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Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref MA/JJ/2647/20

John Griffiths MS
Chair
Equality, Local Government and Communities Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

23 September 2020

Dear John

Thank you for your letter of 7 August and for sending us a copy of the Equality, Local Government and Communities Committee's report on inequality during the Covid-19 pandemic.

We are grateful to the Committee for undertaking this work and will address each of the recommendations you have made individually. As there are a large number of recommendations the responses have been placed in an Annex to this letter.

We hope the Committee finds this information helpful.

Yours sincerely

Julie James AS/MS
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

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Kirsty Williams AS/MS

Y Gweinidog Addysg
Minister for Education

A handwritten signature in black ink. The signature is cursive and reads "Jane Hutt".

Jane Hutt AS/MS

Y Dirprwy Weinidog a'r Prif Chwip
Deputy Minister and Chief Whip

Recommendation 1 - The Welsh Government should ensure that each major policy or legislative decision is accompanied by an effective equality impact assessment, and an analysis of the impact on human rights. Both should be published online and copies sent to this Committee for review.

Accept.

The First Minister has been clear that the Welsh Government must, and will, put equality and human rights considerations at the centre of the response to the pandemic and recovery in Wales, and our work has kept this as the guiding principle throughout.

There has been a considerable effort from across Government, and in collaboration with stakeholders, to understand the impacts arising from Covid-19 and the measures the Welsh Government has decided to put in place to manage Covid-19.

The Welsh Government published the approach it is taking in assessing whether and when conditions enable specific lockdown restrictions to be eased in *Leading Wales out of the coronavirus pandemic: a framework for recovery* on 24 April and *Unlocking our society and economy: continuing the conversation* on 15 May. Both of these documents embody the Welsh Government's commitment to ensuring decisions to ease lockdown restrictions will seek to deliver a 'high positive equality impact'.

We have also published the equality assessments of the measures to manage Covid-19 covering the 21-day reviews. These can be found on the website at: <https://gov.wales/impact-assessments-coronavirus>.

These documents set out the Government's policy objectives and a summary of the impacts of measures to manage Covid-19.

Further impact assessments relating to coronavirus legislation and guidance will be published in due course. We will look to learn the lessons of the past few months to ensure that consideration of impact continues to be an integral part of how decisions are made by the Welsh Government.

Recommendation 2 - The Welsh Government should take immediate action to improve the quality of recording of ethnicity and disability employment data across health and social care services

Accept

Your report rightly highlights the need for better data on equalities to ensure that we understand the risks faced by different groups and are as inclusive as possible in policy making. The Welsh Government has already taken steps to improve the quality of evidence on ethnicity and coronavirus mortality through the implementation of the e-form, including for healthcare workers. We will work with partners in the NHS and social care to encourage better recording of ethnicity and disability data in both staff records and wider health records.

Social care workforce data on ethnicity is currently collected via Social Care Wales through its annual surveys. Mandatory registration of domiciliary care workers (introduced in April

2020) and of social care workers in residential care home settings (planned to be mandatory from April 2022) will enable Social Care Wales to collect more robust ethnicity data going forward.

This isn't simply about data collection however. We also need to understand why citizens might not feel they want to provide this information to public services and why public services find it difficult to ensure good quality data is recorded. Therefore this needs a multi-faceted approach including user insight. We will look at opportunities to get key messages out about the benefits of recording such data and for training to encourage NHS and local authority employees to record ethnicity data in every system, and encourage people to allow information to be recorded.

Recommendation 3 - The Welsh Government should improve data gathering and publication on coronavirus cases and health outcomes disaggregated by sex, ethnicity, disability and key worker status. This should include where necessary, identifying alternative methods of collection and new data sources

Accept

We continue to expand the range of data gathered and published on Covid-19 and health outcomes. In June we published analysis on where the impact of coronavirus might have a disproportionate impact on ethnic minorities, including in employment, housing and deprivation. We have pressed the Office for National Statistics to publish statistics for Wales on Covid-19 deaths by ethnic group and by occupation group and will continue to work with them to ensure that their mortality analysis helps us understand the outcomes for groups in Wales.

The Welsh Government agree it is important to use new and alternative methods to understand Covid-19 and health outcomes by disaggregated characteristics. Analysis by Public Health Wales, which links hospital data with death registrations, has helped show the impact of coronavirus on people with learning disabilities:

<https://phw.nhs.wales/publications/publications1/covid-19-related-deaths-in-wales-amongst-people-with-learning-disabilities/>

This type of analysis demonstrates the new insight that can be gained from linking data. This is why we have secured access to the 2011 Census to support our ambitious linked data research agenda and continue to press UK government departments to share administrative data that will help us understand the outcomes of different population groups. This needs to be done alongside work to improve the quality of the administrative data held.

Recommendation 4 - The Welsh Government should accelerate the review of the Welsh public sector equality duties, focusing on strengthening enforcement and the collection of employment data.

Accept

The review of the Welsh Public Sector Equality Duties (PSED) was temporarily halted during the initial months of the Covid-19 pandemic as resources had to be reallocated to other equality and human rights work. In a similar way, PSED reporting obligations were suspended for six months from March 2020 by the Equality and Human Rights Commission (EHRC).

When resources become available PSED review work will be restarted, building upon work already underway within the Welsh Government to improve the gathering and publication of

employment and other equalities data. The findings of the ongoing research into strengthening equalities and human rights in Wales will be one important source of evidence for the PSED review work. It is anticipated the extensive stakeholder engagement which is taking place will shed light on how best to strengthen the Welsh duties and improve both enforcement and data collection.

Recommendation 5 - The Welsh Government should articulate the necessity and proportionality of all existing restrictions in its human rights analysis published alongside each 21 day review.

Accept.

The Welsh Government is committed to the consideration of human rights at all stages of decision making. The First Minister has been clear that Welsh Government will put equality and human rights at the centre of the response to Covid-19 in Wales.

The necessity and proportionality of all of the remaining restrictions set out in The Health Protection (Coronavirus Restrictions) (No. 2) (Wales) Regulations 2020 are considered every 21 days. We will articulate this in the supporting documents for each 21 day review, to clarify this analysis has taken place.

It should be noted, however, that the examples given in the report, such as social care and duties on the Mental Health Tribunal for Wales, are not areas directly addressed in these regulations.

Recommendation 6 - The Welsh Government should:

- **immediately ‘switch off’ the measures in the Coronavirus Act 2020 which relax social care and mental health duties; and**
- **publish data on the number of people affected by these measures, disaggregated by protected characteristics.**

Accept in part.

Social Services and Well-being (Wales) Act 2014

We fully recognise people’s concerns during this pandemic and the impact of the necessary community-wide actions to protect people and stop the spread of infection. Preventative measures such as social distancing, closures of public and community facilities, limiting gatherings of family, friends and others in individual households and public places has meant that community-based social care and support activities have been unavailable. More than ever, as Welsh Ministers, we have sought to provide clarity and direction during these uncertain times.

The provisions in the Coronavirus Act 2020 (the 2020 Act) which relate to the Social Services and Well-being (Wales) Act 2014 and the associated statutory guidance, provide a robust and transparent framework which local authorities are required to follow before drawing on the 2020 Act provisions, should that be necessary. We can confirm earlier evidence which reflected that of the local government leadership that no local authority has drawn on these powers.

Through the guidance, we have ensured clarity on the continuation of a rights-based approach to social care and provided leadership and direction to address and mitigate the

potential for inconsistency. Despite the constraints of the pandemic, we maintained our co-productive approach to the development of that guidance, albeit on an accelerated timescale, working with stakeholders across Wales, including the Disability Equality Forum chaired by the Deputy Minister and Chief Whip, to produce and publish advice that protects and promotes rights.

Indeed, the Equality and Human Rights Commission’s written evidence to the Committee welcomed that guidance which “*confirms that duties under the European Convention on Human Rights, Equality Act and PSED remain in place. The guidance also states that modifications are time-limited and set with the clear expectation that any changes to individuals’ care and/or support will be returned to their premodification arrangements at the earliest possible opportunity.*”^[1]

We want to re-assure Committee Members that our approach will continue to be informed by engagement and evidence. Throughout the pandemic the Disability Equality Forum, alongside a number of other mechanisms such as weekly meetings with the Older People’s Commissioner and the cross-sector Social Care Planning and Response Group have provided a continuing conduit to consider evidence and develop solutions.

Our approach is also cross-portfolio. The Minister for Housing and Local Government wrote on 12 August inviting Local Authority Leaders and Chairs of County Voluntary Councils to provide an update of the ongoing capacity and resilience of local authorities and CVCs in continuing to provide support, any anticipated longer term impacts or challenges, as well as what support Welsh Government can provide. Ministers will continue to work together to ensure that there is both a clear and shared understanding of the need for, and accessibility of, those protective support arrangements.

The Committee has also recommended that data is published on those affected by the 2020 Act. As no local authority has drawn on these powers, no data is available. However, we can confirm that between 13 May and 31 August 2020 the number of packages of care and support that have been reduced or withdrawn are as follows:-

	By the local authority	By the provider	By the individual
Number of packages	442	98	185

Source: Welsh Government Local Authority Covid-19 Data Collections

For comparative purposes only, the number of new requests for residential care, home care and re-ablement during the same period is as follows.

	Residential Care	Home Care	Re-ablement
New requests	2,490	8,511	10,368

Source: Welsh Government Local Authority Covid-19 Data Collections

Next steps

In line with our earlier engagement and co-productive approach to implementing the 2020 Act provisions, we intend to write to stakeholders seeking their views on the social care provisions within the 2020 Act and the associated guidance. We will report back to Members on the outcomes. Should the outcome be to repeal, the associated guidance would also fall.

Mental Health and Mental Capacity Legislation

^[1] Page 57 - <https://business.senedd.wales/documents/s102950/ELGC%20COV%2030%20-%20Equality%20and%20Human%20Rights%20Commission.pdf>

We are grateful to the Committee for its consideration of the important issue of protecting the rights of patients participating in proceedings of the Mental Health Review Tribunal for Wales (MHRTW) in the light of the pandemic. We would like to take this opportunity to provide further information on matters raised in the report which might have benefitted from further evidence from the Welsh Government or indeed from the President of Welsh Tribunals and the President of MHRTW, both of whom have been consulted in preparing this response.

The Welsh Government brought the principal Coronavirus Act provisions relating to MHRTW into force on 27 March. The urgency for commencement was because the President of the MHRTW had advised that there was a backlog of 35 cases for the Tribunal to hear which had been postponed or adjourned since the start of March and which required re-listing. Nine of these cases were hearings relating to section 2 of the Mental Health Act 1983 (a 28 day order to detain a person for assessment) that needed to be urgently re-listed. In addition, there were 144 cases listed from 30 March onwards plus an additional 53 which had not yet been arranged. At the time it was also apparent that hospitals were neither able to host hearings nor to enable patients to participate remotely.

The provisions, and the subsequent practice direction issued by the President of the MHRTW with the agreement of the First Minister, allow the MHRTW to conduct a hearing with one member instead of the usual three, and on paper only. It is important to note that the Tribunal was already able to conduct hearings by telephone under pre-existing Rules.

Alongside the commencement of the Act provisions and the subsequent practice direction (issued by the President of Welsh Tribunals and the President of MHRTW with the approval of the First Minister), the Welsh Government worked closely with partners to encourage hospitals to facilitate telephone hearings.

As a result, the flexibility to reduce the number of Tribunal members sitting for a hearing and to dispose of cases on paper has never been used. All hearings since then (460 in the period 23 March to 27 August) have taken place by telephone as per the pre-existing rules. There is no backlog.

We are pleased to confirm that the number of people affected, which was sought in the Committee's recommendation, is zero.

Our understanding is that, in contrast, in England hearings were heard by a single judge for at least two months and there is a backlog of cases. Furthermore, in England, conducting paper hearings has been common practice in some categories of cases for several years. The consent requirement in England is not for positive affirmation; it is up to the parties to object to the proposal for a paper-only hearing and as the patients in the relevant categories are cared for within communities they typically either do not receive or do not respond to the proposal.

We have not identified any evidence to substantiate the claim that hospitals are not introducing processes quickly enough to facilitate electronic disclosure of notes or even telephone contact with lawyers.

The possibility of hosting hearings in hospitals with social distancing is, in the experience of those responsible for the operation of MHRTW, theoretical at best. Hospital wards are not, even in normal circumstances, equipped to provide for large meetings. Most of the rooms at the 47 venues used for the Tribunal would not allow more than two or three people to be present under current social distancing guidelines, even if the Coronavirus regulations were

to be relaxed to allow indoor meetings. A basic hearing typically requires eight people to be present, but ten or even twelve is not unusual. Hearings can last for hours, with all the attendant risks of prolonged contact. There are other practical considerations, including the lack of ventilation where windows cannot for medical reasons be opened wide, and the lack of provision for video-conferencing as this is not a core function for the hospitals or their staff. Experience from England suggests that video hearings would offer little additional benefit to patients compared with telephone hearings. Anyone who has difficulty using a telephone for any reason whatsoever would be assisted by a member of the hospital staff who is permitted to be in the room with them. Following representations from the President of Welsh Tribunals we have decided to keep the Mental Health Review Tribunal for Wales provisions which have already commenced in force for at least another six months.

Schedule 8 introduced by section 10(1) of the Coronavirus Act 2020 makes provision to temporarily modify the Mental Health Act 1983 (MHA'83) in Wales and England on both devolved and reserved areas. The modifications will only be put in place in the event that the impact of Covid-19 compromises the operation of the MHA'83 to such a degree that it poses a risk to the health and safety of individuals experiencing mental distress. In keeping with the policy that they would only be switched on as a "last resort" measure, these provisions (other than those concerning the Mental Health Review Tribunal for Wales) have not been commenced in Wales. Since the onset of the Covid-19 pandemic, officials have closely monitored the continued operation of the MHA '83 relevant stakeholders in Wales and counterparts in the UK Government and will continue to do so, particularly in the event of a second wave and usual winter pressures.

Recommendation 7 - The Welsh Government should publish a cross-government poverty reduction strategy with targets and performance indicators.

Accept in principle.

The Welsh Government's Child Poverty Strategy sets out objectives for tackling child poverty. A continued focus and investment in what we know works in tackling poverty using the levers available to us is vital. We have continued to review what more Welsh Government can do to reduce costs for families, boost incomes and ensure the investment in programmes and services which contribute to tackling poverty is, as far as possible, improving outcomes for children and young people, both in the short term and in the long term.

Given the acute financial pressures many families are likely to be experiencing as a result of the pandemic we want to focus on things we can do now. Ministers have agreed a series of practical immediate steps. These steps outline the actions that Welsh Government will take over the coming months to help maximise the incomes of families living in poverty and support them to build their financial resilience.

The Welsh government remains committed to developing our approach to anti-poverty policies and programmes in the future.

Recommendation 8 - The Welsh Government should adhere to the spirit and intent of the socio-economic duty in all of its decision-making until it is commenced in March 2021, and develop interim arrangements to monitor how it is meeting the spirit of the duty ahead of full commencement.

Accept.

A priority for the Welsh Government is to take action to safeguard equality and human rights, particularly in the context of Brexit and recovery from Covid-19. A key piece of this work is through commencing the Socio-economic Duty.

The Socio-economic Duty will apply to Welsh Ministers and certain public bodies in Wales. We are aware the Permanent Secretary has encouraged officials to lead by example, and to be applying the ethos of the Duty in their advice to Ministers on strategic decisions.

By acting now and leading in building socio-economic considerations into strategic decision-making, Welsh Ministers will be able to demonstrate a clear commitment to tackling inequality and ensure we're well placed to deliver the statutory requirements expected of us next year.

To support relevant public bodies in preparing for the future commencement of the duty, the Welsh Government published non statutory guidance on the 1 April, as well as additional documentation, specifically a factsheet and a 'frequently asked questions' document. All of which can be accessed here - <https://gov.wales/socio-economic-duty>

Recommendation 9 - The Welsh Government should monitor and review how local authorities are providing free school meals over the summer holidays.

Accept

Schools and local authorities responded quickly to Covid-19, and set in place measures to ensure that families who rely on free school meals were still able to receive them, even when they were not at school. A range of provisions were introduced which varied according to identified local need and the resources available. Initially this included "grab and go" provision of school meals, but this was later phased out in line with social distancing requirements and, by the summer holidays, all local authorities in Wales were providing either supermarket vouchers, direct cash payments to parents, or were delivering food parcels. In order to meet the needs of the most vulnerable families a number of local authorities have operated more than one system simultaneously. The Welsh Government made available up to £40million to local authorities to support the continued provision of free school meals up to 31 August 2020. This included provision throughout the Easter, spring half term and school summer holidays.

The Welsh Government also provided guidance on free school meal provision during the period where schools were repurposed or closed and we continue to meet with local authority school catering leads to discuss the operational challenges encountered and to share knowledge. The WLGA has compiled and maintained detailed information of the approaches used by each local authority and this has been used as a shared learning tool as much as a monitoring record. Additionally, local authority claims against the £40million allocated for free school meals have been assessed by officials to ensure continued compliance with Welsh Government's policies.

It has ultimately been a matter for local authorities to decide what works best in their area. One system will not necessarily work with all families in every area and whilst we have been made aware of a very small number of complaints regarding free school meal provision, it is also important to recognise that in general the flexibility of local approaches has worked well and been welcomed. Anecdotally, we have been told of very positive feedback from parents. It is clear that more eligible families are receiving support now than before the pandemic and it is hoped that this will continue now that schools have re-opened to all pupils.

It is also important to note that in the event of a national or a local lockdown, local authorities in Wales now have flexible systems in place that can be used as part of contingency planning and will be able to react to a range of scenarios and events.

Recommendation 10 - The Welsh Government should set out what additional fair work measures it is considering implementing to secure a “values-led recovery where the guiding principles are social justice, fair work and environmental sustainability”

Accept.

The Welsh Government is developing a suite of outcome indicators mapped to each characteristic of fair work identified by the Fair Work Commission. We intend to use this indicator set for a variety of purposes, including the measurement of fair work and procurement outcomes over time and in helping inform the development and targeting of future policy. We are discussing their development with social partners ahead of any decision to publish them.

Recommendation 11 - The Welsh Government should accelerate the implementation of the Fair Work Commission’s recommendations that do not require legislation, including improving knowledge of employment rights and ensuring public money is only provided to organisations meeting the fair work standard.

Accept

The Welsh Government is committed to the priorities and ambitions for a fair work nation set out in Fair Work Wales. Whilst Covid-19 has fundamentally altered the context for this work, we continue to progress the agenda and are prioritising interventions to increase workers and employers knowledge of workplace rights and avenues of support; enhance the relationship between public funding and the delivery of fair work outcomes; and improve outcomes in specific areas given prominence by the pandemic, including social care and health and safety.

Recommendation 12 - The Welsh Government should significantly increase funding to advice services that have expertise in employment, benefits and discrimination, including the creation of a helpline specifically for BAME and disabled employees to report concerns about safety and discrimination.

Accept.

Since 2014, in response to the onset of the UK Government’s austerity measures and welfare reforms, the Welsh Government has consistently awarded grant funding of £6 million a year to advice providers ensuring some of the most vulnerable people in Wales can access the advice and support they need.

In 2020, we introduced the Single Advice Fund (SAF) to help meet the increasing demand for access to advice services and ensure that we have quality-assured providers delivering joined-up services. Covering the period 1 January to 31 December 2020, £8.2 million grant funding has been awarded to providers through the SAF to deliver advice services, including specialist advice on welfare benefits, employment and discrimination.

Funded by the Welsh Government’s Voluntary Services Emergency Fund, a support helpline is being established by third sector partners to respond to the varied and disproportionate adverse impact of Covid-19 on BAME people. The helpline will provide

guidance and support on a range of issues and will link to the Wales TUC for specialist employment casework. The helpline launches in September 2020.

The EU Citizens' Rights Project funds Citizens' Advice Cymru to deliver specialist exploitation in the workplace advice. The project is funded until the end of December 2020, providing advice, mediation with employers and support at employment tribunals as necessary.

The ReStart: Refugee Integration project is supporting refugees with specialist support to access ESOL and employability advice. The project is due to run until December 2021 and operates in the four asylum dispersal areas of Wales; Cardiff, Newport, Swansea and Wrexham.

The Welsh Government recognises it is more important than ever that people are able to access the advice that they need. However, we are not in a position to fund all the gaps in provision and will work with other funders to ensure there is a coordinated approach to the provision of advice services across Wales.

Recommendation 13 - The Welsh Government should undertake a large scale, comprehensive benefits take up campaign to ensure people are accessing the benefits they are entitled to both throughout the current pandemic, and more generally when we move out of the current crisis.

Accept.

The Welsh Government recognises the importance of people in Wales claiming their entitlement to devolved and non-devolved welfare benefits and welfare payments. In the first six months of operation (January to June 2020) the benefit advisory services funded through the Welsh Government's Single Advice Fund, helped households across Wales to gain welfare benefit income totalling £14 million.

We recognise that Covid-19 is having a significant impact on people's finances, and we are taking immediate action to help maximise income for low income households, and build financial resilience. The Deputy Minister and Chief Whip has already agreed to spend £800,000 for income maximisation initiatives to boost the income of households across Wales. This funding will support low income households to become aware of, and be able to access, their correct entitlement to financial support from the welfare benefit and wider financial support systems.

We are conscious that Recommendation 4 of your Committee's report on benefits in October 2019 related to benefit take-up. The Welsh Government has already started work on this. We are currently exploring options internally and via external partners on how to raise awareness of entitlement and access to benefits. We have identified initially three priority groups; BAME Households, Households with Disabled Children or Adults and Households in low waged employment. The Welsh Government is also now looking to develop and implement an awareness-raising programme for frontline workers to increase their understanding of welfare benefits and wider financial support systems, which will help to increase their ability to encourage people to claim all the financial support they are entitled to.

Recommendation 14 - The Welsh Government should pause council tax debt enforcement action for 6-12 months. This should come into force at the earliest opportunity.

Reject

Alongside the system of discounts and exemptions, the council tax reduction scheme provides targeted support to households on low incomes. Anyone experiencing difficulty in paying their council tax bill should contact their local authority to discuss the range of support which might be available.

The Welsh Government is providing additional funding to local authorities in recognition of the increase in applications for council tax reductions as a result of the pandemic.

The council tax enforcement system is an integral part of the general arrangements for the payment and collection of council tax and it is needed to ensure that all households with the means to pay, do so. The processes make provision for local authorities to enter into arrangements such as alternative payment plans with households who do not have the means to pay.

Recommendation 15 - The Welsh Government should rebrand the Discretionary Assistance Fund and run an awareness campaign (separate to the take up campaign), on TV and radio, social media, and in print.

Accept in Principle

Since April 2013 the Discretionary Assistance Fund (DAF) has made 362,575 awards with more than £64.7m being spent in grant funding supporting the most vulnerable people with 66% of the fund now relating to emergency payments. The DAF is supported by a network of more than 550 front-line organisations who are actively engaged and key to ensuring that this support is given to those it is intended to help. In order to complement the partner network communication and engagement, Welsh Government continues to conduct a social media campaign, and whilst broad in coverage, also includes the targeting of specific groups. We will keep the effectiveness of our awareness raising under constant review and continue to work with communication colleagues to consider the most appropriate and effective use of mainstream media to ensure the approach is both appropriate and proportionate, and that people who are experiencing financial hardship are aware of the immediate support available through the DAF.

The DAF has over several years, been built up as a recognised brand which has taken several years to establish. We must ensure that it remains recognisable and easily accessible to those people who are most in need of its support at times of financial crisis.

Recommendation 16 - The Welsh Government should ensure that local authorities have sufficient funds to make DHP payments to anyone who is eligible to help prevent evictions.

Reject

A Discretionary Housing Payment (DHP) may be awarded when a local authority considers that a claimant requires further financial assistance towards housing costs and is entitled to either Housing Benefit or Universal Credit (UC) with housing costs.

The DHP fund is not devolved and is the responsibility of the Department for Work and Pensions (DWP). Annually, the DWP allocates a DHP grant to each local authority. Local authorities can top up their allocation by two and a half times the grant allocation

The DHP funding for 2020-21 has increased in Wales by approximately £2.1 million compared to the last financial year. This year the funding is £10.5 million.

We understand that all Welsh local authorities (apart from Pembrokeshire who did not submit information to the DWP) reported that they had spent their full allocated budget for the 2019-20 financial year. Furthermore, 17 authorities topped up their DHP fund in 2019-20 financial year.

The DWP is currently evaluating DHP expenditure to ascertain if Covid-19 has impacted on the use of and demand for DHPs. DWP are looking to establish the volumes and types of DHP applications and values of awards in the first quarter of this year and the first quarter of last year (2019). Local authority input is encouraged as the more information DWP receive the better they will be able to understand the impacts on authorities as a result of the crisis. It is hoped the UK Government will provide additional *in year* monies to DHP funding if local authority returns indicate increased expenditure due to financial pressures of Covid-19.

The Minister for Housing and Local Government also recently wrote to the Secretary of State for Work and Pensions, requesting the following changes to the DHP system:

- A temporary relaxation of the entitlement rule to enable those who are not entitled to Housing Benefit or UC, but who may be on a low income, to access a DHP. This would support renters who struggle for short periods if their income drops due to being on Statutory Sick Pay or reduced hours as a result of COVID-19. The scope would be limited as those who are made redundant would move on to UC and be picked up that way.
- A permanent change to entitlement to DHP when a claim is made for UC with housing costs. It would be more financially beneficial if entitlement to DHP commenced at the beginning of a UC claim rather than waiting for the end of the first UC assessment period.

Regrettably these proposals were refused.

Recommendation 17 - The Welsh Government should explore options for allowing automatic entitlement to devolved benefits such as council tax reduction.

Accept.

Given the acute financial pressures many families are now likely to be experiencing as a result of Covid-19, we are currently taking forward a series of practical steps to help maximise incomes for families living in poverty in Wales.

Welsh Government wants to make it as easy as possible for people to claim support such as free school meals and council tax reductions. We are working with local authorities and other key stakeholders to identify potential solutions to simplify and streamline the way these benefits or entitlements are administered, and ensuring a more consistent approach across Wales. The aim being to make these benefits more accessible to families in need of this support, as well as helping to make the administration of these benefits less resource intensive for local authorities.

Under the legacy system there is a passport into Welsh Government entitlements but this is not the case for Universal Credit. A data-sharing system is in place between DWP and local authorities which flags when a UC claimant may also be eligible for a council tax reduction (CTR) but many UC recipients still need to make a separate application for CTR. We are exploring practical solutions to this.

Recommendation 18 - The Welsh Government should undertake a rapid review of the effectiveness of the BAME Advisory Group's risk assessment tool and ensure it is rolled out to all sectors, but targeted at those most at risk.

Accept

The all Wales *COVID-19 Workforce Risk Assessment Tool* was first made available on the Welsh Government website on 27 May 2020. Working with health and social care stakeholders, including NHS Employers, social care providers, and trade unions the Tool was promoted for use across the NHS and social care sector. The priority was to make it available without delay to those who urgently needed to understand their risk and with their employer take appropriate action.

Whilst monitoring data is therefore not available for most early users, from the outset qualitative feedback has been encouraged to a designated mailbox, as well as through the First Minister's BAME Expert Advisory Group, Risk Assessment Subgroup, Social Care Implementation Group and other stakeholders including the Welsh Partnership Forum Business Committee.

The *COVID-19 Workforce Risk Assessment Tool* is available in English and Welsh and is supported by an [animation](#) which describes how to use the tool, which includes provision for subtitles.

An online interactive version was quickly developed and made available from 22 June. This is hosted on the national e-learning platform Learning@Wales and is available to anyone working in Wales.

From 20 July NHS staff have been able to access the Tool from their individual Electronic Staff Record (ESR). Summary analysis data from the online interactive version is scrutinised by officials and the Risk Assessment Subgroup. It is supported by a comprehensive communication plan for the health and social care sector and is integrated as part of a wider cross cutting communications strategy which continues to develop.

Police forces in Wales have confirmed that they are using an adapted version. It was also referenced in Guidance for the Education sector to support the return of pupils to school for 29 June.

On 7 August an adapted version of the *COVID-19 Workforce Risk Assessment Tool* and sector specific guidance for the Education, Childcare, Playwork, Youth Work and Further Education sector was published. The Tool is also made available for the Education, Childcare, Playwork, Youth Work and Further Education sector to complete online through the Learning@Wales national e-learning platform.

The Tool is accompanied by guidance and FAQs developed in social partnership with NHS Wales employers and trade unions which address discrimination and signpost to further support. The Guidance and FAQs have all been further revised to accommodate changes in Welsh Government Guidance for those who were shielding prior to 16 August.

Recommendation 19 - The Welsh Government should accelerate the fair work forum for social care with a clear view to improving pay and working conditions in the sector. Quick wins should be identified, such as paying domiciliary care workers for all time worked, including travel time, improving opportunities for formal training and ensuring care home workers and domiciliary care workers are treated equally.

Accept

We have worked with social partners to establish the Social Care Forum which met for the first time in September. The Social Care Forum is a tripartite social partnership group committed to embedding fair work within social care. It will help create the environment within which representatives of trade unions, employers and the Welsh Government can work together to influence national priorities and policy concerning fair work in the social care sector in Wales.

The Forum has been tasked with considering how we can use the levers available to us to influence short and medium term changes in the sector aimed at delivering Fair Work. This includes fair reward, as well as employee voice and collective representation; security and flexibility; opportunity for access, growth and progression; a safe, healthy and inclusive working environment; and a working environment in which legal rights are respected and given substantive effect.

Separately, we are taking steps to professionalise social care work in both domiciliary care and residential care home settings. For example, we introduced mandatory registration for domiciliary care workers and voluntary registration for social care workers in adult residential care homes in April 2020, and we are taking steps to introduce mandatory registration for social care workers in care homes in 2022. Newly registered workers are expected to achieve the required formal qualifications within three years which may be undertaken through a Welsh Government funded apprenticeship.

We have also recently published research which was commissioned from the Welsh Institute of Health and Social Care to review the employment terms and conditions of care workers across a range of social care sectors and the NHS. The research was commissioned to understand the extent to which pay and employment terms and conditions vary across different types of employer and the impact on recruitment and retention in the social care sector. Next steps for the research will be considered by the Social Care Forum.

Recommendation 20 - The Welsh Government should make the case to the UK Government to waive taxation on the £500 bonus for social care workers.

Accept

The Minister for Finance and Trefnydd wrote to the UK Government to make this case, but, regrettably, the UK Government turned down the request.

Recommendation 21 - The Welsh Government should actively encourage all public authorities to advertise jobs as flexible by default

Accept

The Welsh Government will explore this issue with devolved public sector employers and the trade unions through our social partnership structures.

Recommendation 22 - The Welsh Government should provide information about how to implement fair and effective flexible working to all employers in receipt of Welsh Government support and make support conditional on employers implementing these approaches.

Accept in principle

The ability to convene social partners and other networks to provide fair work leadership and advocacy is a key lever of government. We are committed to working with employers to provide advice, support and opportunities for peer to peer learning on all aspects of fair work. The Economic Contract and Code of Practice on Ethical Employment in Supply Chains provide an opportunity to engage directly with employers and we are looking at ways in which we can strengthen the implementation of both to improve their reach, drive behavioural change and reinforce links between public funding and fair work outcomes.

Recommendation 23 - The Welsh Government should explore ways of maximising the income of unpaid carers, including through council tax discounts.

Accept

One of the simplest ways to maximise income for a carer is for employers to help them remain in employment. 370,000 unpaid carers of all ages were identified in the 2011 Census and many more will have taken on a caring role as a result of the pandemic. However, the economic challenge of Covid has had a negative impact on many industries and economic sectors meaning workers are being, and will be, made redundant. Too many unpaid carers however, already leave employment or reduce their working hours because they find it difficult to balance their caring responsibilities with work and thereby miss out on career progression, improved pay, or training and development.

For carers not in employment, education or training they should be able to access their rights to a range of information, advice and support regarding benefits, including Carers Allowance, but also be supported where they wish to develop new skills or have existing skills recognised to help individuals access employment, or become self-employed. To support this objective, in 2019-20 Welsh Government funded Carers Wales to translate and launch in Wales, the Carers UK online accredited “learning for living” course.

We will be launching a new ‘national carers’ plan consultation in the early autumn and will be seeking views on a range of issues that matter to carers, including financial pressures that they experience. When developing the final plan we will ensure there are consistent and linked policy approaches regarding help and support for all carers, and work with representatives from across the public, private and third sectors to understand the impact of policy changes. We will also continue to support the proposal from the UK Government for a new minimum employment right of a week of unpaid carers leave for qualifying employees.

As previously stated, the Deputy Minister and Chief Whip has already agreed to spend £0.8m for income maximisation initiatives to boost the income of households across Wales following the Covid-19 crisis. This funding will support low-income households to become aware of, and be able to access, their correct entitlement to financial support from the welfare benefit and wider financial support systems.

The council tax system takes account of the complex financial circumstances of households and incorporates a wide range of discounts, exemptions and reductions.

Recommendation 24 - The Welsh Government should keep under review the PPE it has stockpiled to ensure that it remains of adequate quality and is fit for purpose, including that the design and fit is appropriate for all wearers and suitable for staff, patients or carers who are deaf or hearing impaired [recommendation from the HSCS Committee].

Accept

NHS Wales Shared Services Partnership (NWSSP) are responsible for procuring and distributing PPE for the health and social care sectors in Wales. All PPE issued to health and social care settings by NWSSP will have been certified as safe to use. This process ensures that the PPE product meets the required certification, conformity, testing and manufacturing requirements and standards, providing the assurance that our frontline NHS and social care staff have the protection and confidence they need to undertake their vital roles. Should there be any issues, such as fit-test failures on certain products, NWSSP will seek to source alternatives to ensure that all staff have appropriate PPE. The Welsh Government has already issued some clear masks for use in Wales. These masks are not suitable for use in all situations, but we will look to extend their use where it is safe and appropriate to do so to support those who are deaf or hearing impaired.

Recommendation 25 - The Welsh Government should build upon the implementation of the public health communications recommendations in the BAME Advisory Group report to ensure that targeted messaging is developed for other groups who have been disproportionately affected by coronavirus, such as older people, those from the most deprived areas; disabled people and those with long term health conditions.

Accept

We are continuing to work to ensure messaging to those in vulnerable groups is targeted and disseminated effectively, in partnership with stakeholders

The Welsh Government worked with Public Health Wales to ensure that their Coronavirus information pages were translated into over 100 languages through the Recite Me software. Manually translated materials have also been distributed through our networks in public and third sectors to spread awareness of restrictions and safety information in many different languages. The Welsh Government's Sanctuary website also provides translated information for refugees and asylum seekers specifically.

We are developing further multilingual campaign assets for Test, Trace, Protect and are also working on the launch of the new NHS Covid-19 app with UK Government teams, on multilingual and diversity stakeholder mapping and developing assets on how to use the app in 11 different languages.

Recommendation 26 - The Welsh Government should review the accessibility and availability of mental health support services, in particular for men from lower socio-economic groups.

Accept in principle / in part

Health boards are responsible for ensuring services meet the needs of their communities. Health boards are also being asked to set out in their Operating Framework reports how services will respond to changing needs in respond to Covid-19, including for mental health services. At a national level, the Welsh Government routinely monitor the information from a range of surveys – both in Wales and the UK to help us understand how Covid-19 is impacting on mental health and well-being. We know that levels of anxiety have increased and people are understandably concerned, not just about the risk of Covid-19 but the impact on finances, employment and education.

Given the range of factors that impact on mental health, we are working across government and with partners to review the 2019-22 Together for Mental Health Delivery Plan that was

published in January. The aim is to identify where actions need to be accelerated or strengthened in response to Covid-19. Areas identified for strengthening include further work on the impact of mental health on the BAME community and a focus on lower socio-economic groups, for instance, supporting employment recovery.

Recommendation 27 - The Welsh Government should publish data on the £3 million school digital inclusion funding, how many pupils it has benefited, and set out whether it has identified any specific gaps in provision that were not addressed sufficiently by the fund.

Accept in principle

The support mobilised by the £3 million school digital inclusion funding as part of “Stay Safe. Stay Learning” was delivered directly by local authorities in conjunction with their schools.

Our leading online learning platform Hwb continues to play a crucial role in supporting the delivery of education during this incredibly challenging period, with an average of 2.5 million logins per month over the last three months - a 131% increase on the previous year. There has also been an average of over 9.1 million page views per month over the same period - a 152% increase on the previous year. Over 99% of schools are actively engaged in using the platform.

To support digitally excluded learners in maintained schools, there have been 10,848 MiFi devices and 9,717 software licences allocated to local authorities. Based on local authority feedback, through their own arrangements or via our nationally provided support, we understand that provision for digitally excluded learners is now in place. If a parent / carer hasn't accessed this provision, they need to contact their local school for provision to be made.

Further information can be found at: <https://gov.wales/device-and-connectivity-update-digitally-excluded-learners-during-coronavirus-covid-19>

Recommendation 28 - Qualifications Wales should conduct an evaluation of the exceptional arrangements for awarding grades once the process has concluded. If the evaluation reveals higher than average disparities for pupils sharing particular protected characteristics, or from socio-economically disadvantaged backgrounds, these should be investigated by Qualifications Wales

Accept

Qualifications Wales published equality analysis as part of the AS and A level results publication on 13 August. Following the change in policy to award grades based on centre assessment grades further analysis is now being undertaken and they have recently published a statement on this:

<https://qualificationswales.org/english/results-2020/qualifications-wales-statements/statement-on-plans-for-further-statistical-releases/>

Qualifications Wales is currently working towards publishing an update to its results overview and this is expected to be published this month. This will provide more accurate estimates of final results this summer for A levels, AS, GCSEs and the Skills Challenge certificate as well as comparisons to results in previous years and the proposed standardised grades. Qualifications Wales will also update the information on attainment

gaps and expand it to include an analysis of results for learners with a special educational needs status and further information on results by ethnicity.

There are additional plans to produce and publish the following analysis:

- Analysis of results, centre assessment grades and proposed standardised grades with regional and local authority breakdowns.
- An enhanced version of the [centre variation](#) statistics publication that were produced in summer 2019, with a view to including information by centre type.
- A document that draws together equalities impact analysis with some more detailed analysis.

Recommendation 29 - Qualifications Wales should publish information in easy to understand and accessible formats about the routes available for pupils to challenge the grades that they are awarded through this year's exceptional arrangements, including on grounds of suspected unlawful discrimination

Accept

Following the change in policy to award grades based on centre assessment grades Qualifications Wales has updated the appeals process accordingly. As part of this work a Learner Guide has been published aimed at providing accessible information to support learners. A copy of that guide is available here:

<https://qualificationswales.org/english/results-2020/appeals-explained/guide-for-learners/>.

Recommendation 30 - The Welsh Government should provide a 'catch up' classes fund for children whose education is most likely to have fallen behind during lockdown.

Accept.

The Welsh Government will provide an additional £29 million to schools to boost support for learners at crucial stages in their education from September. More information can be found here: <https://gov.wales/900-extra-teaching-staff-plan-recruit-recover-and-raise-standards-welsh-schools> .

Recommendation 31 - The Welsh Government should agree a sustainable funding model for the VAWDASV sector before the end of this Senedd term. Before this, the results of the mapping exercise should be published.

Accept

The Welsh Government is committed to working with stakeholders to develop a model for sustainable funding for the provision of specialist VAWDASV services through the National VAWDASV Strategy. While a number of models have been proposed, principally one closely aligned to the WCVA's agreed model, there has been no unanimous acceptance of any of the models, despite the strenuous efforts of the National Advisers to achieve consensus.

The mapping exercise requires the input of the sector as it includes not only Welsh Government funding, but also the many sources of funding accessed by the sector (as referenced in the Wales Audit Office's report:

https://www.audit.wales/system/files/publications/VAWDASV_eng.pdf). All but one

stakeholder has completed the mapping exercise within the agreed time frames. The mapping exercise is not suitable for publication, but as a means of informing the model.

The model is intended to support the development of the sustainable funding model and a commissioners group will be convened to feed into this process. Stakeholders have agreed this process.

Recommendation 32 - The Welsh Government should work with the Office for National Statistics to find appropriate ways to collect domestic abuse data for older people

Accept

The Office of National Statistics publishes data from the Crime Survey for England and Wales (CSEW). This records respondents' experience of crime and was amended to include responses from survey respondents up to the age of 74 (previously it only recorded responses from respondents up to the age of 59). Collecting survey responses from those over the age of 74 is much harder and the low numbers are less likely to provide a statistically valid outcome.

A different measure is police data. This records crimes reported, rather than people's experiences of crime, and therefore differs, as many do not report crimes. This is particularly true of domestic abuse, with elderly victims being amongst the least likely to report, therefore this figure would not provide an accurate estimate.

Social services respond to safeguarding concerns about vulnerable adults, including the elderly. This may provide a source of data, although it requires a recognition of the difference between the definitions of domestic abuse, and adult safeguarding concerns. It is arguable whether pursuing a strict distinction between elder abuse and domestic abuse for the purposes of measurement would add value to actions to protect and support older people.

We will continue to work with the Office for National Statistics to ensure that evidence on older adults is effectively captured.

Recommendation 33 - The Welsh Government should provide a short term update to the community cohesion delivery plan and hate crime framework for action for the remaining Senedd term.

Accept.

The work to develop a set of Community Cohesion Principles was paused due to Covid -19; officials have worked closely with partners on tensions related to the pandemic. . The Principles will be developed together with key partners with the aim of identifying an agreed definition and common goals to work together to foster and promote community cohesion in Wales.

As part of this work, we will produce a short update on progress towards the actions in the Hate Crime Framework.

Recommendation 34 - The Welsh Government should run a social distancing public awareness campaign to emphasise the different challenges the 'new normal' presents to different people

Accept

The Welsh Government has promoted the need to keep physically distancing as a key message in the existing Keep Wales Safe campaign. We have also repeatedly given the advice to those who were shielding through direct contact and wider campaign work. We have also supported the [Distance Aware initiative](#) through promotion on social media and directly by Ministers.

Recommendation 35 - The Welsh Government should provide swift guidance to re-opening businesses on physical and communication accessibility.

Accept

The Welsh Government has developed guidance that aims to help businesses and employers and provided practical considerations on how they could operate. The guidance is based on five principles for workplace safety:

- Care: Our health and well-being comes first
- Comply: The laws that keep us safe must be obeyed
- Involve: We all share the responsibility for safe work
- Adapt: We will all need to change how we work
- Communicate: We must all understand what to do

The Welsh Retail Consortium (WRC) has informed us that in April, they highlighted the steps retailers had taken to accommodate disabled consumers to the Equalities and Human Rights Commission. We understand that in these discussions, they were able to explain the reasonable steps retailers had taken to accommodate disabled consumers within the constraints of social distancing protocols.

Members of the WRC have had regular contact with disability charities and organisations. As a sector, there have been three teleconferences from the middle of May, between all major retailers and the charities. The WRC report that these have been a great opportunity to explain steps retailers have taken and refine communications to staff in stores and communication for disabled consumers. They note that feedback from the charities, including Age UK, Alzheimers Society and the RNIB has been very positive and have welcomed a regular opportunity to raise issues on behalf of their members.

The WRC have also reported that members have thought carefully about the operation of their stores during the crisis and refined their practices in liaison with the major charities. The key steps they have taken are: many retailers offering dedicated hours for elderly and vulnerable consumers as well as NHS staff and carers who look after them; retailers understanding queueing was not appropriate for all consumers and briefed their greeters and queue marshals to prioritise disabled consumers; from the start of social distancing, allowing carers to shop with vulnerable consumers, even where they were restricting numbers; they are being careful to ensure signage in store on social distancing is legible for all consumers; and being careful when redesigning stores to ensure social distancing was possible for all consumers.

Retailers have also implemented additional training for colleagues, supported by regular internal communications, to ensure all store workers were aware of the spectrum of impairments and available to help where required.

As the economy reopens the Welsh Government expects the accessibility needs of the public to be fully met wherever possible, and where 2 metre distancing makes that difficult, adequate alternative arrangements to allow access should be put in place.

Recommendation 36 - The Welsh Government should establish a priority grocery delivery scheme for disabled people who are not shielding (similar to Defra/RNIB scheme in England).

Accept in principle

The Welsh Government welcomes the effort retailers have made to expand their on-line ordering and home delivery operation, especially where they are offering this service to a wider group than those shielding. They are also voluntarily introducing initiatives such as prepayment cards to facilitate shopping on another's behalf and several provide food box schemes which can be delivered directly to people's homes. If people need practical help and do not have family or friends locally to provide this, the Welsh Government suggest they contact their local authority or local voluntary council for practical support.

We are also pleased that retailers have committed to supplying priority online slots for those advised to shield once after the shielding period ended.

Recommendation 37 - The Welsh Government should appoint an accessibility lead within the Welsh Government to oversee the production of all key public health and other information in accessible formats

Accept

The Welsh Government is committed to ensuring that all Welsh citizens are informed and aware of how to follow rules and stay safe during Covid-19. That is why we ensure the presence of a British Sign Language (BSL) interpreter at each of our Covid-19 news conferences and ensure that large print and braille are available on request alongside other accessible formats on key products, such as the shielding letters from the Chief Medical Officer.

We have set up an Accessible Communication Group, which met for the first time in June, to discuss and overcome the barriers stopping people from accessing information during this time. This Group includes a wide range of organisations, who have testified to the difficulties that those who are deaf or hard of hearing, blind or visually impaired, with learning difficulties or are autistic experience when trying to access clear and concise information during the coronavirus pandemic. The Group also includes organisations who represent refugees, children and the Gypsy, Roma Traveller community.

Although having a live interpreter at public broadcasts is a good starting point, we know that there is much more that needs to be done. Providing more information in plain English and Welsh, producing content in BSL and in an 'Easy Watch' format, and making better use of videos and QR codes are all suggestions currently being considered or implemented by the Welsh Government. We are also aware of the need to produce easy read versions of guidance and avoid too many idioms, metaphors and technical terms that may cause confusion for those with learning difficulties.

The need to consider offline modes of information sharing has also been raised at meetings of the Accessible Communications Group, as well as the need for producing braille, audio and large print resources for blind or visually impaired people. Taking this feedback into consideration, we have made an active effort to improve the accessibility of our Covid-19

communications, which can be seen in the suite of accessible materials available for resources such as our Test, Trace, Protect campaign.

A proposal for future accessible communication policy is also currently being developed, which will ensure all Welsh citizens receive clear and comprehensible information.

As well as the immediate improvements we have made, we are also working on a document which will set out the standards that Welsh Government will meet in the future to make sure that communications are accessible and meet the needs of people across Wales.

Recommendation 38 - The Welsh Government should lobby the UK Government for the lifting of No Recourse to Public Funds restrictions.

Accept.

The Welsh Government has regularly advocated for changes to the immigration system to improve individual wellbeing, community cohesion, reduce destitution and prevent homelessness. This is an ongoing process, including in relation to the lifting of No Recourse to Public Funds restrictions. Earlier in this pandemic, the Counsel General wrote to the Home Secretary to urge the lifting of these restrictions during the Covid-19 crisis but this has not been heeded. Nevertheless, we have encouraged local authorities to accommodate individuals, regardless of immigration status to safeguard public health.

We are continuing to consider opportunities to improve support for those with No Recourse to Public Funds and have provided funding this year for specialist legal advice and published research on accommodation options. Later this year we will procure training and guidance to support local authorities to better understand migrant rights and entitlement to services.

Recommendation 39 - The Welsh Government should review the current community cohesion and hate crime plans and networks (in line with recommendation 33) with a view to developing an integration strategy in the long term.

Accept.

Welsh Government promotes a person-centred approach which ensures that individuals are enabled to achieve integration, regardless of their background or circumstances. This approach was reflected in the development of policy documents such as *Enabling Gypsies, Roma and Travellers* (2018) and the *Nation of Sanctuary – Refugee and Asylum Seeker Plan* (2019), as well as being integral to the implementation of the ReStart: Refugee Integration Project and Regional Community Cohesion Programme.

Our long-term goal is to create an integrated approach which is measurable and provides clear positive impacts on communities. The initial approach is to develop Community Cohesion Principles with agreed definitions of community cohesion and effective approaches, whilst investigating improved datasets which allow us to better monitor indicators of integration. Without this groundwork in the short- to medium-term an integration strategy is not likely to have the impact which we desire.

Recommendation 40 - The Welsh Government should provide ESOL classes online.

Accept.

Under the ReStart: Refugee Integration project, colleges have been adapting to the Covid-19 campus closures by expanding their offer of online ESOL class delivery. This has been a positive arrangement which has demonstrated a viable way of working in future. However, digital barriers still need to be worked through for certain cohorts – such as asylum seekers – who have struggled with data costs and internet connectivity.

To ensure compliance with social distancing, the Welsh Government's guidance on adult learning delivery from September 2020 encourages blended and digital learning to continue where possible, and we have provided £3.2m in funding for colleges and local authorities to purchase ICT equipment for digitally excluded learners who do not have their own devices, or who have issues with internet connectivity.

Issues surrounding barriers on access for ESOL on line delivery related to language will be followed up with the network and REACH centres.

Recommendation 41 - The Welsh Government should provide migrant awareness training for frontline public services staff

Accept.

Under the EU Citizens' Rights Project, the Welsh Government will provide training to public services front-line staff to ensure they better understand migrant rights and entitlement to services. This will cover issues including those with No Recourse to Public Funds, Settled and Pre-Settled Status, asylum seekers and refugees, and other cohorts. We intend to deliver this training in late 2020 and early 2021.

Recommendation 42 - The Welsh Government should ensure that the EU Settlement Scheme awareness programmes are being run in alternative ways which take account of the on-going restrictions on face to face meetings.

Accept

During the Covid-19 pandemic Newfields Law, Citizens Advice Cymru and Settled have adjusted their services to carry on raising awareness and offering EUSS advice. This includes using live web-based video conferencing to hold meetings, delivering presentations and running webinars, increasing their social media presence and using the time to develop, translate, publish and distribute "how to" information guides and videos.

A video collaboration between Newfields Law, Newport MIND and the community cohesion officer for Wrexham CBC which explains some of the more complex potential scenarios faced by EUSS applicants has received over one thousand views.

Social media has been used to deliver updates and maintain an active presence. Newfields Law regularly publicise events and share relevant articles on EUSS, while Citizens Advice Cymru ran Facebook and Twitter promotion campaigns to advertise that the advice service was still open.

Settled have continued to run campaigns through Twitter, Facebook and WhatsApp. The Settled Facebook page attracted many new followers and Settled are now running Facebook Forums in Italian, Spanish, German, Romanian and Bulgarian.

Webinars have proved to be a useful means of communication for all the service providers. Citizens Advice Cymru arranged a series of weekly webinars advertised and co-hosted with Ethnic Youth Support Team (a support service for BME young people, families and

individuals, including refugee and asylum-seekers living in Wales). These online events covered general advice and EUSS advice with the facility for clients to request a 1-2-1 appointment conducted via telephone or digital means.

During the period, Settled has run webinars using Zoom and Facebook platforms through the medium of Italian, Spanish, Bulgarian, Romanian, Polish, Slovakian, German and French languages. Some of these webinars have been or will be repeated, and webinars in Lithuanian and Portuguese are planned.

These activities are in addition to the continuation of established telephone and email advice provision and the use of email and post to provide an overview of the advice service help available that all the information and advice service partners provide. Both Citizens Advice Cymru and Settled have a first language telephone helpline where clients can arrange a call back for advice in their language of choice.

Recommendation 43 - The Welsh Government should publish data disaggregated by protected characteristics on the support it has provided to businesses as a result of the pandemic.

Accept in principle

The majority of support has not been awarded to individuals, for example, Non Domestic Rates (NDR) is targeted at rate paying building premises so is a blanket cover and doesn't consider characteristics.

For both Economic Resilience Fund (ERF) and NDR we will assess impact including protected characteristics through a full impact and survey study, this is likely to cover owner / director and not the full employment of the business.

Our evaluation will cover the impact of ERF. We will analyse data to determine how many businesses supported, sector, geography, jobs retained. We can do some analysis of business owner by demographic groups, where we have this data. A survey will follow later to secure qualitative information. We are working with other portfolios across Welsh Government to consider the questions for the survey. We expect to publish our findings in 2021.

Recommendation 44 - The Welsh Government should target employment programmes at those who are furthest from the labour market.

Accept

The Welsh Government is clear on its commitment to create a more prosperous and equal Wales, pursuing equality for all. Making sure the people of Wales have opportunities to secure employment, and to then progress in their careers, remains a clear priority.

The Employability plan, published in March 2018, includes commitments to support those furthest from the labour market, and to increase the number of disabled people into work. We have taken a cross government approach to initiate the step changes necessary to remove the barriers being faced by the most disadvantaged seeking employment, and we have enhanced our programmes to provide a tailored, individualised approach to employment information, guidance and support.

Our Community Employability Programmes comprises three programmes funded through the European Social Fund and Welsh Government: Communities for Work, Parents Childcare and Employment (PaCE) and Communities for Work Plus. The support is targeted those who are economically inactive and long-term unemployed, focussing on those furthest away from the labour market who live in the most deprived communities of Wales, those whose main barrier to accessing education or employment is childcare, and those in or at risk of poverty. As of 30 June 2020, the programmes have engaged with over 48,000 individuals and have supported over 18,000 into employment.

However, Covid-19 threatens to reverse progress made in reducing unemployment and economic inactivity over the last decade, and the risks to jobs and businesses is at an unprecedented scale. In response to Covid-19, on 28 July the Minister for Economy Transport and North Wales announced the Covid Commitment to employability and skills. We have committed to invest nearly £40 million to offer advice and support to people aged 16+ to find work, pursue self-employment or find a place in education or training, with hiring incentives for employers to recruit individuals most affected by Covid-19. Young people aged 16-24, disabled people, people from BAME communities, women and those most affected by the Covid-19 pandemic will be prioritised. This comprehensive package of employability and skills support is needed in the coming months to ensure that we are able to provide timely support to employers on their skills and training needs as well as ensure that the people of Wales are able to upskill and reskill, and find employment.

We are not just supporting individuals, but also businesses to create the conditions for people to thrive in work. We are currently recruiting Disabled People Employment Champions who will work with employers across Wales to make workplaces more inclusive and better support the recruitment and retention of disabled people. We will continue to work collectively with partners to focus resources to drive up engagement and support for those furthest from the labour market, and to concentrate efforts on those most affected by the pandemic such as young people, people from BAME communities and disabled people.

The ReStart: Refugee Integration Project supports refugees to access employment due to the significant barriers they face in accessing the labour market. The project will run until December 2021, supporting at least 720 refugees directly, with the development of toolkits and employer engagement activities to indirectly benefit additional refugees.