

Consultation Response Form

Your name: Naila Noori

Organisation (if applicable): **Joint response from Allied Health Professionals bodies –**

The Royal College of Speech and Language Therapists

The Royal College of Occupational Therapists

The Chartered Society of Physiotherapists

British Dietetics Association

email / telephone number: naila.noori@rcslt.org

Your address:

Privacy note:

Please be aware that responses to consultations are likely to be made public, on the internet or in a report. We will store your responses to help us develop the Strategic Equality Plan. Please let us know if you would prefer your response to remain anonymous.

Explanatory note:

There is no minimum or maximum to your responses, although in most questions we anticipate that responses would be under 500 words.

The National Equality Objectives

We have set out our draft [National Equality Objectives](#). The Objectives are intended to be both aspirational and deliverable.

The proposed National Equality Objectives may evolve in response to changing circumstances, we will build this into the Strategic Equality Plan which will emerge from this consultation.

Question 1: Do you agree with the [Long-term Aim](#)? Please explain your answer, suggesting any amendments.

We fully agree with the long-term aim of the Strategic Equality Plan.

However, we would like to strongly suggest that **belonging** is included within the long-term aim. This important element and goal for a society to thrive is often missed.

While inclusion focuses on embracing diversity, belonging emphasises the need to cultivate a culture that not only embraces differences but expects to be positively shaped by those

differences. It requires a challenge to traditional norms and structures, promote open dialogue and actively dismantle biases and barriers. This should allow an individual to feel a deep sense of connection—to feel valued, safe, supported and able to show up as his, her or their authentic self.

We believe that for the Welsh Government to fulfil their long-term aim of strengthening and advancing equality and human rights in Wales, belonging also needs to be at the heart of the aim and needs to be integrated within the National Equality Objectives where relevant.

Question 2: Do you agree with the proposed National Equality Objectives above? Please explain your answer, suggesting any amendments.

We strongly agree with the National Equality Objectives and welcome particularly the intersectional approach of Welsh Government, in recognising objectives and actions already laid out in existing plans and seeking to connect the plans with an aim of amplifying the intersectionality of people's lives and experiences.

However, for Welsh Government to truly take an intersectional approach, the Strategic Equality Plan and National Equality Objectives therein need to acknowledge that some definitions and terminology in legislation do not always reflect the identities or lived experience of individuals.

Achieving equality and positive outcomes requires identification of barriers and biases, and targeted action to overcome specific inequalities, discrimination and marginalisation experienced by certain groups and individuals. This includes, but is not limited to, those with protected characteristics under the Equality Act 2010. Therefore, if the aim of the plan is to improve equality, diversity and inclusion (EDI) and to enhance the sense of belonging for people in Wales, whilst there should be reference to the protected characteristics as defined in the Equality Act 2010, there is a need to emphasise that the actions set out are intended to positively impact groups and individuals beyond these terms and definitions. People possess multiple characteristics within their identity and multiple forms of inequality or disadvantage can create obstacles that cannot be resolved by focusing on a single characteristic in isolation.

We are surprised by the lack of actions around collection of diversity data within the plan. Even though there is mention of Welsh Government working to improve equality data and statistics to inform future policy, there seems to be an absence of any tangible actions.

We acknowledge that some existing plans do contain actions around data and evidence and that the Strategic Equality Plan seeks to avoid duplication and complexity. However, if the plan instead seeks to act as a linked supporting framework to connect those plans and to contain National Equality Objectives linked to actions in existing plans, then emphasising the critical role of robust data collection in advancing equality is crucial.

Moreover, we recommend highlighting the importance of analysing data through an intersectional lens. Collecting a wide suite of demographics is central to understanding the experiences and perceptions of different groups. Traditional data analytics may, however, overlook the connections between different demographic characteristics and thereby fail to capture important disparities that may exist.

Question 3: Please tell us about any other issues relating to equality and community cohesion in Wales that you feel should be addressed?

We, together with the Welsh Allied Health Professionals Committee (WAHPC) have had concerns regarding focus and prioritisation of equality and diversity for allied health professionals (AHP) Even though some AHP professional bodies have taken measures to instil equality and diversity actions, for example by producing statements, making equality pledges, producing an EDI strategy or plan, it is evident that there are inconsistencies within Wales as each allied health profession is at a different stage of their EDI journey. Currently, each of the 13 AHP professions have a different perspective on prioritisation, focus and interpretation regarding EDI.

For this reason, we feel collectively that it is imperative to act and draw together an Equality, Diversity and Belonging (EDB) plan for AHPs in Wales. A plan that will affirm and demonstrate a commitment from AHPs in Wales to equality; a plan of action designed to achieve positive long-term, lasting change; an active step to oppose all forms of discrimination. We are in agreement with the Welsh Government long term aim being based on strengthening and advancing equality and human rights in Wales and feel that the All Wales AHP EDB Plan will work to meet this important aim.

In designing this plan there has been careful consideration of other distinct Welsh Government action plans and policies focusing on action to support a fairer and equitable Wales. The All Wales AHP EDB plan complements these plans and aligns with them but importantly takes an intersectional approach to tackling inequality and unfairness - an element that the Welsh government has highlighted as being critical to advancing equality and human rights.

The All Wales AHP EDB plan importantly directly aligns with many of the National Equality Objectives. In particular –

- National equality objective 2
 - Identify and utilise all levers possible to protect, strengthen and advance equality and human rights in Wales.

- National equality objective 3
 - Work to ensure discriminatory attitudes are tackled in the public service system, including education and workplaces.

- National equality objective 4
 - Ensure that all people have access to appropriate intersectional advice and support to help them live without fear, prejudice, and protect health and wellbeing.

- National equality objective 5
 - Identify areas where further action is needed to ensure greater diversity among elected representatives and identify and investigate mechanisms to redress inequality.

- National equality objective 6
 - Increase workplace diversity by being an exemplar employer, and attracting, retaining, and supporting a diverse staff group at all organisational levels, thus addressing the under-representation that exists within senior management.
 - Remove all employment-based barriers that prevent staff from all backgrounds from reaching their full potential.

We would also like to highlight that very much like the Strategic Equality Plan, the proposal is for the All Wales AHP EDB plan to be a living document that can be further developed. A plan that contains goals and actions that are both aspirational and deliverable but with a need to evolve as the equality landscape changes.

The plan is in a draft form, nearing completion. Please find it attached as an addendum with this response. We would like Welsh Government to consider this plan as it serves as an opportunity for Welsh Government to take direct action and resolve deep rooted and systemic issues which adversely impact people from certain groups. Recently the WAHPC Executive agreed that once this consultation is concluded AHPs will examine how they can implement and support the final plan as published by Welsh Government.

The Principles of Approach

The Strategic Equality Plan will support and draw together other equality plans and policy interventions (the things we do) in specific areas of interest. The [Principles of Approach](#) above connect distinct Action Plans and policies, which provide their own Objectives and Actions.

Question 4: Do you believe having the proposed Principles of Approach strengthens the Strategic Equality Plan?

Yes.

Question 5: If so, do you agree these are the right Principles of Approach? Please explain your answer, suggesting any amendments.

Yes, partly.

We welcome the intersectional approach of Welsh Government but feel that the emphasis is only on the protected characteristics as defined by the Equality Act 2010. For Welsh Government to truly take an intersectional approach, there needs to be acknowledgement that some definitions and terminology in legislation do not always reflect the identities or lived experience of individuals.

Achieving equality and positive outcomes requires identification of barriers and biases, and targeted action to overcome specific inequalities, discrimination and marginalisation experienced by certain groups and individuals. This includes, but is not limited to, those with protected characteristics under the Equality Act 2010. Therefore, If the aim of the plan is to improve EDI and to enhance the sense of belonging for people in Wales, whilst there should be reference to the protected characteristic, there is a need to emphasise that the approach set out is intended to positively impact groups and individuals beyond these terms and definitions. People possess multiple characteristics that constitute their identity, and multiple forms of inequality or disadvantage can create obstacles that cannot be resolved by focusing on a single characteristic in isolation.

The Socio-economic Duty in relation to the Strategic Equality Plan

For people who face the additional barriers of inequality, socio-economic factors can have an even more negative effect and impact on their day-to-day lives. The [Socio-economic Duty](#) is an important part of how we deliver the Strategic Equality Plan.

Question 6: Do you believe the [National Equality Objectives](#) will help us fulfil the Socio-economic Duty? Please explain your answer.

Yes, partly.

Please see answer to question 2, specifically points around intersectionality and data collection.

Human Rights

The Welsh Government is committed to strengthening and advancing human Rights in Wales. We want to understand the extent to which people are aware of their rights under the Human Rights Charter.

Question 7: Do you believe the [National Equality Objectives](#) will help to promote and embed human rights in Wales. Please explain your answer.

Yes, partly.

Please see answer to question 2.

Other areas

Question 8: Do you have any further specific points you'd like to raise in relation to the Strategic Equality Plan?

Yes.

Please see answer to question 3.

Addendum

Welsh Allied Health Professionals Committee

Equity Diversity & Belonging Plan – Draft 1



Introduction

There is an explicit need to create a specific Equity Diversity and Belonging (EDB) Plan for all Allied Health Professionals (AHPs) in Wales as it will demonstrate strong commitment from Welsh AHPs to promote a culture of belonging and inclusivity, and actively take steps to oppose all forms of discrimination.

We acknowledge that privilege, power imbalances, structural and systemic disadvantages exist in all systems. There needs to be a focus on the core of our systems, processes, and behaviour to tackle institutionalised discrimination. Through this Plan we aim we aim to achieve positive and lasting change for AHPs in the NHS in Wales.

We understand that providing the same opportunities to everyone does not make things fair. Without first achieving equity, we cannot achieve equality, and the establishment of equity is the ultimate goal. No aspect of a person's identity should be a barrier for their ability to flourish and thrive. We also understand that equity is a process, and we are committed to this by recognising, taking accountability for, and changing the systemic and structural barriers that get in the way of people being able to flourish and thrive. People affected by inequality should be meaningfully involved in the change process.

A more diverse AHP workforce within NHS Wales will enable opportunities to learn effective approaches to meet the diverse needs of the patient population and to promote the development of more culturally competent practice. The aim is to provide the most appropriate care for the diverse population and information sharing is promoted to enable adjustments of approaches to care.

Belonging is the feeling of being valued through positive connections with others, and to be able to bring the authentic self to work. All AHP workforce need to feel as if they belong in their workplace, are safe and supported in their roles enabling them to thrive. This is achieved proactively through intentional acts of inclusion and embracing difference.

Having an effective AHP EDB Plan with its associated positive outcomes such as 'Allyship', will strengthen the 'AHP Framework for Wales and the 'Our Healthier Wales - Quadruple Aim'. This will be especially important in reducing the impact of ill health and other social determinants to maximise the wellbeing of the population.

Mission Statement / Vision

AHPs in Wales will promote greater equity, diversity and belonging, and proactively consider the nine protected characteristics into service provision. Further and importantly, there is an acknowledgement that an effective EDB Plan should go beyond legal compliance and take an intersectional approach to EDB, which will add value to an organisation, contribute to the wellbeing and equality of outcomes and impact on all employees. AHPs are empowered to tackle all forms of discrimination in our services, including direct and indirect discrimination, victimisation, harassment and bullying.

Our workplaces and AHP community will demonstrate a more diverse workforce, at all levels, who are valued, respected, and can bring their whole selves to work. AHPs in Wales want to be seen as exemplar employees within the NHS to achieve positive and lasting change by being proactive and acting when needed.

The nine protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, sex, religion or belief and sexual orientation'.

AIMS

1. To maintain the importance of Equity, Diversity and Belonging for and within the AHP workforce and retain as a priority.

Goal	Action	Output	Impact	By when	Lead and partners
1. Relevant and quality data will be routinely collated, shared and used transparently, to level inequalities in health.	The introduction of the Workforce Race Equality Standards (WRES) must include and capture data for AHP, appropriately disaggregated so as to provide an evidence base to make and measure targeted structural change	Implemented WRES to include appropriately disaggregated data in relation to AHPs in Wales to provide evidence for workforce career, progression, leadership representation, discrimination and bullying.	High quality, relevant workforce data used to make, and measure targeted structural change. Create a culture where staff can be safe, and confident to provide ethnicity data and speak up against racist discrimination and practice.		Welsh Government NHS organisations Partner organisations

<p>2. All workforce policies and procedures will address systematic and institutional discriminatory practices and that anti-discriminatory principles are threaded through policies and procedures.</p>	<p>Commission an audit (independent?) of all existing workforce policies and procedures through an anti-discriminatory lens and have representation from equality networks/groups within forums established to design the audit/and oversee and support their effective implementation and application.</p>	<p>Completed Independent? audit of current workforce policies with recommendations to strengthen anti-discriminatory principles. i.e. policies around grievances, complaints etc</p>	<p>Workforce policies address systemic and institutional discrimination.</p> <p>Workforce confident that anti-discriminatory principles are threaded through policies and scrutinised independently?</p> <p>Staff will have increased confidence that they will work in a safe and inclusive workplace that recognises and promotes their performance and progression.</p>		<p>Welsh Government</p> <p>NHS organisations</p> <p>Partner organisations</p>
--	---	--	--	--	---

2. The organisation and culture of AHPs in Wales must promote, encourage and support equality and diversity principles.

Goal	Action	Output	Impact	By when	Lead and partners
<p>3. Require anti-discriminatory practice at all levels by – DATE</p>	<p>Appointing executive equality champions</p> <p>All NHS Board members will undertake an EDB education programme with emphasis</p>	<p>Appointment of Executive Equality Champions</p> <p>Appointment of visible equality champions within all health boards</p>	<p>More visible representation and allyship at all levels.</p> <p>Leadership providing confidence to workforce and service users that structural inequalities</p>		<p>Welsh Government.</p> <p>NHS Boards.</p> <p>Equality networks.</p>

	<p>on an intersectional approach and implement and report progress against personal objectives.</p> <p>Appointing equality champions for AHPs in all health boards</p> <p>Providing Equality Networks appropriate levels of resource and access to the Board.</p> <p>Staff to have personal EDB objectives and report progress</p>	<p>Evidence of improved understanding and behaviour of Board members where required.</p> <p>Reporting of detailed personal objectives and progress of objectives</p>	<p>are being proactively addressed.</p> <p>Thriving networks supporting and acting as a critical friend to the Boards</p> <p>Making it a cultural norm that EDB is everybody's responsibility and must be considered to achieve inclusion.</p> <p>Visible evidence of development in the behaviours exhibited by Board members</p> <p>Visible change in decision making when required, demonstrating evidence that diversity and inclusion have been considered and acted upon</p>		
--	--	--	--	--	--

4. No form of discrimination or inequality will be accepted for employees or service users within NHS Wales

Goal	Action	Output	Impact	By when	Lead and partners
<p>4. Staff will work in safe, inclusive environments, built on good anti-discriminatory leadership and allyship, supported to reach their full potential, and staff and allies; both be empowered to identify and address discriminatory practice.</p>	<p>Actions – NHS Organisations and partners (HEI?) will co-design anti-discrimination (through an intersectional lens) education programmes with people with lived experience. Set a requirement for all AHPs, volunteers and students? to complete redesigned anti-discrimination education programmes. To redesign and refresh anti - discrimination public facing campaign</p>	<p>Appropriate anti-discrimination education intervention developed. Report detailing completion of staff completing the education programme. Appraisals will capture completion and participation in anti-discrimination education and will require EDB objectives to be set and met. Appropriate, effective, and up to date public facing campaign designed</p>	<p>Consistent, fit for purpose educational intervention offered to all staff. Mandatory education providing confidence to workforce that organisation is serious about anti-discrimination principles. Evidence of development and change in the exhibited behaviours of participants of the programme. Staff confidence in providing allyship and calling out discriminatory behaviour. Staff confidence in taking</p>		<p>NHS Wales organisations Professional bodies HEIs? HEIW? NHS organisations Partner organisations</p>

			<p>forward complaints about discriminatory incidences by colleagues and the public.</p> <p>Staff confidence in providing allyship and calling out discriminatory behaviour.</p> <p>Staff confidence in taking forward complaints about discriminatory incidences by colleagues and the public.</p>		
--	--	--	--	--	--

CONSIDER

The diversity of the AHP population in Wales

- Recruiting to the profession
- Ensure that the EDB Plan develops to include AHPs who may have health related roles outside of the NHS eg in HEIW, within AHP professional bodies, Social Care, Community, the Third sector or the Welsh Government.
- Becoming an exemplar profession, demonstrating that AHPs in Wales are welcoming, and practice an anti-discriminatory culture
- By speaking out against any form of discrimination and to use all opportunities and influence within the AHP structure in Wales to achieve change.
- By encouraging our professional bodies to recruit equality representatives within the NHS in Wales.

PRINCIPLES

Creating this Strategy sets a framework for AHPs to act

This strategy will change and develop with time to respond to achievements, action which may be required, changing circumstances and the information provided by the indicators. It is based on current information and insight

All AHPs value and understand diversity and the benefits it brings to the profession.

ADDENDUM

Neurodiversity - how this issue is incorporated within the EDB Strategy

REFERENCES

'Equity, Diversity and Belonging Strategy' Chartered Society of Physiotherapy 2021/22

'Equality, Diversity & Inclusion Strategy' Royal College of Podiatry 2022/23

Equality Act 2010

Anti-Racist Wales Action Plan Welsh Government

LGBTQIA+ Action Plan Welsh Government

Workforce Race Equality Standards (WRES) Welsh Government

WAHPC EDB Group

8th February 2024