



REPORT, DOCUMENT

# Business Wales Anti-Racist action plan

Business Wales is committed to being an anti-racist organisation. We will take proactive steps to ensure our organisation is free from systemic racism.

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## Background

In October 2022 Race Equality First (REF) was commissioned by the Welsh Government to develop an Anti-racist Action Plan for the Welsh Government's Business Wales Service.

The development of this Plan is an action within the Entrepreneurship section of Welsh Government's Anti-racist Wales Action Plan<sup>1</sup>. The expected outcome of developing and implementing this Plan is a Business Wales service that is aware of how racism creates disparities, is culturally confident and generates increased numbers of ethnic minority people using the service.

Since 2016 of the 5,869 clients supported by Business Wales to start a business, 405 (7%) identify as Black, Asian and Minority Ethnic.

Business Wales has directly supported over 13,062 business owners since 2016 to support their business development and growth, with 578 (4.4%) identifying as Black, Asian and Minority Ethnic.

An analysis of self-employment by ethnicity sourced from the Annual Population Survey shows that 4.4% of self-employed people in Wales were from an ethnic minority background.

This Plan will provide Business Wales with the roadmap to becoming an anti-racist and culturally confident organisation.

## Methodology and Monitoring of Plan

The methodology for the Business Wales Action Plan involved a review of the service by Race Equality first, which included the Business Wales website and documents that are used to manage and deliver the contracted Business Wales

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service.

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## **Business Wales Anti-Racist Statement**

Business Wales is committed to being an anti-racist organisation. We will take proactive steps to ensure our organisation is free from systemic racism.

Our Race Equality Action Plan sets out how we will create a work environment in which our staff and our customers from all backgrounds do not experience prejudice, discrimination, or marginalisation. This includes:

1. Ensuring that all members of the senior leadership team undertake mandatory racism and cultural awareness training to become educated and aware of their own unconscious bias and how to unpack this.
2. Appointing an Equality, Diversity & Inclusion lead, who reports directly to the Welsh Government senior leadership team and board who is tasked with developing and implementing our race equality action plan.
3. Ensuring updates on the progression of our Anti-racist Action Plan remain a fixed board agenda item.
4. Improving our data gathering to better understand who is using our services so that we can remove any barriers to access and adapt our services for black and ethnic minority communities.
5. Gathering and analysing our ethnicity workforce data so that we can design and measure our progress against evidence-based activities on diverse representation.
6. Ensuring that there is transparent and open advertisement of roles, with racially diverse panels involved throughout the recruitment and selection process.

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7. Appointing a lead equality champion within the Business Wales contracted delivery for race who is held to account for the development and implementation of our Anti-racist Action Plan.
8. Ensure sufficient funding for translators, interpreters and alternative communication methods are available.

**Goal: To ensure all advertising and marketing materials produced by Business Wales are anti-racist and reflect the true depth of the diverse communities in Wales while avoiding stereotyping and cultural appropriation.**

#### **Outcome - Business Wales' outward facing image: Advertising**

Business Wales' outward-facing image is more inclusive and more inviting to diverse communities that seek to start or grow a business.

#### **Action**

1. Ensure contractors, sub-contractors, role models, mentors and all staff who provide business support across all programmes are able to provide resources in a range of languages via the Participation Discretionary Fund. The Business Wales website will start to transfer to HTML format which can be more readily translated by the user. In addition, the contact us page on the Business Wales homepage will feature a language option so that users can request the service in a language of their choice.
2. Promote the Business Wales service more widely in Black and Ethnic Minority communities and as one that will remove barriers (e.g., provision of interpretation and translation, free from any form of discrimination whatever they are, to encourage people from a range of ethnic backgrounds to engage with the Business Wales service).
3. Promote the Business Wales service to ethnic minority community groups and youth groups and run engagement sessions in places of worship (e.g., Mosques, Temples etc.).

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4. Update the Operations Manual to outline the various methods of marketing / advertising of the various schemes and services Business Wales provides to be undertaken.

## Impact

1. Increased numbers of ethnic minority individuals who seek to start or grow a business use the Business Wales service.
2. Business Wales has case studies featuring ethnic minority service users for promotional materials.

## By When

December 2023

## Lead and partners

- Welsh Government
- Contractors – for all programmes and services

**Goal: To create an anti-racist Business Wales service with an increased number of Black Asian and Minority Ethnic people accessing its business support services.**

## Outcome - Business Wales' outward-facing image: Communication

Business Wales' promotional materials: leaflets, flyers; website, marketing campaigns and social media channels convey an image of an organisation that understands and is able to meet the differing needs of individuals from diverse communities that seek to start or grow a business.

## Action

1. Ensure promotional materials used by contractors, sub contractors, role models, mentors and all Business Wales' staff include more inclusive imagery, e.g., include pictures of individuals from a range of different ethnic backgrounds, religions and cultures, and in a range of work settings.
2. Ensure all external events held by contractors, sub contractors, role models and mentors are inclusive and accessible to everyone. Always ensure the main event is inclusive.
3. Consider the timing of external events (including webinars), to ensure they are as accessible as possible for all. E.g., be mindful that Friday lunchtimes are not a good time for Muslim males, and be mindful of certain religious events e.g., Diwali, Eid etc., to avoid clashes

## Impact

1. Increased numbers of ethnic minority individuals who seek to start or grow a business use the Business Wales service.

## Lead and partners

- Welsh Government
- Contractors – for all programmes and services

There can be fringe events which are optional. E.g., a political party runs coffee mornings to discuss issues in the local area. Equality considerations have been thoroughly reviewed and the coffee mornings are accessible to all. The party also decides to run 'Pint and Policy' nights on the side, where individuals meet at the local pub and discuss issues in the local area over a drink. This is acceptable, as the main event is accessible to all.

**Goal: To create an anti-racist Business Wales service that engages with diverse communities in a culturally appropriate way to increase business start-ups and growth amongst Black Asian and Minority Ethnic people.**

## **Outcome - Business Wales' Operational services, contractors and sub-contractors (including Role Models and Mentors), and Welsh Government: Language Support**

All individuals accessing the Business Wales service will be able to communicate in a language of their choice and this will not result in any delay in communication.

### **Action**

1. Ensure all operational staff, contractors and sub-contractors can provide a service in a language, other than English or Welsh, through use of an interpretation service.
2. Ensure Business Wales Helpline record the language and communications needs of prospective clients and accommodate these requirements through service provision.
3. Record usage of Participation Fund and what they are being used for. This will provide a greater understanding of service user needs and to identify gaps in current Business Wales provision.
4. Ensure sufficient funding for translators, interpreters and alternative communication methods are available (Welsh Government).
5. Record the number of times interpretation services have been used and for which languages to gain a better understanding of Business Wales' client base and to identify gaps in provision.
6. Monitor that language needs and the use of language provisions are recorded and gaps in such provisions are being identified (Welsh Government).
7. Consider how Business Wales (Welsh Government & contractor) will demonstrate their efforts to recruit advisors, Role Models and Mentors who can communicate in alternative languages to English and Welsh to ensure a diverse range of Role Models and Mentors.
8. Ensure the language skills of Role Models and Mentors are recorded for match purposes.

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9. Ensure the Business Wales Events Finder record alternative requirements regarding language and communications needs and accommodate these through service provision.
10. Ensure that a bespoke approach to communication will be taken for some clients. For instance, several different dialects within one language may exist, so ensure an interpreter who speaks the same dialect as the client is sourced. Additionally, written communication may not be the best method to use for certain clients, e.g., those with lower literacy skills.

## Impact

1. Increased numbers of ethnic minority individuals who seek to start or grow a business use the Business Wales service.
2. Ethnic minority individuals receive a better service from Business Wales as they can communicate with Business Wales staff in their preferred language.

## Lead and partners

- Welsh Government
- Contractors – for all programmes and services

**Goal: To ensure that the Business Wales workforce includes a proportion of ethnic minority staff equal to that present in the Welsh population as a whole (currently around 6%) at all levels and that ethnic minority groups are attracted to Business Wales and see it as an employer of choice, and to gain their confidence that they will have a rewarding career and meet their full potential.**

## Outcome - Business Wales' operational services, contractors and sub-contractors (including Role Models and Mentors): Representation, Recruitment and Retention

Business Wales employs a diverse range of operational staff, contractors,

subcontractors (including mentors and role models) across all levels of Business Wales who understand Wales and its communities and are proud to serve them.

## Action

1. Consider how Business Wales will demonstrate their efforts to recruit, retain and progress Black, Asian and Minority Ethnic staff across a range of roles in Business Wales.
2. Consider how Business Wales will demonstrate their efforts to recruit, retain and progress staff who can reflect and demonstrate their commitment to Wales' diverse communities, across a range of roles in Business Wales.
3. Provide training for all staff, contractors, subcontractors, mentors and role models, on racism and cultural awareness, to ensure an ethos of understanding across the Business Wales workforce of different cultures and religions and to help all staff (including contractors, sub-contractors, mentors and role models) become educated and aware of their own unconscious bias and how to unpack this. Provide regular training top-ups and monitor the impact of this training to prevent such training from becoming a tick box exercise, as the delivery of information alone does not necessarily develop understanding. Furthermore, ensure the appropriate resources are allocated for this training, particularly time, (attendance of this training should not be in people's personal time) allocating time for such training will help ensure such training becomes embedded.
4. Nominate a range of Equality Champions across protected characteristics and all levels of the organisation (as stated in the Inclusive Support Section of the Operations Manual).
5. Ensure the nominations of Equality Champions by contractors are regularly and properly monitored (Welsh Government). Ensure there is a suitable role description for Equality Champions detailing what being an Equality Champion entails and the skills required. Furthermore, ensure appropriate criteria exists to be met when recruiting Equality Champions. Ensure Equality Champions also receive the race awareness and cultural awareness training (as outlined above)

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before starting their role.

6. Ensure all internal and external Business Wales contracted team-building volunteering / community benefits days are accessible to all staff, contractors, sub-contractors, mentors and role models. E.g., be mindful that Friday lunchtimes are not a good time for Muslim males, and be mindful of certain religious events e.g., Diwali, Eid etc., to avoid clashes.
7. Consider the timings for recruitment, i.e., application closing dates and interviews. Be mindful of certain religious events e.g., Diwali, Eid etc., to avoid clashes. For instance, as Muslims fast during the month of Ramadan, put in place reasonable adjustments if recruiting and conducting interviews during that time.

## Impact

1. Business Wales meets its KPI to train all staff and contractors on diversity and equality and ensures all staff and contractors are aware of and carry out their equality and diversity responsibilities, as detailed in their job descriptions and person specifications.
2. The Business Wales Service is culturally confident and can provide a culturally competent service.
3. There is an increased sense of belonging among staff, contractors and subcontractors with protected characteristics at Business Wales, resulting in happier and more productive staff, contractors and subcontractors.
4. The Business Wales service is perceived by ethnic minorities as a service that understands how to support them in their business ventures.
5. An increased number of ethnic minority individuals who seek to start or grow a business are supported by Business Wales.

## Lead and partners

- Welsh Government
- Contractors – for all programmes and services

**Goal: Staff will work in safe, inclusive environments, built on good anti-racist leadership and allyship, supported to reach their full potential, and all staff are empowered to identify and address racist practice.**

## **Outcome - Representation at Senior Leadership and Board level**

The board and senior leadership of Business Wales are committed to implementing anti racism throughout Business Wales and monitor progress of the organisation's Anti Racist Action Plan at every board meeting.

### **Action**

1. Ensure that all members of the Business Wales contracted senior leadership team undertake mandatory anti-racism training to become educated and aware of their own unconscious bias and how to unpack this. Provide regular training top-ups and monitor the impact of this training to prevent such training from becoming a tick box exercise, as the delivery of information alone does not necessarily develop understanding. Furthermore, ensure the appropriate resources are allocated for this, particularly time, (attendance of this training should not be in people's personal time) allocating time for such training will help ensure such training becomes embedded.
2. Ensure the equality champion within the Business Wales external service reports on activity to the senior leadership team within the contracted organisation.
3. Commit a budget and appropriate resources for this Anti racist Action Plan.
4. Ensure Business Wales is held accountable by Welsh Government, on a quarterly basis to provide updates on the progression of this Anti-racist Action Plan.
5. Senior leadership team of Business Wales will provide Welsh Government with a breakdown of employees (including the senior leadership team and board members) by ethnicity and pay band and highlight the steps being taken to improve representation across the organisation.

6. Ensure that there is transparent and open advertisement of roles, with racially diverse panels involved throughout the recruitment and selection process (invite members from external organisations for this if required).
7. Nominate a lead Equality Champion for race who is held to account for the development and implementation of this Anti racist Action Plan.
8. Where possible, set up a two-way mentoring programme where senior and junior staff mentor each other professionally and share knowledge and lived experience.
9. Monitor the progress made on the above actions on a quarterly basis.

## Impact

1. Increased visible diversity across all levels of Business Wales as a result of the board and senior leadership team at Business Wales understanding Wales and its communities and showing pride in serving them.
2. The Business Wales service is perceived by ethnic minority people as a service that understands how to support them in their business ventures.
3. An increased number of ethnic minority individuals who seek to start or grow a business are supported by Business Wales.

## By when

June 2024

## Lead and partners

- Welsh Government
- Contractors – for all programmes and services.

**Goal: Improved information and performance data on the participation of ethnic minority groups in the Business Wales Service and boost our use and understanding of data and evidence to underpin anti-racist policies and measure progress.**

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## **Outcome - Data collection, Key Performance Indicators (KPIs) and amendments to be made to Business Wales documents (e.g., Operations Manual, BW1A, BW1B, ITT)**

Better collection of data will assist Business Wales to better design their KPIs, to implement the actions of the Anti Racist Action Plan, meet their equality objectives, and to identify gaps in provision and ensure the service is accessed and accessible to all.

### **Action**

1. Ensure the equality data of Business Wales staff, contractors, subcontractors, mentors and role models is collected to ensure Business Wales understands the diversity of their workforce.
2. Encourage staff, contractors, subcontractors, mentors and role models to self-scribe their ethnicity and other equality data to identify as they wish to.
3. Ensure that the importance of completing equality data is communicated to all Business Wales staff, contractors, subcontractors, mentors and role models and ensure the completion of equality data is part of the appointment induction and the supervision process to ensure regular updates.
4. Communicate the importance of completing equality data to the Business Wales workforce (including contractors, sub-contractors, role models and mentors), explain what difference it has made and what differences it can make if everyone were to complete their data. Thank those who have already completed their data. E.g., “Thank you to those who have already completed their equality data, as a result, we have been able to do X and Y.” communicating why the collection of data on staff and contractors is important and what we do with it.
5. Ensure all staff, contractors and subcontractors (including role models and mentors) complete exit questionnaires to gain a better understanding of the reasons why colleagues from ethnic minority backgrounds leave the organisation and to address any retention issues.

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6. Welsh Government will encourage and assist the Business Wales provider to annually publish their ethnicity pay gap and to set targets and an action plan to bridge these gaps.
7. Ensure sufficient and detailed data collection of the clients who Business Wales is engaging with and assisting to identify gaps in reach and provision.
8. Ensure a full ethnicity breakdown is recorded in customer satisfaction surveys to identify any trends in unsatisfactory outcomes of service for clients from certain ethnic groups.
9. Ensure all complaints about racism and other forms of discrimination are recorded as racism or discrimination, handled effectively, investigated fairly and in a timely manner and these processes effectively monitored, regularly. Ensure all contractors and sub-contractors have an adequate complaints procedure in place and ensure they report on the number and nature of their complaints to Welsh Government in quarterly reports. Ensure all contractors and sub-contractors are aware of what constitutes as racial discrimination and ensure all contractors and sub-contractors review and investigate all complaints linked to racism / discrimination fully. [Consider including this in the Operations Manual.]
10. Update the “Inclusive Support” section of the Operations Manual to widen the requirements of contractors to meet not just the obligations under the Equality Act 2010, but also the requirements outlined in other frameworks and conventions, such as the Welsh Government’s Anti-racist Wales Action Plan and the International Convention on the Elimination of Racial Discrimination (ICERD).
11. Future Business Wales Invitation to Tender’s (ITT’s) will require future providers to meet the requirements of both the Anti racist Wales Action Plan (ARWAP) and the International Convention on the Elimination of Racial Discrimination (ICERD) is also included.

## Impact

1. Business Wales employs a more diverse range of operational staff, contractors, subcontractors (including mentors and role models).

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2. Business Wales meets the following KPI: “It is important that contractors collate and analyse up to date demographic information on their clients.”
3. Business Wales provides a full ethnicity breakdown, (rather than collecting only whether a client identifies as Black, Asian or Minority Ethnic) of the clients they engage with and as a result, is aware of any gaps in provision and reach for certain ethnic groups.

#### **By when**

December 2023

#### **Lead and partners**

- Welsh Government
- Contractors – for all programmes

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