**UCU Cymru response to HEFCW’s Consultation on funding to support race equality in higher education.**

The University and College Union (UCU Wales) represents almost 7,000 academics, lecturers, trainers, instructors, researchers, managers, administrators, computer staff, librarians, and postgraduates in universities, colleges, adult education and training organisations across Wales. UCU Wales is a politically autonomous but integral part of UCU, the largest post-school union in the world. We welcome this opportunity to respond to HEFCW’s Consultation on funding to support race equality in higher education.

HEFCW asks, “Is there any further comment on the funding methodology you would like to make, including as it aligns, or otherwise, with our commitments to the Well-being of Future Generations Act, its sustainable development principle, goals and ways of working?”

In our [response](https://www.ucu.org.uk/media/12501/UCU-Wales-response-to-the-race-equality-action-plan-Jul-2021/pdf/UCU_Wales_response_to_the_race_equality_action_plan_Jul_2021.pdf) to Welsh Government’s Consultation around the Race Equality Action Plan (REAP), UCU Wales identified four central principles;

*1: The Race Equality Action Plan (REAP) must be seen as a roadmap and not an end in itself*

*2: Since so much depends on local implementation, the voices of black staff and students must be central to that process. However, in prioritising action, there is a difference between ‘asking for solutions’ and acting upon issues which people “are telling you need to change”.*

*3: Whereas it can be difficult to identify any single point of departure, change from the inside (institutional process and culture) and from above (governance, funding and accountability) are all crucial.*

*4: Given that the plan is situated in a context of multi-generational racism, failure to achieve the plans ambitions will merely reinforce the message that change is impossible. It is thus essential that the plan is properly resourced to succeed!*

Noting the previous Education Minister’s 2021/2022 [remit](https://www.hefcw.ac.uk/wp-content/uploads/2021/03/HEFCW-Remit-Letter-2021-22-English-Mar2021.pdf), whilst UCU Wales welcomes additional funding to support race equality in higher education, we are concerned that, unless supported by other measures, institutions efforts to gain a Charter Mark will not secure the deep-rooted transformation implicit to achieving an “anti-racist Wales” by 2030.

Our point of departure determines that positive action must be rooted in the lived experiences of black students and staff. Referencing the ‘nothing-without-you-about-you’ social model adopted in Future Generations and Well Being and across Welsh Government, we concluded that “in order to secure and consolidate an anti-racist post compulsory education system, institutions and government must enable challenge as one of its most valuable resources”.

Acknowledging that the Minister’s remit preceded the publication of REAP, UCU Wales questions how far the Advance HE [Race Equality Charter](https://www.advance-he.ac.uk/equality-charters/race-equality-charter) can be used to mainstream a reflective culture in which challenge is welcomed as a crucial asset.

In March 2021, Advance HE published an [impact review](https://s3.eu-west-2.amazonaws.com/assets.creode.advancehe-document-manager/documents/advance-he/AdvHE_REC_Review_Exec%20Summary_1615303290.pdf), assessing the Charter’s performance to date. As a note of explanation, while the authors of the report differentiate between ‘BAME’ and ‘black’, UCU uses the terms ‘black’ and ‘people of colour’ to cover all black and minority ethnic people.

With respect to academic staff, of the six institutions to provide data, the impact ranged between low to miniscule. During a four-year period, “five saw a small increase in the proportion of BAME staff overall, with four reporting an increase in the proportion of BAME Professors. However, it was also found that “black academic staff have tended to benefit less than other ethnic groups from impacts achieved”.

In terms of student impact, the overall results were more encouraging but similarly mixed. “Greater impact has been achieved in increasing proportions of students that are BAME than that seen with staff” although “change across ethnic groups was uneven: three institutions reported small decreases in the proportion of UK undergraduate students that is Black”.

Finally, the report concludes that “black professional and support staff have not benefitted from impacts achieved compared with other ethnic groups, with notable decreases in representation in the majority of sampled institutions”

In assessing the barriers to achieving impact and making progress, the review cited; “a lack of accountability, resistance; difficulties of delivering across the institution, challenges of balancing REC work with Athena SWAN work, insufficient resourcing, lack of buy-in within the institution, concern about overburdening small numbers of BAME staff, employment of a deficit model, and lack of understanding and acknowledgement of structural racism and whiteness, Covid-19, a culture of denial, lack of incentives to implement the action plan, lack of a structure for implementation, fear, competing priorities, a lack of SMART actions and ongoing informal processes in recruitment and promotions which disadvantage BAME staff”.

Whilst the report does identify “improvements” from 2019 onwards, the overall impression suggests mixed and minimal progress in the face of substantial challenges and limited institutional buy-in. Largely for this reason, it is difficult to reconcile the historical performance of the Race Equality Charter with Welsh Government’s ambition to achieve an “anti-racist Wales” in 2030.

UCU Wales believes that part of the problem resides in the Charter’s strategic approach. With an emphasis on data collection and self-assessment, one is sometimes left with the impression of an extensive tick box exercise. In fairness, the Charter is designed to provide institutions with a framework and audit function around which to develop their own departmental plans. However, whilst the report is clear about weaknesses, it unpacks them very much in the Charters own terms and seeks to address difficulties by making the same approach easier.

For instance, it was found that “the biggest challenge regarding SATs was achieving the wide representation required while maintaining an effective group. Several participants also highlighted the challenge of including BAME people while not over-burdening them with REC work”. In our response to Welsh Government’s REAP consultation, UCU Wales wrote “since so much depends on local implementation, the voices of black staff, students and community groups must be central to that process. However, in prioritising action, there is a difference between ‘asking for solutions’ and acting upon issues which people “are telling you needs to change”.

Noting the difficulties implicit to charging oppressed groups with responsibility for their own liberation, UCU Wales added “with respect to the wider university community, a number of black respondents felt that institutions require meaningful forums in which black staff & students can raise their voice. Crucially where this occurs, a decision maker must be in the room to actively listen. “Students are standing up and have a lot to say – deep culture change means listening to them”.

UCU thus adopts an approach in which institutions resource and enable black staff and students to raise their own voices through a variety of forums. As sources of challenge and accountability, universities can engage with these networks and plot change around actual lived experience. We contrast this with the Charter’s method whereby change is seen as contingent on the relative knowledge of ‘panellists’ or the resilience ‘over-burdened BAME people’.

Indeed, there is a risk that in its effort to “secure buy-in, reduce workload and data burden”, the charter dilutes engagement by formalising a standardised bureaucratic approach. Evidence of this can be observed in the finding that “challenges in ensuring robust decision-making were expressed by panellists, such as ensuring everyone’s views are heard and the varying knowledge and experience of panellists, and by survey respondents, including the objectivity of the process, whether panellists have sufficient knowledge, the consistency of decision-making and low success rates”.

The proposed remedy (to streamline and simplify the process) risks work becoming siloed with small gains occurring beyond the sight of most leaders, staff and students. This is not how culture change is consolidated.

Finally, the Charter does not seem provide any obvious mechanism for trade union engagement. This not acceptable given the role of campus unions in representing black members as well as the need to take forward equality negotiations. Note the Universities UK guidance document ([Tackling Racial Harassment in Higher Education](https://www.universitiesuk.ac.uk/sites/default/files/field/downloads/2021-08/tackling-racial-harassment-in-higher-education.pdf)) which includes trade union engagement in Recommendation 2.

To address these problems, UCU Cymru argues that an institution should only apply for a charter following and extensive consultation with people of colour and their allies across the student and staff body. The consultation format must be meaningful, accessible and, disbarring Covid restrictions, face-to-face as well as online. Typically, it will be proactively delivered in partnership with the local SU and campus unions. Moreover, in addition to focus groups, the exercise will comprise open events supported by posters, social media and university communications. UCU Cymru notes that an institution’s ability to carry out this task will be partly determined by its success in regularly reaching out to the wider community. Furthermore, it will serve to test the effectiveness of representative structure. To promote trust and confidence, all qualitative material gathered from staff, students, unions should be made available for all stakeholders subject to confidentiality.

Similarly, the same exercise should take place as a condition to achieving the Race Equality charter. In this way, we can be truly confident that award provides the most accurate reflection of the experiences of black staff and students on the ground.

In addition to this suggestion, UCU Wales would like to share some further recommendations from our original response to REAP. Crucially the majority do not currently feature as requirements in the Charter;

1: Increased facility time and administrative support for both university and trade union representatives. “This should be a core priority and cannot simply be added to somebody’s workload. It’s not about commitment - its about being able to do the job”.

2: Free flow of information

3: Enhancing the role and prestige of equality committee members to mainstream genuine change.

4: Welsh Government advice or guidance around safeguarding volunteers who undertake the intense emotional labour attached to delivering the plan

5: Related to governance, any prospective cuts to departments or courses which touch upon anti-racism (such as social science and critical studies) must be impact assessed. Similarly, in terms of promoting a culture of curiosity and challenge, government must take steps to establish staffs individual right to academic freedom. Whilst the positive ambition of decolonization will not be achieved overnight, it is unlikely to be achieved at all if institutions place ‘efficiency’ ahead of free thinking and investigation. To that end, institutions must recognise an individual right to academic freedom as exists in the Irish Republic and practically everywhere else in Europe.