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Race Equality First's NGO submission to the Universal Periodic Review:

Introduction:

Due to word constraints, this submission will reference only the following topics which were raised in the thirty-sixth session of the Human Rights Council: the UK Government's proposals to reform the Human Rights Act (HRA); increasing racially motivated hate crimes; the UK's counter-terrorism measures; and the failure of the UK Government and devolved administrations to incorporate the International Convention on the Elimination of Racial Discrimination (ICERD) into domestic law.

Methodology:

This submission has been put together using the findings from the nine consultations REF held for the Joint NGO Shadow Report on racial inequality in Wales, to be submitted to CERD.¹ This submission therefore draws heavily on the findings and recommendations in the CERD Shadow Report for Wales. You can access the full CERD Shadow Report and consultation evidence here: <https://raceequalityfirst.org/the-un-press-release/>.

REF's response to the comments and recommendations in the last UPR (2017):

Maintaining existing standards and legal protections for human rights in the UK:

In paragraphs 113 and 114 of the thirty-sixth session of the Human Rights Council, Canada and Chile raised concerns about the potential impact of the UK's exit from the EU on its human rights legislative framework.

In paragraph 6, the UK made it clear that it had no plans to withdraw from the European Convention on Human Rights (ECHR). However, on 14th December 2021, the UK Government launched a consultation on its proposals to replace the HRA. In its consultation document² the Government said it aims to 'update' the act. However, the proposals would replace the HRA with a 'Bill of Rights' (BoR) that would dramatically weaken individuals' ability to hold the government and public authorities to account and to defend themselves when the state

¹ The consultations took place from 12th February to 9th March 2021 and engaged 35 individuals from 19 civil society organisations (CSOs) in Wales. Each consultation involved an average of four participants and discussions were centred around issues relating to racism in Wales. The CERD Shadow Report also incorporated feedback from our steering group, comprising of eight individuals who have a wide range of expertise. Steering group members came from academia, the third sector, health and social care, religious representational bodies and trade unions.

² See: [Human Rights Act Reform: A Modern Bill of Rights](#).

violates their rights.³

REF, alongside numerous other NGOs responded to this call, rejecting the premise of the consultation, and stating that the HRA currently works well to protect people when their rights are violated, and thus, does not need to be changed. REF, alongside numerous other NGOs were also deeply concerned and frustrated by the highly divisive nature of the consultation. The consultation process was very complex and technical, the wording of many questions was deliberately misleading, and flawed, or in some cases, no, evidence was used to justify the proposals made.

Additionally, there was a lack of engagement with the devolved administrations and no attempt to make the consultation accessible to the wider population: there were no easy read versions of the consultation documents, no videos and no options for those who communicate via British Sign Language. Furthermore, the proposals are incompatible with the devolution settlements and out of step with political and public opinion in the devolved nations. The proposals conflict with the direction of human rights law in Scotland, Wales and Northern Ireland, where the devolved administrations are considering ways to enhance the rights protections offered by the HRA.⁴ Furthermore, in Northern Ireland, European Convention rights run through the Good Friday (Belfast) Agreement, which set the framework for post-conflict policing. We are therefore deeply concerned as the proposals in the HRA consultation risk undermining the peace agreement and the political and policing structures that flow from it.

The proposals in the government's consultation will affect everyone but will have a disproportionate impact on those who possess one or more protected characteristics, who are more likely to already encounter difficulties accessing their rights and justice. A non-exhaustive list, outlining the different ways people would be affected negatively by these

³ Additionally, the proposals made in this consultation are in contravention to the findings of the Independent Human Rights Act Review (IHRAR) – an independent panel set up by the same government department to look at reforms to the HRA. The IHRAR concluded that overall, the HRA is working well. The IHRAR Report made recommendations for modest changes to the HRA and highlighted the key points that rights are not of use unless they are enforceable, and that many individuals are not aware of their rights. The IHRAR Report proposed that rights should be taught from early childhood, so people know what they are and how to use them, however the UK Government consultation does not echo the need for this and instead seeks to limit the human rights protections that we have. See: [IHRAR Report](#).

⁴ For instance, in Wales, the UN Convention on the Rights of the Child has been partly incorporated into Welsh domestic law and the Welsh Government has also committed to incorporate the Convention for the Elimination of Discrimination Against Women and the Convention for the Rights of Disabled People. The Welsh Government is also in the process of putting together its Race Equality Action Plan – a roadmap that sets out how Wales is to become an Anti-racist nation by 2030. See: Welsh Government., (2021). [An Anti-Racist Wales. The Race Equality Action Plan for Wales](#). Furthermore, the Welsh Government commissioned its own research into strengthening and advancing equality and human rights in Wales, looking at how to align existing domestic legislation with UN treaties. See: Hoffman, S. Nason, S. Beacock, R. Hicks, E., (2021). [Strengthening and advancing equality and human rights in Wales](#). Cardiff: Welsh Government, GSR report number 54/2021. The Welsh and Scottish Governments have released statements, expressing disappointment at the pejorative nature of this consultation and frustration at not being involved. See: Jane Hutt MS & Mick Antoniw MS, Written Statement: UK Government Proposal to Reform the Human Rights Act 1998, 12 January 2022, <https://gov.wales/written-statement-uk-government-proposal-reform-human-rights-act-1998>. Deputy First Minister John Swinney, Human Rights Act: letter to the Lord Chancellor, 21 December 2021, <https://www.gov.scot/publications/human-rights-act-letter-to-the-lord-chancellor>.

proposals can be found in Annex A.

In paragraphs 134.66 to 134.78 of the thirty-sixth session of the Human Rights Council, Haiti, Ireland, Kazakhstan, Kenya, Mexico, Namibia, Portugal, Switzerland, Thailand, Ukraine, Uzbekistan, Belarus and France recommended the UK Government:

- Ensure that the BoR is drafted through broad-based consultation with civil society, including the perspectives of minority groups.
- Ensure that any legislative modification [to the HRA] maintains the current level of protection the HRA guarantees.
- Ensure that the BoR would complement rather than replace ECHR in Northern Irish law, given their particular circumstances.

The UK Government has failed to ensure genuine consultation and the inclusion of minority groups' perspectives in the drafting of the BoR. Instead, the UK Government has deliberately released a misleading and, in many ways, inaccessible, consultation which seeks to dramatically weaken our ability to hold the government and public authorities to account and to defend ourselves when the state violates our rights. The UK Government has also failed to consider the impact these proposals would have on the devolved administrations.

Recommendation – The UK Government should not replace the HRA with the BoR as it would have detrimental impacts on individuals' ability to hold the government and public authorities to account and to defend themselves when the state violates their rights.

Incorporation of ICERD into domestic law:

In paragraphs 28, 134.46, 134.58, 134.61, 134.64, 134.88 and 134.178 of the thirty-sixth session of the Human Rights Council, Iraq, Greece, Uganda, Kyrgyzstan, China and Uzbekistan noted that the UK Government and devolved administrations have not fully incorporated the ICERD treaty into their domestic law. They urge the UK to ensure that the principles and provisions of the Convention are directly and fully applicable under domestic law in all territories of the UK. This concern was also expressed by CERD in paragraphs seven to eight of its concluding observations of the 2016 CERD Shadow Report.⁵ The Committee too urged the UK to ensure that the Convention is incorporated into its domestic law. This concern was also echoed in the 2021 CERD Shadow Reports for England⁶ and Wales.⁷

Recommendation – The UK Government and devolved administrations should ensure that the principles and provisions of ICERD is fully incorporated into their domestic law.

⁵ CERD., (2016). [Concluding observations on the twenty-first to twenty-third periodic reports of United Kingdom of Great Britain and Northern Ireland](#), p.2, para 7-8.

⁶ Runnymede Trust., (2021). [England Civil Society Submission to the United Nations Committee on the Elimination of Racial Discrimination](#), p.9-10.

⁷ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.13. This was also asserted in the 2016 CERD Shadow Report – see: Runnymede Trust., (2016). [Submission to the UN Committee on the Elimination of Racial Discrimination in advance of the public examination of the UK's implementation of ICERD](#).

UK Counter-terrorism legislation and measures:

In paragraphs 13 and 92 of the thirty-sixth session of the Human Rights Council, the UK Government stated that their counter-terrorism legislation and measures complied with international human rights obligations and were closely scrutinised by the UK Parliament.

In paragraphs 134.128 and 134.129 of the thirty-sixth session of the Human Rights Council, Malaysia and Mexico urged the UK Government to review its counter-terrorism measures which target individuals or groups based on race or religion, including Muslims. CERD also expressed concern that the UK's Prevent strategy has created an atmosphere of suspicion towards Muslims in the UK.⁸ This concern was also echoed by Muslim representational bodies and civil society in the 2021 CERD Shadow Reports for England⁹ and Wales.¹⁰

Those who attended REF's consultations for the 2021 CERD Shadow Report for Wales reported a positive relationship between Welsh Government and the Welsh Muslim population, with the devolved administration open to engaging and consulting Muslims and their representational bodies in decision-making.¹¹ However, consultees were concerned at the prolonged disengagement from the UK Government with the Muslim Council for Britain, and argue that this disengagement is leading to poorly designed policy to support Muslims and thus, reinforcing a culture of scepticism towards Muslims across the UK.¹²

We are also deeply concerned with the problematic and inherently racist definition of 'British values,' and 'extremism'. As part of the Prevent policy schools are required to teach British values to reflect life in modern Britain. These values are democracy, rule of law, respect, tolerance, and individual liberty. Welsh Government defines extremism as: "*vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.*"¹³ The focus on 'British values' – implying it is only Britain that champions such views – is fundamentally racist and deeply damaging, as it renders the histories of ethnic minorities marginal or non-existent altogether, devaluing ethnic minority people's political and cultural heritage whilst undermining their personal identities.¹⁴ Those who attended REF's consultations for the 2021 CERD Shadow Report for Wales echoed these concerns, arguing that it is contradictory, jingoistic and intellectually unfounded that there is something inherently and distinctly British about certain values, rather than them being universal.¹⁵ The 2021 CERD Shadow Report for Wales therefore concluded that Prevent is a racist policy that compounds the experience of racialised people across Britain.¹⁶

⁸ CERD., (2016). [Concluding observations on the twenty-first to twenty-third periodic reports of United Kingdom of Great Britain and Northern Ireland](#), p.5, para 18.

⁹ Runnymede Trust., (2021). [England Civil Society Submission to the United Nations Committee on the Elimination of Racial Discrimination](#), p.9-10.

¹⁰ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.13.

¹¹ *Ibid*, p.38, footnote 201.

¹² *Ibid*.

¹³ Welsh Government., (2016). [Respect and Resilience: Developing Community Cohesion](#), p.2.

¹⁴ Moore, R., (2019). Fundamental British Values. (Unpublished).

¹⁵ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.39, footnote 208.

¹⁶ *Ibid*, p.39.

CERD urged the UK to review and evaluate the impact of Prevent to ensure the current counter-terrorism measures in the UK do not constitute profiling and discrimination on the grounds of race.¹⁷ However, despite arranging for a review into Prevent, those who attended REF's consultations for the 2021 CERD Shadow Report for Wales expressed concern around those who have been put forward to head such review, including Lord Carlisle, an advocate of Prevent, and William Shawcross, who has a history of Islamophobic comments.¹⁸ The review under Shawcross has begun, however, in February 2021, a coalition of 17 human rights and community groups informed the Home Secretary that they intended to boycott the Government's review of Prevent and in March 2021 more than 550 Muslim scholars, community leaders, CSOs, mosque councils, and national and regional bodies issued a call to boycott the Shawcross-led review of Prevent.¹⁹ We are therefore deeply concerned in the ability of the UK Government to hold themselves accountable and open to criticism on Prevent.²⁰

Recommendation: The Shawcross review into Prevent should be stopped and a truly independent review implemented as an urgent priority, with an appropriate individual appointed to front this. The review should investigate into the extent of any racial bias in Prevent training materials and investigate into the factors influencing Prevent referrals from public sector staff, e.g., media portrayals, institutional or personal bias, pressure to make referrals etc. The review should also identify the impacts of Prevent referrals (including false-positive referrals) on the physical and mental health of minority group children, young people and adults.²¹

Recommendation: Democracy, rule of law, respect, tolerance and individual liberty should not be labelled / taught as inherently 'British' values.²²

Rising racially motivated hate crimes recorded by the police in the UK:

In paragraphs 14 and 94 of the thirty-sixth session of the Human Rights Council, the UK Government explained that they have a strong legislative framework to tackle hate crime: the '*Hate Crime Action Plan*' (2016).²³

In paragraphs 35, 39 and 65 of the thirty-sixth session of the Human Rights Council, Kyrgyzstan, Malaysia and Russian Federation all noted that racially aggravated hate crimes were increasing. CERD also raised concerns of increases in reported hate crimes and the

¹⁷ CERD., (2016). [Concluding observations on the twenty-first to twenty-third periodic reports of United Kingdom of Great Britain and Northern Ireland](#), p.5, para 19.

¹⁸ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.39, footnote 210. See also: Civil Society (2014), [Commission unfairly targets Muslim charities, says thinktank](#).

¹⁹ See: [Call to Boycott the Shawcross Review of Prevent](#) (2021). See also: Runnymede Trust., (2021). [England Civil Society Submission to the United Nations Committee on the Elimination of Racial Discrimination](#), p.30-31.

²⁰ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.39, footnote 212.

²¹ See: Runnymede Trust., (2021). [England Civil Society Submission to the United Nations Committee on the Elimination of Racial Discrimination](#), p.30-31.

²² Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.39.

²³ The UK Government also explained that two cross-party all-parliamentary groups, one focusing on anti-Semitism and one on anti-Muslim hatred, have been established to understand the issues better.

significant gap between reported cases and successful prosecutions.²⁴

In paragraphs 134.85, 134.100, 134.102, 134.105, 134.106, 134.107, 134.109, 134.111, 134.114, 134.115, 134.117, 134.118, 134.120, 134.122 of the thirty-sixth session of the Human Rights Council, Malaysia, Israel, Kyrgyzstan, Netherlands, Pakistan, Republic of Korea, Russian Federation, Thailand, United States of America, Angola, Bahrain, Bangladesh, Chile and Ecuador recommended the UK Government:

- Take additional serious measures to eliminate racial enmity which leads to hate crimes.
- Ensure efficient implementation of the *'Hate Crime Action Plan'* (2016).
- Tackle religious hatred, including that which constitutes incitement to discrimination, hostility or violence in political discourse and in the media.
- Continue to strengthen data collection to better understand the scale and severity of hate crimes to assess the impact of the *'Hate Crime Action Plan'*.
- Ensure perpetrators of hate crimes are prosecuted.
- Further strengthen legislative and judicial measures to address racial discrimination and hate crimes.
- Work to improve the services for hate crime and discrimination victims.

Despite the introduction of the UK Government's *'Hate Crime Action Plan'* (2016) and the Welsh Government's *'Tackling Hate Crimes and Incidents: Framework for Action'* (2016/17)²⁵, which set out actions to prevent hate crime and support victims, between 2013 and 2019, the number of police recorded hate crimes in England and Wales have more than doubled.²⁶ Alongside this, there is evidence that the gap between reported cases and prosecutions is widening, with less than 1 in 10 hate crimes in England and Wales resulting in a prosecution in 2018/19.²⁷

Those who attended REF's consultations for the 2021 CERD Shadow Report for Wales were concerned at the lack of communication between the police and victims during the reporting process – consultees also highlighted the failure of the police to explain case outcomes to victims.²⁸ REF's Hate Crime and Discrimination Casework Service highlighted this as a particular issue in North Wales, with six out of eight (75%) hate crime victims REF supported in the region (from July 2020 to June 2021) having put in a complaint against North Wales Police (NWP) for the lack of communication and empathy when handling their case.²⁹ Also within REF's Hate Crime and Discrimination Casework service, we have seen inconsistent enforcement of hate crime laws by the police, prosecutors, and the judiciary in

²⁴ CERD., (2016). [Concluding observations on the twenty-first to twenty-third periodic reports of United Kingdom of Great Britain and Northern Ireland](#), p.4, para 16.

²⁵ Welsh Government., (2016). [Tackling Hate Crimes and Incidents: Framework for Action. Delivery Plan 2016-17](#).

²⁶ Home Office., (2020). [Hate crime, England and Wales, 2019 to 2020](#).

²⁷ House of Commons., (2020). [Hate Crimes: Prosecution Rate. Volume 669: debated on Thursday 16 January 2020](#). See also: Dearden, L., (2019). [Less than one in 10 hate crimes prosecuted despite record attacks](#).

²⁸ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.17, footnote 63.

²⁹ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.17, footnote 64.

Wales, best illustrated by the following case study. REF assisted a victim of a race hate crime in Cardiff in 2019, whose colleague had dressed in blackface at their work's Christmas party and sang songs with racial connotations to them. The perpetrator was found guilty of racially aggravated behaviour at a Magistrates' Court, however they appealed, and the case was quashed, with a judge stating that the perpetrator did not mean to cause any harm and did not understand the implications of their actions.³⁰ Nonetheless, such experience has had a lasting and damaging effect on the victim. Additionally, those who attended REF's consultations for the 2021 CERD Shadow Report for Wales discussed their own experiences of hate crime and explained how they did not feel safe during the judicial process, particularly when being required to face their perpetrator in court after an attack on their identity left them scared.³¹

Those who attended REF's consultations for the 2021 CERD Shadow Report also expressed concern at the common misconception that a racial hate crime is categorised by the use of a racial slur, as perpetrators are aware of this and instead intimidate victims in other ways, purposely refraining from using racial slurs so they avoid being incriminated for their behaviour.³² This makes evidencing such hate very difficult and may contribute to explaining the low hate crime conviction rates as the evidence is lacking to progress cases to this stage.³³ Additionally, incitement of racial hatred is also difficult to prove under current UK hate crime legislation, as it must be proven that the perpetrator intended to – or, at the very least, was likely to – stir up racial hatred, to qualify for prosecution.³⁴ This leaves a considerable gap for perpetrators to claim inciting racial hatred was not their intention, alleging instead that they were simply expressing their right to free speech. This often means that perpetrators receive a lesser punishment for their behaviour if any at all³⁵ and this too may also contribute to explaining low hate crime conviction rates.

Additionally, police forces in England and Wales continue to fail to record data about hate crime victims accurately and comprehensively – police data recorded in relation to hate crimes is not being disaggregated by protected characteristic.³⁶ HMICFRS³⁷ found that of 7,796 religiously-motivated crimes recorded, the religion of the victim had been recorded as

³⁰ See: Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.18, footnote 66. See also: BBC News., (2019). [Minstrel singer Brian Davies wins race case appeal](#). INews., (2019). [Man who wore blackface and dressed as minstrel at Priory workers' Christmas party charged with racial harassment](#).

³¹ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.17, footnote 60.

³² Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.18, footnote 67.

³³ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.18, footnote 68.

³⁴ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.18. See also: UK Government., (n.d.) [Public Order Act 1986. Acts intended or likely to stir up racial hatred](#).

³⁵ This is because those proven to have intentionally stirred up racial hatred receive a harsher penalty than cases where it was deemed only 'likely' that racial hatred would be stirred up as a result. See: Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.18.

³⁶ Runnymede Trust., (2021). [England Civil Society Submission to the United Nations Committee on the Elimination of Racial Discrimination](#), p.14. See also: Home Office., (2020). [Hate crime, England and Wales, 2019 to 2020](#).

³⁷ Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services.

'unknown' on 29% of occasions.³⁸

Those who attended REF's consultations for the 2021 CERD Shadow Report for Wales asserted that Brexit and those politicians who facilitated the UK's exit from the EU, certainly played a role in the increasing levels of hate crime with the inflammatory rhetoric used throughout the campaign, legitimising hate towards racial and religious minorities.³⁹ Furthermore, those who attended REF's consultations for the 2021 CERD Shadow Report for Wales also highlighted that Gypsy, Roma and Traveller populations experience appalling hate speech, which they have attributed to the stigmatisation of these populations in the media.⁴⁰

Recommendations – the UK Government and devolved administrations should:

- Ensure victims and witnesses receive consistent and adequate support during the reporting and judicial process by investing in services which support victims to mitigate victim attrition.⁴¹
- Ensure that all police officers, public prosecutors, and criminal judges in Wales fully understand the basic concepts of hate crime and incitement to hatred, are equipped with the skills to recognise, record, and investigate such incidents and are trained to deal with hate crime and victims in a professional manner.⁴²
- Ensure that all police forces in England and Wales have clearer guidelines on the distinctions between hate speech and free speech.
- Prioritise significantly reducing the gap between the number of hate crimes reported and the number successfully prosecuted.
- Ensure that perpetrators of hate crime are held accountable, including those who have a public platform and chose to use racist and divisive language – they too should be brought to account.
- Commission a national survey for Wales on the prevalence of hate crime, similar to the Scottish Crime and Justice Survey.⁴³

³⁸ Runnymede Trust., (2021). [England Civil Society Submission to the United Nations Committee on the Elimination of Racial Discrimination](#), p.14. The inspectorate was particularly concerned that this "has serious implications for forces in terms of their ability to understand hate crime and how it affects victims and their communities, and then respond appropriately." See also: HMICFRS., (2018). [Understanding the difference: the initial police response to hate crime](#).

³⁹ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.19, footnotes 73 & 83. See also: BBC News., (2019). [Brexit 'major influence' in racism and hate crime rise](#).

⁴⁰ Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.20, footnote 93. This specific concern was raised by Spain in paragraph 134.84 of the thirty-sixth session of the Human Rights Council, where it was recommended that the UK Government dedicate more resources to fight against negative stereotypes displayed in the media against the most affected minority groups – one of which being Gypsy, Roma and Traveller populations.

⁴¹ See: Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.21.

⁴² See: Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.21. N.b., it is important for such training to promote awareness of hate crime and its impact on victims – see Williams, M., and Tregidga, J., (2013). [All Wales Hate Crime Research Project](#).

⁴³ See: Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.21. N.b., this survey should include the collection of disaggregated data on cyberhate and Violence Against Women and Girls (VAWG) in Wales.

Other experiences of discrimination experienced by ethnic minority groups:

In paragraphs, 134.87, 134.95 and 134.98 of the thirty-sixth session of the Human Rights Council, the United States of America, Kazakhstan and Argentina recommended the UK Government review and strengthen current policies and initiatives to combat societal discrimination against members of racial, religious and ethnic minority groups. Due to word constraints, please see the article in footnote 46 which provides a general overview of the most recent human rights issues facing ethnic minority groups in the UK, including inequalities in healthcare, housing, employment and the criminal justice system⁴⁴, which REF contributed to.⁴⁵

⁴⁴ Due to word constraints this submission also does not refer to the ongoing ethnic disproportionality in stop and search. Recent data for Wales shows that Black people continue to be disproportionately targeted by the police when it comes to stop and search. Of every 1,000 White people living in Wales, eight were stopped and searched. This compares to a rate of 56 per 1,000 Black people, 16 per 1,000 Asian people, and 28 per 1,000 people who identify as being from a Mixed ethnic background. Furthermore, the gap in the stop and search rate between White and Black people was slightly wider in Wales (eight to 56) than it was in England (seven to 51). See: Wales Governance Centre., (2022). [Stop and Search – extent of racial bias confirmed at First Minister's Questions](#). See also: Wales Online., (2022). ['Disgraceful' stop and search statistics for Welsh police forces released](#). These concerns were also raised by consultees in the CERD Shadow Report for Wales. See: Race Equality First., (2021). [Joint NGO Shadow Report on Racial Inequality in Wales](#), p.23-27.

⁴⁵ Each Other., (2022). [Reviewing Our Rights As 2022 Gets Started: Race](#).