

## **RESPONSE TO ‘WORKING FOR EQUALITY IN WALES’;**

### **THE WELSH ASSEMBLY GOVERNMENT CONSULTATION DOCUMENT FOR A SINGLE EQUALITY SCHEME**

This is a response submitted by the 5 members of the Wales Disability Reference Group; Disability Wales, Learning Disability Wales, Mind Cymru, Wales Council for the Blind and Wales Council for Deaf People

#### General Comments

We welcome the preparation of this consultation document and the substantial statement of intent that it represents. The central focus of the document is that it is setting down intentions for the future rather than reporting on progress made and we are therefore heartened that the Welsh Assembly Government wants to ensure that its activities are based on the human rights principles of fairness, respect, equality and dignity and focused on the needs of all the citizens of Wales.

We are particularly pleased that there is a recognition that WAG will ‘need to work effectively with all of our partners to make progress in delivering on this progressive agenda.’ We also note that in preparing this document WAG consulted with a number of disability organisations and interests.

We welcome the commitment to publish progress reports every six months and the intention to make WAG’s work towards the Single Equality Scheme as transparent and accessible as possible.

The document does also provide information on activities and planning that has already taken place and we wholeheartedly acknowledge the progress that they represent.

We welcome the requirement that has resulted in each WAG department preparing an action plan as its contribution towards fulfilling the Single Equality Scheme but are disappointed that, at least in terms of the action plan priorities that are provided, a number of them are very general, and in some cases appear to merely represent a restatement of the departments existing corporate priorities.

When there is so much to commend in the document, we are extremely disappointed that WAG has to date declined to adopt the UN Convention on the rights of disabled people until it is ratified by the UK Government. Nor is there any mention of the Convention in the document. We do not see how this stance is consistent with the Single Equality Scheme and it challenges our faith in WAG's commitment to equality.

### Specific Comments

#### Chapter 1

We welcome the emphasis that the success of the Scheme will be judged by equality of outcomes, not inputs. We note the Living in Wales survey and that 12% of respondents said they experienced discrimination, victimization or harassment in the last five years. We agree that there needs to be a consistent commitment to changing public and institutional attitudes.

We welcome WAG's intention to go further than meeting its legal responsibilities to promote equality of opportunity and to work towards leveling up existing commitments.

We are pleased that WAG wants feedback on the action plans and see the introduction of Equality Champions in each department as a very positive step. We support the commitment to expand the use of the Welsh language in more communities across Wales.

#### Chapter 3

We welcome the intention to eliminate unlawful discrimination and to ensure that equality is at the heart of decision taking, policy making and service delivery. We strongly support the intention to;

- provide training to WAG staff to raise awareness of human rights in the context of WAG's work
- deliver an annual seminar for public authorities on human rights

- contribute to the Year of Human Rights Learning
- revise the Equality Impact Assessments so that they address the seven areas of equality
- use the EHRC human rights enquiry to inform WAG's work.

We particularly welcome the intention to integrate human rights principles into the Inclusive Policy Making process.

We also welcome the intention to have due regard to the UK's international obligations but are very disappointed that there is no reference at this point to the UN Convention on the rights of disabled people. This Convention should play an underpinning role for all WAG policies related to disabled people in exactly the same way as the UN Convention guides WAG's Seven Core Aims for children.

#### Chapter 4

Dept of Constitutional Affairs, Equality and Communication;

We are surprised that only two priorities are identified, albeit that the first one is very broad.

Dept for Children, Education, Lifelong Learning and Skills;

These priorities appear to be a restatement of the dept's corporate priorities rather than being specifically about equality issues.

Dept for the Economy and Transport

We support the priorities identified.

Dept for the Environment, Sustainability and Housing

These priorities appear to be a restatement of the dept's corporate priorities rather than being specifically about equality issues.

Dept for Health, Social Services etc.

The first priority is supported. Priorities 2 and 3 appear to be a restatement of corporate priorities.

Dept for Public Services and Performance

We warmly welcome the action plan priorities that have been identified.

Dept for Rural Affairs and Heritage

We welcome the priorities identified.

Dept for Social Justice and Local Government  
We welcome the priorities identified.

Dept for Human Resources

Though we found the two priorities to have been rather general, we note that Chapter 7 makes it clear that WAG has undertaken a substantial amount of activity to promote equality in its role as an employer.

#### Chapter 5

We welcome the emphasis being given to gathering relevant data and making it publicly available so that progress can be more effectively measured.

We welcome the annual analysis of the staff survey.

#### Chapter 6

We warmly welcome the intention to ensure that all WAG policy making activity is subject to consideration of the equality duties.

We welcome the preparation of Impact Assessments and their publication on the website.

#### Chapter 7

We support the initiatives being taken by WAG as an employer.

#### Chapter 8

We welcome the initiatives on public appointments and would ask that monitoring take place to evaluate the progress that is being made.

We conclude by thanking WAG for the opportunity to comment on this consultation document.

23.01.09

