



promoting equality in housing  
hybu cydraddoldeb ym maes tai

# Tai Pawb

**Response to:**

**Anti-racist Wales**

**Equality and Social Justice Committee Inquiry**

October 2023



## Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. We are Wales' leading national organisation promoting equality and diversity in housing. We imagine a Wales where everyone has the right to a good home. Too many people in Wales don't have somewhere to live in security, peace, and dignity: we are determined to change that. We support and work with our members to help them put ideas into practice while influencing policy makers to make housing policy fair. We are the thought leaders on equality, diversity, and human rights issues for the housing sector and beyond.

Tai Pawb operates a membership system which is open to local authorities, registered social landlords, third sector organisations, other housing interests and individuals.

## What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: [www.taipawb.org](http://www.taipawb.org)

Charity registration no. 1110078

Company No. 5282554

## 1. Introduction

- 1.1. Tai Pawb welcomes the opportunity to respond to Anti-racist Wales Inquiry into the effectiveness of the implementation and delivery of Anti-racist Wales Action Plan (ARWAP).
- 1.2. Tai Pawb's mission is to advance equality and diversity in housing in Wales therefore our response is focused on specific actions within the **Homes and Places section** of ARWAP, its implementation and delivery.
- 1.3. Our response is based on:
  - engagement that Tai Pawb has had to date with housing organisations in Wales (including housing associations, local authority housing departments and third sector housing support organisations).
  - 2023 survey of 41 housing organisations in Wales conducted in 2023
  - two sets of surveys and subsequent reports conducted for our Deeds not Words initiative: [2021 Baseline Surveys](#) (of 27 housing organisations and 833 housing employees) and [2023 Two-Years-On Surveys](#) (of 22 organisations and 812 employees).
  - Ongoing engagement with ethnic minority colleagues (as part of our [Deeds not Words panel](#)) and ethnic minority and refugee organisations we work and partner with.
- 1.4. Tai Pawb was extremely pleased to see the launch of ARWAP in 2022 and the role of the plan in driving anti-racism is extremely important. Although we see good progress in some areas, like increased ethnic diversity of boards and improvements in organisational cultures, 20 years on from the introduction of the then Welsh Assembly Government's [BME Housing Action Plan](#) many issues remain and it is crucial that ARWAP drives action to address these:
  - staff is not ethnically diverse, particularly at senior management and managerial level. Our data shows that only 1.2% of senior managers and only 0.8% of other managers are from ethnic minority communities despite some great practice in this area (e.g. CCHA grew its workforce diversity from 6% to 15 % in less than a year).
  - Racist and religious hate crime and harassment is still too commonly experienced by communities and housing employees

- Some ethnic minority communities still experience much higher levels of [overcrowding and poorer housing conditions](#) despite some [good practice in this area](#)
  - Ethnic minority communities are still at much higher risk of homelessness with sanctuary seekers facing [particular disadvantage](#) and those with NRPF facing destitution.
- 2. Consider the effectiveness of Welsh Government actions to deliver the plan, including what is being done to ‘lead by example’ in taking a proactive and cross-governmental approach to racism.**
- 2.1. ARWAP is overall an ambitious plan with a stated purpose of making ‘a measurable change to the lives of ethnic minority people by tackling racism’. The plan is very comprehensive and, in order to achieve tangible impact, it requires investment of time, leadership, resources and funds.
- 2.2. Although it is difficult to evaluate effectiveness of actions in a short space of time, there are certainly positive steps and actions that Welsh Government has taken to implement its ARWAP housing actions as well as lessons that could be learnt.
- 2.3. Positive steps include:
- Funding of anti-racism manager in Tai Pawb to help the sector deliver on some actions
  - Greater focus on anti-racism in policymaking (e.g. in housing regulation or homelessness policy)
  - Appointment of officials responsible for ARWAP (and other EDI areas) in housing department
- 2.4. Actions which could increase the effectiveness of ARWAP include:
- The need for more targeted communication on ARWAP commitments with senior sector leaders to raise the profile of the plan
  - Identifying and using all the possible levers at WG disposal to ensure delivery including funding conditions.
  - Greater investment and more cross departmental responsibility in relation to Gypsy, Roma and Traveller housing actions.
  - Reviewing and changing some ARWAP actions to refocus on delivery on key housing issues

2.5. In January 2023, Tai Pawb employed a dedicated Anti-racism Manager – a post funded by the Welsh Government to support the social housing sector with the implementation and delivery of specific actions within the Homes and Places section of ARWAP. Despite only operating for 9 months, the project has been instrumental in raising awareness of ARWAP and helping housing organisations plan and deliver on their actions. Since its inception, we have seen a surge in the numbers of anti-racism delivery plans produced by housing providers and anti-racism training undertaken. Examples of project activities include (amongst others):

- 121 implementation advice and support to organisations
- Housing specific [Anti Racism Newsletter](#) and topical briefings
- Events and networking meetings
- [Anti-racism toolkit for housing](#)
- Good practice guides (to be produced): meeting housing needs of ethnic minority people & culturally inclusive design, hate crime
- Equality Impact Assessment Toolkit and Template
- Amplifying ethnic minority tenants voice, via survey and setting up on tenant panel

2.6. In 2020, two years before the introduction of ARWAP, Tai Pawb launched its own anti-racism initiative – [Deeds not Words](#). Although the initiative did not receive specific funding from the Welsh Government, Tai Pawb as an organisation is partly funded by the Welsh Government to help the housing sector deliver on wider equality, diversity and inclusion issues, and the initiative would not have been possible without this support.

2.7. Deeds not Words is a pledge and an initiative for the housing sector to end racial inequality in housing. The pledge asks housing organisations to take very specific actions to embed and progress anti-racism, including better communication, engagement, use of data, reducing overcrowding, increasing diversity, training and stronger leadership. To date, the pledge has over 30 subscribers from housing associations and housing support organisations. The pledge also involves quarterly leaders' meetings where good practice is shared and progress reported; Tai Pawb monitoring of progress and impact via surveys; setting up of Deeds not Words panel of ethnic minority housing professionals who focus on awareness, leadership and sector challenge. And Deeds not Words coffee mornings – peer networking group.

2.8. The initiative has so far had very [positive impact](#) in some the specific areas it aims to address, e.g.

- reduction in experiences of racism amongst staff
  - shift in organisational cultures towards more inclusivity (with ethnic minority colleagues feeling measurably safer and more listened to).
  - slow but measurable increase in [ethnic diversity of housing association boards](#) (from 4% in 2020 to 7% in 2022). This is also linked to fantastic positive action initiative developed and funded by CCHA, Taff, Linc Cymru, Cadwyn and Hafod housing – [Pathway to Board](#).
  - Our survey shows that nearly 80% of housing organisations had some form of anti-racism plan or commitment (either standalone or as part of EDI plans/strategies) although only 30% have been published
- 2.9. Although it is positive to see the impacts of our work and WG’s focus on ARWAP, many challenges remain and some of these are caused by structural issues which require longer, concerted commitment and investment (e.g. overcrowding or homelessness), whilst others could be addressed quicker with concerted effort (e.g. ethnic diversity of staff).
- 3. Consider progress and monitoring arrangements for the Plan, including the role of the public sector (local authorities, health, education), third sector and where applicable, the private sector.**
- 3.1. Whilst in some areas, the plan has progressed well thanks to e.g. investment highlighted above, in others, it could have progressed quicker or better.
- 3.2. Actions related to Gypsy and Traveller accommodation. Our colleagues in Travelling Ahead Project and Gypsy and Traveller coalition are reporting very slow progress of these actions, potentially caused by WG capacity issues and lack of funded specific advice and support for local authorities. While we are not aware to what extent these are being addressed, there is a definite action which could help improve this: funded implementation advice and support which would help local authorities make progress. This need for specific implementation advice and support has been identified by both: Gypsy and Traveller organisations we have spoken to and Local authority colleagues we have contact with.
- 3.3. While we have highlighted some good progress on housing actions above, this progress seems to be more varied in local authorities. While we have come across local authorities which report that they are well on their way to preparing a plan or delivering on anti-racism, housing colleagues in other local authorities have little or no awareness of ARWAP commitments. There are multiple reasons for this including: local authorities being big organisations with the need for greater coordination between multiple departments; for example

multiple ARWAP actions related to recruitment, diversity or training appear in different sections of the plan which requires local authorities to coordinate this across departments, while other actions are e.g. housing specific.

- 3.4. While we are not part of ARWAP monitoring arrangements, we can certainly see some positive impact of ARWAP governance arrangements within WG being led at the highest level (e.g. we can see it mentioned more by senior officials we work with, it is more often brought up in the course of various policy working groups, boards etc).
- 3.5. In terms of data arrangements, we could certainly do with better data on some housing and homelessness actions and issues. For example, there is currently no national robust data on housing conditions in Wales although we are aware that this is something that the Welsh Government is looking at. Similarly in the sector, our survey shows that only 57% of social housing providers can break down their stock condition data by household characteristic (including e.g. race). Improvements in housing conditions data – nationally and locally are urgently needed. Poor data, including ethnicity data, was one of the contributory factors in the tragic death of Awaab Ishak in Rochdale.
4. **Examine the progress of the Racial Disparity Unit, and determine whether there are gaps in data collection and analysis of data is being carried out effectively.**
  - 4.1. Whilst we cannot comment on progress of Racial Disparity Unit as we are not involved in its development, we would suggest that the unit engages with each department responsible for delivering ARWAP to identify data gaps in those areas (we are not aware whether this has been done).
  - 4.2. We have already provided some comments on data in paragraph 3.5 above (housing conditions). In addition to this key data gaps in relation to ethnicity and housing are as follows.
  - 4.3. Lack of national data on social housing tenancies (nationally, we can only assess the ethnic make up of social tenants every 10 years, based on Census). Welsh Government is therefore unable to assess e.g. to what extent the ethnic make up of social tenants is changing or not.
  - 4.4. Lack of data on homelessness amongst people with No Recourse to Public Funds, including refused asylum seekers and migrants. [Report commissioned by Welsh Government](#) highlighted that estimates range from 100's to 1000's.



Welsh Government is unable to assess the extent of destitution and potential support needed unless reliable data is there (e.g. via support organisations).

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

5.1. We would suggest that ethnic minority advocacy organisations and individuals would be much better placed at commenting on this as they work directly with communities affected.

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

6.1. It would be difficult to comment on outcomes achieved in this short space of time although we have already commented on some key impacts and effectiveness throughout this document. Some of these impacts related to initiatives which started earlier than ARWAP (e.g. Deeds not Words), although based on our experience and engagement, ARWAP has certainly helped to bring anti-racism higher up the priority list, especially where investment in extra resource has been made (like Tai Pawb's Anti-racism Manager).

6.2. One action we have not mention so far is anti-racism training. Tai Pawb has developed Antiracism training for the housing sector – however this is a paid service due to the need to use paid associates for this work. We can certainly see that requests to our organisation for Anti-racism Training delivery have significantly picked up in Q2 and Q3 of 23-24 – in parts due to us raising awareness of ARWAP housing action requiring senior leaders and boards to receive training by the end of 2023-2024. We are however aware that some organisations cannot afford to pay for training, e.g. especially smaller third sector housing support organisations which have been hit hard cost of living and lack of increase in housing support grant. Welsh Government should consider funding or partly funding such training or at the very least – e-learning to assist smaller organisations.



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

7.1. Apart from impacts already reported, and despite the challenges also already highlighted, we have certainly seen great examples of good practice in the housing sector which could be **replicated elsewhere and across the sector**. Some of these examples are potentially scalable and, with appropriate funding, could be widened to other sectors, therefore Welsh Government should consider providing funding to scale these up e.g.

- [Pathway to Board project](#) (CCHA, Taff, Linc Cymru, Cadwyn and Hafod housing)– aimed at increasing ethnic diversity of housing boards and beyond;
- [Get Into Housing Project](#) – aimed at providing work experience opportunities for ethnic minority people
- Much good practice has been highlighted by Tai Pawb in our various publications and on our webpages e.g. [Anti Racism - Tai Pawb](#), [Day of Action December 2022](#); [Action plans](#) etc. [Launching the Good Practice Briefing Report on Refugee Accommodation: A Step Towards Inclusive Communities](#);

7.2. Quite a few of the housing actions require changing or amending to make them more effective or for them to have any impact. There isn't enough space in this paper to outline all but an example would be action on overcrowding which currently commits Welsh Government to research on the link between overcrowding and Covid-19 (and this has been completed) – however this has little impact on the lives of ethnic minority people. A better and more specific action would be to simply commit to reducing overcrowding long term through structural changes to e.g. social housing grant regimes, provision of specific grants on conditions aimed at building bigger properties or acquiring them (we are being told that in urban areas building many large properties is not viable due to the cost and availability of land and how SHG works but buying or converting is a better option).

7.3. Specific actions relation to homelessness of sanctuary seekers and migrants need to be reviewed. In our opinion these are currently not effectively implemented, with homelessness amongst refugees and destitute asylum seekers (as well as migrants) being a huge problem and on the rise (due to the widening of asylum areas). We believe that some of the key problems here are overreliance on refugee sector, lack of capacity of refugee sector, the need for greater role of social housing providers).



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- 7.4. We would recommend that ARWAP actions are reviewed by Welsh Government in partnership with communities and those tasked with implementing them.