

The Equality Team
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

14 July 2021

By email only (RaceEqualityActionPlanconsultation@gov.wales)

RE: Race Equality Action Plan: An Anti-racist Wales

Dear colleagues,

Thank you for the opportunity to respond to your Race Equality Action Plan. This work reflects our vision for safe, effective and kind nursing and midwifery that improves everyone's health and wellbeing. As the professional regulator of more than 732,000 nursing and midwifery professionals, we have an important role to play in making this a reality, alongside our partners.

Key principles we're in support of

We are in total agreement that leadership in the health and care sector needs to be actively anti-racist. Your plan comes at a time where professionals from a Black and minority ethnic background have suffered disproportionately, as our [Covid-19 equality impact assessment](#) explores further. We're clear that all partners involved in the delivery of health and social care services should be vocal about, and committed to, tackling the issues for both the professionals working in health as well as the people accessing care facing inequalities, as our [2020-2025 Strategy](#) sets out.

We are particularly supportive of specific actions on maternity and any work undertaken to reduce the mortality disparities for maternity service users from an ethnic minority background. These actions are in line with our [standards of proficiency for midwives](#) and [our Code](#), which states that midwives 'must make sure that those receiving care are treated with respect, that their rights are upheld, and that any discriminatory attitudes and behaviours towards those receiving care are challenged'.

We also support targeted actions for people using and working in social care – a sector with specific challenges, including widespread staffing shortages in nursing. Nurses from Black and minority ethnic backgrounds are more likely to be employed within the social care sector, with a disproportionately high number employed in the care home sector compared to their proportion on the register as a whole. We welcome any proposals to improve the experiences of these professionals and the people they provide care for, and work undertaken to attract future professionals to the sector.

We are keen to see clear metrics accompanying the actions, against which progress can be monitored and measured. For example this would be helpful when reviewing the effectiveness and diversity of health and care leadership. We agree with you that the desired outcome of this work should be that people from a Black, Asian or minority ethnic background feel services are helpful, supportive, delivered for and with them and

that their rights are at the centre of all design and delivery of health and care. It's important that feedback from people impacted by this work is captured and shared regularly as actions are delivered.

Sharing our data and insight

We are in alignment that collecting, understanding and using data and intelligence is a key part of tackling disparities. Our equality work is always informed by the evidence available to us, and as a four nation regulator we endeavour to understand nuance and differences in the experiences of people across the different nations. We have recently published our latest data about the professionals on our register, including this [report on professionals in Wales](#). We have also published information about the number of professionals with an address in Wales who have joined, and those who have left, the register for the first time and this is broken down by ethnicity [in this data set](#).

Our data shows that the total number of nursing and midwifery professionals with permanent registration who have registered addresses in Wales grew 2 percent between April 2020 and March 2021, to 37,446 professionals. Of these, 3,587 professionals told us they were Black, Asian or from another ethnic minority background. The three biggest categories of ethnic minority professionals in Wales were Filipino, followed by Indian and then African. There are also 745 professionals on the Covid-19 temporary register with an address in Wales who are able to support the UK's response to the coronavirus pandemic.

Last October we shared the first report of our [Ambitious for Change](#) research into how the diversity characteristics of the professionals on our register, and those seeking to join the register, impact their regulatory outcomes. We think you may find this research useful in your work, particularly as we found that Black, Asian and minority ethnic professionals face additional barriers, including lower rates onto nursing and midwifery courses, lower chances of registering through our overseas processes and higher referrals to our fitness to practise function from employers. We are continuing our research into why these differences occur and are committed to making sure that we and others take ownership over this work, echoing your own action plan.

Working collaboratively

We support your vision for a whole system approach - we can't resolve complex sector-wide issues in isolation, and we want to work with partners wherever possible. This is demonstrated in our recent [open statement to healthcare providers](#) alongside the NHS Race and Health Observatory, General Medical Council and the Care Quality Commission, where we collectively committed to tackling institutional discrimination in all its forms. While some of our partners in this statement are England only organisations, ours is a UK commitment, including Wales.

As part of our collaborative approach to supporting, regulating and influencing we are currently working with the Care Quality Commission and the General Medical Council to produce a shared data platform. The aim is to triangulate data in order to identify concerns and highlight any potential risks; we will then be able to use our tools to intervene early and therefore mitigate any further risk to the public. We are keen to

expand this beyond England in terms of collaboration with system regulators and will pursue this in the future.

We will continue to work closely with colleagues on Wales' unique health and care landscape, and are looking forward to working the new Chief Nursing Officer for Wales Sue Tranka and the new Director of Nurse and Health Professional Education at Health Education and Improvement Wales's Lisa Llewelyn.

I hope this response has been useful. We look forward to seeing the outcome of your consultation and exploring further how we can collaborate and ensure that everyone, no matter their background, has the excellent experience they deserve when working for, or accessing, health and care in Wales and across the UK.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Andrea Sutcliffe'.

Andrea Sutcliffe CBE
Chief Executive and Registrar

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