Incorporating Human Rights in Wales Frequently Asked Questions

In 2021 a report for the Welsh government recommended making international human rights part of Welsh law. This led the Welsh government to set up a working group to examine how this could be achieved through a process known as 'incorporation'.

➤ Read the 2021 report in full or in summary: <u>Strengthening and advancing</u> equality and human rights in Wales | GOV.WALES

This briefing answers some **Frequently Asked Questions** (FAQs) about incorporation.

If you want to learn more, you can follow the links below to additional reading.

1. What do we mean by 'incorporation' of human rights?

Put simply, incorporation means protecting human rights in law.

In the UK this would mean making human rights part of UK law. In Wales it would mean making human rights part of Welsh law.

See FAQ 4 for more on incorporation.

2. What human rights are we referring to?

When speaking about incorporation in the UK or Wales we are referring to human rights written down in United Nations human rights treaties. These are important because the UK has voluntarily signed up to many United Nations human rights treaties, and so the rights they contain should be guaranteed to everyone in the UK, including in Wales.

See a list of human rights treaties agreed by the UK: <u>International | Scottish Human Rights Commission</u>

3. Can you explain a bit more about those human rights you say should be guaranteed for everyone in the UK and in Wales?

Our human rights include 'civil and political rights'. These are rights that protect important freedoms like privacy, fair trial, free speech and the right to protest. Civil and political rights are <u>already protected</u> everywhere in the UK by the *Human Rights Act* 1998, so there is no need for us to protect these rights in Welsh law.

➤ Find out about the *Human Rights Act 1998*: The Human Rights Act EHRC

Our human rights also include 'socioeconomic rights'. These are 'everyday rights' which refer to basic goods and services we all need to live a dignified life. For example: adequate food, decent housing, appropriate health and social care, and a proper education. Socioeconomic rights are <u>not protected</u> by UK law, so it is important we protect them in Welsh law.

United Nations treaties which guarantee socioeconomic rights include:

- The International Covenant on Economic Social and Cultural Rights.
- The Convention on the Rights of Disabled People.
- The Convention on the Rights of the Child.
- The Convention on the Elimination of Discrimination Against Women.
 - ➤ Read these treaties: International | Scottish Human Rights Commission
 - Read more about our everyday rights: <u>Everyday rights conversation:</u> resource page | Just Fair

4. You have already described incorporation in simple terms (FAQ 1). Can you say a bit more about incorporation, with a focus on Wales?

While incorporation simply means making human rights part of UK or Welsh law, there are different ways this can be achieved.

The three most common methods are:

Direct incorporation (sometimes referred to as 'full and direct incorporation'): in Wales this would mean using Welsh law to make socioeconomic rights binding on the Welsh government and public authorities in Wales.

Direct incorporation is the strongest form of incorporation as individuals can ask a court to provide a remedy if the Welsh government or a public authority fails to act in compliance with socioeconomic rights.

The only examples of direct incorporation in the UK are:

- The *Human Rights Act 1998*, which incorporates the European Convention on Human Rights into the UK-wide legal system.
- The UN Convention on the Rights of the Child (Incorporation)(Scotland)
 Act 2024, which incorporates the Convention on the Rights of the Child into
 Scots law (not UK or Welsh law).

Indirect incorporation: this would mean using Welsh law to require the Welsh government and public authorities to take socioeconomic rights into account in planning and service delivery. However, they would not be binding, so courts would not be able to provide a remedy in cases where the Welsh government or a public authority fails to act in compliance with socioeconomic rights.

An example of indirect incorporation in Wales is:

• The *Rights of Children and Young Persons (Wales) Measure 2011*. This requires Welsh Ministers to have 'due regard' to children's rights under the UN Convention on the Rights of the Child when exercising any of their functions.

Sectoral incorporation: is a version of indirect incorporation but limited to specific areas of policy (i.e. sectors), for example, education or social a care.

Examples of sectoral incorporation in Wales are:

- The Social Services and Well-being (Wales) Act 2104, which requires any
 person exercising functions under the act to have 'due regard' to the UN
 Convention on the Rights of the Child and the UN Principles for Older Persons.
- The Additional Learning needs and Education Tribunal (Wales) Act 2019 which requires a relevant body exercising functions under the act authorities to have due regard to children's rights and disabled people's rights.
 - ➤ Read more on the different ways to achieve incorporation in Wales: <u>Bevan</u> Foundation Briefing on Incorporation
 - Read about the UN Convention on the Rights of the Child: <u>UN Convention</u> on Rights of a Child (UNCRC) UNICEF UK
 - ➤ Read the UN Principles for Older Persons: <u>United Nations Principles for Older Persons | OHCHR</u>

5. Is incorporation important?

There are a number of reasons why incorporation is important, here are a few:

- Human rights agreed by the UK are written down in international law. For this
 reason, they may be seen as distanced from people and communities here in
 Wales. They can easily be overlooked when the Welsh government or public
 authorities make decisions or take actions which affect our lives. By making
 our socioeconomic rights, or 'everyday rights', part of Welsh law they become
 a legal requirement and a necessary consideration in planning and delivery of
 public services.
- A second reason incorporation is important is because it helps close the
 'implementation gap'. This is the gap between what governments agree should
 be our human rights, and what actually happens in practice (i.e.
 implementation). By making socioeconomic rights a key part planning and
 delivery of public services in Wales it is far more likely that people's experience
 will reflect the fundamental guarantees provided by these 'everyday rights' in
 areas such as housing, health and social care, and education.
 - For more on closing the implementation gap see FAQs 11, 12, 15 and 16.

- Making socioeconomic rights part of Welsh law would mean that the courts could ensure that the Welsh government and public authorities act appropriately to provide individuals with the public services they need to live a dignified life, to support their well-being and to flourish.
- Making socioeconomic rights part of Welsh law would benefit the people of Wales now, but also in the future. It cannot be guaranteed that future governments or public authorities in Wales will act in compliance with the objectives of human rights Making socioeconomic rights part of our law in Wales would protect them in the future, enabling future generations to challenge decisions and actions which are not in compliance with their 'everyday' rights.
 - ➤ Read more on the importance of incorporation: <u>Bevan Foundation</u> Briefing on Incorporation

6. Is the UK government or the Welsh government legally required to incorporate human rights?

Unfortunately, no. The UK government and the Welsh government are free to decide whether to incorporate human rights into UK law or Welsh law.

However, guidance from the United Nations on what governments should do to properly implement human rights is quite clear that incorporation is a key step for implementation of human rights, including socioeconomic rights.

➤ For an example of United Nations guidance: General Comment No. 9: The domestic application of the Covenant | Refworld

Despite this, and even though the UK has agreed many United Nations human rights treaties, successive UK governments have refused to make international human rights part of UK law. This means that many people and communities in the UK are not experiencing the full benefits of their socioeconomic rights.

For more on implementation see FAQs 11, 12, 15 and 16.

7. Isn't incorporation of socioeconomic rights something we should leave to the UK government?

It was a previous UK government that introduced the *Human Rights Act 1998* to incorporate the European Convention on Human Rights. However, the European Convention is about civil and political rights, not socioeconomic rights (see FAQ 3).

Since the 1998 Act successive UK governments have refused to incorporate socioeconomic rights into UK law. This means that to ensure everyone in Wales is

able to experience the full benefit of socioeconomic rights, their 'everyday rights', it is up to the Welsh government to take steps to make them part of Welsh law.

In fact, the current Welsh government has agreed to make some socioeconomic human rights part of Welsh law. These are rights written down in:

- The Convention on the Rights of Disabled People.
- The Convention on the Elimination of Discrimination Against Women.
 - For links to information on these treaties: <u>International | Scottish Human Rights Commission</u>
 - ➤ Read the Programme for Government where the Welsh government commits to incorporate these treaties (page 14): Welsh Government Programme for Government Update

8. Can we actually make socioeconomic rights part of Welsh law?

The simple answer is yes. In 2011 the Senedd or Welsh parliament (then known as the National Assembly for Wales) made the Convention on the Rights of the Child part of Welsh law. This Convention includes socioeconomic rights.

Find out more about the Convention on the Rights of the Child and Welsh law here: Children's rights in Wales | GOV.WALES

UK legislation giving the Senedd powers to make laws for Wales is clear that the Senedd has power to pass laws to implement human rights (referred as 'observing and implementing' the UK's international obligations).

The relevant legal clause is found in the *Government of Wales Act 2006*, in Schedule 7A paragraph 10.

> Find the legislation here: Government of Wales Act 2006

For the Senedd to be able to pass a law to incorporate socioeconomic rights in Wales the Welsh government would need to prepare a Bill (or draft law) referring to relevant rights and ask the Senedd to use its power to make this part of Welsh law.

Find out how laws are made in Wales: Law making in Wales | Law Wales

9. Are there any limits on which socioeconomic rights the Senedd can make part of Welsh law?

Yes, there are limits. This is because the power to make laws for Wales is shared between the UK parliament and the Senedd, and responsibility for policy is shared between the UK government and the Welsh government. This is referred to as a 'reserved powers' model of devolution for Wales.

Read more about the reserved powers model of devolution here: <u>Reserved Powers Model</u>

When the Senedd and Welsh government exercise their powers to make law and policy for Wales they are carrying out 'devolved functions'.

The 'reserved powers' model prevents the Senedd from incorporating socioeconomic rights into Welsh law if those rights refer to areas of law or policy which are the responsibility of the UK parliament or UK government. These areas of responsibility are called 'reserved competences'.

It would take up too much space to discuss all the areas where the UK parliament and UK government have reserved competences affecting socioeconomic ('everyday') rights. Some examples include: welfare benefits, and employment rights; and so, the Senedd cannot pass a law which would require the Welsh government or public authorities in Wales to act in compliance with socioeconomic rights in these areas.

Despite some limits on the Senedd's ability to make socioeconomic rights part of Welsh law, it does have power to incorporate a number of rights which are relevant to devolved functions, these include: housing, education, health and social care.

10. What steps are we taking in Wales to make socioeconomic rights part of Welsh law?

As was noted at the start of this briefing, the Welsh government has set up a working group to examine how we can make socioeconomic rights part of Welsh law. As any law would be introduced through Welsh legislation, this group is known as the 'Legislative Options Working Group'. It is led by civil society (meaning organizations which are not part of government).

The working group has yet to finish its work. It is currently examining how to ensure that any legislation to make socioeconomic rights part of Welsh law so they apply exclusively to devolved functions (see FAQs 8 and 9).

Read about the work of the Legislative Options Working Group here:
<u>Human Rights Legislative Options Working Group | GOV.WALES</u>

11. We hear a lot about the need to 'implement' human rights. Is there a difference between incorporation and implementation?

As noted in FAQ 6, guidance from the United Nations states the importance of incorporation as key to implementation of human rights. It needs to be fully understood that incorporation and implementation <u>are not</u> alternatives.

<u>Incorporation is implementation</u> and is key to giving effect to socioeconomic rights in practice.

As the UK has agreed many United Nations human rights treaties. This means that all governments and public authorities in the UK should take steps to implement the rights they contain. This is a legal requirement written down in all human rights treaties.

For an example of the legal requirement to implement human rights see the International Covenant on Economic, Social and Cultural Rights, article 2.

Find the Covenant here: International | Scottish Human Rights Commission

In Wales, the Welsh government and public authorities should use the powers and resources available to them to ensure that people experience the benefits of socioeconomic rights in their daily lives.

As noted in FAQ 9, in order to properly <u>implement</u> socioeconomic rights the Welsh government should take steps to <u>incorporate</u> them into Welsh law. As discussed in FAQ 8 and 9, the Welsh government could introduce a draft Bill (draft legislation) to make socioeconomic rights part of Welsh law.

12. Should the Welsh government focus on implementation of socioeconomic rights instead of incorporation?

As FAQ 11 makes clear, it is <u>incorrect</u> to talk about incorporation and implementation as if they are alternatives. Incorporation is a key step contributing to proper implementation of socioeconomic rights, it is part and parcel of implementation.

However, incorporation is not, by itself, sufficient to ensure everyone in Wales benefits from their socioeconomic rights. It is important to recognize that when we speak about implementing human rights we are referring to a range and variety of actions.

Guidance from the United Nations suggests many actions that governments could take to implement human rights. This guidance is set out in documents known as 'General Comments'.

You can find out more about General Comments here: General Comments
OHCHR

The steps recommended in the guidance include incorporation. They also include, for example:

- Human rights budgeting.
- Human rights impact assessment.
- Staff training on human rights.
- Raising public awareness of human rights.
- Supporting and working with civil society.
- Taking steps to monitor and evaluate progress against human rights targets.

What is clear from the guidance is that none of these actions, on its own, will be sufficient to fully realize socioeconomic rights.

It is up to governments and public authorities to adopt a range of actions to implement socioeconomic rights.

The United Nations Committee on the Rights of the Child provides the most comprehensive guidance on implementation, referring to the Convention on the Rights of the Child. However, much of this guidance can be applied generally to human rights and socioeconomic rights.

Read the Committee's guidance: <u>General Comments</u> (see General Comment Number 5).

13. But can't we promote socioeconomic rights through the Equality Act 2010?

The *Equality Act 2010* provides a number of protections against adverse discrimination affecting people with one or more 'protected characteristics'. These protected characteristics refer to: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The 2010 Act also establishes a number of objectives for government and public authorities to promote equality. In Wales, these objectives include the need to reduce socioeconomic inequality: a 'socioeconomic duty'.

- Read about the Equality Act 2010: Equality Act 2010 | EHRC
- Read about action on equality in Wales: <u>Equality and human rights | Topic |</u> GOV.WALES
- Read about the socioeconomic duty in Wales: <u>Socio-economic Duty: an overview | GOV.WALES</u>

There is no doubt that the *Equality Act 2010* can help tackle discrimination that prevents people benefiting from their socioeconomic rights in areas such as employment, housing, education, health and social care. Equality and socioeconomic rights are certainly mutually reinforcing. However, there are differences.

The 2010 Act establishes general objectives for the Welsh government and public authorities. In contrast socioeconomic rights establish concrete objectives referring to provision and quality standards in areas such as housing, education, social care and health care.

The 2010 Act does not require progressive policies that improve the standards of public services. There can be equality where everyone receives the same poor level of public services, or no services at all. Socioeconomic rights differ as they are written in ways that demand at least a minimum level of provision and progressive standards of achievement, and often include detailed statements on what should be provided to individuals.

For examples of treaties which include socioeconomic rights that establish standards and provide detail on what ought to be provided see:

- The International Covenant on Economic, Social and Cultural Rights, article 11 on a standard of living, and article 12 on health.
 - ➤ Read the treaty here: <u>ICESCR</u>
- The Convention on the Rights of Disabled People, article 28 on a standard of living and social protection.
 - > Read the treaty here: Convention on the Rights of Persons with Disabilities
- The Convention on the Elimination of Discrimination Against Women, article 10 on education.
 - ➤ Read the treaty here: Convention on the Elimination of All Forms of Discrimination against Women

Another difference is that the *Equality Act 2010* tackles discrimination against people with protected characteristics which prevents them accessing goods and services. Socioeconomic rights apply more widely and promote entitlements to decent public services for all, including people with protected characteristics.

Finally, the objectives of socioeconomic rights are more 'proactive' than equality objectives. This is because they require government and public authorities to actively make provision and to use available resources efficiently to improve the quality of public services.

These differences mean we need socioeconomic rights as part of Welsh law to guarantee everyone in Wales a decent level of public services.

For more on the relationship between human rights and equality: Bevan Foundation Briefing 3

14. What about our Well-Being of Future Generations (Wales) Act 2015. Can we promote socioeconomic rights through this legislation?

The Well-Being Act requires the Welsh government and public authorities in Wales to 'maximise their contribution' toward achieving seven 'well-being goals'. These are: a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities, a Wales of vibrant culture and thriving Welsh language, a globally responsible Wales.

There are connections between the well-being goals and socioeconomic rights. For example, between the goal of a healthier Wales and the socioeconomic right to the highest attainable standard of health, e.g. article 12 of the International Covenant on Economic, Social and Cultural Rights.

> Read the Covenant (the treaty) here: ICESCR

The well-being goals are broad and general. They provide the Welsh government and public authorities with lots of discretion over how to interpret well-being.

Although socioeconomic rights refer to basic necessities vital to individual well-being, there is no guarantee that they will be taken into account by the Welsh government or public authorities when they are planning how to achieve the well-being goals. Which is why we need socioeconomic rights as part of Welsh law.

For more on the relationship between human rights and well-being: <u>Bevan Foundation Briefing 3</u>

15. What difference would incorporation of socioeconomic rights make to the way public services are planned?

The rights being considered for incorporation in Wales would require careful attention to be given to the way public services are planned to meet need in key areas e.g. education, health, social care, housing, the environment (see FAQ 7)

Socioeconomic rights as part of Welsh law would introduce a framework of objectives and standards (including minimum standards) to direct planning toward meeting greatest need, and to ensure efficient use of resources to address the needs of the most vulnerable and disadvantaged.

As noted in FAQs 13 and 14, socioeconomic rights establish concrete targets for public services, which would be relevant to planning of all public services in Wales where the Welsh government and public authorities are carrying out devolved functions (see FAQ 13 for the meaning of 'devolved functions').

Evidence on the impact of incorporation clearly demonstrates that it leads to closer attention to relevant human rights in policy planning.

For an introduction to the evidence, and references for further reading see:

<u>Strengthening and advancing equality and human rights in Wales |</u>

<u>GOV.WALES</u> (see the full report at paragraphs 5.5 and 5.6)

16. Would incorporation have an impact on people's lives?

As noted in the FAQ 15, socioeconomic rights in Welsh would introduce a framework of objectives and standards for public services in Wales, in particular to direct planning toward meeting greatest need. However, there are many factors which influence how people actually experience public services in Wales – not just whether socioeconomic rights are part of Welsh law. These include: the amount of funding available to government and public authorities, the level of individual and community need, how efficiently public services are organised and coordinated, and the impact of unexpected events such as the COVID 19 pandemic.

➤ For a discussion of some of the factors influencing public services in Wales: Under pressure: how are local government services changing?

Incorporation on its own is not a 'silver bullet' which will guarantee that people benefit from their socioeconomic rights. But making socioeconomic rights part of Welsh law would influence planning for public services making it more likely that delivery will focus on ensuring individuals benefit from 'everyday' rights (see FAQ 15).

However, in practice people's actual experience will depend on how the Welsh government and public authorities make use of <u>all the powers and resources</u> <u>available to them</u> to implement socioeconomic rights (see FAQ 12). Adopting a Human Rights Approach would greatly help Welsh government and public authorities to implement socioeconomic rights.

17. What is a Human Rights Approach?

A Human Rights Approach requires a coordinated and committed approach to promote socioeconomic rights through the planning and delivery of public services in Wales. This involves putting socioeconomic rights at the heart of all planning and delivery. In Wales this would begin with legislation to protect and promote socioeconomic rights in Wales law.

Other actions to support a Human Rights Approach include:

- Devising action plans with suitable targets for delivery determined by reference to socioeconomic rights.
- Providing guidance and training to key workers on how to promote socioeconomic through service delivery.
- Allocating adequate resources to support delivery.
- Ensuring the equality and non-discrimination are guiding principles.
- Empowering people and communities to understand and take advantage of their rights.
- Establishing processes to enable people and communities to participate in the way public services are planned and delivered.
- Monitoring progress and outcomes against socioeconomic rights targets.
- Being fully accountable to people and communities for public services.
 - For more on a Human Rights Approach: <u>HRA</u>
 - ➤ For more on a Human Rights Approach with a focus on the experience of a local authority in Wales: A Human Rights Approach Swansea:

While incorporation and a Human Rights Approach would make it more likely that socioeconomic rights will influence outcomes, much will depend on the willingness of the Welsh government and public authorities to take additional steps to promote rights in practice.

Research has confirmed that where socioeconomic rights are recognised in law this can lead to better policy and delivery outcomes.

For an introduction to the evidence, and references for further reading see: Strengthening and advancing equality and human rights in Wales | GOV.WALES (see the full report at paragraphs 5.5 and 5.6).

A key area where incorporation of socioeconomic rights can contribute to improved public services is by making government and public authorities more accountable. This is discussed in the next FAQ.

18. Would incorporation of socioeconomic rights make the Welsh government and public authorities more accountable?

At the moment there is an 'accountability gap' when it comes to compliance with socioeconomic rights. Legal duties which have some link to socioeconomic policy are quite vague, and the courts cannot enforce compliance with socioeconomic rights (see FAQs 13 and 14).

Direct incorporation of socioeconomic rights in Wales would bridge the accountability gap (see FAQ 4 on direct incorporation). It would enable a court to review decisions and actions taken by the Welsh government and public authorities to assess how these affect individuals, and whether they have done enough to comply with socioeconomic rights.

Court based enforcement would be a strong mechanism for ensuring the Welsh government and public authorities are properly accountable for decisions and actions they take which affect people's socioeconomic rights in Wales. Something which would help ensure high standards of rights-focussed decision making and service delivery. But court-based enforcement would not be the only accountability mechanism available if socioeconomic rights were incorporated in Welsh law.

Other options for strengthening accountability as a result of incorporation include:

- Complaints mechanisms. These are informal procedures which enable an
 individual to challenge a decision or action of government or public authority.
 Incorporation of socioeconomic rights in Wales would enable individuals to rely
 on 'everyday' rights when making a compliant, including by pointing out where
 decisions or actions fall below the standards established by those rights.
- Giving more powers to national institutions such as commissioners or ombuds to investigate and hold the Welsh government and public authorities to account for breaches of socioeconomic rights.
- Giving the Senedd more options to scrutinize the legitimacy of Welsh government policy based on obligations and standards established by socioeconomic rights.
 - For more on how incorporation of socioeconomic rights can improve accountability: Models of incorporation, see e.g. chapter 4.
 - Read about how incorporation has contributed to increased accountability for children's rights in Wales: <u>The Impact of Legal Integration of the UN</u> <u>Convention on the Rights of the Child in Wales</u>

19. Would incorporation be affordable in Wales: would it require additional resources?

Public services cost money. Decent housing, education, health care and social care all come at a cost. These services already cost money, but equally there is already money available to be spent on providing public services in Wales, i.e. in the Welsh budget.

➤ Read about the money allocated to Wales to be spent in the Welsh budget: How is devolved Government in Wales financed? | Law Wales

Making socioeconomic rights part of Welsh law would have implications for public services planning, and delivery in Wales (see FAQs 15 and 16). Initially this would mean that resources available to the Welsh government and public authorities are prioritised to meet need in key areas e.g. education, health, social care, housing, the environment, and to ensure efficient use of resources to address the needs of the most vulnerable and disadvantaged.

This is not about additional expenditure, but instead about establishing a framework to ensure and confirm the most efficient and effective use of limited existing resources to meet the most pressing need. It is worth noting that in many areas of public expenditure both the Welsh government and public authorities are prioritising spending to meet the greatest need.

- ➤ For discussion on how the Welsh government allocates its budget: <u>How is</u> the Welsh Government spending its budget in 2024-25?
- ➤ Information on policy priorities and spending by the Welsh government can be found on the Welsh government's website: Home | GOV.WALES

In the longer term, it would be foolhardy to deny that making socioeconomic rights part of Welsh law would not imply a need for additional resources. This is because socioeconomic rights are aspirational, which means they promote greater availability and higher standards of public services. This has resource implications.

However, it is a fundamental premise of implementation of socioeconomic rights that any <u>improvement is progressive and dependent on resources being available</u>. This is known as <u>progressive realisation</u> of socioeconomic rights.

While making socioeconomic rights part of Welsh law would require available resources to be used efficiently to promote socioeconomic rights, it would not require the Welsh government or public authorities to achieve targets which are impossible to meet due to resource constraints.

- ➤ For insights into progressive realisation: <u>Progressive realisation United Nations Convention on the Rights of the Child</u> (this discussion refers to children's rights, but the information on progressive realisation is applicable to all socioeconomic rights)
- ➤ For more on progressive realisation, including further references and case studies of the experience in several countries see: Models of incorporation

For a more detailed and technical discussion of progressive realisation:

<u>Progressive Realisation</u>

20. Finally, is there support for incorporation in Wales?

There have been a number of campaigns in Wales calling for incorporation of human rights in Welsh law, including socioeconomic rights. These campaigns have been led by civil society organisations representing different groups in Welsh society whose quality of life is directly affected by their ability to access their socioeconomic rights.

➤ These campaigns are noted in a blog on making socioeconomic rights part of Welsh law: <u>Human Rights Day 2024 - Swansea University</u>

It is also the case that comprehensive research in 2021 received evidence from different sources which confirmed a strong desire amongst civil society organisations to incorporate human rights in Welsh law.

➤ The full research report can be found here: <u>Strengthening and advancing equality and human rights in Wales | GOV.WALES</u> Support for incorporation is discussed in chapter 5.

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