competition."
Culture interview quote

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In the majority of cases, data analysis did not point to shortlisting as a phase that required particular focus since similar proportions of ethnic minority candidates passed the process in the current recruitment data outcomes data and some historic recruitment data points.

Since we were not able to observe the live sifting/shortlisting process, we have based our findings on the **External Candidate Recruitment Guidance** provided.

"Sift" is only mentioned in relation to CVs and 'shortlisting' in relation to what will stop you getting shortlisted. There is a positive statement about what can increase the potential of being shortlisted including 'ordering'. It is very possible therefore that recruiting managers and panel members involved in sifting are not properly considering applications that are unordered or not ordered in the expected way. If there is such an expectation in relation to layout, there need to be clear instructions on the application form and application guidance, such as 'appropriate numbering of evidence/criteria is expected to ease the assessment of the application'. Without this, there is no way for candidates to know they could be marked down or possibly not marked/shortlisted at all. The other alternative is to remove reference to 'ordering' from the guidance and consider all applications equally, regardless of the ordering.

4.4.4.   Interviews

Our initial plan was to observe recruitment interviews for live posts, with either internal or external shortlisted candidates. When it became clear that this was unlikely to happen for a variety of reasons including data protection and the difficulty of panel members and applicants agreeing to be observed, we discussed and agreed with our working group that mock interviews would be helpful instead.

Six virtual mock interviews were observed, most were recorded and all transcribed. All involved Welsh Government staff who volunteered to be panel members and applicants. All of those volunteering as panel members were experienced in the recruitment process. At the end of the interview, all applicants were offered feedback. Notes and/or scores (amalgamated or individual) were also provided after the mock interviews were completed.

The mock interviews were valuable in several areas, though they were, of course, different from interviews for 'live' posts in a number of ways. The notable differences between interviews for live posts and these mock interviews are:

- the panels were different for almost all of the interviews, therefore there were few opportunities to note changes in practice or behaviour between different interviewees;

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- there could have been differences for candidates in terms of feeling more relaxed, though all seemed to be taking the situation very seriously;

- it being a mock interview could mean notes and marking were not as thorough or considered as in a live recruitment; and

- the panel may be more aware of what they are doing or saying because they are being observed, and because that observation is for an anti-racist review.

As these interviews were conducted to observe the process, questions and panel behaviour, we were not specifically noting the impact of mock interviews on the interviewees' responses. That said, it is worth noting that for a mock interview, everyone is generally on their 'best behaviour', but the reactions to questions (such as misunderstanding and confusion) are generally authentic once a candidate settles into the interview. The interviewers are also on their 'best behaviour' but unconscious bias and interviewing habits generally remain.

We have made a number of observations, which we hope will be helpful for your recruitment interview process generally and in relation to your aim to have HR policies and practices that are explicitly anti-racist. As stated above, because the panels were different, it is difficult to conclude whether or not the behaviours were in any way affected by the race or any protected characteristic of the interviewee.

The recommendations are drawn from these direct observations and include some extrapolation, given the range of other feedback received; however none of the mock interviews were for roles at the lowest grades and therefore we realise the behaviour of panels and chairs may be different toward those new to the Civil Service. We have assessed the panel as if the outcomes, behaviour etc. would be the same for all levels.

Scripted introduction

The introductions for each interview were clear, aided by the script. In all of the mock interviews, experienced individuals chaired the two-person panels.

Time

The introduction message from the interview script was read in all interviews:

*"**Time Management** – There is a limited amount of time to complete the interview, therefore we've got an estimated time available for each question. In order to manage the time, I may need to interrupt you and ask you to bring your response to a close in order to move on to the next question."*

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The emphasis on time management in the introductions varied with the different chairs, and this different emphasis ran through the interviews themselves. Some chairs stated the time limits in the introduction (adding to this statement), some panel members reminded candidates of how long they had to answer questions when asking the questions, and others never mentioned anything specific about time. This may have been consistent if there had been a series of interviews with the same panel, but we were unable to assess that. The emphasis on time for some interviewees, though, could leave individuals who are not used to a designated time specification feeling rushed or flustered. Stating the time allowed for each question feels like an overemphasis and risks making candidates nervous about going over time to the point that it distracts them in their answers from the start – this can easily feel like just another test being thrown at them.

If the designated time for answers was running out, there were different reactions from panel members. Some seemed to stop making notes when the time ran out, others went past the seven minutes for the behaviour questions. In some interviews, it was clear time was running out because there was increased engagement, i.e. nodding and looking up from some of the panel members who were not as animated previously. This could be interpreted in different ways by interviewees, either suggesting they are doing well, or 'hurry up', 'enough'. If the latter, this could be very off-putting at a crucial time for someone who is nervous.

Notes

In relation to the introductions, there is a statement on the use of notes for applicants:

> ***"Use of Notes** – You're welcome to use any prompt cards you may have with you to support you through the interview, however these should be referred to as little as possible. If the panel feel that you are reading from a pre-prepared document, we will stop the interview and you will be asked to avoid relying on your notes. We also ask that you don't make any notes during the interview ."*

We understand that this final sentence about notes has now been removed from current/new guidance. We support this decision for the following reasons:

It is common to allow candidates to make a note of the key points of a question before they answer it, and it will actively impede access for some to be told this is not allowed. This could potentially be the case especially for anyone whose first language isn't English, since they may make notes in their preferred language to understand it better or in English to refer back to it. Those who are less comfortable in the situation may need to jot down

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keywords. In contrast, allowing prompt cards seems advantageous to those who already know the types of questions and even the order in which questions will be asked.

One panel member made the statement about notes in a different way:

Use of notes *– "If you've got any notes yourself or any prompt cards, please feel free to use them. We like to get a feel for your natural answers. So try not to read them verbatim, but if you've got pointers or anything like that, that's absolutely fine. You're welcome to use those as well".*

Nothing was said about taking or not taking notes, and because of the nature of changing panels across the interviews, we do not know whether this deviation from the script would have been consistent for all candidates.

Not everyone will want to make notes, but notes may have been useful when some questions were asked which are, in effect, two questions in 'one' (see the 'structure of the main questions' section below).

Strengths base line assessment

Strengths based assessment requires panels to ask a baseline question that is designed to enable panellists to identify the body language and speech patterns a candidate manifests when they are naturally enthusiastic about something. The Civil Service Guidance on Success Profiles identifies Strengths as "the things that we do regularly, do well and that motivate us".

In all of the mock interviews this question was also the first question asked of the candidate and therefore served the dual role of a warm up question as well.

The baseline question on the paperwork used during each observed mock interview was: "What motivates you?". One chair (who chaired two interviews) on both occasions, asked the question: "What do you enjoy doing outside of work?" This is an unmarked question. However, the concern about these open questions, unrelated to the role applied for, is the potential for both conscious and unconscious bias to play a part in how the interviewee is viewed for the remainder of the interview. If the candidate shares an interest or motivation with the panellist, this is extremely likely to create an affinity (like me) bias or may activate

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the 'halo effect[49]' or 'horns effect[50]'. Research shows that unconscious bias influences both the notes taken and the scores awarded[51].

Though this is an unmarked question, the instructions in the two sections provided for panel notes reads:

- **What**: Use of evidence, recent and/or in-depth examples to back up self-report

- **How / Body language:** Tone of voice, voice modulation, pace/flow of speech, quality of expression, smiles, eye contact, lean forward position

The 'What' certainly indicates a lot is expected of this answer. The 'How' seems to require judgement skills and a level of cultural awareness which is unlikely to be present for all panel members. It could potentially be entirely misunderstood - there are a whole host of reasons (culturally, religiously, socially, physically, mentally) that would make someone 'act' in a way that was not in line with what the panel consider 'normal'. Some considerations are preferences/personality, introvert/extrovert, cultural background, disabilities and mental health/mood.

In our observed situation with different panels, it is impossible to say whether the answers to these 'unmarked' questions impacted what the panel members heard and then noted in the interviews, after hearing answers that they either subconsciously 'approved of' or 'did not approve of'. However, given the personal nature of "What do you enjoy doing outside of work?", it would be difficult to avoid making a judgment, and that judgement having an impact on the behaviour of the panel member, unless the individuals on the panel are explicitly considering their reactions. Though the alternative 'motivation question' did at least leave individuals mainly talking about work or work-related issues, there are still many aspects of potential personal judgment, but narrower and more common responses being made.

Some of the answers to these two unmarked questions:

"What motivates you?" (The scripted warm-up question) Some of the responses:

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[49] The halo effect is a type of cognitive bias, which happens when you make a snap judgment about someone on the basis of one positive trait.

[50] The horn effect is a type of cognitive bias, which happens when you make a snap judgment about someone on the basis of one negative trait.

[51] Barrick, M. R., Dustin, S. L., Giluk, T. L., Stewart, G. L., Shaffer, J. A., & Swider, B. W. (2012). Candidate characteristics driving initial impressions during rapport building: Implications for employment interview validity. *Journal of Occupational and Organizational Psychology*, *85*(2), 330-352.

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"Doing a good job, fair treatment, feeling happy and supported"

"Something that uses my creative spirit"

"Targets… I like an end goal" This was linked to running goals and then work. This was the most well received answer to this question

"A task or challenge I have accomplished"

An answer which focussed on the satisfaction of achieving a difficult position in Pilates

"**What do you enjoy doing outside of work?" (the unscripted question):**

"Gardening"

"Finding out and letting other people know about MESN role models". It was prefaced by "it's sort of work but it's not work" – these 'technically' unmarked questions, can just leave individuals wondering 'What is the right answer?', 'What do the panel want to hear?'

Jogging – I'm trying to do the 5k

I love reading books… I enjoy reading around (anti-racism)

Some of the panel notes in response to these answers in the 'How/body language' section:

"Calm, even tones"

"Not too much thinking time to respond"

"Smiling – not overly animated"

"Eye contact" – stated several times and an interesting observation for an online interview

"Laugh at start"

"Good flow of speech"

"Lots to say"

"Some enthusiasm…very controlled"

All of these notes have the potential to impact bias – all include a level of judgement which could potentially impact the remainder of the interview in terms of what interviewers notice and note down, as well as whether it seems appropriate (or a waste of time) to ask additional questions.

There are also inevitably considerable elements of the interviewee trying to 'guess' the 'right answer' and what may be considered a 'good' thing to be motivated by, or an

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acceptable hobby or interest for the Civil Service. The potential for positive bias (such as affirmation bias, where we feel positive about people 'like us') is there for anyone who knows or understands what motivations, hobbies or interests would impress a panel in a Civil Service context – those who have been employed in the Civil Service elsewhere or those who know others already 'inside'. If you are unaware of this type of bias, an honest and unusual answer could easily leave one or more panel members feeling negative toward an individual, wondering about 'fit' and, as research has shown, result in different and less favourable notes and therefore ultimately reduce the scoring and likelihood of a job offer.

We believe that these questions are likely to trigger complex decisions that could ignite performance anxiety in general, and are likely to be impacted by stereotype threat which will disproportionately impact on ethnic minority candidates. If the candidate believes that they should try to give an answer that will show them in a good light in the Civil Service, they may spend several seconds running through options in their mind to find the one that they believe will be seen most positively. For some, it may merely take them some time to consider which they will speak about, or try to identify something if they don't have an obvious 'hobby'. Unfortunately, this pause will count against them in respect to strengths-based interviewing and panellists are told that any significant hesitation in answering is an indication that the response will not be a strength.

Strengths based interview questions

Strengths are defined in the Civil Service Success Profiles as "the things that we do regularly, do well and that motivate us". The premise is that a candidate's response when describing a strength will come effortlessly – requiring little thought, be enthusiastic and contain specific details of their achievements in this area. Candidates are instructed accordingly; they are told not to prepare for strength-based questions by rehearsing their answers and to give their initial response. There are, in total, 36 strengths.

Panellists are instructed[52] to look for evidence that the candidate's answer contains the following three elements for it to be judged a strength:

Performance: the candidate can perform an activity/behaviour to a high level of
     capability or proficiency.

Engagement: the candidate seems motivated, enthused and empowered when doing
     the activity.

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[52] Success Profiles - Civil Service Strengths Dictionary (publishing.service.gov.uk)

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Use: the candidate does activity regularly and as often as possible.

In one strengths question, ("How true of you is the following statement…"), the only reference to the candidate's answer was the word "True" and "keen on efficiency". The other eight points made in the notes were made on the candidates' personal reactions and attributes.

Candidate unfamiliarity with how to answer strength-based questions

The 'External Candidate Recruitment Guidance' says on strengths questions:

"There is no expectation or requirement for you to prepare for strengths questions in advance of the interview, though you may find it helpful to spend some time reflecting on what you enjoy doing and what you do well."

This downplays the importance of these questions for candidates who cannot, unless they have inside information, understand the way these strengths are actually assessed.

One summary feedback for a candidate (HEO interview) was:

"It wasn't clear that the candidate understood the difference between a strength and a behaviour. The panel felt the candidate's strength responses were akin to those given for a behaviour."

Given the brief descriptions provided in the External Candidate Recruitment Guidance, and the fact that someone who has already passed a Civil Service interview, (like these internal mock interview candidates) cannot make the distinction, then this implies that it would be extremely difficult for a person to understand this differentiation, especially someone who has not been through an interview like this before and does not know someone who can provide advice.

Lack of clarity in the length of answer required

The strengths questions were sometimes asked exactly as they were stated in the script, some panel members gave a little introduction, such as for the strength question "improver", the script says:

How true of you is the following statement "I enjoy coming up with new ideas and looking for better ways to do things?"

This is a semi-closed question that suggests a short answer is required, such as 'very', 'not very', etc. However, some candidates will have been told and will remember they have two

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minutes and therefore understand a longer answer is needed. In these mock interviews, some were not told. All of the interviewees in the mock interviews were internal and therefore in some way familiar with Civil Service interviews. But if this was the first time an individual was participating in an interview like this, what would happen if they just said, "That's very true of me," given there is an instruction that no supplementary questions are asked? Can we be sure all panel members would feel it appropriate to ask for an explanation?

One panel member introduced the above question with: "I'd like you to comment on the following…" - this candidate then felt uncertain about what was required and checked whether only a "one-word answer" was wanted. That individual had the confidence to ask, but others with less confidence may not have felt able to check.

Impact of panel demographics and behaviour

Gender diversity was achieved on all of the mock interview panels, all with two people, and racial diversity was achieved on three of the panels. Although it is best practice to have both gender and visible ethnic diversity on panels, this lack is likely to be a reflection of the availability of visible minorities in the Welsh Government to participate in panels.

There were variations on how panel members positioned themselves on screen, and how engaged they were with candidates. In general, a central position on the screen was held, and panel members appeared to be looking at the screen in front of them, which, therefore, pointed to the conclusion that when looking up, they were looking at the interviewee. Most of the panel also seemed to nod or smile at appropriate times during answers to the questions.

One panel member was close to being offscreen for the entire interview, two almost never looked up or acknowledged anything that was being said and one panel member was not looking ahead and seemed to be looking at a different screen. The individual looking mostly to one side was assumed to have a second screen where they were taking their notes, however we (as an observer) found this to be the most off-putting. Had the interviewee been someone who was nervous or lacked confidence, it had the potential for the conclusion of lack of interest – it was not always clear whether the individual was even taking notes.

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Structure of the main questions

Lack of clarity of type of answer required

We reviewed the joint panel notes for an HEO interview in relation to the following question:

"Give an example of when you had to deliver a difficult message with clarity and sensitivity, being persuasive if required."

The notes said: "Focused on process and actions… less on softer skills and style of communication". If softer skills and communication style are wanted, the question needs to be stated clearly. Making a statement before the question that this is a 'behaviour question' will mean little if the candidate is not used to this style of interview and/or is nervous; also, given that following a process and taking action is 'behaviour' unless you are very familiar with what the Civil Service wants, a candidate may just focus on the actual question, not the wider 'behaviour' description.

Two questions in one

Some questions are two questions in one, for example:

The behaviour question (HEO interview) for 'working together' was:

"Describe a time when you collaborated with a range of stakeholders. How did you build an effective ongoing working relationship?"

If all of those elements are needed, this can be one (quite long) question, e.g.: 'Describe how you built and maintained effective relationships with a range of stakeholders which you collaborated with on a project'. Otherwise, the question needs to be broken down.

The behaviour question (HEO interview) for 'communicating and influencing' was:

"Give an example of when you had to encourage the use of different communication methods and the benefits of adapting or changing communication styles."

Most panel members asked these questions as if they were one question, when there are clearly two elements; only one panel member recognised the two parts and repeated the question without prompting, pointing that fact out. There is no indication of time balance (for the candidate) or points allocation (for the panel members) on the two 'areas' of the questions. The question, or part two of the question, needed to be repeated half the time. This took either a level of confidence from the candidate (not necessarily present for all) or

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a level of astuteness and care from the interviewer to 'go back to' and repeat the question – also not guaranteed.

Supplementary questions

For the vast majority of questions, supplementary questions were asked. Often the first supplementary question provided was used. However, some panel members asked the second or third question and linked it to the answer already given – in these situations it did feel like a 'natural' supplementary. Where supplementary questions were not asked, there seemed to be a time factor, where the candidate was getting close to the designated time. One interviewer, when asked by the second panel member if they wanted to ask any other questions, said they didn't and "I think we have reached the time limit in any case".

The main concern with the supplementary questions is a lack of direction as to how these should be noted or marked.

Some panel members made a note of the supplementary question and followed that with the appropriate notes. For others, there was no indication that a follow-up question was asked or what it was. As these are additional to the original question and the interviews were never for the same role with the same panel, it is impossible to say whether there would be consistency in what was being asked. Some individuals had substantial notes written after the supplementary question. As these questions are offered and do not necessarily investigate or link to the answer already given, it is impossible to say how any level of consistency is achieved. It could be that these additional questions were being asked because it was a mock interview and panellist sought either to try to demonstrate best practice, or because panel members might have thought we were curious to hear them.

4.4.5. Tests

None of the roles considered during the application review or a random sample of other externally advertised roles (approximately 15 roles), stated that tests would be used in the recruitment process. We understand that tests are used within recruitment for some professions.

There is a growing recognition that practical tests promote fairness and can reduce bias in recruitment processes, given the research and recognition of high levels of bias in verbal interviews alone[53].

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[53] 'The validity and utility of selection methods in personnel psychology: Practical and theoretical implications of 85 years of research findings' Schmidt, F.L. and Hunter, J.E. (1998).

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From the live recruitment feedback received (an additional three roles), there were also no tests reported as having been carried out, despite some of the criteria being likely to be more effectively tested by a practical test than interview question. This seems to be encouraged in the main recruitment policy under internal interviews, however the benefits of practical tests did not seem as clear in relation to external interviews. It is of course recognised that if trying to carry out remote testing, this requires considerable thought, but the benefits relating to unbiased decision making is huge[54].

4.4.6.   Post interview feedback

We were not able to interview any individuals who had taken part in an external Welsh Government interview and not been offered a role.

The feedback given by managers to internal applicants who were unsuccessful in that application described in some of the culture interviews, was generally positive.

"The feedback from my manager… was very good, very thorough"

"(The manager was) very supportive… Trying to adapt the job role to give me experience that I would need to fill gaps (to get it next time)… (I was) not a cog in a machine, not just there to do a function. It made me feel really valued as a person, and that she was keen to support me personally with the knowledge that if I did get a promotion, I would then leave the team and go somewhere else, take all my subject knowledge with me, yeah, so it was great".

However, we were told of a concerning experience where a manager gave feedback to a new ethnic minority staff member (who had never been in the Civil Service). They described this feedback from their senior manager, received soon after they started in their role:

"I'm fully aware of my unconscious bias… we interviewed yourself and a white woman, and that White woman could have done this job easily, but I was aware of my unconscious bias and said no, you need to get the job".

This feedback is counterproductive. Together with other behaviours experienced by that individual from the manager and other senior people - they said they had been put-down and their skills repeatedly undermined with no constructive feedback. They were left seeking other employment with a clear decision that they would never work for the Welsh

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[54] 'Orchestrating Impartiality: The Impact of "Blind" Auditions on Female Musicians' Goldin, C. and Rouse, C. American Economic Review, vol. 90, no. 4, September 2000;.

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Government again. No doubt they will also be making their feelings clear to everyone they know outside of the Welsh Government. Recruitment on merit needs to be emphasised.

4.4.7. Training/reading for recruiting managers

We reviewed the training and information to which recruiting managers are directed about anti-racism:

- 'Conversations on Anti-Racism' slides which formed the basis of a training session ()

- A-Z of Anti-Racism (glossary)

- The 'Anti-racism hub' (on Intranet) document

This information is supplied to increase the recruiting managers' (and others) knowledge and awareness of anti-racism. We have highlighted some areas for improvement below but suggest that these are reviewed on an ongoing basis as you develop further guidance and development for all staff, managers and those involved with recruitment.

Definitions

We have some concern about subtle messages from the language used in the definition of 'ethnicity' in the A-Z of Anti-Racism:

"Refers to long shared cultural experiences, religious practices, traditions, ancestry, language, dialect or national origins (for example, African-Caribbean, Indian, Irish and Traveller)".

This gives the impression that Welsh, English or Scottish are not ethnicities and further 'others' ethnic minority groups. It may be useful to add other relevant examples, especially those most pertinent to your context.

Conversations on Anti-Racism slides

Our recommendation throughout is that anti-racism elements are included in all compulsory training that is specific to the topic. So rather than promoting generic anti-racism training, we are recommending that the compulsory panel chair/member recruitment training includes more emphasis of the impact of implicit bias on recruitment and selection decisions and how to avoid/minimise the impact of bias. This is an opportunity to make your definition of anti-racism real by "Actively identifying and eradicating the systems, structures and processes that produce radically differential outcomes for ethnic minority groups." – in practice here this will focus on the areas highlighted in this report. For example, lower likelihood of passing the interview phase in external recruitment, lower likelihood to receive a temporary promotion and experiences of subtle and explicit racism.

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4.4.8. Concerns of racism in the recruitment process

In the all-staff survey, we asked people who had been involved in recruitment processes whether they had ever observed racism in any aspect of the assessment process they had been involved with.

3% of respondents (16 out of 521) said that they had observed this. Of these 16 people, six people had raised a concern.

Examples related to the following themes:
- Personality - "candidate told they showed lack of enthusiasm"
- Discrimination relating to accent
- Assumption about (lack of) drafting skills based on name
- Lower score for answers from ethnic minority candidate
- Positive discrimination – we were told that a panel member said, "This person will help me to meet my ethnicity targets".

Only two people were aware that any action had been taken to address these concerns, but neither person knew whether the action had been effective. The survey did not request information on what action was taken so we cannot make an assessment on this.

4.5. Discussion

The Welsh Government's external recruitment process is thorough, and all of those we met or spoke with, who were involved in the process in any way, were clearly committed to a fair process and the wish to employ people who were the best, at the time roles become available. You have put in place the 20% recruitment target which demonstrates your desire to increase ethnic minority representation through over-representation in recruitment outcomes.

There are though, numerous areas where the process allows for those who are not necessarily the best to gain an advantage and therefore, potentially be employed above a 'better' candidate. We have found that some of the basics of good practice recruitment are not yet in place and this is getting in the way of equitable recruitment processes.

We recommend an overarching approach which allows you to design and assess the impact of recruitment processes by job family, or similar categorisation, in order to focus in on areas that need your attention – such as outreach methods or minimising bias in recruitment phases where it may be present.

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We explore some specific areas of required focus below.

4.5.1. Data and analysis

As discussed, full recruitment phase outcomes data were not able to be presented from the new recruitment system due to a number of factors explored elsewhere, primarily complexity of how data is stored, system knowledge and staff resource. This is a critical issue for monitoring going forward. It limits your ability to check whether ethnic minority people are having equitable experiences in specific phases of your recruitment process. Specifically, being able to identify recruitment phase method – e.g. interview, test, practical exercise – would enable you to see where disproportionality may exist. There may be opportunities to change how recruitment phases are recorded, such as tagging to a specific method, which could allow analysis for these specific phases separately. Whilst no process is perfect, monitoring enables you to demonstrate why and where action may need to be taken if disproportionality exists. This enables you to target action where it is needed most in your organisation, rather than simply what may be good practice (but may not be critically needed in your organisation).

Given the above, alongside the differences in ethnic minority representation across Wales and population benchmarks for different roles and specialisms, we believe that a more granular approach to recruitment analysis will be appropriate. In the same way that different approaches will be needed to ensure that equitable recruitment and selection methods are maintained for different role types, the analysis will need to be flexible depending on the associated outreach, recruitment and selection methods. We recommend below that your recruitment analysis focuses on specific job families or campaigns. In this way, we hope you will be better able to identify the recruitment phases used in the process and their associated outcomes data, but also consider what appropriate benchmarks for applicants' make-up are. This will enable you to consider where additional outreach is needed or where positive action may have a legal basis due to your ability to demonstrate under-representation.

4.5.2. The application process

The Civil Service Commission Recruitment Principles state that:

"All initial external recruitment to permanent posts ……must be made on merit via fair and open competition ……."[55]

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[55] The Welsh Government Recruitment Policy

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We argue that the Welsh Government's commitment to recruitment on merit is being undermined by the impact of the application process:

- the application process appears to emphasise previous Civil Service experience;

- it could deter applicants who do not have a 'standard' work history due to issues such as career breaks and multiple roles; and

- the length of the form, for those who have not had experience in this type of application, may be off-putting;

It is important to consider whether all external jobs, at all levels, need to go through this system, which has been described by people involved in this review as 'rigid', 'too complex' and 'off-putting'. In particular, could the process for entry-level roles be simplified?

We suggest that it is preferable to simplify the process for all applicants, so that selection can clearly be seen to be on merit, thereby avoiding any reinforcement of deficit thinking in respect to ethnic minority people. We note that the recent TS grade campaign is an example of simplifying the process for all applicants and this has seen some positive results.

4.5.3. Positive action

You shared a proposal for a number of proposed positive action mechanisms with us. Having reviewed the most recent recruitment data, we believe that many of these actions are unnecessary since most of them apply to the earlier stages of recruitment. Your recent data demonstrates that proportionate numbers of ethnic minority candidates are applying for roles (18.9% of applicants with known ethnicity) and being subsequently shortlisted via name-free methods (19.2% of applicants with known ethnicity). This suggests interest from qualified candidates since they are being proportionately shortlisted. Where we observed a drop-off in the proportion of ethnic minority candidates is during the interview (or other intermediary) phases (Only 13.6% of candidates with known ethnicity passed the recruitment process). We therefore recommend that you focus your efforts on understanding the reasons for this drop-off. They could include conscious and unconscious bias by those involved in the recruitment process, and recruitment processes where ethnic minority candidates are less likely to perform well – for example processes which do not proactively aim to reduce the impact of stereotype threat, code-switching[56] and covering[57], as addressed above.

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[56] The act of changing between two or more languages, dialects (= forms of a language), or accents (= ways of pronouncing words) when you are speaking.

[57] A strategy used when individuals will downplay a [stigmatised] identity.

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There may however be specific roles, job families or campaigns where the legal basis for positive action may be clear. For this reason, we recommend more granular analysis of recruitment – from initial interest throughout all recruitment activities– in order to identify where this is needed. Where outreach and support are needed, activities such as those already used: encouraging ethnic minority people to apply, developing targeted application processes, and providing additional support are to be encouraged and monitored for impact. The information sessions for applicants run by the EDWT seem to be one of the outstanding examples of this. One sensible priority would be to increase the number of these sessions being made available, and ensure that their impact can be measured.

We explore the specific example of the guaranteed interview scheme for ethnic minority candidates in more detail below.

Guaranteed interviews for Black, Asian and minority ethnic candidates:

"The Black and ethnic minority interview scheme, I think there is some kind of issue with colleagues. They said, 'Why did they get (the interview)… if they're good enough for the job, they'll just go straight to interview anyway'. They didn't understand why there was a need for it."
An interviewee from the culture interviews

The Disability Confident guaranteed interview scheme for disabled people who meet the minimum requirements for a job is a long-established and accepted model with general recognition of the need for such a scheme. The Welsh Government, as well as the guaranteed interview scheme for disabled people, currently guarantees interviews for Black, Asian and minority ethnic employees applying for posts internally who meet the minimum requirements for the post. However, although evidence suggests there is no need for this scheme as potentially only a few internal applicants have ever required it,, a recent letter from the Welsh Government to the CSC has asked for its views on a guaranteed interview scheme to be applied within the Welsh Government for Black, Asian and minority ethnic applications coming through the external recruitment process. The idea of guaranteed interviews for Black, Asian and minority ethnic candidates in external interviews is a difficult one, which would need to be considered carefully. If proceeding, the Welsh Government needs a good range of the recommendations in this report also in place.

If you proceed with this scheme and the numbers of ethnic minority individuals increases, the area of retention will need to be scrutinised very carefully. There will be a need for a public and accepted recognition of structural and systemic barriers which are in place for ethnic minority people in the Civil Service if it is to enhance the reputation of the Welsh Government. However, the potential claims of tokenism (internal and external, ethnic

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minority and non-ethnic minority/ethnic majority), and the potential backlash both internally and from the wider community is a risk. This could mean the recruitment rate for ethnic minority individuals increases, but a long-term workforce with increased numbers of ethnic minority staff is unlikely to be attained without significant changes to make the Welsh Government a more comfortable environment for new ethnic minority staff (See 3 Organisational culture, behaviours and retention).

The other area of concern is how this is viewed by the ethnic minority individuals who are contemplating applying for roles; if an interview is secured, the question will be "am I only being interviewed because of my ethnic minority status?". This leaves the question, if offered the job, "have I only been offered the job on that basis?", which is not a comfortable place for any new starter. It also means that those working with an ethnic minority new starter may assume they were not the best person for the job, but received the job offer only because of the underrepresentation within the Welsh Government – a particularly difficult position for anyone starting a role managing people or with immediate decision-making responsibilities. There is also the question of legality, which is one of the questions being asked of the CSC.

For these reasons, our recommendation would be *not* to proceed with the guaranteed interview scheme, but instead to focus on improving outreach and information sessions, and using a simplified process for external recruitment. Although this will take more time and resources, in the long-term it will benefit all applicants. A simplified process would also help to address the issue of 40–50 % of external applicants not completing their application forms. Not only would this improve the application process for all, it would also help to ensure that the Welsh Government can select from a more extensive talent pool.

4.5.4. Strengths-based interview questions

There are a number of concerns: an ethnic minority person being told to focus on the things they 'enjoy and (their) motivations' (from the external candidate guidance) is likely to set up stereotype threat for candidates. Being asked in the 'warm-up' question about motivations can easily reinforce biases for the panel. Additionally the 'two-minute' expectation, and with notes being made like was thinking', these questions will penalise people for whom English is not their first language.

The level of interpretation expected of recruiting managers in these questions (with body language and tone also being noted in the behaviour questions by some panel members) is unreasonable, particularly when judging ethnic minority people and people from a range of diverse cultural backgrounds. Panel members need to be extremely aware of their own biases, upbringing and personal and professional culture-led expectations to be able to

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make these judgements fairly. In general, the more structured elements of the success profiles such as behaviour, experience and technical aspects, are better areas to focus on when trying to ensure this process is anti-racist.

There appears to be little empirical evidence for the validity of strength-based recruitment. A literature search has only been able to identify four papers specifically examining a strength-based approach to recruitment, including one book. The most promising research was an evaluation by a professional services firm on the impact of strengths-based recruitment on their graduate selection outcomes[58]. They did find a benefit to using strengths-based recruitment but with the use of highly skilled and trained assessors. Furthermore, the process was designed using a rigorous job analysis, and for a specifically targeted group (graduate entry).

In contrast there are numerous systematic reviews and meta-analysis on the good predictive validity of a structured approach to interviews using behavioural and situational interviews spanning over one hundred years of research[59]. Structured interviews have been found to have good predictive validity[60] because they help the interviewer to gather objective information about the candidate and assess this against relevant criteria to do the job. Our understanding is that whilst the Civil Service Success Profiles approach is required, there is no requirement to include strengths-based questions in all recruitment interviews.

4.5.5.   Diversity on panels and 'equity advocates'

There are benefits to having diversity on recruitment panels, which has been acknowledged by the Welsh Government and is encouraged beyond the expectation of gender. In particular, in a situation where the aim is to significantly increase the numbers of ethnic minority staff, it is important for candidates to be able to see 'themselves' already there, by reflections in the panel (as well as publicity and images that show representations of the Welsh Government). Having an ethnic minority panel member is likely to reduce stereotype threat and performance anxiety for ethnic minority candidates.

The need for voices from a variety of ethnic minority backgrounds in the post-interview panel assessment and when considering feedback is also essential, though all voices need to

[58] Garcea, N., Isherwood, S., & Linley, A. (2011). Do strengths measure up?. *Strategic HR Review*, *10*(2), 5-11.

[59] Ryan, A. M., & Ployhart, R. E. (2014). A century of selection. *Annual review of psychology*, *65*, (693-717.).

[60] https://msu.edu/~morgeson/levashina_hartwell_morgeson_campion_2014.pdf

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be well-informed. It should not be assumed that just having an ethnic minority person on the panel is all that is needed – everyone needs to be aware of their conscious and unconscious biases in those discussions.

Given ethnic minority staff numbers in the Welsh Government at the moment, an attempt to have an ethnic minority person on every recruitment panel will be unworkable. In a situation where ethnic minority representation on panels becomes emphasised, ethnic minority individuals who become 'trusted' panel members will not have time to deliver on their substantive post as the demand will be so high. We are proposing a change to the process - through the formation of a pool of equity advocates. These would be individuals at different grades, and can be ethnic minority people, or not. The critical factor is that they are trained to have expertise in identifying and appropriately responding when bias is identified. They then participate in the recruitment process as full panel members with a specific role to hold the process to account. These equity advocates can be either your own staff, or could be appointed externally. In one exemplar organisation, giving Equity Advocates the power of veto over recruitment panel decisions was seen as pivotal to ensure their role is effective. Whilst in that organisation the veto was rarely used, it was critical that all panel members knew that the equity advocate is able to pause or request a review, or veto any decisions made by the panel if they fear, or have observed bias in the process.

Given current criteria, this would be a significant shift, but one that has benefits in helping to achieve your aims and gives staff a development opportunity which can boost their confidence and networking skills as they mix with people in different parts of the Welsh Government and at different levels, making it more likely they will be fully engaged and want to stay.

4.6. Recommendations

The application process and evidence requirements for lower-grade and entry-level roles at Welsh Government seem to discourage individuals from applying. Many believe their chances of passing the initial stage are low, particularly if they do not already know someone who is an insider. Therefore, many of the recommendations in this section relate to simplifying both the application and interview processes, and increasing the support offered to those unfamiliar with the wider Civil Service, especially first-time applicants.

4.6.1. Data and analysis

R4.1. Calculate the over-representation needed in order to meet organisational recruitment targets to match population representation over a designated time period. (As shown in example calculation.)

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R4.2. Report more regularly against recruitment targets – we suggest quarterly at a minimum. This will allow you to monitor successes of interventions more closely.

R4.3. Analyse full recruitment phase outcome data by job families or campaigns in order to monitor equitable outcomes throughout the process on an ongoing basis. This data is ideally available 'live' so that any issues with processes can be highlighted immediately. If this is not possible, we recommend proactive quarterly reviews.

R4.4. Ensure that analytical resource is made available to develop CAIS reporting on recruitment phase outcomes by ethnicity.

4.6.2. Outreach

R4.5. Ensure the EDWT team are sufficiently resourced to take a more pro-active role to supporting recruiting managers in relation to understanding under-representation, and the best methods to attract the most diverse group of applicants.

R4.6. Increase resources in the EDWT to enable more ethnic minority targeted outreach and an increased number of information sessions, including more in-person information sessions around Wales.

R4.7. Revise the information in all outreach and applicant guidance to make it clearer that speaking Welsh is not essential (unless required for the post), although commitment to promotion of Welsh language is critical.

R4.8. Amend the External Recruitment Assurance Checklist to include an assurance that recruiting managers are actively required to seek a range of candidates with diverse backgrounds.

R4.9. For major campaigns, run interview practice/mock interviews for individuals who have never worked in the Civil Service – this could be designed creatively including groups – rather than the heavy investment of one candidate to one panel.

R4.10. Run a campaign which highlights the range of jobs and skills which can be developed (in a similar vein to the 'Join the forces' campaign but lower budget), helping to make the Welsh Government an employer of choice.

R4.11. Review the list of options for how people were attracted to this role to ensure that the impact of outreach activities is measured.

4.6.3. External applicant guidance

R4.12. Strengthen and extend the guidance given to external candidates, and make it more accessible – possibly with videos (talking heads, with diverse representation) and/or example questions and how answers can be 'directed' – or dramatically simplify the interview process.

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R4.13. If strengths-based interview questions continue to be used, update the External Applicant Guidance with a more detailed explanation of this type of question, so that candidates can fully prepare and people who are advising applicants can focus their advice more accurately.

4.6.4. Improve the application process

R4.14. Continue to monitor where applicants drop out of the application form to prioritise simplification or other improvements to secure more applications.

R4.15. Review the application form from an inclusivity lens (with reference to section 4.4.2). In particular, simplify, rearrange and clarify potentially confusing instructions (e.g. change employment history to request either three years or a maximum of five employers).

R4.16. Consider changing the options if someone is going to leave the application to 'Exit and continue later', 'Next page/continue' or just 'Exit', at which point the form takes the individual to a pop-up (or similar) for further help and the monitoring form, with encouragement and rationale for completing the monitoring form.

4.6.5. Training for recruiting managers and panel members

R4.17. Improve the information contained in the anti-racism elements of the resources to which recruitment managers are directed.

R4.18. Improve and expand guidance on sifting, including examples of weak and strong answers to paper sift questions

R4.19. Improve and expand interview guidance for panel members and panel chairs:

   a. Greater emphasis on the issues of bias and unconscious bias, self-awareness (through shortlisting and interview) and the need for consistency.

   b. How to improve the validity and rigour of structured interviews and how to manage and mitigate the variety of cognitive errors and biases that undermine equity.

   c. An expectation that when the panel meets beforehand there is agreement regarding supplementary questions and how they are handled – in notes and marking.

   d. A reminder of the expectations and aims from the Anti-racist Wales Action Plan, without the current expectation of 'read the Anti-racist Wales Action Plan'.

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e. Much more emphasis is needed on awareness of bias/the potential for unconscious bias when shortlisting.

R4.20. Ensure that your own additions to the Civil Service training content include individuals who are visibly ethnic minority people, especially pictures of people in senior positions and/or panel chairs.

R4.21. Monitor more closely whether managers are completing the actions set out in the 'external recruitment outreach standards checklist'. Provide support as needed.

4.6.6. Equity Advocates

R4.22. Recruit and train a pool of diverse equity advocates to be part of external recruitment panels with a focus on the levels with significant underrepresentation of minority ethnic staff. Equity advocates to be given the power of veto over any decision they feel may be unsafe.

4.6.7. Shortlisting

R4.23. Provide clear instructions on the application form, such as 'appropriate numbering of evidence/criteria is expected to ease the assessment of the application' and include this information in the applicant guidance.

4.6.8. Interviews

R4.24. If stating the time expectation is needed at all, we recommend:

a. State "the approximate time allowed for questions is… "

b. Do not repeat the time allowed for each question asked

R4.25. If English is not the candidate's first language, the time allowance will often not be enough and therefore the procedure would need to be amended to allow additional time in these circumstances. A question can be asked at the point of the interview being offered, not in the application form where it could be misinterpreted.

R4.26. Make the following changes to the questions asked:

a. The judicious use of strengths questions, with a focus the behaviour, experience and technical aspects of the success profiles, particularly at non entry level grades

b. Remove or adapt the current warm-up question, due to the high likelihood of bias (conscious and unconscious) impacting the outcome of the notes and scores

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    c.   Review questions to eliminate semi-closed questions and double questions

R4.27. Panel members should consider their position and visibility on screen, ensuring they are facing the camera (with consideration of potential impairment or condition).

R4.28. Clarify panel members' roles in terms of repeating, rephrasing or reminding candidates of the question.

R4.29. Provide guidance for the panel on the noting and marking of supplementary questions.

4.6.9.   Policies and procedures

R4.30. Update the small 'External Recruitment' section of the Recruitment policy with at least an up-to-date list of the guides and documents that are available for direction on the process for external recruitment.

R4.31. Ensure the external recruitment assurance checklist encourages recruiting managers to use targeted advertising and outreach in conjunction with the EDWT and monitor whether this takes place.

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5. Conclusion and recommendations

The Welsh Government has set itself the ambition to become a wholly anti-racist organisation, with systems, structures and processes in place that ensure equity of outcomes for ethnic minority colleagues. You want to foster an ethos of anti-racism and culture of inclusion across all that you do, and act as an exemplar for your approach across Wales.

However, this review has found a number of data points that demonstrate a lack of equitable outcomes for ethnic minority staff. Ethnic minority staff shared experiences of racism, and the need to move around the organisation to avoid career-blocking managers and find career-enabling managers. Recruitment data shows that ethnic minority applicants are less likely to be successful at interview phase, and our survey data showed that ethnic minority staff were less likely to receive temporary promotions. We found that staff do not have confidence in your reporting structures and therefore they are not often used. Staff told us about pockets of toxic parts of the organisation where ethnic minority staff are not able to thrive.

This review has identified that in order to achieve your ambition, a range of fundamental systemic structures will need to be in place. They will be facilitated by implementation of a comprehensive change programme across the whole of the organisation. There is a need for an appropriately senior leader, with experience of progressing EDI including anti-racism in organisations, in order to shift the dial alongside appropriate governance throughout your organisation. Having policies and appropriate monitoring and evaluation that reflect the organisational shift is an important part of this process, but one to be implemented after you have a clear plan in place for this organisational change.

These systemic and structural changes will take time. For example, in the higher education sector, organisations using the Race Equality Charter framework, are expected to take three years to implement the work required to achieve 'firm foundations' for race equity work[61]. Similarly measurable success in our NHS exemplar organisations was over a three year period. The first step therefore is for the Welsh Government to develop an achievable SMART action plan for getting the foundational fundamentals for becoming an effective anti-racist organisation in place over the next year, and fully embedded by three years. Doing this will ensure that anti-racist work by the Welsh Government really is at the heart of

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[61] https://s3.eu-west-2.amazonaws.com/assets.creode.advancehe-document-manager/documents/advance-he/AdvHE_Race%20Equality%20Charter%20Review_1615534497.pdf

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an inclusive organisation. One in which anti-racism really has "has shaped its strategy, its work, its management and operating systems, and its core values and norms for success".

Aspects of this work are already underway with the Director of People and Places focussing on 'getting the basics right'. The key will be to ensure that when addressing these basics, they are viewed through an anti-racist lens so that that perspective is addressed simultaneously, such as the issues raised in the recruitment section of this report. There will also be initiatives underway that have been developed before this report was available, such as the guaranteed interviews for ethnic minority people and the Aspire programme, which will need to be carefully reviewed considering the findings of this report.

Through this review, we have identified a large number of recommendations (see Appendix 1) that you need to take in order for your HR policies, procedures and practice to become explicitly anti-racist. You will need to work through these recommendations and consider how you can best operationalise them.

In order to support this process, we have highlighted the following recommendations in the section below:

- **High impact** – those recommendations which we feel are most likely to really shift the dial in terms of people's lived experiences within the organisation, but require significant investment. These recommendations will not only improve experiences for ethnic minority staff, but all staff as they reflect excellent practice for organisations.

- **Priority** - those recommendations that we feel are of particular priority – either because they are both urgent and important, or because we believe they will 'unlock' your ability to deliver real change. By implementing the full set of these recommendations and more, as you develop your anti-racist knowledge and practice, you will be able to make real and visible progress.

- **Quick wins** - We have also identified a number of smaller recommendations, with a requirement for very low or no additional people resource, and no anticipated additional cost. We have described these as quick wins. We recommend you implement these as soon as possible, to make positive progress and maintain momentum in this work.

5.1. High impact recommendations

We believe that the following recommendations are those that are most likely to shift the dial in terms of people's lived experiences within the organisation, but require significant investment – people, time and/or resources. These recommendations will not only improve

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experiences for ethnic minority staff, but all staff as they reflect excellent practice for organisations.

5.1.1. High impact recommendation 1: Recruit a Strategic EDI Lead

It is clear that the Welsh Government has stated senior level commitment to becoming an anti-racist organisation. The Anti-racist Wales Action Plan is supported at the highest organisational level and this review has been prioritised at a senior leader level. We understand that the DISG has been established to monitor anti-racism and other EDI work and you have an EDI champion who regularly reports to the Board on EDI matters.

However, without the right infrastructure – a senior experienced professional EDI lead, data team, SMART action plan and so on - the Welsh Government is in danger of just talking about what needs to be done rather than being in a position to get things done.

For this reason, our highest priority recommendation, of all our recommendations, is that you appoint a sufficiently senior person, with the required experience to oversee this work. It will be almost impossible for you to maintain real progress without this dedicated resource.

R1.4. **Create a new role at Grade 6 (or above) to oversee this work, including the implementation of the recommendations from this report. The post-holder is required to have a proven track record of facilitating measurable progress on EDI and anti-racism within a complex organisation.**

5.1.2. High impact recommendation 2: Sponsorship programme for high potential ethnic minority staff

Our research has found some examples of ethnic minority staff able to progress successfully to senior roles and examples of managers who have appropriately supported ethnic minority staff's career development. However, we also found that ethnic minority staff are less likely to have temporary and permanent promotions and that they are less likely to agree that they have the appropriate support to develop within the Welsh Government. Given your desire to represent the Welsh population throughout all levels, it will be critical that ethnic minority staff are able to progress in the same way, on merit, as non-ethnic minority staff. Ability to progress is also tied closely to retention, therefore this has particular importance to your long-term ethnic minority representation.

For this reason, we have selected the development of a formal sponsorship programme as a priority recommendation. Research shows that sponsorship, when introduced appropriately – to redress unconscious bias and historic under-representation – can be extremely

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effective to level the playing field and ensure that ethnic minority staff have access to the same level of sponsorship as is provided via informal sponsorship which is more likely to be accessible to majority groups.

R2.9. **Develop a formal sponsorship programme for ethnic minority talent at the grade level(s) (suggested EO/HEO) before there is a significant drop in representation at a particular grade. This will ensure that ethnic minority staff have had the appropriate stretch and other relevant experience so they can compete equally to majority group staff who are benefiting from informal sponsorship.**

R2.11. **Use this group of sponsors on the Aspire programme instead of mentors to ensure that career barriers are addressed as an outcome of the programme.**

5.1.3. High impact recommendation 3: Further research into the interview phase

Our research has identified the interview phase in recruitment to be a potential factor that limits the success of ethnic minority staff in your recruitment processes. For this reason, we are prioritising our recommendation to carry out further research into the reasons for lower success rates of ethnic minority candidates in interviews. We suggest this research should cover both the interview process for external and internal appointments.

Analysis should be done on specific parts of the interview process to narrow down the potential reasons for differences, and therefore focus appropriate actions to rectify where appropriate. Some areas that can be explored specifically, with reference to the ethnicity of candidates are:

- analysis of success rates/scoring by question type. Our hypothesis outlined above is that other than for entry level roles, strengths questions are not likely to be best practice; and

- analysis of panel notes for potential bias or unequal treatment. Research has shown that minoritised groups experience bias in supervisor narrative comments in performance appraisals, and this is seen in the same way through notes for panel members [62].

R4.3. **Analyse full recruitment phase outcome data by job families or campaigns in order to monitor equitable outcomes throughout the process on an ongoing basis. This**

- [62] Wilson, K. Y. (2010). An analysis of bias in supervisor narrative comments in performance appraisal. Human Relations, 63(12), 1903–1933.

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data is ideally available 'live' so that any issues with processes can be highlighted immediately. If this is not possible, we recommend proactive quarterly reviews.

5.1.4. High impact recommendation 4: Introduce equity advocates for internal and external recruitment

This review has highlighted areas of the recruitment process where implicit bias may be influencing outcomes for ethnic minority staff. Given ethnic minority staff numbers in the Welsh Government at the moment, it would be an unnecessary burden on staff numbers for ethnic minority representation to be present on all interview panels. Whilst ethnic minority representation on panels has positive impacts for ethnic minority applicants, there are difficulties of over-reliance if these panel members are expected to ensure fairness. One of our exemplar EDI organisations attributed improved outcomes for ethnic minority staff in recruitment to their deploying of equity advocates. For these reasons, we are prioritising this recommendation as a high impact one.

Critical to the success of the development and implementation of a pool of trained equity advocates for recruitment and promotion, is that these equity advocates undergo detailed training in identifying bias in recruitment processes and responding to it appropriately. Equity advocates participate in the recruitment process as full panel members with a specific role to hold the process to account. These equity advocates can be either your own staff, or could be appointed externally and can be of any ethnicity. In the exemplar organisation, giving equity advocates the power of veto over any recruitment panel decisions was seen as pivotal to ensure their role is effective. Whilst the veto was rarely used, this gave the equity advocates sufficient 'weight' to hold the process and other panel members to account effectively.

Equity advocates could subsequently be involved in the development and implementation of additional training and guidance for interviewers. If needed, they could also be involved in the development of appropriate positive action schemes to support ethnic minority applicants at the interview stage.

R4.22. Recruit and train a pool of diverse equity advocates to be part of external recruitment panels with a focus on the levels with significant underrepresentation of minority ethnic staff. Equity advocates to be given the power of veto over any decision they feel may be unsafe.

5.2. Priority recommendations

5.2.1. Governance, policy-making and strategic leadership

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After highlighting the highest impact recommendations, we now highlight some more priority recommendations. We feel that these are of particular priority – either because they are both urgent and important, or because we believe they will 'unlock' your ability to deliver real change. By implementing the full set of these recommendations and more, as you develop your anti-racist knowledge and practice, you will be able to make real and visible progress.

Critical to the successful response to our independent report is a detailed action plan that focuses on the internal implementation of these recommendations. As outlined above, these actions will need to be SMART and monitored appropriately to ensure that they are completed.

R1.3. **Develop a SMART action plan to establish the six fundamentals over the next year to ensure that the work is fully embedded within three years.**

In order to support your senior accountable person (above) and to ensure wider accountability for this work, we also recommend an urgent change to the status and position of DISG to ensure this work remains high priority and that progress is monitored and therefore assured.

R1.1. **Elevate the position of the Diversity and Inclusion Steering Group (DISG) to be a committee to the executive committee, jointly chaired by the permanent secretary and an EDI subject matter expert. Its role will be focused on assurance in relation to anti-racism and other priority focuses for EDI within the Welsh Government.**

5.2.2. Development, promotion and progression

Alongside the sponsorship programme for identified high performers, we recommend a scripted career and wellbeing conversation for all staff. This universal requirement on managers has a number of benefits for all staff, including ethnic minority staff, not just related to progression – conversations about progression are consistent and regular (thereby avoiding assumptions about type or lack of progression desired), and staff have a space to raise other issues related to well-being.

R2.12. **Develop and roll out a scripted career and well-being conversation for staff to be delivered over a specific period. Hold Directors responsible for ensuring that all of their managers comply within the time frame. Record findings centrally, and analyse for training and development needs. Conversations should include the potential for stretch projects and/or other development opportunities.**

5.2.3. Organisational culture, behaviours and retention

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The Anti-racist Wales Action Plan is a clear government priority and there is commitment for anti-racism at the highest level in the organisation. Whilst this doesn't automatically translate into all staff being anti-racist in their approach, it does make it more likely that anti-racist behaviour will be appreciated and regarded within the Welsh Government.

Overwhelmingly though, this review found that ethnic minority staff are less likely to feel that they belong within Welsh Government, more likely to be looking to leave the organisation and that many have experienced both explicit and subtle racism at work. Whilst not unlike many organisations who have carried out race equality reviews, there is clear evidence that there is a gap between the aspirations of the Anti-racist Wales Action Plan and the actual experiences of ethnic minority staff in the Welsh Government.

Specifically, the level of racism currently experienced within the organisation, along with the findings around the lack of reporting, suggest that the Respect work currently being delivered has not 'filtered down' throughout the organisation.

For this reason, we have chosen to highlight two elements that relate to responding to staff's experiences of inappropriate and racist behaviour.

In response to the relatively low numbers of reported racist 'incidents' we are proposing you strengthen your compassionate approach to HR, encouraging informal resolution where possible and mediation where needed. We believe (and research shows) that this is more likely to have a positive long-term impact on developing a more inclusive culture, rather than simply 'zero-tolerance' approaches.

R3.6. Continue to promote and use informal resolution wherever appropriate, including encouraging open conversations in teams and between individuals. Where appropriate, offer mediation to support finding agreement on acceptable future behaviours.

We also acknowledge what we heard from ethnic minority staff: that there are parts of the organisation where toxic cultures are sustained and where ethnic minority staff are not welcome. In order to develop an evidence-based organisational response, we propose that you use all data sources available and seek to take an active approach to identifying and investigating these parts of the organisation.

R3.13. Use data from multiple sources (reporting, anonymous reporting, absence, retention, staff survey) to triangulate potential areas of the organisation which require more targeted action around racism and inappropriate behaviour.

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Alongside these mechanisms, we are highlighting that some learning for all staff should be compulsory, via its inclusion in other mandatory 'mainstream' development sessions. Focusing on micro-aggression and more subtle forms of racism makes sense because this is the most common in your organisation (and our society), and can be harder to 'pin down'. This does not make its negative impact any less exclusionary and damaging. Including some basics on how to prevent or correct this behaviour is also critical for the development of an anti-racist culture.

R3.18. **Include explanation of micro-aggressions, how to respond when you experience or observe micro-aggressions and how to be an active bystander in induction and ongoing training around culture and inclusion.**

In order to further reinforce the role of leaders and managers in this area, we recommend that inclusive leadership is embedded alongside some basics around cultural competence so that leaders and managers have a stronger base from which to call. Critically, race and ethnicity specifically cannot be lost in 'generic' inclusive leadership – we recommend that specific development is focused on increasing comfort to have conversations about race.

R3.21. **Include an inclusive leadership, with core anti-racist components and cultural competence knowledge and skills development module in all leadership training, including increasing comfort to have conversations about race.**

5.2.4.   Recruitment and selection

The Welsh Government's external recruitment process is thorough, and all of those we met or spoke with who were involved in the process in any way were clearly committed to a fair process and the wish to employ people who were the best at the time that roles become available. There are though numerous areas where the process allows for those who are not necessarily the best to gain an advantage and therefore potentially be employed above a better candidate.

Our first priority recommendation relates to a review of the application form, to make some important changes to ensure that it is not off-putting, especially for those who are new to Civil Service recruitment. We suggest that this review take place with input from MESN and all other staff networks.

R4.15. **Review the application form from an inclusivity lens (with reference to section 4.4.3). In particular, simplify, rearrange and clarify potentially confusing instructions (e.g. change employment history to request either three years or a maximum of five employers).**

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Specifically, throughout our review, we have identified a number of potential negative impacts of strengths questions on candidates that may be more likely to occur for ethnic minority applicants. These relate to identity, stereotype threat and language. Fortunately, we believe that the current manager-led recruitment lends itself to using the behaviour, experience and technical questions. For the same reasons, we also highlight R2.23b which suggests removal or adaptation of the warm-up questions.

R4.26a The judicious use of strengths questions, **with a focus questions on the behaviour, experience and technical aspects of the success profiles.**

We have noted a number of required changes to the interview guidance for panel members and chairs. Since these individuals play a significant role, especially with the absence of tests in many recruitment processes, we feel that these changes are critical to reduce the likelihood of conscious and unconscious biases impacting recruitment outcomes.

R4.19. Improve and expand interview guidance for panel members and panel chairs R4.1. Calculate the over-representation needed in order to meet organisational recruitment targets to match population representation over a designated time period.

R4.3. Analyse full recruitment phase outcome data by job families or campaigns in order to monitor equitable outcomes throughout the process on an ongoing basis. This data is ideally available 'live' so that any issues with processes can be highlighted immediately. If this is not possible, we recommend proactive quarterly reviews.

The complexity relating to this analysis has been explored above. That said, we recommend that this recommendation is prioritised and appropriately resourced.

5.3. Quick wins

We have identified a number of smaller recommendations, with a requirement for very low or no additional people resource, and no anticipated additional cost. We have described these as quick wins. We recommend you implement these as soon as possible, to make positive progress and maintain momentum in this work

5.3.1. Governance, policy-making and strategic leadership

In order to enable your reporting to have more immediate comparison and thereby value, we recommend that undeclared/PNTS people are excluded from the overall proportions. Providing Welsh Government population and population comparator data will enhance this action further.

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R1.8 For all data reporting, exclude the undeclared/PNTS people from the overall proportions. Provide as a separate data point.

5.3.1. Development, promotion and progression

Quick wins related to development, promotion and progression is also highlighted below:

R2.2. Carry out further analysis of the temporary promotions data by directorate to identify specific trends. Research the reasons for those trends.

R2.4. Focus on the inclusivity criterion within the Civil Service Behaviours to establish and measure all managers' inclusive leadership capability when recruiting and promoting managers.

5.3.2. Culture, behaviours and retention

Quick wins related to culture, behaviours and retention:

R3.10. Publicise the reporting mechanism more widely, and the anonymous and confidential support available.

R3.14. Offer confidential 'consequence free' exit interviews facilitated by people such as Dignity and Respect Advisers or relevant network or Trade Union representatives. Ask interviewers to provide themes for organisational exit on an annual basis.

5.3.3. Recruitment and selection

Quick wins related to recruitment and selection:

R4.7. Revise the information in all outreach and applicant guidance to make it clearer that speaking Welsh is not essential (unless required for the post), although commitment to promotion of Welsh language is critical.

R4.14. Continue to monitor where applicants drop out of the application form to prioritise simplification or other improvements to secure more applications.

R4.32. Panel members should consider their position and visibility on screen, ensuring they are facing the camera (with consideration of potential disability).

5.4. Summary

We have set out above a number of priority recommendations and quick wins. They are categorised by topic below. We hope that these priority recommendations are a realistic

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expectation for the Welsh Government to begin implementing within six months of this extensive review.

Topic	High impact	Priority	Quick wins	Other
1 Governance, policy-making and strategic leadership**Error! Reference source not found.**	1	2	1	9
2 Development, promotion, progression and inclusive leadership	2	1	2	12
3 Organisational culture, behaviours and retention		4	2	17
4 Recruitment and selection	1	5	3	22
Total	**4**	**12**	**8**	

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6. Appendices

Appendix 1   Full list of recommendations

Recommendation Sections
- **1 Governance, policy-making and strategic leadership**
- **2. Development, promotion, progression and inclusive leadership**
- **3 Organisational culture, behaviours and retention**
- **4 Recruitment and selection**

Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Effective governance	R1.1	Elevate the position of the Diversity and Inclusion Steering Group (DISG) to be a committee to the executive committee, jointly chaired by the permanent secretary and an EDI subject matter expert. Its role will be focused on assurance in relation to anti-racism and other priority focuses for EDI within the Welsh Government.	P
Effective governance	R1.2	DISG and anti-racism work to be supported by strong programme and project management.	
Strategic SMART action plan	R1.3	Develop a SMART action plan to establish the six fundamentals over the next year to ensure that the work is fully embedded within three years.	P
Expert-led and well-resourced EDI team	R1.4	Create a new role at Grade 6 (or above) to oversee this work, including the implementation of the recommendations from this report. The post-holder is required to have a proven track record of facilitating measurable progress on EDI and anti-racism within a complex organisation.	HI
Expert-led and well-resourced EDI team	R1.5	The recommendations in this report should be reviewed, approved and synthesised with any current and related action plans. They should then be converted into a strategic action plan with SMART actions.	

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Active and involved networks and advocates	R1.6	Ensure that MESN is sufficiently resourced and that they are consulted on plans, rather than responsible for working up the detail of anti-racist work.	
Data, analysis, targeted response, evaluation	R1.7	Use targeted data analysis to isolate problems and opportunities. For example, when looking at annual workforce make-up, separate data by region and compare to local population data.	
Data, analysis, targeted response, evaluation	R1.8	For all data reporting, exclude the undeclared/PNTS people from the overall proportions. Provide as a separate data point.	QW
Data, analysis, targeted response, evaluation	R1.9	As soon as data allows, bring in analysis by ethnic group and other identities in order to carry out intersectional analysis.	
Data, analysis, targeted response, evaluation	R1.10	When planning anti-racist initiatives, build in evaluation. This will rely on robust, up-to-date data. Use these evaluations to understand which initiatives are most effective in order to target investment.	
Strategic leadership	R1.11	Develop a departmental data score card so that senior leaders can take responsibility for addressing race equity in their own departments.	
Strategic leadership	R1.12	Develop SMART objectives for the changes and interventions for which senior leaders will be held accountable when delivering in their departments.	
Policies and policy-making	R1.13	Once sufficient progress has been made on these and associated recommendations, carry out a full review of all policies to ensure that they reflect your target organisational culture.	
Data and research	R2.1	Monitor temporary promotions by ethnicity, including whether or not the person successfully secures achieves a permanent promotion following the TPA.	

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Data and research	R2.2	Carry out further analysis of the temporary promotions data by directorate to identify specific trends. Research the reasons for those trends.	QW
Data and research	R2.3	Measure length of time for people to progress from one grade to another selected grade. Analyse by ethnicity to assess where interventions may be needed.	
Inclusivity criterion	R2.4	Focus on the inclusivity criterion within the Civil Service Behaviours to establish and measure all managers' inclusive leadership capability when recruiting and promoting managers.	QW
Management skills development	R2.5	Establish mandatory 'becoming an effective manager' type training for all first time managers with core anti-racist components.	
Management skills development	R2.6	Promotion criteria must include the expectation that applicants for be able to demonstrate that they have attended relevant management and leadership training, and have applied what they have learned to their practice, including evidence that they have supported their direct reports' development. (Reference - Civil Service Behaviour Developing self and others.)	
Management skills development	R2.7	Revise existing leadership training to include a specific module on anti-racist and inclusive leadership and management behaviours and practice.	
Management skills development	R2.8	Hold managers to account for their ability to promote equitable and inclusive work environments. (Reference - Civil Service Behaviour – Leadership.)	
Sponsorship programme	R2.9	Develop a formal sponsorship programme for ethnic minority talent at the grade level(s) (suggested EO/HEO) before there is a significant drop in representation at a particular grade. This will ensure that ethnic minority staff have had the appropriate stretch and other relevant experience so they can	HI

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
		compete equally to majority group staff who are benefiting from informal sponsorship.	
Sponsorship programme	R2.10	Urgently recruit and train a pool of sponsors to sponsor participants on the proposed Aspire programme who will be two grades above the level of the group of ethnic minority staff who will be targeted to be their protégées.	
Sponsorship programme	R2.11	Use this group of sponsors on the Aspire programme instead of mentors to ensure that career barriers are addressed as an outcome of the programme.	HI
Career development plan	R2.12	Develop and roll out a scripted career and well-being conversation for staff to be delivered over a specific period. Hold Directors responsible for ensuring that all of their managers comply within the time frame. Record findings centrally, and analyse for training and development needs. Conversations should include the potential for stretch projects and/or other development opportunities.	P
Promotion policy and process	R2.13	Develop a structured process, with associated policy in place, to ensure that temporary promotions are fairly awarded, including ambitious targets for improvement.	
Promotion policy and process	R2.14	Recruit and train a pool of diverse equity advocates to be part of promotion panels with a focus on the levels with significant underrepresentation of minority ethnic staff. Equity advocates to be given the power of veto over any decision they feel may be unsafe.	
Promotion policy and process	R2.15	Ensure that promotion panels are provided with relevant and up to date data on the difference in levels of representation and rate of promotion in a particular division at a specific grade.	
Promotion policy and process	R2.16	Develop guidance for promotion panels on the use of the tie-breaker provision in the positive action legislation.	

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Ethnic Minority Talent development programme	R2.17	Ethnic Minority Talent development programme aimed at key shortfall areas (we suggest HEO, SCS). Key components of the programme could be: a. core leadership & management workshops; b. career and selection coaching; c. executive sponsor for each participant; d. national level leadership programme or MBA or similar; and e. facilitated action learning sets	
Data and analysis	R3.1	Explore how to capture a higher proportion of new-starters' ethnicity, including a targeted campaign to encourage people to share their ethnicity and other monitored characteristics, highlighting the significance of race and ethnicity due to the Anti-racist Wales Action Plan.	
Data and analysis	R3.2	Consider how workforce make-up reporting for higher grades (G6 and above) can be made more meaningful without sharing data unnecessarily, whilst low numbers of ethnic minority staff remain.	
Data and analysis	R3.3	Monitor the trends in leaver data, over three to five years, to identify whether retention of ethnic minority staff requires greater focus.	
Data and analysis	R3.4	Continue to monitor employee relations cases by ethnicity in order to identify where there may be any differences in experiences and/or process that need to be addressed.	
Data and analysis	R3.5	Continue to carry out equalities analysis on all annual People Survey questions and use this data to implement actions which ensure equitable experiences.	
Compassionate approach	R3.6	Continue to promote and use informal resolution wherever appropriate, including encouraging open conversations in teams and between individuals. Where appropriate, offer mediation to support finding agreement on acceptable future behaviours.	P
Compassionate approach	R3.7	Encourage managers to seek support and guidance on diversity issues in confidence, from an appropriate coach, before the issues become more serious.	

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Compassionate approach	R3.8	Update the Dignity at Work policy to reflect the compassionate approach, for example the independent support available. Revise the language as appropriate, for example change 'complaint' to 'concern'.	
Effective policy and reporting	R3.9	Review the existing complaints system in order to identify improvements to the process.	
Effective policy and reporting	R3.10	Publicise the reporting mechanism more widely, and the anonymous and confidential support available.	QW
Effective policy and reporting	R3.11	Synthesize learning from informally and formally reported racist incidents in order to reduce their incidence.	
Effective policy and reporting	R3.12	Pilot an anonymous reporting tool for reporting inappropriate behaviour.	
Effective policy and reporting	R3.13	Use data from multiple sources (reporting, anonymous reporting, absence, retention, staff survey) to triangulate potential areas of the organisation which require more targeted action around racism and inappropriate behaviour.	P
Effective policy and reporting	R3.14	Offer confidential 'consequence free' exit interviews facilitated by people such as Dignity and Respect Advisers or relevant network or Trade Union representatives. Ask interviewers to provide themes for organisational exit on an annual basis.	QW
Anti-racist training, cultural awareness and Respect campaign	R3.15	Assess the impact of the Respect Campaign, and identify any shortfalls and/or where it can be improved or changed.	
Anti-racist training, cultural awareness and Respect campaign	R3.16	Ensure that anti-racism is threaded through all mandatory training and induction. Consider whether a specific focus on cultural awareness should also be included.	
Anti-racist training, cultural awareness and Respect campaign	R3.17	Consider where specific anti-racist training with individual directorates or policy areas, is needed – either in response to a specific incident/group of incidents or feedback or because of its relevance to policy area. Commission anti-racist experts to design bespoke training specific to their context.	
Promote internal capability to reduce racist behaviour	R3.18	Include explanation of micro-aggressions, how to respond when you experience or observe micro-aggressions and how to be an active bystander in induction and ongoing training around culture and inclusion.	P

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Promote internal capability to reduce racist behaviour	R3.19	Design or commission a specific intervention to reduce the incidence of banter/inappropriate jokes. Consider using the real-life examples included in this report, and via experiences of ethnic minority staff, to demonstrate that 'this happens here'.	
Increase comfort and knowledge around race and ethnicity	R3.20	Educate line managers about the barriers often faced by ethnic minority people, especially in relation to recruitment and progression (reference this report) and how to monitor potential differential impact on ethnic minority staff in their decision-making process.	
Increase comfort and knowledge around race and ethnicity	R3.21	Include an inclusive leadership, with core anti-racist components and cultural competence knowledge and skills development module in all leadership training, including increasing comfort to have conversations about race.	P
Showcase ethnic diversity	R3.22	Pro-actively showcase ethnic minority career progressors, role models and senior ethnic minority staff to combat unconscious biases around successful leaders being older, White and male.	
Culture and engagement role	R3.23	Consider creating an internally focused role that is specifically focused on internal cultural change.	
Data and analysis	R4.1	Calculate the over-representation needed in order to meet organisational recruitment targets to match population representation over a designated time period. (As shown in example calculation.)	P
Data and analysis	R4.2	Report more regularly against recruitment targets – we suggest quarterly at a minimum. This will allow you to monitor successes of interventions more closely.	
Data and analysis	R4.3	Analyse full recruitment phase outcome data by job families or campaigns in order to monitor equitable outcomes throughout the process on an ongoing basis. This data is ideally available 'live' so that any issues with processes can be highlighted immediately. If this is not possible, we recommend proactive quarterly reviews.	P
Data and analysis	R4.4	Ensure that analytical resource is made available to develop CAIS reporting on recruitment phase outcomes by ethnicity.	
Outreach	R4.5	Ensure the EDWT team are sufficiently resourced to take a more pro-active role to supporting recruiting managers in relation to understanding under-representation, and the best methods to attract the most diverse group of applicants.	

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Outreach	R4.6	Increase resources in the EDWT to enable more ethnic minority targeted outreach and an increased number of information sessions, including more in-person information sessions around Wales.	
Outreach	R4.7	Revise the information in all outreach and applicant guidance to make it clearer that speaking Welsh is not essential (unless required for the post), although commitment to promotion of Welsh language is critical.	QW
Outreach	R4.8	Amend the External Recruitment Assurance Checklist to include an assurance that recruiting managers are actively required to seek a range of candidates with diverse backgrounds.	
Outreach	R4.9	For major campaigns, run interview practice/mock interviews for individuals who have never worked in the Civil Service – this could be designed creatively including groups – rather than the heavy investment of one candidate to one panel.	
Outreach	R4.10	Run a campaign which highlights the range of jobs and skills which can be developed (in a similar vein to the 'Join the forces' campaign but lower budget), helping to make the Welsh Government an employer of choice.	
Outreach	R4.11	Review the list of options for how people were attracted to this role to ensure that the impact of outreach activities is measured.	
External applicant guidance	R4.12	Strengthen and extend the guidance given to external candidates, and make it more accessible – possibly with videos (talking heads, with diverse representation) and/or example questions and how answers can be 'directed' – or dramatically simplify the interview process.	
External applicant guidance	R4.13	If strengths-based interview questions continue to be used, update the External Applicant Guidance with a more detailed explanation of this type of question, so that candidates can fully prepare and people who are advising applicants can focus their advice more accurately.	
Improve the application process	R4.14	Continue to monitor where applicants drop out of the application form to prioritise simplification or other improvements to secure more applications.	QW
Improve the application process	R4.15	Review the application form from an inclusivity lens (with reference to section 4.4.3). In particular, simplify, rearrange and clarify potentially confusing instructions (e.g. change	P

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
		employment history to request either three years or a maximum of five employers).	
Improve the application process	R4.16	Consider changing the options if someone is going to leave the application to 'Exit and continue later', 'Next page/continue' or just 'Exit', at which point the form takes the individual to a pop-up (or similar) for further help and the monitoring form, with encouragement and rationale for completing the monitoring form.	
Training for recruiting managers and panel members	R4.17	Improve the information contained in the anti-racism elements of the resources to which recruitment managers are directed.	
Training for recruiting managers and panel members	R4.18	Improve and expand guidance on sifting, including examples of weak and strong answers to paper sift questions.	
Training for recruiting managers and panel members	R4.19	Improve and expand interview guidance for panel members and panel chairs: a. Greater emphasis on the issues of bias and unconscious bias, self-awareness (through shortlisting and interview) and the need for consistency. b. How to improve the validity and rigour of structured interviews and how to manage and mitigate the variety of cognitive errors and biases that undermine equity. c. An expectation that when the panel meets beforehand there is agreement regarding supplementary questions and how they are handled – in notes and marking. d. A reminder of the expectations and aims from the Anti-racist Wales Action Plan, without the current expectation of 'read the Anti-racist Wales Action Plan'. e. Much more emphasis is needed on awareness of bias/the potential for unconscious bias when shortlisting.	P

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
Training for recruiting managers and panel members	R4.20	Ensure that your own additions to the Civil Service training content include individuals who are visibly ethnic minority people, especially pictures of people in senior positions and/or panel chairs.	
Training for recruiting managers and panel members	R4.21	Monitor more closely whether managers are completing the actions set out in the 'external recruitment outreach standards checklist'. Provide support as needed.	
Equity Advocates	R4.22	Recruit and train a pool of diverse equity advocates to be part of external recruitment panels with a focus on the levels with significant underrepresentation of minority ethnic staff. Equity advocates to be given the power of veto over any decision they feel may be unsafe.	HI
Shortlisting	R4.23	Provide clear instructions on the application form, such as 'appropriate numbering of evidence/criteria is expected to ease the assessment of the application' and include this information in the applicant guidance.	
Interviews	R4.24	If stating the time expectation is needed at all, we recommend: a. State "the approximate time allowed for questions is… " b. Do not repeat the time allowed for each question asked.	
Interviews	R4.25	If English is not the candidate's first language, the time allowance will often not be enough and therefore the procedure would need to be amended to allow additional time in these circumstances. A question can be asked at the point of the interview being offered, not in the application form where it could be misinterpreted.	
Interviews	R4.26	Make the following changes to the questions asked: a. Ensure the judicious use of strengths questions strengths questions and focus questions on the behaviour, experience and technical aspects of the success profiles. b. Remove or adapt the current warm-up question, due to the high likelihood of bias (conscious and unconscious) impacting the outcome of the notes and scores.	P

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Chapter/ sub-title	No.	Recommendation	High impact/ priority/ quick-win
		c. Review questions to eliminate semi-closed questions and double questions.	
Interviews	R4.27	Panel members should consider their position and visibility on screen, ensuring they are facing the camera (with consideration of potential disability).	QW
Interviews	R4.28	Clarify panel members' roles in terms of repeating, rephrasing or reminding candidates of the question.	
Interviews	R4.29	Provide guidance for the panel on the noting and marking of supplementary questions.	
Policies and procedures	R4.30	Update the small 'External Recruitment' section of the Recruitment policy with at least an up-to-date list of the guides and documents that are available for direction on the process for external recruitment.	
Policies and procedures	R4.31	Ensure the external recruitment assurance checklist encourages recruiting managers to use targeted advertising and outreach in conjunction with the EDWT and monitor whether this takes place.	

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Appendix 2   Welsh government Groups and Directorates

The Permanent Secretary is the head of our organisation, and the most senior civil servant in Wales. The Permanent Secretary is supported by **five directors general** and other members of the Senior Civil Service.

The organisation is divided into **five groups and one directorate**, listed below:

Chief Operating Officer's Group (COOG)

The Chief Operating Officer's Group focuses on developing a confident, capable and resilient organisation needed for a post-COVID, post-EU future. We are also responsible for the delivery of vital inspectorate and planning services.

Our responsibilities include Operations & Efficiency; Finance; HR; Commercial & Procurement; Digital, Data and Technology; Knowledge and Analytical Services, Communications and Governance. Planning & Environment Decisions Wales, Care Inspectorate Wales and Healthcare Inspectorate Wales.

We provide critical day-to-day support to the Permanent Secretary and across groups, ensuring the successful running of the organisation to allow the delivery of the programme for government commitments on behalf of Ministers.

Climate Change and Rural Affairs Group (CCRA)

CCRA supports the Climate Change and Rural Affairs ministers across a range of policy areas - including climate change, infrastructure, rural affairs and housing and regeneration.

The work of our group is broad in scope, with activities ranging from challenges relating to creating a Net Zero Wales by 2050; ensuring people have high-quality, warm, secure and energy-efficient homes to live in; the development of a future sustainable farming scheme; supporting the food and marine sectors; and delivering 21st Century infrastructure that will move us towards a low carbon transport system.

The Group is also responsible for:

- managing our natural resources sustainably
- overseeing Wales' planning system

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- supporting our agriculture and food sectors

- ensuring the health and welfare of animals

- supporting the regeneration of communities

- implementing sustainable development policy.

Economy, Treasury and Constitution Group (ETC)

Working with colleagues across Welsh Government, ETC Group supports the First Minister and Cabinet in the delivery of the Programme for Government, with particular responsibilities for advising the Minister for Economy, Deputy Minister for Arts and Sport, Minister for Finance and Local Government, and the Counsel General and Minister for the Constitution. Our work spans a range of policy and operational areas including the Welsh Treasury, legal services and legislative counsel, international relations, business and regions, constitution and justice, WEFO, R&D, science and innovation, and culture, sport and tourism.

The work of our Group includes responsibilities for the Welsh Government's budget, tax policy, the provision of strategic economic advice and support for business to help grow the Welsh economy, developing science in Wales, promoting good working relationships between the four nations and internationally, and securing a successful EU transition.

The Group is also responsible for:

- raising the international profile and influence of Wales

- providing legal and constitutional advice to Ministers

- drafting Welsh laws

- making regional funding work better and smarter for Wales

- developing and strengthening the national tourism industry and promoting major events

Group Ops Team colleagues support all this work through a range of corporate and organisational development services.

Health and Social Services Group (HSS)

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Our role is to focus on supporting the Government to deliver its priorities, whilst also providing leadership to the NHS and Social Services to ensure they can deliver the required changes in services and culture. These changes are set out in "A Healthier Wales", our plan for the future of health and social care, published in June 2018.

The group has a unique role within the Welsh Government in that it is responsible for exercising strategic leadership and management of the NHS in Wales and is responsible for the robust stewardship of NHS funds. It does this via 7 Local Health Boards, 3 NHS Trusts and 2 Special Health Authorities which are directly accountable to the Minister for Health and Social Services through the Chief Executive of NHS Wales and Director General.

The group has the following overarching responsibilities:

- promoting, protecting and improving the health and well-being of everyone in Wales, and leading efforts to reduce inequalities in health

- making available a comprehensive, safe, effective and sustainable National Health Service

- ensuring that high quality social services are available and increasingly joined up with health care and other services

- ensuring that through Cafcass Cymru, children are put first in family proceedings, their voices are heard and decisions made about them by courts are in their best interests.

Office of the First Minister (OFM)

Our Purpose

At the centre of government, our role is to assist and empower the First Minister and Welsh Ministers to govern effectively and to deliver the Government's priorities for the people of Wales, as set out in the Programme for Government.

Working across the Government we are creative, collaborative and we aim to work together to deliver for the people of Wales.

Public Services and Welsh Language Group

PSWL is responsible for helping to create excellent education and public services for people in Wales.

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In summary, the Group's portfolio includes:

- responsibility for helping all children and young people reach their potential by giving them the best start in life raising the standards of education.

- responsibility for helping people to live in safer and more cohesive communities, with lower levels of poverty and greater equality.

- safeguarding and supporting vulnerable people.

- delivery of the commitments made within Cymraeg 2050.

- working in social partnership to create a fairer society, promoting fair work outcomes within the public and private sectors.

- breaking down the barriers in our tertiary education system, delivering for all learners, of all ages through the establishment of the Commission for Tertiary Education (CTER).

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Appendix 3   Recruitment data outcome categories and background

APPOINT data

- Applications started: all applications that were started, whether or not they were submitted.

- Applications considered: all applications that were submitted, excluding those that were withdrawn.

- Passed sift: applications that met any minimum criteria and were successful at sift (application) stage.

- Progressed to interview stage: applicants who were offered an interview. Please note, while most recruitment exercises appeared to have 2 stages (sift and interview), some included additional tests/assessments. For the purposes of this analysis, it is assumed that the additional tests/assessments took place after sifting and prior to interview. Please note that the percentages reported are overall progression rates for all applicants, regardless of whether they took part in additional tests/assessments.

- Successful at interview: applicants who passed the interview stage, including those offered a post and reserve candidates, who may be offered a post if a suitable one arises in the next year.

- Offered a post: successful applicants who were offered a post, including those who declined.

Based on the available information, it is not possible to calculate test/assessment pass rates.

CAIS data

- *A*pplications started: all applications that were started, whether or not they were submitted.

- Applications considered: all applications that were submitted, excluding those that were withdrawn.

- Passed sift: applications that met any minimum criteria and were successful at sift (application) stage.

- Passed recruitment process: Those who passed the recruitment (including reserve candidates)

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- Offered a post: Those who were subsequently offered a post (including those who declined the offer).

A full breakdown of progression rates by recruitment stage was not possible at this point due to the structure of the data.

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Appendix 4   Prioritisation process

Working group members voted on the following areas which are now ordered in terms of priority as assessed by working group members:

Topic	Weighted score
Recruitment – interviewing – including observation of interviews for White and ethnic minority staff;	47
Progression – including – identifying career enablers and barriers through comparing successful and stalled careers (White and ethnic minority);	45
Behaviours and resolution: The stated HR values of organisation that inform staff behaviours and policy/ process (including complaints) when those behaviours are not met, link to training;	45
Retention - policies and process, including differences/reasons for leaving & staying between ethnic minority people and White;	42
Leadership - including review of anti-racist objective setting process – how are they monitored and reported? Linked to EIA?;	38
Inclusive leader behaviours – including review of values, and the addition of behavioural anchors;	37
Training and Development – Impact - does it have the conditions necessary for behaviour change and transferring learning to the workplace;	26

The results were relatively close, which is as to be expected given how much they intersect.

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We combined this feedback with MESN's priorities which were collated via Slido after we attended a MESN meeting.

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Appendix 5   Survey respondents

We hosted two online surveys on Smart Survey in English and Welsh.

Responses

1159 responses were received which relates to a 19% response rate [63].The majority of responses were provided in English, and 31 people responded via the Welsh language survey. The responses included almost 3000 free text comments across 20 open questions in both English and Welsh..

11% of respondents identified as ethnic minority, including White ethnic minorities

A detailed breakdown for respondents by ethnicity is shown below. This data is provided only for those respondents who shared their ethnicity:

Ethnic group	Number of responses	Proportion of responses	Welsh Government workforce
Asian / Asian British	11	2%	1.2%
Black / African / Caribbean / Black British	*	*	*
Mixed / multiple ethnic groups	19	3%	1.2%
Other ethnic group	12	2%	0.4%
White	676	93%	96.8%

As can be seen in the table above, there is slight over-representation of ethnic minority people compared to the proportion of Welsh Government staff.

Intersectionality

We asked a small number of additional questions in order to consider how other characteristics and/or protected characteristics intersect with ethnicity. Unfortunately, due to the relatively small number of ethnic minority respondents we were not able to carry out meaningful intersectional analysis on the survey results themselves. With each additional

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[63] Using headcount of 6086 ay 31 May 2024

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characteristic combined with ethnicity, the numbers of people with those shared characteristics become too small to be reportable. However, this will be an important area to consider, and will become easier to analysis as the numbers of ethnic minority staff increase.

We have provided further data on our survey respondent make-up below. This only includes people who shared their information. You can see that in all areas recorded, the survey respondents were relatively representative of the whole staff population.

Gender	Number of responses	Proportion of responses	Welsh Government workforce January 2023
Female	437	61%	60%
Male	282	39%	40%
Any other gender	*	*	*

Grade	Number of responses	Proportion of responses	Welsh Government workforce January 2023
TS	49	7%	12%
EO	80	12%	18%
HEO	167	25%	24%
SEO	169	25%	22%
G7	144	21%	17%
G6	31	5%	4%
SCS	38	6%	4%

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Grade	Number of responses	Proportion of responses	Welsh Government workforce January 2023
Permanent	672	93%	94%
Temporary	53	7%	6%

A full list of survey questions can be provided on request.

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Appendix 6   Interview frameworks

Career trajectory interviews

Purpose: identify enablers and barriers to progression for senior leaders

Interview to be undertaken in conjunction with career timeline mapping exercise (completed by interviewee)

5. Please state for me your name and title. Please tell me what your key job responsibilities are now.

6. How did you first come to work at the Welsh Government, and why did you choose to come here?

Supporting questions to consider as you complete the graph:

7. For each job/role, consider:
   - Title and duties
   - Number of years in each position
   - How and what precipitated the move to the next job/role?
   - Are there any major shifts in functional areas?
   - Are there significant learnings associated with each move?

8. Examining the different jobs or periods in your career, are there any points that are particularly significant for understanding your development professionally or
   - Were there any significant failures?

9. For each job/role, what are the
   - Title and duties
   - Number of years in each position
   - How and what precipitated the move to the next job/role?
   - Are there any major shifts in functional areas?
   - Are there significant learnings associated with each move?

10. What have been the highest and lowest moments of your career?

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11. [as relevant] You have achieved a level of success that is rare amongst ethnic minority staff at the Welsh Government:

- would you agree?

- to what do you attribute this?

- Are there ways in which you think your experiences at the Welsh Government have been different from most other minority ethnic staff?

- (In what way) do you think that race and ethnicity have negatively or positively impacted your career?

12. Do you consider your race, ethnicity and/or gender to play a part in shaping your managerial style, approach and/or philosophy?

13. Can you describe the role networks have played in advancing your career, if any?

- What impact have they made

- What types of support have they afforded

14. What challenges remain in your career?

15. Is there anything that we have not discussed that would be helpful for me to hear

16. Do you have any comments or feedback for me about the interview or the project

As relevant:

- What have you done to promote an anti-racist culture within your domain/area?

- What was your anti-racist objective for this last year and have you achieved it?

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Culture interviews

1. Please summarise your role and responsibilities at Welsh Government, including how long you have been working at the Welsh Government?

2. Has your role changed at the Welsh Government during your time there? How?

3. How have you experienced:
   a. Progression?
   b. Recruitment?
   c. Culture?

4. During your time at the Welsh Government, have you known or seen other ethnic minority staff leave the organisation? If so, do you know their reasons for doing so? Do you believe they were in any way connected to their race / ethnicity?

5. (How) do you think your race / ethnicity has affected your experience of working at the Welsh Government, in positive or negative ways?

6. Have you experienced any complaints or grievances around race / ethnicity, either yourself or people you know of? Please share your experiences and thoughts.

7. Who would you turn to if you experienced discrimination? E.g. MESN, Trade Unions, etc.

8. Are you aware of the Anti-racism Wales Action Plan (Anti-racist Wales Action Plan), specifically the commitment and actions around making the internal workings of the Welsh Government anti-racist? Please share.

9. Do you see any positive impacts in your working life as a result of the launch of the Anti-racist Wales Action Plan in 2022? What has worked? What hasn't?

10. What would you like to see change within the Welsh Government to better support / or more consistently support ethnic minority staff?

11. Are you aware of / a member of MESN? What do you think of their role within the Welsh Government?

12. Is there anything else that we haven't covered that you would like to share with us?

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Appendix 7   Deliberative workshop and theory of change

At an interim phase of the project, we held a deliberative workshop with the following purpose:

To enable the Welsh Government to make positive progress towards becoming an anti-racist organisation.

- Identifying what needs to be in place to become an anti-racist organisation

- Identify the specific activities and actions needed to make progress

- Identify organisational enablers and barriers and explore how to effectively progress given this context

At this workshop, we outlined the definition of a Theory of change:

Explaining Theory of Change

- A Theory of Change is a **specific and measurable description of a change** that forms the basis for planning, ongoing decision-making and evaluation.

- A theory of change is an interpretation of what we believe – but **based on evidence and experience** – expressing what defines success and what it takes to get there

- Theory of change breaks down broad, long-term changes **into a series of smaller changes at different levels** to understand how they are linked.

- It can be represented in a change map - **a visual representation of the change you want to see and how you expect it to come about**- or as a written account of connected events or both.

- Theory of Change | NCVO

And the steps to build a Theory of change and provided examples of SMART action planning.

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How to build a Theory of Change

The steps to build a theory of change:

1. Agree the long-term intended impact (the big long-term change you want to see)
2. Map outcomes (the real changes resulting from your activities) backwards, thinking of them as necessary pre-conditions
3. Identify activities (the things we do - our services, products, campaigns etc) necessary to achieve outcomes
4. Identify assumptions (enablers and risks underlying your theory) to interrogate your theory.
5. Establish a timeline and plan resources
6. Produce a diagram and narrative to summarize this information

In small groups, with support from facilitators, attendees working through the theory of change process for the following draft recommendations:

- Senior Director of Culture and Inclusion to lead this work internally (Governance)

- Trained Equity Advocates for recruitment and promotion panels (Recruitment)

- Formal sponsor and talent management programme (Progression)

- Consider how reporting can support better experiences for individuals and promote organisational learning (Culture)

- An anti-racist and EDI governance structure that is fit for purpose (Governance).

Outputs from the workshop were retained by Welsh Government for future consideration in action planning, following the completion of this report.

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