

Re: Consultation response to Anti Racism Plan

Platform is the charity for mental health and social change.

We are a platform for connection, transformation and social change. We're driven by the belief that a strengths-based approach is the foundation to sustainable wellbeing for everyone. We do not believe that people or communities are "broken" or in need of fixing.

Our work takes a trauma informed approach to understanding mental health and emotional distress, and we see the current mental health, and wider health, social care and public sector systems as no longer fit for purpose. Based on illness and deficit models, they deny people the hope and agency to heal.

Racism is itself traumatic, and we are committed to eradicating it. Our response below reflects this position and focuses on the key areas we would like to see strengthened:

Overall approach

We support the vision of the plan and believe that the placing of lived experience should be its heart. Lived experience should be valued and paid for where individuals rather than organisations are being asked to help. We also welcome the commitment to improving diversity at senior leadership and board level.

We welcome the acknowledgment that many organisations need to step up and improve. moving beyond seeing race equality as a tick box exercise. We look forward to seeing many of the proposals in this document being implemented.

We are pleased that the strategy reflects the need for more diversity in public sector management, with anti-racism considered a core principle required by anyone holding such a position. We think this principle should be further clarified and strengthened, with details as to what that will entail and how the principle will be spread across existing public sector management. We also welcome the repeated acknowledgement that more data is required throughout public services, so that the experiences of minority groups are better reflected.

However we feel that the Welsh Government should also address the elephant in the room – which is that in recent years there has been an attempt to re-normalise racism within mainstream British political discourse. We note the UK

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government's attempt to deny the existence of institutional racism recently, and the poor quality of much media coverage of serious issues related to racism and structural power. We are concerned that far from challenging this, we have arrived at the stage where neither of the main UK political parties appear to be willing to challenge racist viewpoints they perceive to be widely held in case it leads to electoral difficulties. We would hope that in Wales, the Welsh Government could lead efforts to avoid this "culture war" style politics and will be vocal in condemning it when it takes place.

We have specific comments on the following areas:

Mental Health

The Task Force is to be welcomed, but it requires clear terms of reference and firm commitments to be appropriately resourced. We also believe it should be led by somebody from a minority community, as currently the all Wales Alliance for Mental Health membership organisations - bar one - are led by white people and are different stages of addressing their own diversity.

We are concerned about the lack of specific actions in the plan on Mental Health. For example, the statements below from the plan use the terms "consider" and "explore":

'Welsh Government will consider what more needs to'

'Welsh Government will explore ways to improve early access to mental health and Dementia services for ethnic minority populations'

We would suggest that these terms need to be strengthened and the plan needs to outline concrete actions rather than areas for further consideration and exploration, as in practice many services will be focused on coronavirus recovery and may not prioritise them without clear instructions and language that makes the Welsh Government's intentions clear.

The Mental Health system as it currently stands is known to discriminate against minority communities, who are disproportionately represented in statistics on detentions and compulsory treatments, yet often face barriers in accessing preventative and early intervention services. The current system fails to offer appropriate representation to people caught in this cycle of increased medication, discharges them with inadequate support, and then inevitably re-admits them due to this lack of support. The system lacks an acknowledgement that racism itself is traumatic, and that many people using it have experienced

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trauma and multiple disadvantages across housing, education, and access to good employment.

Furthermore, the system itself contributes towards re-traumatisation of people, and needs radical reform to be fit for purpose. We therefore recommend that the strategy is strengthened to acknowledge this, and specifically includes the following actions:

1. Acknowledgement that racism and living in constant fear of racism is a traumatic experience, and persistent racism is re-traumatising. Racism is a causal factor for poor mental health, alongside poverty and inequality, and can prevent healing. It results in people entering the Mental Health or Criminal Justice systems, and is one of the fundamental causes of poor Mental Health.
2. The equalities data set developed by the outcomes group should be accepted and implemented as a matter of urgency.
3. That policies are put in place to reduce the over-medicalisation of Mental Health experienced by minorities when they encounter NHS services. For example recommendations from the lancet¹ about ensuring medication is the last resort should be adopted forthwith throughout the health service.
4. Investment in community mental health services located in the areas where these services are most needed, offering culturally appropriate services and a wide range of other services such as housing advice, employment support etc.

We do not believe Health Boards are best placed to deliver and lead on this investment, they have many pressures and competing priorities. Instead we believe Welsh Government should commission and lead the development of this work and the services required, possibly placing it within the remit of the Task and Finish Group.

Education

We support efforts to improve the diversity of experiences reflected in the curriculum, as well as improve diversity of the workforce – especially at senior management level. We think this principle should be expanded to the support services such as education consortia, and commitment to the principles of race equality become one of the criteria that ESTYN measures schools and colleges against.

¹ See [https://www.thelancet.com/pdfs/journals/lanpsy/PIIS2215-0366\(20\)30309-6.pdf](https://www.thelancet.com/pdfs/journals/lanpsy/PIIS2215-0366(20)30309-6.pdf)

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We believe this area could be strengthened by incorporating an understanding of the impact of trauma on Mental Health, with explicit reference to the fact that racism itself is a traumatising experience.

We also recommend that the Welsh Government monitors closely any UK legislation that has the effect of requiring universities to host racist events, and re-affirms that higher education institutions should be promoting equality, with no place for racism, using its own legislative powers if necessary.

Housing and Planning

We are pleased that the strategy recognises that the existing housing system fails Gypsies and Travellers, and people with uncertain immigration status. However we are disappointed that the strategy does not recognise the continuing impact that policies of 'no recourse to public funds' (NRPF) has had. The consequences of this policy, as documented over 10 years ago by Amnesty International and Shelter Cymru, have been to empower gangmaster employers, people traffickers, and those perpetrating violence against women and children.

We call on the Welsh government to challenge the UK's NRPF policy, and to work with organisations experienced in helping people in this situation so that all Local Authorities understand the alternative legal mechanisms available to assist people in this situation. We also call on the Welsh Government to ensure that refuges and shelters for those escaping abuse and violence are funded directly to enable places for people with NRPF (so that organisations providing this service and relying on housing benefit for funding places have alternatives).

We note that the Planning System is absent from any considerations in the anti-racism plan. Yet the planning process is the primary mechanism in which social and affordable housing is built, and that access to good quality affordable housing is a crucial part of improving the lives of minority communities. This is a major omission, and requires correcting. The existing planning system has failed to secure enough affordable housing over the recent decades (with many developments often containing just 10% affordable housing, half of which is never delivered) and the consensus in the housing sector is that Wales needs far more social housing. We therefore recommend that changes to the planning system include:

- Setting a target for all major housing developments to contain at least 40% social and affordable housing (with housing associations and local authorities working with housing developers to finance this)
- Ensuring local development plans understand the importance of mixed tenure housing estates, properly supported by infrastructure and public

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services, rather than seeking to create 'ghettos' of social housing separate to private development.

- To ensure and clarify that equalities considerations are a material planning consideration, with planning officers, planning committee members, and the planning inspectorate receiving the necessary equalities trainings to ensure they understand this and what it would mean in practice.
- To remove the ability of the planning inspectorate to water down affordable housing commitments imposed by local authorities in developments so that they are 'profitable' for large developers.
- For genuine community consultation, involving all communities, about the types of S106 agreements that should be sought from large developments so that local communities genuinely see benefits from large developments.

Criminal Justice

Platform supports the devolution of the criminal justice system.

We support changes to the criminal justice system to make it a trauma aware system. Racism is traumatic but the criminal justice system sometimes sees responses to trauma as 'criminal' or 'anti-social behaviour' when in fact there is underlying trauma involved. Victims of crime can also be re-traumatised through the processes of the criminal justice system. We believe that the process of changing the system would be enhanced by the devolution of criminal justice, and with the ability of Welsh Government to more integrate its services with other public services.

We would welcome the opportunity to discuss further.

Yours Sincerely

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