

Building an anti-racist culture:

A toolkit for
your workplace



Inclusive
Employers



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Introduction

If you can change the workplace, you start to change the world

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Like you, we at Inclusive Employers and our friends at The Guinness Partnership were horrified by the murder of George Floyd in May 2020. And by the many, many deaths and injustices experienced by black people here and elsewhere across the globe, simply because of the colour of their skin.

These events, the Black Lives Matter protests that followed, and the learning we had all started or were doubling down on, are what led to Guinness contacting Inclusive Employers and offering support to develop this anti-racism toolkit. We knew that we needed to do something more to create lasting change in the workplace. We believe that workplaces have the power to change society.

Our anti-racism toolkit has been a year in the making. We've designed it to help you take practical action to create and embed an anti-racist culture in your organisation. In line with Inclusive Employers' mission to make everyday inclusion a reality, we have created a toolkit that we hope is practical and useful for as many employers as possible. We designed it for everyone, no matter where your organisation's anti-racism work is right now and to support everyone who has experienced racism first-hand. There's a good chance that even the most advanced among you will find some useful nuggets.

We took the time to speak to lots of different organisations about where they are with their anti-racism activity, putting in many months of research. We wanted to understand how and why we got here, how racism affects everyone,

and how we could work to solve the problem within our workplaces – and, by extension, society. By adding our professional experience, we created a toolkit that aims to help you to make practical changes. It discusses the why, describes the what, and, most important of all, helps you with the how.

Throughout the toolkit we have referred to ethnic minorities, a term designed to accommodate everyone who (in the UK) is not of white British ethnicity, so encompassing for example the Gypsy, Roma and Traveller communities. There are occasions where we have referred to specific groups where relevant, for example in discussing the role of the British in slavery and colonialism, when explaining the context of this toolkit and its origins, or when discussing the impact of racism on specific ethnic groups. Whilst the toolkit is designed to help employers take an anti-racist approach, the driver for developing the toolkit has been the experience of people of colour, and black people in particular. The murder of George Floyd, the Black Lives Matter movement, but also, importantly, the experiences of our black friends, family and colleagues and the need to support them right now have been uppermost in our minds as the toolkit has been developed.

A recurrent theme in the way that British people talk about racism is the constant references to the USA when the subject is racism here in the UK. It feels as if we are continuing to brush our own issues with race under the carpet. Worse, it seems like we care about the nuances of race in the USA far more than we care about our own shortcomings.

We do, of course, express racism differently here. In the UK, racism is more covert – it's mostly hidden. Focusing on other countries is a convenient diversionary tactic: it prevents us from looking at what we need to do right here and right now. There are more than enough examples of racism in our own society and workplaces without having to look abroad for examples. This country was a key player in slavery and in the development of the ideas and rhetoric of white supremacy. As a nation we are yet to face up to the deaths of black and brown people in police custody, to the gaps in educational attainment, to the lack of workplace equity... and so on.

We need to deal with it. Which is why we've focused on British examples, research, articles, writers, activists, and experts (where we've been able to) to show how racism works in the UK.

That's the background. The toolkit itself is a guide to taking practical action. Whilst we have retained a British focus, the principles should be applicable to other countries (relevant laws allowing), as well as to other aspects of inclusion.

Every organisation has its own unique context based on its size, sector, geography, operational structures, employee demographics, and so on. So the toolkit is intentionally not too prescriptive: some of our recommendations may not work in the unique context of your organisation. If so, the toolkit suggests alternative ways to achieve a similar outcome. And of course you must build your strategy and plan around your own unique data – which will help you understand what you're great at, and what you really

need to focus your organisational effort and resources on.

Finally, a thank you to all those who have shared their experience and expertise, helping us to shape our work. And to those who continue to act as allies, advocates, and accomplices: you're as important as ever. Our special thanks goes to:

- The Guinness Partnership
- Every person from the myriad of organisations who took the time to tell us about their anti-racism work
- Every person who has written, spoken, tweeted, messaged, etc. about anti-racism. We have probably found you during our research this last year!

- The Inclusive Employers team

P.S If you'd like to understand where your organisation currently sits on anti-racist action – and inclusion more broadly – the [Inclusive Employers Standard](#) helps you gauge where you are now, track your progress, and benchmark your organisation. The team can also help you with all the actions described in the toolkit, so don't hesitate to reach out.

Foreword: a personal view

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I know this as well as you do: when it comes to the subject of racism – and especially the experience of race in the workplace – we’re feeling tired, frustrated, and angry. We have a healthy scepticism that our organisations’ newly discovered commitment to anti-racism will be little better than window dressing. We’re not sure it’ll root out the systemic issues that prevent us from receiving equal opportunities in our careers and our lives. Why? Because we’ve heard it all before, haven’t we?

But I believe there is an appetite for change – and I don’t care whether the motivation is moral or commercial – because the appetite is bigger than I have ever seen it. I am cautiously optimistic that we will see some real changes for our generation and those to come.

So I thought it might be useful to share some of my personal learnings that relate, not to anti-racism work, but to being an ethnic minority employee in today’s workplace. My experiences are unique to me and to my own demographic profile, but I hope they can provide some food for thought. And, if you are also from an ethnic minority, provide some comfort that you are not alone.

Find your people

In 2019, as part of a positive-action initiative, and for the first time in my career, I found myself in a meeting room that had only ethnic minority people in it. Before that I don’t think

I’d ever really noticed that I was often the only black or brown face in a room, but that day has stayed with me. There was a comfort in knowing there was no discrimination at play in our group. I remember thinking to myself, “Ah, so this must be what it feels like to be white.” It was quite the revelation, and incredibly valuable for the way it made me take another look at my workplace experiences.

So – find your people. Those who get you, who support you, and who understand when you’ve had a bad experience and need to get it off your chest. I can’t say this enough: talking through experiences of racism with people who understand it is invaluable. They don’t have to be colleagues – they can be friends or family, a business or industry network group, or someone else entirely. If you can’t find what you need, try setting it up!

Find your supporters

Reflect on your career and your work life, and think about who these people might be. I’ve been fortunate during my career to have had people who believed in me, and one who has quietly (at least to me!) sponsored me – indeed I would say she has been the single most influential person in my career to date. But we all have people like this, whether they be sponsors, mentors, or role models. Find them, celebrate them, don’t let them go! They are worth their weight in gold.

Remember, they don’t need to be people who work in your organisation or even in your industry. They don’t even have to be from an ethnic minority – mine isn’t.

Be yourself

For years we have been told to fit in; expected to talk and act white, to not make a fuss, to keep our heads below the parapet. No more! – say I. Let’s celebrate who we are and what we bring to the table.

Let’s stop perpetuating this idea that we have to act white to get where we’re going. It’s hard to ‘unlearn’ a lifetime of conditioning, but if our organisations are celebrating diversity and building racial equity, then we should hold them to it.

And while we’re on the subject, can we celebrate ourselves too? Getting to where we are in a society that is fundamentally unequal and often stacked against us, takes strength, resilience, and damn hard work. Own that, and please stop second-guessing yourself.

Be a change-maker

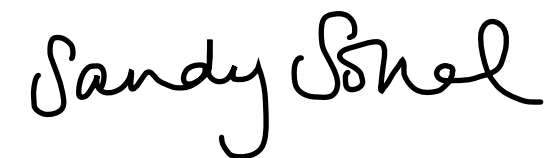
We’re changing and learning all the time. Things I thought nothing of back in the 90s wouldn’t be considered acceptable these days (look at [Friends](#)). But we have to push forward, one step at a time, building on each win before we move on to the next. We’re building on the work of those who came before us.

So continue to make change where you can, within your sphere of influence and throughout your career. This could be anything from supporting your fellow colleagues, to challenging the status quo, to ensuring inclusivity in your team, to setting the anti-racism agenda for your whole organisation. It can be quiet or it can be loud. One thing’s for sure: we shouldn’t be waiting for white people to do their thing.

Support each other

We all have different experiences of race at work; it depends on factors such as our ethnic and cultural background, gender, disability, sexuality and so on. While we may not be facing extreme and overt prejudice as regularly as previous generations, there are still plenty of examples of covert racism and structural or institutional barriers. British anti-racism activists have had a long tradition of banding together for change and we’re standing on the shoulders of the generations that came before us. Let’s do the same – lift each other up, celebrate each other’s successes, and support our younger generations to reach new heights.

We have the power to make a difference.



Sandy Sohal

Consultant (Special Project) at Inclusive Employers and Director of Homeowner Services at The Guinness Partnership



Section 1: **Building an understanding of anti-racism**

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What is racism?

Racism has been in the news a lot recently. The stories – and the arguments – have prompted fresh conversations in our professional and personal lives. At times like this it's helpful to remind ourselves of the meaning of the words we use. So we've taken some definitions from the Cambridge Dictionary.

Racism

Policies, behaviours, rules, etc. that result in a continued unfair advantage to some people and unfair or harmful treatment of others based on race.

Harmful or unfair things that people say, do, or think based on the belief that their own race makes them more intelligent, good, moral, etc. than people of other races.

Structural racism

Laws, rules, or official policies in a society that result in and support a continued unfair advantage to some people and unfair or harmful treatment of others based on race.

Systemic racism

(also known as 'societal racism')

Policies and practices that exist throughout a whole society or organisation, and that result in and support a continued unfair advantage to some people and unfair or harmful treatment of others based on race.

Institutional racism

Policies, rules, practices, etc. that are a usual part of the way an organisation works, and

that result in and support a continued unfair advantage to some people and unfair or harmful treatment of others based on race.

These definitions link to race and ethnicity. But if we take a step back to look at more general terms, we see that racism also connects with words such as prejudice and discrimination:

Prejudice

An unfair and unreasonable opinion or feeling, especially when formed without enough thought or knowledge.

Discrimination

Treating a person or particular group of people differently, especially in a worse way from the way in which you treat other people, because of their skin colour, sex, sexuality, etc.

This is where we need to bring in the idea of 'intersectionality', a term coined by Kimberlé Crenshaw, to reflect the fact that people of colour have additional protected characteristics other than their ethnicity. For example: women of colour and LGBTQ+ people of colour. These people tend to experience greater discrimination resulting from a combination of marginalised characteristics. That's why a woman of colour will experience more discrimination than a white woman. This concept is explained in more detail later in the toolkit.

What is anti-racism?

Most people would probably describe themselves as 'not racist'. In other words, they do not believe they discriminate against people based on the colour of their skin. We could extend this to mean that they believe people of all ethnicities should be treated equally. And it probably means they do not condone overt racist behaviour – comments, racial abuse, racist jokes and so on. But they probably don't challenge it. And if they do, not consistently.

To be anti-racist requires much more. Anti-racists are the people who:

- Actively seek to understand how white supremacist ideals perpetuate in society and shape its world view. They want to understand the roots of racial inequality and how it continues to manifest itself.
- Actively seek to change things to create a more equitable society.
- Self-reflect to understand how they are personally perpetuating these ideas, and work to change these habits (because habits they are – we all have behaviour and language that is ingrained through exposure to wider society).
- Think about what they read and watch and listen to. Consider who owns the businesses they buy from. Reflect on who is in their social circle and why.

- Talk about racism and anti-racism: at work and with friends and family. Yes, it's uncomfortable at first – a barrier that's worth reflecting on – but it gets easier the more you do it. You can't solve a problem that you're unwilling to articulate.
- Openly stand against racism in all its forms, and consistently back up their words through their actions and behaviours.

To conclude, racism is not about individual prejudice, although this is its practical, everyday outcome. Taking a 'not racist' stance is passive; it fails to challenge the systemic issues. Worse, it silently upholds the status quo of a racist society. Anti-racism is working to understand these structures and to deconstruct them wherever we have the power or influence to do so.



Let's talk about race

Here in the UK, people are really, really, uncomfortable talking about anything to do with race. The harmful notion of white people who think of themselves as 'colour blind' is one manifestation of our discomfort. It also affects our debates on immigration, the messages conveyed by our media and the endless deflection from the nub of the matter in any public or private conversation on the subject.

The fact that we have only recently started coming to terms with our history, and the part it played in creating a racist society, is a factor in our discomfort. Even our own government believes that there is little evidence of institutional racism in the UK according to the [Commission on Race and Ethnic Disparities Report](#), a view that drew national¹ and international² derision.

Nevertheless, we do have to get comfortable talking about racism. We cannot fix a problem that we cannot name or discuss.

The conversation has to become an everyday event – honest, open, transparent, repeatable. Which means we have to build trust, empathy and understanding. We need to talk about injustice whenever we see it, in the workplace as well as in our private lives.

If you haven't already started these conversations in your workplace, it can be hard to know where to begin. You'll be worried about how you'll deal with the inevitable fall-out. So here are some things to think about:

- Why does your organisation need to have this conversation? The answer could be as simple as 'you understand that racism exists in society and your workplace, so you need to ensure your organisation is equitable for all' or it could be more specific.
- How will you continue the conversation? Having a one-off discussion could do more harm than good in terms of trust and progress. Think about what you're trying to achieve from each conversation, and how you can structure it in a way that works for both you as an employer and your employees.
- Think about the terms of reference for each conversation. What is its purpose? Who will attend? Mixed groups or people of colour only? Your leadership team? Who will facilitate it and does that person have the right experience? Are they internal or external? Are they senior? Are they white or a person of colour? Is it a fact-finding mission? A problem-solving conversation? A venting conversation? Depending on your organisation's size, will you split the conversations by ethnic groups? Will you have spaces for white allies to discuss their anti-racism learning and actions? You need to think everything through.
- If you're a leader, are you having informal conversations with your teams? How open are you about your own background, what you're learning or what you experience? Sharing openly helps to build trust with your team, and an understanding that everyone is working on anti-racism and talking about it.

- Think about ways to ensure the psychological safety of all your employees before, during and after their conversations. Take particular care of people of colour and ethnic minorities on your team: they may well have had traumatic experiences of racism throughout their lives. Their safety and wellbeing should take priority.
- How open is your organisation's culture? Are people polite and non-confrontational? Are you used to having brave conversations and facing challenges head-on? How will you make sure the conversations remain constructive?
- People can find discomfort difficult to bear. Unfortunately discomfort is a vital part of learning (about anything, not just race).
- Think about the actions that will come out of your conversations. Talking has little value if all you're doing is listening to people relive racist experiences. A lack of action will reduce the trust your employees have in your organisation.

Another reason why people struggle to talk about racism is because we conflate structural racism with individual acts of prejudice. People can easily think that they are being called out personally, which is not (usually) the case. The defensive mindset restricts your ability to change things. Therefore, you should think about education and how you pitch your internal communications. Aim to remove opportunities for awkwardness so that people can get on with making constructive progress.

Preparing for the conversation

- Be clear about how talking about racism and anti-racism links to your organisational values, culture and mission – and repeat the message regularly.

- Be clear about the purpose of the conversation. If it's to talk about a particular characteristic, say so. And then create more spaces for people who want to talk about other characteristics.
- Know where you are going and what will happen afterwards. Make sure your HR and leadership teams have agreed a plan. For example, what happens when you hear about an instance of racism in your workplace? How will you react and what will you do about it?

“

Not everything that is
faced can be changed.
But nothing can be
changed until it is faced.

James Baldwin

”

- Provide a clear framework for the conversation, supported by additional reading or resources for those who want them, plus time and space for colleagues to reflect afterwards. Participants may well need space if they've been sharing private or traumatic experiences.
- Set the ground rules. Everyone should have a chance to speak, so no one gets a second chance unless there's time at the end. Those who want to remain silent, can. If there's lots to say, add in another date.

- Be clear about the behaviours you expect in your conversations, such as respect, openness and a lack of defensiveness. Provide information on the words that people can use. People can be uncomfortable talking about race because they don't know if they have the right language³.
- Also, think about whether people should be expected to share their personal experiences of racism. Consider the effect these stories might have on your employees of colour and other ethnic minorities, including leaders, all of whom will be experiencing their own challenges and will have put a lot of energy into compensating for the lack of engagement by their white peers.
- Let everyone know that this is a confidential, safe space. If someone is taking notes, explain why. Make it clear that no one will be identified and that the notes will be shared afterwards so participants can see for themselves.
- Listen attentively – these conversations are about hearing, not responding. No one should attempt to judge or defend the experiences described.
- If participants are reluctant to talk, consider lining up two or three volunteers (who are happy to speak) to get the conversation going.

Further information

- [The surprising solution to workplace diversity - Arwa Mahdawi](#)
- [Catalyst has a useful infographic on conversation ground rules](#)
- [The truth about racism in the UK - Creative Review](#)

Footnotes

- ¹ <https://metro.co.uk/2021/04/01/participants-in-racism-report-deny-being-involved-as-backlash-intensifies-14345688/>
- ² <https://news.un.org/en/story/2021/04/1090032>
- ³ [Can I Say That? How Comfortable Are We Talking About Race in the Workplace? Research report by INvolve and Audeliss](#)



Breaking down myths in anti-racism work

White privilege in our organisations and society

A discussion of white privilege and the ways in which our organisational and societal structures and systems are rooted in white supremacy and the legacy of colonialism.

Racism is not about individual prejudices – or a lack of them. It is a set of ideas within society that have, through constant reinforcement over the centuries, worked their way into our collective psyches. Although colonialism might seem to be long past, we live in a country that was built on its legacy. The impact and the damage caused by colonialism have been far-reaching. The following examples show how its effects reach into the present day:

- The number of former colonies in the developing world whose wealth or assets were stripped by the British.
- The ‘whiteness’ of global beauty ideals. Their influence is so strong, black and brown people have for decades used skin-lightening products, many of which are dangerous. In the Indian subcontinent, beauty is synonymous with being ‘fair’ – or as close to white as possible. In the West (including the UK), we see this in attitudes to skin colour: everyone of colour experiences racism to some extent, but none so much as dark-skinned black people.
- Adulatory stories about the lives and works of revered historical figures, whose racism is conveniently removed from the history books¹.

- Our workplaces, where people of colour are under-represented², and are vanishingly rare at senior levels.
- British ‘heritage’ consumer brands that are beginning to come to terms with their historical links to slavery, and how those connections led to their present-day success³.

UK-based slavery

Most of the British slave trade took place overseas, which is why slavery was much less visible in the UK than it was elsewhere. For the UK, slavery was very much ‘out of sight, out of mind’. But that does not mean it didn’t happen. From 1640 to 1807 (when the British slave trade was abolished)⁴, the UK was the dominant player in the transatlantic slave trade. According to estimates, Britain transported 3.1 million Africans to its colonies (Caribbean, Americas and other countries), of whom 2.7 million survived the journey.

Slave owners in the UK were not just the rich, famous names we expect to hear⁵. There were a surprising number of ordinary people who owned slaves in the Caribbean, and who received compensation from the government when slavery was abolished. The breadth of slave ownership was revealed through years of research by University College London (UCL)⁶.

In contrast, slavery in the USA was much more visible, which has resulted in a more forthright discussion of its legacy. In Britain, our story is much more nuanced, but this does not absolve us of the need to take accountability and to work for equity.

Building an anti-racist culture

A toolkit produced by Inclusive Employers

Guilt

Nobody expects the average white person to feel guilty or ashamed of a history they didn't personally take part in. Quite the contrary: guilt and shame are not constructive emotions. Neither helps drive equity. What we are looking for is change through action.

If you do feel guilt, acknowledge the feeling, and then examine why you feel that way. Think about the structures in society that favour you and influence your ways of thinking – and do so without you realising it. And then take a stand against people being treated differently because of their ethnicity.

Defensiveness rather than acceptance

If people fail to deal with their feelings of guilt before moving to a more constructive place, they can become defensive. Some people believe that they have a 'right to comfort' – hence the idea of 'getting comfortable with being uncomfortable'. That cannot be right: to prioritise one's own comfort is to dictate what can and cannot be spoken. Which means that people will struggle to hear what they're being told when they should be listening and learning to play their part in creating change for the better.

In conversations you therefore need to encourage people to keep an open mind. They need to understand that when you talk to them about racism, you are not accusing them personally. And the fact that they didn't notice something happening doesn't mean that someone else didn't experience it. Those who have not spent a lifetime experiencing racism are unlikely to know what it looks or feels like. Nobody expects them to. What people do expect, however, is a willingness to change the status quo from which they benefit.

'I don't see colour' and similar statements

In the UK, when people talk about race and racism, others are quick to respond with phrases such as "I don't see colour" or "I like/hire/judge people based on who they are, not what they look like". This is the sort of thing they've been taught to do for decades. In general, these sentiments come from a good place: people want to say that they see and treat everyone equally without regard to their ethnicity. Some people use these phrases in defence of their behaviour: "I don't see race, so how can I possibly be racist?"

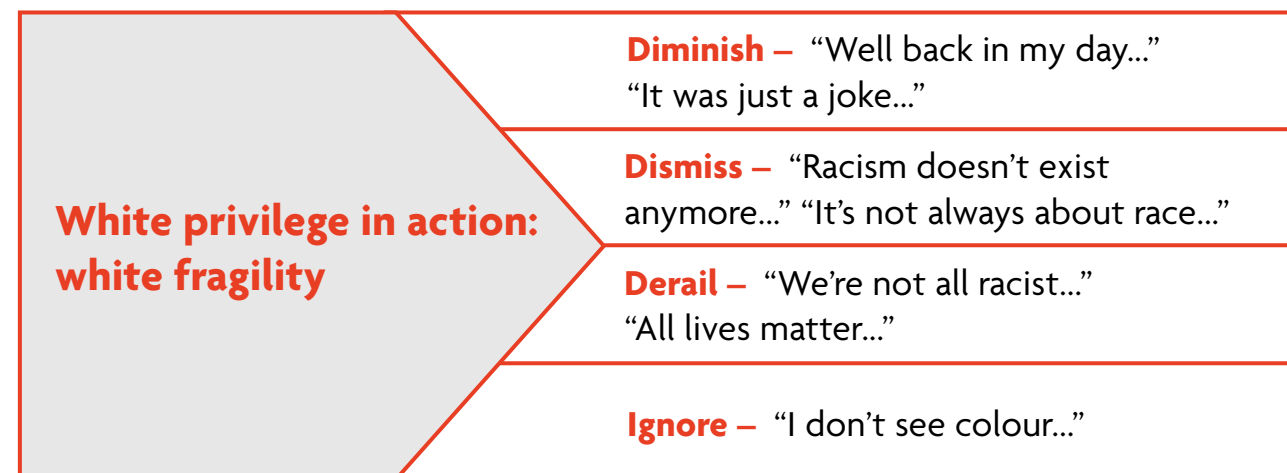
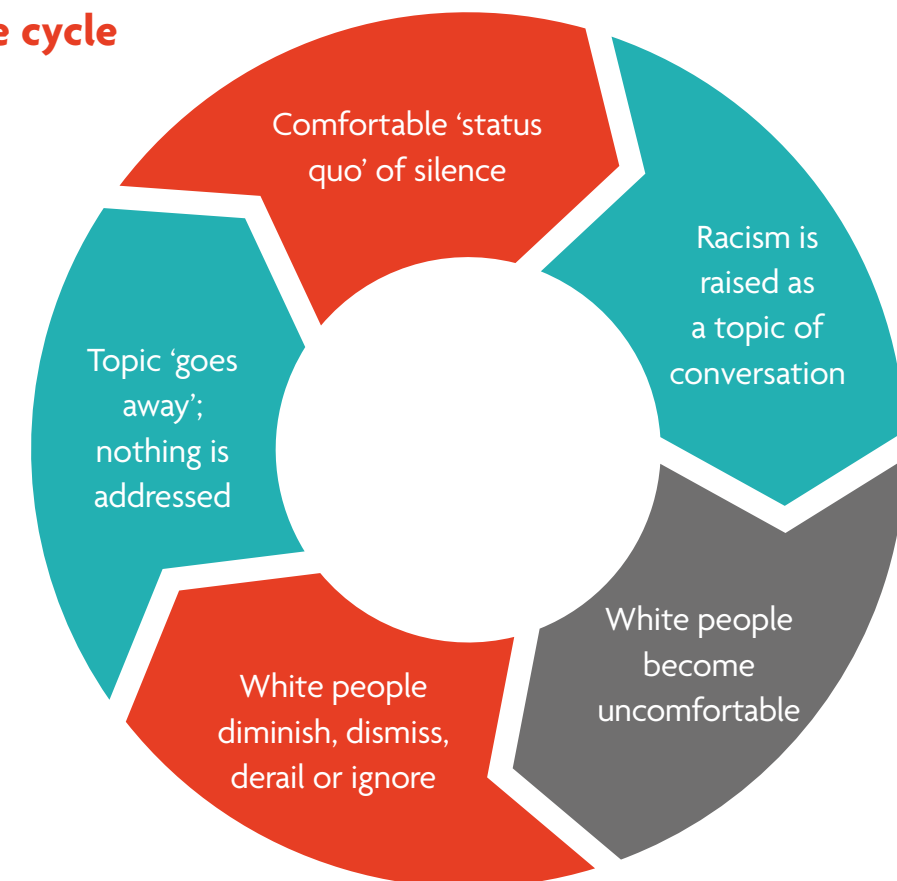
The problem with this type of colour-blind approach is that it doesn't help solve

racism. Instead it's a refusal to acknowledge that someone's ethnicity can alter their life experiences and chances. It minimises or ignores their experience of racism – which is gaslighting. It's just one more expression of privilege: white people do not see racism because their race has never been a barrier. Their lack of awareness of racism has made them immune to it.

People from ethnic minority backgrounds do not have this luxury. From a young age they will have been aware of their race and its meaning. Throughout their lives, they will have been constantly reminded of it through overt racism, covert racism and the relative lack of opportunity afforded them in housing, work, healthcare and other areas of life.

When someone claims that they don't see colour, they're avoiding the conversations that white people find uncomfortable. How can they see racism if they refuse to see race? And if they can't see that there's a problem, how can they play a part in solving it?

Break the cycle



The expectations we hold, and their impact

Our workplaces are not immune from the racism in our wider society. We see this in the attitudes of some of our colleagues (hands up if you've never had a report of overt racism in your organisation?), and we see it in the make-up of our organisations and in employee career trajectories. Even in organisations that exhibit no overt prejudices, there is often a failure to treat ethnic minority employees in the same way as white employees.

How can we know this? The evidence is usually in the level of representation of ethnic minorities in a organisation. For those who delve deeper, there's always more evidence in the detail of workforce data. Chances are, you'll notice some patterns. The next step is to go further into the data to understand why this is happening. Here are some questions to ask:

- Are certain people held to different standards and expectations than others are? For example, are some people less able to make honest mistakes? Are they allowed to behave in the same way as others?
- Are assumptions being made about certain people's ability? Or about their commitment to your organisation?
- Are they expected to do more admin-related work than others who do the same job?
- Do you allow certain people to voice their opinions, and expect others to be silent and compliant?

These questions lead us on to the stereotypes and the pigeon-holing:

- Black people are always brilliant at music and sports.
- South Asian people are good at IT.

- South-east Asian women are compliant.
- Black men are intimidating and violent.
- South Asian women are oppressed.
- Black women are aggressive.

Everyone knows about negative stereotypes, but how often do people stop to think about the impact of positive stereotyping? Or the idea of the 'model minority', and how it plays into our cultural attitudes? People often hold up model minorities as examples of 'striving' and 'doing well because they work hard', without acknowledging that everyone works hard but that some have bigger hurdles to overcome. These attitudes are so deep-seated they crop up in politics and public life, as shown by this [House of Commons briefing paper from October 2020](#).

The myth of meritocracy

A meritocracy is a system in which people receive rewards through achievement rather than social status or wealth or some other factor. In a corporate context, this means that rewards such as promotions or bonuses are based on what a person has achieved, not on who they are.

Most employers claim to operate a meritocratic system – to base employee promotions and earnings on achievement, performance and potential.

Meritocracy is framed as something that helps organisations be more successful – which is absolutely right. Its principles are founded on fairness and equity.

You can check how meritocratic your organisation is by asking questions like these:

- If we are a meritocracy, would we expect to see a degree of diversity throughout our organisation, especially at senior levels, that roughly reflects society as a whole?

- Is it possible that achievement – especially at senior levels, where objectives and goals are invariably high level and less detail-oriented – is not that easy to measure objectively?
- If it's difficult to assess achievement objectively, is there a chance that biases could creep into performance evaluations?

If your organisation is not broadly representative, the answer to all three questions is likely to be yes. If it isn't, the inference has to be that the organisation thinks that ethnic minorities are less intelligent or less capable than white people. And if that were true, no amount of anti-racist activity is going to change things.

A true meritocracy is absolutely what we should be aiming for in our organisations as it will produce the performance benefits that come from working with diverse teams and inclusive cultures. But most organisations are not meritocratic. Instead they hand out their promotions and pay rises to a select group of people who compete for them against each other. This is why there's a dearth of minorities at senior levels in organisations. It also explains why there are disproportionately few women at senior levels (women make up roughly 50% of the workforce, yet many organisations are still aiming low by setting a target of just 30% female representation at senior level).

How meritocratic is your organisation?

Probably not as much as you or your colleagues think. To find out, you need to look at the composition of your workforce. Is it reasonably representative of society? Who in your organisation is getting promoted? Who is being identified as talent? Who is being earmarked for development to give them opportunities to advance? Who is staying in your organisation and climbing its ladder? And who is leaving because they didn't get the opportunities?

To see how meritocratic – or otherwise – your organisation is, try Laura Liswood's Meritocracy Stress Test in the resources list. It will also give you plenty of practical ideas on how you can start to tackle the problem.

Preparing yourself for going on an anti-racism journey

Further information

- [Meritocracy stress test - World Economic Forum](#)
- [Bleached girls: India and its love for light skin - The Conversation](#)
- [One in 11 BME workers are now unemployed say TUC - HR Review](#)
- [Disentangling privilege from merit: a crucial step for true inclusion at work - London School of Economics blog](#)
- [Watch Jane Elliott's original brown eyes/blue eyes exercise](#). Jane once did the experiment in the UK – see the full programme on YouTube or an interesting clip [from twitter here](#)
- [The Anti-racist Educator's white privilege test](#)
- [What is white privilege? - GQ Magazine](#)
- [Confronting racism is not about the needs and feelings of white people - The Guardian](#)
- [Colorblind Ideology Is a Form of Racism - Monnica T Williams Ph. D.](#)
- [Tokenism, colour blindness and microaggressions: fighting for visibility in the fitness industry - The Independent](#)
- [The year we weaponised the model minority myth - Refinery29](#)
- [Confronting racism as a British Indian - Varsity blog](#)
- [Unpacking the invisible knapsack - Peggy McIntosh](#)

Footnotes

- ¹ <https://www.bbc.co.uk/news/magazine-29701767> – includes examples of how Winston Churchill's racist views informed his decision-making.
- ² The employment rate for black and minority ethnic (BME) groups is 62.8%, compared with an employment rate for white workers of 75.6%. For some ethnic groups the gap is worse: the employment rate for those from a Pakistani or Bangladeshi background is only 54.9%: McGregor-Smith Review (2017)
- ³ <https://news.sky.com/story/lloyds-of-london-and-greene-king-apologise-for-slave-trade-links-12009342>
- ⁴ <http://www.nationalarchives.gov.uk/slavery/pdf/britain-and-the-trade.pdf>
- ⁵ [How many Britons are descended from slave owners?](#)
- ⁶ <https://www.theguardian.com/world/2015/jul/12/british-history-slavery-buried-scale-revealed>

Taking an anti-racist approach to life – and work – is not easy. All those centuries of racism have seeped into our collective psyches – into what we think and how we do things. So it would be naïve to think we could become anti-racist without putting in some serious hard work and self-reflection. Anti-racism is, however, a fundamental element of societal fairness and justice, which makes it a task worth doing.

Here are some tips to help you succeed:

- As well as educating yourself on anti-racism, you need to understand that the work is active – which by definition means you should be 'doing' something. People who are 'not racist' effectively watch the racism happen around them. They say nothing and do nothing, which makes them complicit.
- Becoming a truly anti-racist person is a lifelong journey. You'll make mistakes; you'll be inconsistent. You need to know this is OK – it's a journey and nobody is perfect. Reflect on your mistakes, change what you can, apologise if necessary, and move on. It's like changing any habit: you might fall off the wagon but that doesn't mean you should give up.
- Reflect on your own personality; be self-aware. Are you someone who is happy to have constructive debates, to think about ways to improve, to hear other people's perspectives? Are you someone who prefers to avoid conflict? How do you learn best? How do you take in information? The

answers will help you plot your own best route forward.

- You have to know yourself first, before you can understand others. Then you can begin to see what's wrong – the systems and structures that support racism.
- What support will you need? Reflection time? Practical support? Coaching? A sounding board? A trusted person or group you can say anything to?
- How resilient are you? Are you empathetic towards yourself? Make sure you know how you will practise self-care when things feel tough.
- Know your starting point – understand your own biases. Everyone has them, but you can't mitigate them if you don't know what they are. Know your strengths and weaknesses; capitalise on the former and develop the latter. For example, you might be great at influencing people, but need to work on threading relevant data into your conversations.
- How easy do you find it to speak up when something is not right? What if the person who has said or done something wrong is senior to you (in status, age or any other hierarchical scale)? Do you feel comfortable dealing with things in the moment? How?



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If you're feeling defensive or uncomfortable, take some time to reflect on why, and where that might be coming from. Learn to stop putting yourself and your feelings at the centre of a conversation that should be about others.

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Have you thought about how you could deal with events in a way that works and feels authentic to you? You don't need to be confrontational – and sometimes you don't even have to name the thing that's not right. Sometimes it's as simple as not laughing at a joke or using your body language to signal something is not OK.

- Be curious. Be willing to make mistakes and to learn from them (the growth mindset¹).
- If you're feeling defensive or uncomfortable, take some time to reflect on why, and where that might be coming from. Learn to stop putting yourself and your feelings at the centre of a conversation that should be about others.
- Reflect on your own behaviours, beliefs and backgrounds. Think about how they – and the power they afford – may have contributed to inequity. Take accountability for the part you have played, and work to change things. Talk to others and encourage them to follow your lead.
- You have to educate yourself. Do not expect friends, colleagues or family to describe their experiences or to revisit trauma to demonstrate the experience of being an ethnic minority person.
- Educating yourself doesn't need to be dry or time-consuming. Some of the best learning comes in bite-sized pieces and non-traditional formats. It could be equipping yourself with the right language, or learning more about the history of racism and anti-racism. For example, take another look at the 'going for an English' sketch from Goodness Gracious Me.

Further information

- [Anti-Racist Ally: An Introduction to Activism and Action – Sophie Williams](#); a good introduction to being an ally, with lots of practical advice.
- [The Other Columbus: Antiracism work is supposed to be hard - Scott Wood](#)
- [The voices behind the UK's anti-racism protests - The Guardian](#).
- [White allyship: what it means to me - Michael Jannetta](#)
- [How white people can start their journey to being anti-racist - Debra Allcock Tyler](#)
- [What having a growth mindset actually means - Carol Dweck](#)
- [The make up of the media - Reuters](#)

Footnotes

- ¹ <https://hbr.org/2016/01/what-having-a-growth-mindset-actually-means>

Barriers to anti-racism in your organisation

Culture change can be difficult. However you approach it – through a big bang or incremental changes – there will always be some people who don't want to get on the bus.

Here are some of the objections you're likely to come across, together with ideas on how you can counter them:

Objection - Anti-racism is political.

Counter idea - No it is not. This is an issue of social justice and equality, which transcends politics. It is about fairness for everyone.

Objection - We don't discriminate, we're a meritocracy.

Counter idea - A meritocracy is still prone to the influences of personal bias. Even the most transparent of processes involves elements of subjective decision-making, which is where biases can subvert the process.

Objection - We like hiring people we know, because that way we know they are good, which really means "we're looking for someone who will be a good 'cultural fit' for us".

Counter idea - This approach risks hiring people who look and think like the existing team. It leads to group-think, which inhibits high performance.

Objection - We hire based on talent not ethnicity (or any other characteristic).

Counter idea - If that were true, the organisation would have diversity at every level, and high employee-engagement scores relating to inclusion. The data will reveal the truth.

Objection - Why do we need to explicitly say we're anti-racist? There's no penalty for not spelling things out.

Counter idea - It depends what people consider a penalty. By not taking an actively anti-racist organisational stance, the organisation risks:

- Losing talent that regards inclusion and diversity as important factors when choosing their employer.
- Unwittingly choosing not to perform at its best.
- Allowing racism to creep into its organisational culture. This will ultimately have a negative effect on staff morale and wellbeing, leading to increased absence and poor performance.
- Legal and other claims.
- Damaging its brand reputation from the point of view of customers, service users and employees.

Objection - We don't have the resources or the time to focus on anti-racism. Right now, this is the least of our worries.

Counter idea - If anti-racism – or inclusion – is a corporate value or behaviour (inclusion often is), it should receive the same consideration to budget and resources as any other work stream. Nevertheless, an organisation can still make big changes incrementally. For example, it should consider anti-racism and inclusion whenever it reviews its policies or processes, which tends to be a cyclical task. Eventually anti-racism becomes standard practice.

Objection - We aren't a racist employer, so why do we need to be anti-racist?

Counter idea - How does the employer know that it's not racist? There may be no evidence of overt prejudice, but that doesn't mean that all groups are treated equally. Only by looking at its data can an organisation understand how it's performing.

Objection - We keep trying to hire black and brown people, but we can't find any who are talented enough.

Counter idea - Why does the organisation think this? Use the organisation's own data to understand what's happening. For example, are there certain points in the application process where black and brown people fall away? Is the employer advertising roles in the right places? Are its adverts potentially excluding certain people? And at interview, are people judging applicants based on what they regard as professional dress or behaviour? Are they influenced by applicant names or educational backgrounds?

If there's a genuine pipeline issue (for example, where technical qualifications take many years to acquire), develop a plan to deal with it.

Objection - We've done enough: we've posted on social media, have been through unconscious bias training, and donated funds to an anti-racist charity.

Counter idea - This is good but not helpful if it hasn't solved structural racism within the organisation. Active anti-racism means making change wherever the organisation has the power to do so.

Objection - I'm not prejudiced or racist.

Counter idea - The person who says this may not personally be prejudiced, but by not speaking out and changing the things that are in their power to change, they are perpetuating a system in which some people benefit to the detriment of others.

Objection - I don't know what I can do to help.

Counter idea - These are people you need to work with constructively, perhaps reframing the message in ways that help them understand the issues. Or show them other routes through which they can contribute. Reassure them that they will have support, and that it is normal to make mistakes.

Ultimately, being anti-racist takes effort and a willingness to give up the privileges afforded by being white. If it was easy to change the way that power structures influence peoples' lives, we wouldn't have a problem with racism.

What is intersectionality?

Some other ways to create change or persuade your employees of the need for change

- Be clear about where you're heading, and then get on with it. Your employees have signed up to your corporate values and behaviours, and to your governance codes of practice, which include the legally enforceable aspects of anti-racism. You can use behavioural nudges within your work, perhaps by showcasing inclusive practices in your organisation etc. The silent majority will have no problem with this approach; those who do object will soon find that they have to comply or leave your organisation.
- Explain why anti-racism is important to your organisation: aligns with your values, improves performance etc.
- Explain the what's-in-it-for-me? aspects: justice, fairness, better performance, other organisational benefits etc and how they will improve the workplace for everyone.
- Use facts to counter or quell internal challenges. For example, if you say that your organisation is likely to perform better, share the research that proves it. If you are faced with the argument that you are already a diverse and inclusive organisation, use internal data to demonstrate your reality.

Further information

- [Everyone wants an anti-racist workplace but no-one wants to speak up - Forbes](#)
- [Is cancel culture really just long-overdue accountability for the privileged? - Forbes](#)
- [The racism of the 'hard-to-find' qualified black candidate trope - Stanford Social Innovation Review](#)

Intersectionality is a term coined by Kimberlé Crenshaw. The word, which emerged from ideas connected with critical race theory, makes the point that no social identity characteristic exists independently of any other. Every person has numerous identities: ethnicity, gender, sexuality, socio-economic background, physical or mental ability, and so on. Their characteristics – or diversity factors – do not exist in isolation.

An awareness of intersectionality helps people understand the different ways that particular groups experience life and work. The experiences of a heterosexual black woman, for example, are different to those of a gay Jewish man. The effect of diversity factors is cumulative: people with multiple factors are likely to experience more discrimination than those with fewer. A white woman, for example, may well experience sexism, but a black or brown woman is even more likely to face sexism in addition to racism (and perhaps other types of discrimination, such as religious belief). It is very difficult to separate the types of discrimination people with more than one diversity factor experience – particularly in cases of covert discrimination or microaggression – because their characteristics are not independent.

When you take an intersectional approach to your anti-racism work, you see that different groups have different experiences. You understand that some are more at risk

of experiencing harm than others. Which is why trans people of colour experience racism (including from the LGBTQ+ community) as well as transphobia in their workplace and in society¹.

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An awareness of intersectionality helps people understand the different ways that particular groups experience life and work.
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Crenshaw's research showed that the more intersections a person has, the more at risk they are of becoming 'invisible' – of not being heard. There's plenty of academic research to show that humans dislike complexity; intersectionality is an outcome of that aversion. Knowing why some groups are more at risk than others helps people in their allyship. For example, if you design your policies to work for those with the most intersections, they'll probably work for everyone.

When you appreciate the various characteristics that make a person who they are, you're better placed to understand how you can create real equity in your organisation. Simply increasing the number of ethnic minority people (or people with any other characteristic) will not create an environment that's inclusive, fair and welcoming for everyone. If you don't also make your organisational environment inclusive and psychologically safe, you'll struggle to retain these employees.

Questions to ask about yourself and your organisation

- How do different types of people experience your workplace? You could think about culture, behaviours etc, but you should also review your data. For example, is a particular ethnic minority more or less likely to be in senior roles? Or to work in a particular area of your business? Is someone from another group less likely to pass their probation? Or more likely to be subject to performance management for relatively minor infractions?
- Consider your own intersectionality. How do your various characteristics interact with your ethnicity: gender, sexuality, socio-economic background, disability?
- How will you ensure your organisation's policies, processes and practices treat everyone equally, and in particular those most vulnerable to discrimination?

To conclude, intersectionality is understanding the needs, challenges and experiences of people with a range of characteristics. Intersectionality tells you that what's needed to create equity in your organisation will not be the same for everyone.

Further information

- [Kimberlé Crenshaw describes what intersectionality is](#)
- [Interview with Kimberlé Crenshaw on 'Intersectional Feminism'](#)
- [Asif Sadiq on race inequality, intersectionality and the journey to belonging](#)

Footnotes

- ¹ https://www.gires.org.uk/wp-content/uploads/2016/02/BAME_Inclusivity.pdf.

Subtle acts of exclusion and gaslighting

What are subtle acts of exclusion (microaggressions), and where did the concept come from?

The language we use to describe casual, often imperceptible, acts of discrimination has changed. The word 'microaggression' is the preferred academic term, but that can be divisive in ordinary conversation. Few people know what a microaggression is; it sounds like a tiny act of aggression. To describe an action as a microaggression immediately puts people on the defensive, which impedes their ability to understand the nature of the action.

That's why many people prefer to call them 'subtle acts of exclusion' – or SAEs for short. The SAE is a much clearer description of what takes place. It doesn't need explaining because it means 'what it says on the tin'.

The idea of microaggression comes from work undertaken during the 1970s by Chester M. Pierce, a Harvard University psychiatrist. He used it to mean the indirect or subtle discrimination of marginalised groups.

Dr Tiffany Jana and Dr Michael Baran extended Pierce's work. They define SAEs as verbal and non-verbal acts that serve to exclude people by subtly telling them that they 'are not normal', 'don't belong', 'are inadequate' and so on. SAEs are rarely intentional. Even the best of us occasionally commit them.

SAEs come in numerous forms: stereotypes, objectifications, negative assumptions and positive assumptions (for example, the notion of the model minority can be just as harmful as a negative assumption). They are insidious

and damaging to the people who experience them – and to your organisation.

What does an SAE look like?

Verbal examples

Saying things like 'you speak good English' to someone who was born here.

Asking 'where are you really from?' to anyone who is not white.

Making jokes about people from certain backgrounds always being late, having smelly food etc.

Asking questions or making comments based on the questioner's own stereotypes.

Denial of any prejudice when someone is picked up after committing an SAE.

Questioning lived experiences.

Verbal SAEs are often dismissed as banter – harmless stuff.

Non-verbal examples

Assuming that the white person in the meeting is the leader or decision-maker.

Interrupting people in meetings or failing to acknowledge their ideas or contributions but recognising identical contributions when presented later by other people.

Leaving people out of meetings and discussions that are relevant to them.

Inviting everyone to lunch apart from a particular person, using the excuse that it's social not work-related.

Having different expectations of various people based on stereotypes e.g. Asian people are hardworking and meek, so it's okay to dump extra work on them.

SAEs are by far the most common expression of racist attitudes. People from all backgrounds experience them daily online, in the media and in face-to-face encounters at work and at social gatherings.

Racial gaslighting

The term gaslighting comes from the 1944 film *Gaslight*, in which a man slowly convinces his wife that she is going insane by telling her she is imagining what is happening to her. Gaslighting is a form of psychological abuse. Racial gaslighting is a similar type of abuse based on race, in which a white person dismisses, diminishes or otherwise explains away the experiences of a person of colour. It is a reaction to reports of SAEs and other discriminatory behaviour – and a form of SAE in itself. It is problematic because it leaves people questioning themselves and their own experiences.

What does gaslighting look like?

On the face of it, the phrases people use for racial gaslighting seem innocuous. People repeat them so often, many have become clichés. The one thing they have in common is an attempt to undermine the recipient's perception of the experience. The speaker is denying that what happened is racist and they're being racist by spinning things round: in effect, they're saying "It's not me, it's you." Here are a few common examples:

- I think they were only joking / That's just banter
- It wasn't a big deal
- Why do you have to make everything about race?
- That wasn't about race, you should try to fit in more
- I don't think that person was being racist / I don't think people are racist any more
- Are you sure that was racist? / I don't think that's what they meant / You must be imagining it
- You are playing the race card
- I think it is you that is being racist

Why are SAEs and gaslighting harmful?

The effect on people who experience SAEs and gaslighting is lasting and negative. This pervasive form of drip-drip racism makes it harder for people from marginalised groups to perform at their best. While each individual act might seem like an inconsequential, shrug-it-off event, their cumulative effect is profound. Over time, the person on the receiving end begins to internalise their effect.

SAEs and gaslighting are harder to spot than overt racism, and can sometimes be impossible to describe or document. As a result, when people report them, they're often not believed. Because of this, many don't even bother. SAEs and gaslighting are stressors, making people feel that they do not belong; they can feel like bullying. The intent of the person committing the acts might not be bad, but the impact of their words and behaviours is.

Those who experience them can end up feeling like they don't belong and that they will never belong. They may also feel that they have nothing useful to contribute, which means that they stop engaging and

the organisation misses out on valuable ideas and thinking.

How do you stop them?

To eliminate SAEs and gaslighting you have to make it clear that they are not acceptable in your organisation. To ignore them is to let them become part of your everyday culture, causing damage to your organisation and its reputation. Allowing them to continue without consequences is likely to lead to more overt discrimination in your workplace.

Ideas for tackling SAEs and gaslighting:

- Understand what SAEs are. Learn to spot them, challenge them, and spread the word so that your employees also know how to deal with them. Bear in mind that everyone has their own unconscious biases and that they have to make an effort to ensure their biases do not prompt their own SAEs.
- Actively listen to peoples' lived experience when they report SAEs and gaslighting behaviour – and believe them.
- Put robust policies, processes and practices in place to support those who report SAEs and gaslighting after experiencing or witnessing them and be transparent about your processes. Apply them without exception.
- Clearly communicate these policies, processes and practices: explain how people can report, what you will do, how you will support those who experience SAEs and gaslighting, and manage those who commit them (remembering, of course, that a single conversation may be enough to help the perpetrator understand their impact and stop the behaviour). Also be clear about your approach to repeat offenders.

- Be clear about the language and behaviours you expect in your workplace. You are not responsible for changing peoples' underlying racist beliefs, but you are responsible (under the Equality Act 2010) for ensuring that they're not displayed in any way within your workplace.
- Ensure your leadership team is 'walking the talk', leading by example and holding their own teams to account.
- Give your employees the tools to:
 - Understand and identify SAEs and gaslighting, whether committed by themselves or others.
 - Challenge appropriately – in the moment, in private directly afterwards or by reporting to HR or a line manager. Help people to feel comfortable about these conversations: you could start by talking about an occasion when you realised you were committing an SAE, and what you did about it. Honesty will help you to build trust and a more inclusive environment.
 - Challenge themselves when they realise they're repeating these types of behaviours.
- Think about the opposite approach: committing subtle acts of inclusion (SAIs). Here's how they could look in your organisation:
 - Give everyone the space to speak or share their ideas in meetings, then make sure the contributors get the credit.
 - If you notice someone taking credit for an idea that's already been suggested by someone else, say something like "I'm really pleased that we're considering XX's idea."
 - If you spot people making other types of SAE, have some phrases ready to deal with them – in the moment or in private later.
 - Show that you put equal value on everyone's contribution within your team.
 - Create psychological safety within teams and within your wider organisation.

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Actively listen to peoples' lived experience when they report SAEs and gaslighting behaviour – and believe them.

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- Get your leaders to role-model SAIs.
- Create channels for employees to feed back their experiences, celebrate good practice and raise concerns.
- Take reports of SAEs and gaslighting seriously; hear complaints and investigate.

Further information

- [Dr Derald Wing Sue discusses what a microaggression is, how it manifests itself, how it impacts people, and what can be done to address it](#)
- [Where Are You From? The Game - BBC3 Comedy](#)
- [Subtle Acts of Exclusion - Dr Jama and Dr Baran](#)
- [Going for an English \(Goodness Gracious Me\) - BBC](#) and [This article explains key takeaways from the sketch](#)
- [Like death by a thousand cuts: how microaggressions play a traumatic part in everyday racism - The Independent](#)
- [Death by a thousand cuts: how to challenge a microaggression culture - Chartered Management Institute](#)
- [When and how to respond to microaggressions - Harvard Business Review](#)
- [What is racial gaslighting? - BBC Futures](#)
- [UK report on race is a masterclass in gaslighting - The Financial Times](#)
- [As an Asian-American, I'm tired of being racially gaslit by my peers - Jennifer Li](#)
- [How racial gaslighting invalidates my experience as a black woman - Sophie Williams](#)

Black Lives Matter v Marxism

What is everyone so het up about?

Ever since the Black Lives Matter (BLM) movement gained traction in the UK during the summer of 2020, many people – including public figures – have objected to associations between BLM and anti-racism on account of BLM's perceived links to Marxism.

We've provided some context and background to help you talk about the subject.

Black Lives Matter – some background

- The Black Lives Matter organisation was founded by US community organisers after the murder of Trayvon Martin in 2013.
- The wider Black Lives Matter movement has grown into an international anti-racism movement. It does not have any formal political links, including to Marxism.
- One of the organisation's co-founders stated in a 2015 video interview that she and another co-founder were “trained Marxists”. This has given many opponents of BLM (particularly in the USA, and also in the UK) the opportunity to politicise its social-justice conversation in an effort to reduce support for BLM. ‘Fake news’ has amplified the political narrative by linking the two.
- The co-founder's statement does not mean that the BLM organisation or the BLM movement are based on Marxist values. BLM is about social justice, not political ideology.
- In the USA, where BLM was founded (and where it is focused), it is broadly supported by Americans – most of whom would not consider themselves to be Marxist.

- There is no evidence that BLM in the UK has any links to Marxism or to the US BLM organisation. On its UK website, BLM says it has no links.

Marxism – some background

- The Marxist movement reflects the views and philosophies of Karl Marx. It has its roots in early communist and socialist thinking.
- Here is a brief explanation of Marxism: <https://www.youtube.com/watch?v=W0GFSUu5UzA>.
- Marx believed that the capitalist society of the 19th century was weighted in favour of landowners, factory owners and other ‘bourgeois’ groups. He said this should change.
- His concept of communism is different to the one that took root in the communist systems of Eastern Europe during the 20th century, and to its perceptions elsewhere in countries such as the USA, following the Cold War.

So what has this got to do with BLM?

In the USA, anti-communism has been a long-standing justification for labour exploitation and the suppression of labour organisation (e.g. unions etc) in the pursuit of capitalism¹. Communism and socialism have come to symbolise ‘evil’ and are seen as a ‘threat to the American way of life’. That makes them a useful political scare tactic to win support for opposing policies and views. At the core of the ‘American way of life’ is the idea that someone can come from nothing and achieve anything; it reflects a particular cultural outlook.

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BLM is not a political movement; it's a social-justice movement aimed at creating equality for black people.

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In the UK and Europe, which are both socially and politically to the left of the USA, people tend not to think of Marxism, communism or socialism as evil, except in their most extreme manifestations. This is probably a result of our geopolitical landscape, and the fact that many of these philosophers were European. Marx, for example, lived in Germany and London. And it was in London where the most enlightened people of his era were living.

Many European countries have socialist values to some degree, no matter what their current politics. In the UK, we have a long history of post-industrial-revolution socialist values, expressed through trade unions, social housing, the NHS and our education system. In politics, the Labour party's values have been traditionally socialist-leaning.

In brief

- BLM is not a political movement; it's a social-justice movement aimed at creating equality for black people.
- Everyone has their own individual political and economic views. Some lean towards capitalist/individualistic concepts; others towards socialist/collectivist ones.
- The US viewpoint is different to ours. Americans have their own complex set of historical, cultural and geopolitical circumstances that have formed their present-day political outlook.
- The "BLM is Marxist and therefore bad" message is not rooted in fact. Those groups that make the BLM-Marxism connection to oppose anti-racism have never carried out any serious research into the BLM movement, Marxism or socialist values.

Further information

- [America's obsession with rooting out communism is making a comeback - The Guardian](#)
- [A brief introduction to Marxism - The Curious Classroom](#)
- [A well-researched exploration of the BLM movement - Yorkshire Bylines](#)

Footnotes

- ¹ Spider Web: The Birth of American Anticommunism by Nick Fischer (2016, University of Illinois Press) https://blackwells.co.uk/bookshop/product/9780252040023?gC=5a105e8b&gclid=CjwKCAjwybyJBhBwEiwAvz4G76xkg73YgrmAk84Eb0fXEiG7lwTqTZR5AleQ0GiPXELRI5b3NcvomRoC-ZsQAvD_BwE

Critical race theory

What is it? Where did it come from?

Critical race theory (CRT) is a concept created by a group of academics, including Kimberlé Crenshaw (who also coined the term 'intersectionality') and Richard Delgado (an American legal scholar teaching civil rights). Although CRT appeared in the late 1980s/early 1990s, its academic roots date back to the 1970s. The theory aimed to understand how (in the USA, initially) racism continued to exist despite the introduction of so many anti-discrimination laws. The theory has a loose framework and a set of principles that have since been picked up globally. It now relates to a wider range of racialised minorities than it originally did.

CRT has several key principles; the main ones are outlined below:

- Racism is not a series of one-off incidents of prejudice. On the contrary, it is part of our everyday lives, influencing our thoughts, personal relationships, workplaces, educational systems and our legal systems. Racism is embedded in our institutions, systems and culture – in other words, it's structural. Since people tend to mix in homogenous groups and are more likely to seek out information directly related to themselves, merely having empathy is not enough to change racism.
- Race is a social construct, i.e. humans are just humans with varying levels of melanin. Ethnicity confers no physical or mental differences.

- We must tell the stories and histories of people of colour because they're so often left out of the narratives of white-majority countries.
- We must take a race-conscious approach to social transformation, instead of the traditional approach that favours rationalism and legal equality. In other words, we should challenge the validity of concepts such as colour-blindness and meritocracy.
- We need to take intersectionality into account to understand the needs and challenges of people from different races, sexes, classes, etc. And we need to understand whose needs are promoted and whose are excluded. Since each group has different needs and wants, they should all be taken into account independently. For example, what a heterosexual black woman experiences or needs is very different to what a LGBTQ+ East Asian man might need.
- The advancement of civil rights for black people in the USA happened because it suited the self-interests of the white elitists of the time. For example, continuing racial discrimination could have had an effect on the country's international relations and therefore its financial/economic interests.

You don't need to know too much of the intellectual background of anti-racism work to understand that inclusion, diversity and equity are grounded in CRT. By applying CRT tenets,

for example, we saw that Britain's historic failure to acknowledge the contribution of Commonwealth nations to World War 1¹ and World War 2 has left many British people with a distorted understanding of history.

CRT doesn't give people direct answers to questions or provide them with different versions of history. That's not its purpose. Instead it challenges people to question whether the information they have (history, facts etc) is the only truth... to wonder what might be missing... to ask what hasn't been said. Is the information biased towards one area of activity or one particular output? Is it another example of history having been written by the winners?

Many of us will recall being told as children not to believe everything we read or hear. CRT is a way of keeping that healthy scepticism alive. It helps us to be inclusive and to recognise the truths behind the headlines.

Why the big fuss? Why are we talking about it?

There's been plenty of fuss over the use of CRT in teaching practices, mostly in the USA, but also [here in the UK](#). The reality is that, in both countries, most teachers aren't aware of CRT. More to the point, CRT is not a topic that can be taught in an easy or straightforward manner – or even at school level. The furore seems to be linked to an increased interest in giving school children a broader view of history – rather than focusing on the traditional colonialist story. For example, we have only recently begun to learn that both world wars involved many black and brown people from the British colonies. Before that, they had been whitewashed out of the history taught in schools. This lapse has now been recognised, and the education sector is beginning to look at other gaps in the record to make sure that what we teach

our children is not limited to the white British experience. In Wales, for example, all schools now teach black history.

What is happening in the USA, and how is it relevant to the UK?

Those who oppose anti-racism are using CRT to discredit anti-racism in education, in the workplace and across society. It is one of several attempts to delegitimise or derail conversations about race, prejudice and discrimination in the UK (the idea that Black Lives Matter is Marxist is another delegitimising narrative). The media tends to fuel the fires. Even broadsheets miss vital context and detail in favour of outrage and clickbait.

Since CRT's purpose is to understand how society perpetuates racism, it shouldn't be controversial. We've been talking about the existence of structural racism within the UK since at least the 1990s, and particularly since the [inquiry into the murder of Stephen Lawrence](#). The presence of racism in the UK is generally accepted, as is the idea that we should be working to remove it.

The outcome is that CRT is itself now being used by racist people and those who benefit from racism as a reason for maintaining the status quo. We can only guess that this might be rooted in some type of fear. Whether that's the fear of losing privilege or the fear that equity might mean that they will be treated less favourably. In reality, the anti-racism movement is about achieving equity. Those with additional or unwarranted privilege may find themselves in a worse position than that which they're used to. To quote Franklin Leonard: "When you're accustomed to privilege, equality feels like oppression. (it's not.)"

Further information

- [Kemi Badenoch: The problem with critical race theory - The Spectator](#)
- [What critical race theory is - and isn't - CNN](#)
- [What is critical race theory? And why are racists afraid of it? - Al Jazeera](#)
- [Lost empire: its a myth that Britain stood alone against Hitler - The Guardian and The Observer](#)
- [Factfile: Commonwealth and Allied Forces - BBC](#)



How to: adopt anti-racist and inclusive language

Words have power. For centuries people have used them to uphold power structures in their societies. So maybe it's time to rethink which words or phrases are acceptable.

All languages change and evolve over time. But the pace of language change tends to be quicker in aspects of life that are changing fast. Science and technology are good examples. Words such as *unmute* and *voice assistant* are recent additions to the English language to describe ideas that didn't exist a few years ago. In the same way, social changes have influenced the language we use to describe race and race-related issues. But the language of race is different. It has consequences. Which means that it's up to the people from the communities that experience the effect of racist words and language to decide which words they're comfortable with. Inevitably there are differences of opinion. There's no one-size-fits-all approach. Everyone has their own preferences, and it's likely that these will continue to evolve.

When you take a moment to think about language development, you can see how those who don't experience racism have had the privilege of thinking certain words or phrases are harmless. They don't see the loaded meanings, nor have they felt the violence of, and behind, the words. So it's vital to get the language right and to kick out the derogatory words. It can, however, be difficult to keep up with the changing usage and perceptions of the terminology of a subject that doesn't affect you personally. But the more you engage in allyship, and

have conversations about race, the more comfortably up-to-speed you'll be. Read our guide on 'How to: challenge racism as active bystanders, allies and accomplices' within the first section of this toolkit.

We all make mistakes. If you are corrected for using a word that is out-of-date or pejorative, apologise and use the right word from now on. Bear in mind that language is fluid and that meanings can vary between cultures. In South Africa, for example, many mixed-ethnicity people refer to themselves as 'coloured', which would be considered outdated and offensive here in the UK.

Some words or terms are still the subject of debate. B.A.M.E. (Black, Asian and Minority Ethnic), for example, has been under discussion since at least 2015. If you intend to use terms like this in your internal communications, you should check with your employees (particularly those from ethnic minority backgrounds) which ones they're comfortable with. If you are writing to an external audience, explain why you're using your chosen terms. As a rule of thumb, it's best to describe exactly who you are talking about. Use a catch-all term only if you're talking about several groups. For example, if you're a HR professional writing about a data set, you might start with "we have X% ethnic minority employees", and then delve into the detail with "X% of these are South East Asian women" and so on.

Glossary: a brief guide to the vocabulary of anti-racism

Anti-black racism: A type of racism specifically directed at black people.

Anti-racist: Anti-racist behaviour takes place only when people take an active stance against racism; it does not apply to saying or doing nothing.

Accomplish: Someone who works to dismantle structures and systems that create or perpetuate racism, and whose work is informed by ethnic minority people. For example, a person in an organisation who engages with ethnic minority employees to ensure that the recruitment practices are free from racial bias.

Active bystander: Someone who intervenes or challenges when they see discriminatory – in this context, racist – language or behaviour. Active bystanders understand how their actions build an inclusive culture.

Ally: Someone who openly stands with an individual or group in a marginalised community. For example, white people who take part in BLM marches or actively champion anti-racism.

B.A.M.E. (Black, Asian and Minority Ethnic) or B.M.E (Black and Minority Ethnic): Umbrella terms used by government departments and HR teams to describe ethnic minority people, usually in the context of data analysis. Where possible, it is better to name the group of people you are talking about. For example Jewish men or East Asian women, whose experiences of race and racism are different.

Black, brown, yellow: We use black all the time in the UK. Some people do not like the word because it doesn't link to a geographical place in the way that Asian does, and can therefore feel derogatory.

Using brown to describe South Asian people (and others) is increasingly common in the UK – though some do not like it.

Yellow has long been a pejorative term for an East Asian person. However, it could be increasing in popularity – in *The Good Immigrant*, Vera Chok wrote: “I use the word ‘yellow’, offensive as many find it, because this is how I believe I’m seen. I use it because, while we can’t often tell what someone’s race is, we do see colour.” Best not to use it unless you are describing yourself.

BIPOC (Black, Indigenous and People of Colour): An American term that’s increasingly popular in the UK. However it doesn’t fit in the context and history of the UK, where indigenous people are not an ethnic minority.

British [insert ethnicity here]: Common in the USA (e.g. Italian American) and previously common in the UK (e.g. British Indian). Now typically replaced with terms that cover a wider group, such as South Asian, or black Caribbean.

Code-switching: Adapting language and behaviour to fit in with work and social situations where the unwritten rules are dictated by the white majority. In other words, not being able to be yourself.

Colour-blind: The idea that people can choose not to see colour and will therefore treat everyone the same. While it’s easy to see good intention behind this, the reality is that the racial disparities, discrimination, and racialised privilege within society are not seen – they are ignored – and therefore allowed to persist. Since heritage, culture and customs are often linked to race, the colour-blind approach is a failure to see the whole person – an unintentional but negative outcome.

Colourism: This is prejudice or discrimination directed at people with a darker skin tone.

Colourism can apply to people within the same ethnic group. Among the Indian community, for example, light-skinned women have historically been (and often still are) considered more beautiful and enjoy wider opportunities.

Diversity: Including or involving people from various social and ethnic backgrounds, and with varying personal characteristics such as gender, disability, sexual orientation etc.

Equity: Fairness in access, opportunity, experience, and outcome.

Ethnicity: Race and ethnicity are often used interchangeably. Ethnicity is the preferred word to describe people of various backgrounds and cultural heritages. Race is a socially constructed term with no scientific merit.

Ethnic minority: Used in the UK to describe anyone who is not white British. Can also be used to describe people from other white backgrounds, though this varies depending on context.

Inclusion: When people feel that they genuinely belong, that they’re relevant, and that they’re involved. They feel that their contributions to their workplace and society are valued and matter.

Intersection, intersectionality: The fact that we all have multiple characteristics which shape our life experiences, and that we should be mindful of how attitudes towards these characteristics compound discrimination. Intersectionality explains why an older black woman and a younger black man have different experiences – their experiences in life are not just about their ethnicity.

Microaggression (subtle acts of exclusion): Verbal and non-verbal acts that serve to exclude people, and subtly tell people that they are ‘not normal’, ‘don’t belong’, are

‘inadequate’, and so on. These acts not always intentional – many people don’t realise they are committing them.

Minority ethnic: Increasingly popular in the UK, probably due to being an element of the B.A.M.E. acronym. Feels like a description of an object rather than a person; can therefore feel dehumanising.

Non-racist: Non-racist behaviour is inactive behaviour. It means not engaging in racist behaviour, but it doesn’t challenge racism. A non-racist person may find racist jokes offensive, but they don’t confront the people who tell them in any way.

People of colour: Commonly used in the USA. While it seems to be falling out of favour there (for the same reason as B.A.M.E. is here), it’s becoming more popular in the UK. Some people find it offensive: an example of othering – in this context, setting up white people as the norm and thereby perpetuating superiority.

Performative action: Talking the talk, but not walking the talk. For example, stating that your organisation is committed to anti-racism but not doing anything about it. Performative action destroys trust among your ethnic minority colleagues and damages your consumer and employer brands.

Political blackness: Political blackness comes from the anti-racism movements of the 1960s to the 1980s. It was used as an umbrella term by people of all backgrounds who experienced racism. That’s why many people from other ethnic minority groups who lived through that era still refer to themselves as black. The term is declining in use; many people no longer know what it means.

Race: Race is a socially constructed concept. Historically it was used to assign certain characteristics and perceived physical

differences to certain groups of people, but it has no scientific merit or justification. Ethnicity is the preferred way to describe people of various backgrounds and cultural heritages. However race and ethnicity are still often used interchangeably.

Racist: A person or thing (e.g. a policy) that is prejudiced against, or antagonistic towards, a person or people on the basis of their membership of an ethnic group, typically a minority or marginalised group.

Racism: Policies, behaviours, rules etc. that result in a continued unfair advantage to some people and unfair or harmful treatment of others based on race. Can also refer to harmful or unfair things that people say, do, or think based on the belief that their own race makes them more intelligent, good, moral etc. than people from other ethnic backgrounds.

Reverse racism: The idea that people from the dominant ethnic group (in the UK: white British) can be discriminated against. Although this group can experience prejudice, they're unlikely to experience racism because that's linked to power structures in a way that affects life chances and opportunities.

Subtle acts of exclusion (microaggressions): Verbal and non-verbal acts that serve to exclude people, and subtly tell people that they are 'not normal', 'don't belong', are 'inadequate', and so on. These acts are not always intentional – many people don't realise they are committing them.

Tokenism: Making a symbolic or perfunctory effort to do something. For example, recruiting one or two senior leaders from an ethnic minority background to make it look like you have racial equity. But not working to embed inclusion and racial equity in the culture of your organisation.

White fragility: The discomfort of white people in discussing race and racism. Typical

reactions include: anger, defensiveness, feeling attacked, explaining things away, diminishing someone's experiences, switching the topic to other types of discrimination, invoking reverse racism, refusing to address the issue, or walking away.

White privilege: The lack of obstacles faced by white people in the UK resulting from their ethnic background (which is not to say that white people do not face other barriers in their lives and careers). An example of white privilege is the way that white people will see people who look like them in every single aspect of life; from work to media to education to politics. White privilege is not experiencing fear or suspicion of the police and other authorities based on a history of unfair and often illegal treatment.

White supremacy: White supremacy is the idea that white people are naturally superior to people of other ethnicities. It can produce overt prejudice, for example the National Front in Britain during the 1970s and 1980s or the racist tweets aimed at the England team's footballers during the Euros in 2021. White supremacy can be all-embracing. In many ways its ideals are subtly woven into the fabric of our lives, from our education system to our healthcare and workplaces, to what we see on TV shows and read in the news.

Further information

- [A guide to race and ethnicity terminology and language – The Law](#)
- [The language of inclusion – Blogher](#)
- [The coded language that holds women back at work – BBC Worklife](#)
- [Rejecting political blackness isn't an excuse to erase solidarity between South Asian and Black communities - Gal Dem](#)

How to: challenge racism as active bystanders, allies and accomplices

We all want and need to challenge racism in our workplaces. We want to change the behaviours and the language, as well as the organisational systems and processes that restrict the opportunities of ethnic minority people.

This is vital work, but it can't be done without everyone playing their part. Anti-racism is everybody's responsibility; all of us have to take action.

So how do we go about it?

1. Understand the roles people can play in eradicating racism at work

To support a programme of anti-racism in your organisation, there are three broad roles people can adopt:

Active bystander: Someone who intervenes or challenges when they see discriminatory (meaning racist) language or behaviour. Active bystanders understand how their actions help to build an inclusive culture; they believe in doing the right thing.

Ally: Someone who will stand with an individual or group in a marginalised community, and use their privilege to amplify the marginalised voices. Examples include white people taking part in the BLM marches or actively championing anti-racism.

Accomplice: Someone who works to dismantle structures and systems that create or perpetuate racism, and whose work is informed by ethnic minority people. An example would be a person who works with ethnic minority colleagues to ensure that the

recruitment practices in their organisation are free from racial bias. Accomplices take a step beyond allyship, though the two terms are often used interchangeably.

2. Improve your own knowledge of racism in the workplace

- Get to understand everyone's responsibilities under the Equality Act 2010 – to know who is protected, and from what. Be aware of how different types of discrimination can affect your organisation, the perpetrators and the victims.
- Seek out diverse opinions and experiences to broaden your understanding of anti-racism, particularly in a work context, and to benefit from a wider range of perspectives.
- Learn about the experiences of those who are different to you. You can do this through reading articles, blog posts and books (fiction or non-fiction), watching internet videos (YouTube etc) and TED talks, etc. Don't assume that ethnic minority friends and colleagues will teach you – the onus is not on them to resolve racism.
- Challenge your own internal biases and assumptions. Understand your blind spots and where they come from, and find ways to eliminate their influence on your thoughts and decisions.
- Be intentional: consider why you are doing something or saying something, and think it through carefully before you start.



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The truth is, genuine allyship is not kindness, it is not a charitable act, nor is it even a personal commitment to hold anti-racist ideals – it is a fall from grace.

Kelsey Smoot, in the Guardian

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3. Lay the groundwork in your organisation, especially among senior leadership

- Check that your HR policies are consistent with anti-racist principles, and that they support everyone against all forms of discrimination, including micro-aggressions and subtle acts of exclusion.
- Review your bullying and harassment, whistleblowing, etc. policies to ensure they are appropriate as well as transparent, and that they explain the procedure that follows each report.
- Think about your language, body language and behaviours and ensure you're demonstrating inclusion and anti-racism.
- Make sure that everyone is ready to hold each other to account. Remind yourselves to practice anti-racism and help each other to consider the negative impact of certain behaviours. Bear in mind that everyone makes mistakes. When that happens, apologise, correct yourself and move on. Remember that an apology means nothing if the behaviour continues.
- Ensure your leaders and executives embody these behaviours and lead by example – this will help your employees feel more confident that they, too, can do it.
- Be ready to support those who challenge racism when they see it; reassure active bystanders, allies and accomplices that you are with them.
- Think about how you will create a safe culture for everyone, including and especially those who come from ethnic minority backgrounds. Think about ways of creating an environment that's psychologically safe, that doesn't force

assimilation into the dominant culture, and that celebrates the diversity of everyone's contributions to your organisation.

4. Put your anti-racism programme into place

- Train your employees on anti-racism – including microaggressions and subtle acts of exclusion, bullying, harassment, victimisation, active bystanding and allyship. Work to improve their understanding of inclusion and anti-racism so that everyone knows exactly what your organisation stands for.
- Be clear about the behaviours you expect all employees to display, and that any discrimination will not be accepted. Deal seriously with all reports of racism, and avoid falling into the trap of maintaining someone's employment simply because they're a high performer.
- Encourage people to report instances of racism, and deal with them appropriately. Your case numbers will likely increase in the short term, but this will help you understand where your organisational culture is in terms of anti-racism and perhaps pinpoint specific issues.
- Encourage active bystanders, allies and accomplices. Explain to your employees what these behaviours look like in your organisation and let everyone know that they will be supported.
- Make everyone accountable for their behaviour. Let them know that there will be zero-tolerance for racist behaviour of any sort. This doesn't necessarily mean disciplinary procedures. People often don't understand the effect their language or behaviour has on others, but once they're made aware of it, they willingly change. But if there is resistance, you should not shy

away from a formal response. The rigour with which you respond gives confidence to those who experience racism that your organisation will not tolerate it.

How to be an active bystander, an ally or an accomplice at work

- Before you step in, check the situation – is it safe for you to challenge in the moment? Employers – you must work to give people the confidence that they will be safe if they challenge racism.
- Support the person to whom the racism was directed. If they want to share their experience, listen attentively. Should they decide to report the incident, your help or support could be useful. Or maybe you could point them towards other resources, such as HR, a staff network, the union rep or your employee-assistance programme.
- Use your body language to make it clear you don't approve of the behaviour – e.g. don't laugh or even force a polite smile when you hear a racist joke.
- Call out the behaviour – publicly if you can – and support the person to whom it was directed.
- Name or acknowledge the behaviour for what it is. For example, if someone repeatedly commits microaggressions or subtle acts of exclusion, discuss it with them; explain why it's unacceptable and be clear it needs to stop.
- If it's not possible to challenge the behaviour in the moment, change the subject. Move the conversation on, then follow up later with a direct conversation or a report.
- If you're in a group, more than one of you can challenge the behaviour. Sometimes it takes one person to call out the behaviour before others step in to provide support.

- Report the behaviour. Follow your organisation's policy for reporting incidents. It doesn't have to have been directed at you for you to report it.
- Finally, be kind to yourself. Standing up for what's right requires courage, and is rarely comfortable. Challenge in whatever way works for you – you don't always have to do it publicly or in a way that's confrontational.

Further information

- [Performative allyship is deadly \(here's what to do instead\) - Forbes](#)
- [Allyship and going beyond the hashtag - Joanne Lockwood](#)
- [A challenging conversation: how to tackle the status quo successfully - The Foundation Forum](#)
- [The bystander effect - Coolpsychologist](#)
- [Three ways to be a better ally in the workplace - Melinda Epler](#)
- [How to support witnesses of harassment and build healthier workplaces - Julia Shaw](#)
- [When and how to respond to microaggressions - Ella F. Washington, Alison Hall Birch, and Laura Morgan Roberts](#)
- [White people say they want to be an ally to Black people. But are they ready for sacrifice?- Kelsey Smoot](#)

Section 2: Building an anti-racist strategy

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Bringing your board, executive and leadership teams on stream

Anti-racism and inclusion have become a must-have rather than the nice-to-have that they used to be. Neither is about getting people to fit in, but about celebrating their individuality and their unique contributions.

Having an actively anti-racist culture isn't just the right thing to do: we now know it provides a competitive advantage through improved performance. It is easy to see how anti-racism will become a basic expectation.

The tips below are for everyone – for leaders looking to bring their colleagues on board and for activists hoping to persuade their leaders to take up anti-racism.

How to frame your message

Chances are, at least one – maybe several – of your leadership team will need persuading. They'll want to know why they need anti-racism within their organisation and why they should dedicate resources to your plans.

Prepare yourself by planning ahead:

- What is the key message you want people to take away?
- What are the objections or challenges you are likely to face? Work out ways to head them off before they derail the conversation.
- Consider your audience: what style of presentation do they like? Data? Storytelling? Written reports? PowerPoints?
- If you're working to convince a group of people, frame your message in ways that suit a broad range of preferences.

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Inclusion and diversity are critical factors Gen Z considers when deciding whether or not to join an employer

An extract from Deloitte's

Welcome to Gen Z report

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For example, you could start with the vision of what your anti-racist culture will look and feel like. Then get into the detail of how this will improve performance and the bottom line. Talk about future workplaces and how current and future generations are increasingly looking for organisations that share and demonstrate their values. Talk about the increasing demographic diversity of your locality or the country as a whole, and how your organisation cannot afford to miss out on talent. Cite data (e.g. the census), reports and research for those who need to see the evidence.

How to persuade and support leaders

- Be clear that you are talking about systemic change, rather than policing prejudiced thoughts. Explain that you already have clear policies and processes to deal with

prejudiced and discriminatory behaviour.

- Think about how you will support senior leaders to become champions of anti-racism and your inclusion strategy – and to be active and visible communicators and role models.
- Be willing to challenge your senior leaders; be a critical friend.
- Talk about how you will help and support or train them to build trust with employees when they have the difficult conversations, and to walk the talk generally.
- Create a safe space for them to ask questions about anti-racism and to build their skills, knowledge, and ability to be leaders of an anti-racist organisation.
- Help them to reflect on why inclusion would be personally valuable and inspiring, and link that to the organisational need for anti-racism action.

Economic benefits of anti-racism

There's more to equity than a moral and often legal obligation (via the Equality Act 2010). Research shows that there are performance benefits for inclusive and diverse cultures. For example, McKinsey¹ found in 2019 that the most ethnically diverse companies were 36% more profitable than the least diverse, compared to 25% for those with the best gender diversity. Unfortunately the UK is one of the poorer global performers for ethnic diversity at executive level².

Data shows that more inclusive cultures perform better in terms of corporate governance, creativity and innovation, problem-solving and employee engagement – and that it's employee engagement that unlocks valuable discretionary effort.

The consequences of not evolving into an anti-racist organisation

The evidence is clear: companies that fail to be inclusive and diverse are more likely to be poorer financial performers. In addition, there are other negative consequences:

- **Difficulty attracting and retaining talent**
People increasingly prefer to work for organisations whose values align with their own. Simply hiring more ethnically diverse people is not enough because they won't stay in cultures that are not inclusive. Which increases your recruitment costs at the same time as it degrades your employer brand. These are big factors in a post-pandemic, post-Brexit world.
- **Less robust operational performance**
A lack of diversity affects activities such as corporate governance, problem-solving, innovation, understanding customers etc. To use a simple example: the almost entirely white perspective of mainstream British journalism influences the way our media – and therefore we – see the world. The media's lack of diverse perspectives revealed itself when the Society of Editors released a statement saying “the UK press is not bigoted” – and drew a scornful response³.
- **Consumer alienation**
Consumers – especially younger ones – are increasingly drawn to brands that have similar values to their own. At the time of the last census (2011), the annual buying power of ethnic minorities in the UK was estimated to be around £300 billion. It's likely that the 2021 census will reveal considerable growth, especially since ethnic

minority consumers are often younger and of working age.

- **Reputational damage**

Incidents of corporate reputational damage following reports of racism are on the increase. They stem from instances of [individual prejudice](#) or from systemic or institutional issues, such as the 20% pay gap between white and black bankers 'reported by [Lloyds](#) when they published their pay gap report and outlined their race action plan.

Next steps

When you have agreement to proceed with building an anti-racist culture, you can start working on your vision, strategy and action plan for anti-racism. You can find more information and support in Section 1: Building an understanding of anti-racism and Section 2: Building an anti-racism strategy of this toolkit.

Footnotes

¹ <https://www.mckinsey.com/featured-insights/diversity-and-inclusion/diversity-wins-how-inclusion-matters>

² <https://www.consultancy.uk/news/24614/uk-and-us-lag-behind-global-progress-on-executive-diversity>

³ <https://www.pressgazette.co.uk/society-of-editors-diversity-meghan-harry/>

Further information

- [Now comes action: what next for anti-racism and business? - The CBI](#)
- [Why inclusive leadership is important for modern business - CEO Magazine](#)
- [The Equity Effect - report from Henley Business School](#)
- [How Gen Z is bringing a fresh perspective to the world of work - Forbes](#)
- [What employers need to know about Gen Z - Hays blog](#)
- [For Gen Z, a company's commitment to diversity is almost as important as salary - Intel report](#)
- [5 ways racism is bad for business, and what we can do about it - World Economic Forum](#)
- [Why racism is a business issue - Pinsent Masons](#)
- [The business case for diversity in the workplace - World Economic Forum](#)
- [Basecamp implodes as employees flee company, including senior staff - The Verge](#)
- [Welcome to Gen Z - Deloitte](#)
- [Move beyond the business case to end corporate racism - Bloomberg](#)
- [Diversity wins: how inclusion matters - McKinsey & Company](#)

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Female candidates increasingly want an accurate and honest impression of an employer's workplace experience and culture before deciding whether to join them. And what they're looking for is employers who WALK their diversity talk – including creating a workforce that reflects wider society and an inclusive talent environment where all employees can fulfil their potential. When considering a potential employer, 61% of women look at the diversity of the employer's leadership team, 67% at whether it has positive role models similar to them, and 56% at whether the organisation publicly shares its progress on diversity. So to win the fight for female talent, it's not enough for an employer to have an attractive talent brand: it's also vital to have an inclusive talent brand.

An extract from PWC's Female Talent Report

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Employee data and benchmarking

Evidence suggests that organisations increasingly support the idea that Government should make ethnicity pay gap reporting mandatory – presumably because they’ve seen and experienced the benefits of gender pay gap reporting. Many are already voluntarily publishing their ethnicity pay gaps in anticipation of it becoming law. Since reporting is voluntary, the level of detail and information available is variable.

If you are not yet looking at your own ethnicity pay gap, it’s time to start gathering your data. Knowing how you reward different groups of people is vital for understanding your organisation’s approach to inclusion and diversity, and to becoming an anti-racist organisation. If you don’t know where you are now, you won’t know what strategy or action plans you need to put things right. Reliable data will help you take an evidence-based approach to setting targets, monitoring progress and knowing when it’s time to up your ambition.

You might find gathering and analysing ethnicity data challenging. This is because there are many categories for ethnicity data, and it’s important to get these right. And you may find that employees are reluctant to share their ethnicity with you. The first step may be to build their trust.

In addition to data for pay gap reporting, you should gather and analyse a broader range of data to give yourself a fuller picture of your organisation. Some of that data will be factual. Recording employees’ ethnicities, for example, gives you a dispassionate overview of your company’s ethnic diversity. Other data will be more subjective. Gathering employee views on inclusivity within your organisation helps to explain what’s going on.

What data do you need, and what will it tell you?

Employee ethnicity is not the only data you need. If you don’t already, ask about all protected characteristics and any other pertinent information (for example, you may find socio-economic background a useful point to track). The more data you have, the richer the detail. For example, you may find that people with a particular characteristic or intersection are over-represented in senior roles, while others are under-represented.

You should track ethnic minority representation at all points of the employee lifecycle and in all HR processes. Track your data at every stage of the recruitment process: during any organisational change (from promotion to redundancy programmes), through performance management processes, in talent and succession management processes, in pay and reward, and as people leave your organisation. These rich seams of data help you understand who is facing barriers and what they may be.

Other data points worth examining include:

- Questions in your employee survey relating to inclusion e.g. the proportion of people in your organisation who have witnessed or experienced discrimination in the past 12 months (include verbatim comments where available)
- Grievances, disciplinaries, and bullying and harassment cases relating to relevant subjects
- Proportions of people accessing key development opportunities
- Employment tribunal cases
- Whistleblowing cases
- Informal as well as formal complaints
- Anecdotal information, stories, experiences

It's worth taking the time to think about the data that would be useful to you in progressing your anti-racism work. There may be other sets of data not mentioned here.

Once you've captured the detail, you'll be able to better understand the dynamics at play in your organisation and use the data to improve both representation and inclusion.

How do you get the data you need?

- **Review existing data**
First things first – understand what data you already have and how reliable it is. You may find that much of the data you hold is outdated or inaccurate. Or you may find that the data is accurate but that your completion rates are low. Consultation and engagement are key at the start of the process. They help you understand why people might choose not to disclose their information. They also help you take concerns on board, provide reassurance, and get internal networks and groups on board to promote the exercise.

- **Plan your data collection process**

This should not be a one-off campaign or a 'project'; it must be a consistent activity that is properly resourced. For example, you should provide ongoing opportunities for employees to share their data. Bear in mind that some protected characteristics, such as disability, can change.

- **Consider your language**

Make sure your response options are up to date (for example, the 2021 census included Roma as a category for the first time) and that your systems are flexible enough to accommodate changes to classifications. Even the language we use changes over time. We recommend using the latest census as your starting point and providing a free text box for those who wish to self-identify. But then consult with colleagues (for example, your employee resource group) to see if you should be making adjustments to account for your local population.

- **Keep in line with the law (EU General Data Protection Regulations - GDPR)**

You're collecting sensitive personal data, and must explain how it will and won't be used each time you ask for it. You also need to store the data securely. You can't force people to give you this information so always give them a 'prefer not to say' option. Bear in mind that laws on gathering ethnicity data vary from country to country. Take especial care if yours is a transnational organisation.

- **Make it easy**

Ensure that employees can access your system easily (particularly those who are not normally desk-based), and that the system is user-friendly. The easier it is for people to provide information, the more responses you'll get.

- **Get the message out**

Your leaders, line managers and supervisors must keep talking to their teams about why you would like them to hand over their data. These conversations will help to build trust.

- **Communication is key**

Add data collection to your internal comms programme to ensure you are communicating regularly within your organisation. Include the following points:

- o Why you're asking people to provide their data
- o Why it's important to provide it
- o What you're going to do with it

Whenever you are reporting progress on anti-racism (when launching or providing updates on your strategy or action plan, for example), you should remind colleagues that their data is helping to drive progress. This will help employees make the link between the personal data they provided and the improvements you're making. It also helps to build trust and will encourage slower adopters to provide their data.

Why should your employees disclose their personal information to you?

Some people, especially ethnic minorities, are reluctant to disclose their ethnicity and other protected characteristics to their employers. It's easy to see why.

Here are some ways to help build their trust and encourage disclosure:

- **Be explicit about how the data will be used**, and who will have access to it.
- **Be clear about confidentiality**: for example, that nobody will be personally identifiable. This is particularly pertinent for smaller organisations, for those that lack diversity, and for organisations that analyse data to reflect intersectionality.

- **Link your data requests to other work** you are doing on anti-racism and inclusion. Say how disclosures influence your strategy and action plans and support your progress on anti-racism.

- **Ensure your senior leaders are walking their talk on anti-racism** – visible role-modelling from the top is fundamental to building trust. They should be talking about why it's important to provide data. They may even be able to illustrate with a personal story if they've previously been reluctant to provide their own data.

- **Communicate regularly** about how you are using the data.

- **Explain why providing this information will benefit them** as well as your organisation.

Benchmarking your organisation's ethnic make-up

Once you know who makes up your organisation, you need to understand whether you're representative of your locality, your region or, if you're a nationwide company, the country. This will help you understand where you're falling short and set realistic targets to put things right.

Who or what should you compare yourselves to?

- Census 2021 – are your measures and targets already out of date? The full 2021 breakdown will be released in mid-2022, but many organisations are still setting targets based on 2011 data.
- Council data tends to be more up-to-date than old census data. But be aware that it is less comprehensive and less detailed than census data, which captures smaller groups and locations.
- Government data.

- Travel to work areas (TTWAs) vs immediate population data. Think about which of these you should use as a comparator. For example, in London some organisations compare themselves to TTWAs – but this can erode trust in organisations where most employees do not commute from outside London (a region that has less ethnic diversity than London itself).
- There may be data available for your specific industry sector. Some industry bodies or regulators compile this. Here's an example from [Ofcom](#).

What now?

- Analyse your data by ethnicity. Wherever possible, break your data down to individual ethnicities rather than categorising employees simply as B.A.M.E. (black, Asian and minority ethnic) and white. If you also have data on other protected characteristics, you should take an intersectional view – so long as your sample sizes are large enough to maintain anonymity. For example, your reporting might say “X% of our employees are from ethnic minority backgrounds. X% are black/black British. X% are black/black British females”. You can also use your data to reveal the ethnic minority experience at different career stages or different points in the employee life cycle. For example, you might find that entry-level roles have more ethnic diversity, or that certain groups feel less included than comparable groups who joined your organisation earlier or later than they did.
- Analyse your data by grade or seniority, by business unit, by role type, by employment contract types etc. The detail reveals where you have pockets of good or poor inclusion practice.

- Ask yourself these questions:
 - What patterns can you see at different levels or in different parts of your organisation?
 - Who is in your senior leadership roles?
 - Who is performing your lower paid roles?
 - Who is getting promoted, and who is not? And how long does it take different groups to move up?
 - Who is being developed or billed as top talent or high potential in your company?
 - Who is applying, who is being interviewed and who is being hired?
 - Who is passing their probation and other milestones?
 - Who is paid less than others?
 - Who is being put on formal performance plans, and who isn't?
 - Who is going through disciplinary and grievance processes?
 - Who is leaving your organisation voluntarily, and for what reason?
- Tracking exits from your organisation reveals who is staying and who is leaving – and why. Are some groups leaving for promotions because their talent is not being recognised? Is their performance being judged more harshly than that of their white counterparts? Are they being disciplined or exited for robust reasons?
- Share the information with your senior leadership team and your wider organisation. But take care to present your information in ways that guarantee anonymity.
- Use your data to inform your anti-racism strategy and action plan.

Understand your inclusion culture

As well as understanding what your data tells you about your organisation, you need to understand your organisation's inclusion culture. There are many ways to do this, including the [Inclusive Employers Standard](#). This will help you understand where progress is being made, and which aspects you still need to work on.

Further information

- [Information on the 2021 census - Office of National Statistics](#)
- [Data set on population estimates by ethnic group and religion - Office of National Statistics](#)
- [Report on population estimates by ethnic group and religion - Office for National Statistics](#)
- [Ethnicity facts and figures service - UK Government](#)
- [Don't wait for ethnicity pay gap legislation to start gathering data - People Management](#)
- [More balanced workplace ethnic mix is hampered by lack of data: employers need data and action to reap the benefits of diversity - Financial Times](#)
- [UK doubles number of people from minority ethnic backgrounds in prominent roles - The Guardian](#)
- [To fight discrimination, first you must understand how to measure it - World Economic Forum](#)



Internal and external communication

To make the most of your organisation's anti-racism work, you need your communications team on-side. They're critical for getting your message out to your organisation and beyond, and for getting people on board with your plans.

If you are responsible for communications in your organisation, you'll know that they have to be aligned with your values and your commitment to anti-racism. But where do you start with this task? The following tips may be helpful.

Look at your current language and narratives

Take some time to research and think about where racial stereotypes crop up in society – and how they could be repeated in your organisation.

Audit all internal and external communications. Internal communication could include your intranet, company templates (Word, PowerPoint etc.), briefing documents, company emails (including signatures), operational documentation such as report templates, policy and process documents etc. External communication might include your website, annual reports (anything in the 'for investors' section of your website), customer-facing pages and documents etc.

These are the sorts of things you should add or remove:

- Words and images that do not reflect your anti-racism position and values.
 - Example: If your organisation has decided not to use the term 'B.A.M.E', you should remove references to it.
 - Example: You might find that you want to add more diverse imagery to your website if it doesn't currently reflect your employee and customer base.
- Language that is offensive.
 - Example: The phrase 'fuzzy wuzzy': this was used by British soldiers during the 1800s to describe black people by their hair.
 - Example: Using the phrase 'final solution'. This phrase was a euphemism used by the Nazis to describe the mass murder of Jewish people.
- Subtle messaging that isn't racially inclusive or which reinforces racial inequality.
 - Example: Phrases that suggest positive aspects of 'whiteness', such as using 'whiter than white' to describe strict compliance with the rules
 - Example: Using words or phrases like 'blacklisted'. Although the term is not offensive in itself – and has nothing to do with skin colour – it connects the word 'black' with a negative concept.

Tell the story internally

Think about your anti-racism story – the way you communicate the rightness, the relevance, and the benefits to everyone of your anti-racist culture. Work with appropriate colleagues to communicate what anti-racism looks like in your organisation, and how your strategy and action plans will help to achieve racial equity. Think about the following:

- How your anti-racism vision and strategy link to other strategic priorities.
- Why your organisation's work on anti-racism is important to the organisation and to all employees.
- Are you including the voices of colleagues who experience racism? Think about your staff networks as well as ethnic minority colleagues.
- How are you celebrating the achievements of employees from all backgrounds?
- Have you collectively agreed the language your organisation is comfortable with using? Language, particularly around social justice, evolves rapidly. Don't undermine your good intent by using terms that no longer convey the right message. Forward-thinking companies maintain a dialogue with their ethnic minority employees to keep their language up to date.

Tell the story externally

What story are you telling externally? Decide which elements of your anti-racism strategy and action plans are appropriate for external audiences, and which ones would be neither useful nor relevant. There's a fine balance to be struck between sounding positive and upbeat, and overstating your case. Claiming to be further ahead than the reality will be seen as disingenuous. But saying too little might give the impression that racial equity is not a topic that interests your organisation.

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External communications should match employees' internal experiences. If an organization is not vigilant in practicing the values it says it claims are important, those values become meaningless.

John Amaechi

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The most honest approach is to align your external messaging with your internal reality. For example: if your website is populated with pictures of a diversity that doesn't reflect the reality of the organisation, you will lose credibility and trust. Be brave enough to tell the world that you're on a journey to a better place. You won't be alone: no organisation is yet leading in every aspect of racial inclusion.

In all cases, you should have a consistent plan and a framework to help you decide which conversations you take part in. For example, how will you respond if one of your suppliers has a racist incident that is picked up by the media? What if one of your employees shares racist or discriminatory views on their social media? Is your organisation comfortable with talking about racism publicly?

Having a plan stops you putting out one-off comments, and your framework gives your communications colleagues the ability to respond to events in the moment without straying beyond your corporate position.

Marking events internally and externally

The calendar is full of days and seasons that celebrate various characteristics, cultures, events, and religious festivals. By tradition however, only a narrow range has been celebrated in the UK.

To truly reflect the diversity of your own organisation, you may want to acknowledge events and festivals that you have previously overlooked. Choosing which dates you acknowledge, and how and why you acknowledge them, should be a collective decision. Involve your employees in the process, especially those who are closely associated with particular dates. They can help you decide whether your purpose is to create awareness, celebrate events or a combination of factors. If you have an employee network, this could be a good forum for these decisions.

If you can't easily agree, it can be helpful to allow some flexibility. Don't feel locked into the dates and events on your annual plan; sometimes you can let the spirit of the moment take over. Think also about the ways your employees can keep the momentum going beyond the calendar dates. Be sure to amplify ethnic minority voices as part of the events, and give credit for ideas and assistance.

Awareness dates that may be relevant include:

- National Inclusion Week
- Black History Month
- South Asian Heritage Month
- East and South East Asian Heritage Month (launched September 2021)
- Race Equality Week
- Holocaust Remembrance Day
- Gypsy, Roma and Traveller History Month

[You can access Inclusive Employers' Diversity Calendar for more dates.](#)

If you are planning to mark or celebrate religious festivals, make sure you do this in a culturally appropriate way. Check with people who follow the faith in question. You might also find your staff network groups can offer support.

Unplanned or unexpected events

During 2020, in the aftermath of George Floyd's murder, there was a massive 'unplanned' outpouring of emotion and political resolve. Many organisations were blindsided by the strength of feeling and the impact the event had on their black employees. Some organisations said nothing, which left black employees feeling underwhelmed and unsupported by their leaders and much less engaged with their organisations.

Think about what your organisation should do in these moments. How do you mark them respectfully? How do you support affected employees – and demonstrate through words and actions that they may need extra sensitivity from colleagues or that line managers may need to exercise some discretion in terms of workloads etc? You need a clear plan that prepares senior leadership for dealing with these sorts of events.

In 2021, there was a similar wave of feeling when several black England footballers experienced a deluge of racist abuse following their team's exit from the Euros. It was the kind of reaction that people from an ethnic minority background have learned to expect. For them, the ensuing national debate was personal. What did your organisation say or do at the time to support its black and ethnic minority employees?

Much has been written about the performative nature of some external – especially social media – communications shared by employers. Many have shown public support for anti-racism and racial equity, but when you look to see what action they're taking behind the scenes, you find very little. Their lack of authenticity can't be hidden: employees, customers, and stakeholders soon pick up on the mismatch between public words and private actions. If your organisation is not anti-racist and ethnically diverse, you should be careful about what you share. But if you are making progress or working to change your culture, you should say so.

Further information

- [What does it mean to celebrate the UK's first-ever ESEA heritage month? - The Independent](#)
- [Tips for designing an actively anti-racist communications strategy - The Communications Network](#)
- [Reflections on: the role of comms in building an anti-racist brand - Charity Comms](#)
- [Now comes action: what next for anti-racism and business? - CBI](#)
- [The anti-racism movement and brands' social media communication strategies: a 2020 study - Lightspan Digital](#)
- [Brands, your black box is empty of action - The Drum](#)
- [Life after #BlackOutTuesday: who kept their promises? White where we left off: looking back at the day Instagram turned black and what brands and influencers have - or haven't - done for black lives since June - Refinery29](#)
- [Be careful not to use these racist phrases in your content – Brand Content](#)

Positive action vs positive discrimination

People sometimes struggle to understand the difference between positive action and positive discrimination. Some people think that they amount to the same thing: unfairly hiring underqualified people to meet diversity targets.

It's time to set the record straight.

Positive discrimination

Positive discrimination is when someone is given an unfair advantage because they are part of a group that has traditionally been treated unfairly.

Here's an example of how it works:

An employer realises that certain ethnic minorities are under-represented in its organisation. So it decides to hire more people from these groups. When the next vacancy arises, it employs someone who is not the best candidate for the job. It chose this person because they're from an under-represented ethnic minority.

- Apart from a few limited exemptions, positive discrimination is illegal.
- Positive discrimination is how employers treat some people more favourably than others because they have a protected characteristic (defined in the Equality Act 2010).

The tie-break clause

If you have two equal candidates for the same role – equal in terms of qualifications and performance standard at interview – it is legal to offer the job to the candidate who has a protected characteristic that is under-represented in your organisation.

Organisations are reluctant to use the tie-break clause for fear of a legal challenge. However, it can work well if used properly. You'll need data to prove that both candidates are exactly the same, that the particular protected characteristic is under-represented, and that this characteristic is more useful to the organisation than a different characteristic held by the other candidate. And just to be safe, you could always run everything past an employment lawyer before you make your tie-break choice.

Positive action

Positive action enables making education and employment opportunities available to under-represented groups who have traditionally been treated unfairly – for example because of their race.

Here's an example of how it works:

An employer with data to show that the organisation has fewer ethnic minority managers, creates a training and development programme for ethnic minority employees to generate a pipeline to these roles. When it's time to appoint new managers, the employer still has to apply the same non-discriminatory selection process that they'd apply to any vacancy. They always appoint the best candidate for the role.

- Positive action is legal and widely used – so long as you can prove that it's justified because a group is under-represented, has different needs, or is being disadvantaged in some way.
- Positive action lets employers take steps to fix problems they've identified.
- Positive action is permitted because some types of discrimination are so ingrained, anti-discrimination legislation has failed to end it. As a result, ethnic minority people are under-represented in certain roles.
- Positive action seeks to redress the balance while ensuring you get the right person for the job every time.
- Positive action must be proportionate. For example, offering an MBA to an under-represented group would not be proportionate for entry-level roles, but may well be right for more senior levels.

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Positive action enables making education and employment opportunities available to under-represented groups who have traditionally been treated unfairly – for example because of their race.

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Examples of positive action

- Targeted training and development programmes.
- Encouraging particular groups to apply for roles via the wording in job adverts.
- Offering shadowing, mentoring and sponsorship programmes to under-represented groups.
- Having open days or internships for under-represented groups to encourage them to get into a particular field.

How should I use positive action in my organisation?

- Start by gathering credible evidence to prove that a particular group is under-represented in your organisation. Compare your internal data with local and national demographic data. Always base your decisions on evidence.
- Fully understand the problem you're trying to fix. Does your lack of ethnic minority representation run through all levels of your organisation, or is it more specific – a result, perhaps, of barriers to progression? Knowing the detail helps you pinpoint the most appropriate ways to incorporate positive action into your organisation.
- Be sure to co-create initiatives, to gather feedback from all employees (especially the group you're designing for), to continually review all initiatives, and to measure progress.
- Communicate! Have clear conversations about what you're doing, and why you're doing it. Engage with the majority by providing context. Explain that what you're doing is not positive discrimination. Explain the 'why' to create empathy.
- Ask yourselves this question: have we done enough to attract, develop and encourage the right person for the job?

Further information

- [When an employer may make a decision based on age, race or another protected characteristic - The Advice, Conciliation and Arbitration Service \(ACAS\)](#)
- [Positive action speaks louder than words; five principles for employers - Lewis Silkin LLP](#)
- [Guide to positive action for chambers - Bar Council](#)
- [Guide to positive action in recruitment and promotion - Government Equalities Office](#)

What is sponsorship?

Sponsors are influential senior leaders with the power to advocate for employees who have potential to progress. Sponsors raise the visibility of the person they're sponsoring among other senior leaders, and help them make connections within the sponsor's own networks.

Sponsorship is often informal – for example, when a line manager gets on well with, and sees potential within one of their team and gives them opportunities to stretch themselves and to shine. For ethnic minority employees, informal sponsorship is harder to come by for two reasons: (1) the pool of ethnic minority leaders is small and traditional forms of networking have not been inclusive, and (2) white senior leaders have historically been less likely to sponsor colleagues from different backgrounds.

Sponsorship of ethnic minority employees broadens the talent pool

Research shows that ethnic minority employees are less likely to be mentored or sponsored by senior leaders. The reason is simple: senior leaders are more likely to choose to sponsor or mentor someone in whom they see similarities to themselves. This laissez-faire approach becomes a cycle: straight, white, male leaders sponsor other straight white males for leadership. And so on.

By doing things differently – sponsoring talented ethnic minority employees – you become an active ally within your organisation.

You foster inclusivity while using your skills and connections to widen the corporate talent pool.

How do I get started as a sponsor or mentor?

- Find out what your organisation already offers. Is there a formal sponsorship scheme? Is there a separate one for under-represented talent? Does sponsorship happen informally, based on organic relationships?
- Think about (or find out, if there's a formal scheme) what success looks like, and how you will know whether the sponsorship is working. How often will you meet? Which of you will speak with the employee's line manager? How will you build trust?
- Sponsorship relationships can last years, sometimes continuing long after both parties have moved to other organisations. That's what happens when you take the time to build mutual trust and respect.
- Know yourself. Think about your own privileges, blind spots and biases, and be aware of how they may affect your own conversations. Get to know and understand the person you're sponsoring. Talk to them about how you can help them (navigating the politics, subject-matter expertise, providing visibility and opportunities etc). Think about what you'd like to know about them (e.g. their career aspirations). Understand their experience in your workplace as an ethnic minority person. This will enable you to support them more effectively.

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Sponsors raise the visibility of the person they're sponsoring among other senior leaders, and help them make connections within the sponsor's own networks.

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- Think about the colleagues who are currently sponsored in your organisation, and why. What skills and potential are you looking for? Are there groups who have the potential, but lack the support that others get?
- Think about the way you choose who to sponsor. Do you gravitate towards people who have a similar personality type to you? Do you favour people with similar backgrounds to yours, or people who do similar things in their free time? Think about why this may be, and how it might affect other talented employees.
- Sponsorship is a step beyond mentorship. Since you'll be providing opportunities and access to your networks, the person you're sponsoring has the potential to harm or enhance your reputation. So choose carefully; only sponsor those in whom you see potential.
- Help the person you've chosen to identify areas that will broaden their knowledge, get them out of their comfort zone, and get them to think more strategically or through different perspectives.
- Coach the person towards progress and success. Provide honest and open feedback, a lack of which is a barrier to ethnic minority progression.
- Speak of them highly to your peers and senior leadership. Advocate for them, lend them your credibility.
- Put them forward for projects that develop them, increase their experience, or help them see your organisation's bigger picture. Encourage them to develop their leadership skills. Advocate for them when they're ready for a new challenge.

- Support them in navigating your organisation's politics, unwritten rules, and behaviours etc. Challenge these where they are biased.
- Remember that you will also benefit from being a sponsor. You'll get that good feeling that comes from helping someone achieve their potential, you'll learn new things from them, and you'll expand your own network.
- Create more opportunities for senior leaders to meet emerging ethnic minority leaders and build diverse networks.
- From the rich diversity within your organisation, seek out emerging leaders to sponsor and advocate for.

Further information

- [We need mentorship at an executive level to achieve greater diversity - City AM](#)
- [Why sponsorship is key to helping black employees advance - McKinsey](#)
- [How to get a sponsor and make the most of the relationship - Adam Bryant](#)

Taking anti-racism beyond your organisation

This toolkit is mostly concerned with building an anti-racist culture within your organisation, but there are ways in which an employer can reach out to external stakeholders, customers and service users to encourage anti-racism elsewhere. For a genuinely anti-racist organisation, this is a natural progression. They understand that to walk their talk, they have to be consistent on every front. There may well be penalties (such as losing business from racists), but the alternative – keeping quiet and pandering to the racism around them – is a negation of the values they have set themselves.

Here are some ideas:

What should you expect from customers, service users, and other stakeholders?

- It is not OK to expect your employees to deal with racism, prejudice and bias from outsiders in the course of their work.
- How do you communicate your expectations of how outsiders should behave towards your employees? How do you respond to such action? The simplest options – moving an ethnic minority person away from the situation or replacing them with a white person – don't address the root of the problem and can compound it.
- What support can you offer employees who experience this type of racism? Think about practical support as well as mental-health support.

- What training should you give to leaders and managers on how to deal with these situations? What processes are in place?
- Do you have clear guidelines for how and when employees can challenge racial prejudice from outsiders? Can they be confident that your organisation will support them?

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How do you communicate your expectations of how outsiders should behave towards your employees?

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Examples

[JP Morgan](#) gave its teams the power to cut ties with customers who are racist towards their employees.

The railways have long had a well-publicised, zero-tolerance approach to passengers who abuse their employees and other passengers. See [Transport for London's](#) most recent campaign.

[John Lewis & Partners](#) display a set of Kindness Rules in all their stores.

How should you design and pitch your product or service?

- Is it inclusive? Does it work for everyone?
- Are you designing your products and services with all customers and service users in mind? How inclusive – and diverse – is your design team?
- Have you subjected it to an equality impact assessment?
- Do you have a diverse panel of customers, stakeholders or service users who can give you feedback on new or updated products and services?

Examples

[Marks & Spencer](#) revised the range of shades for its lingerie and tights when they realised that its 'nude' variety was designed around lighter skin tones.

[Fenty Beauty](#): the make-up and cosmetics brand introduced 40 shades of foundation from launch, helping to tackle inequalities in beauty ideals across the cosmetics industry.

Who are you doing business with?

- Who is in your supply chain?
- Who do you invest with?
- What do you spend money on?

Many organisations have committed to diversifying their supply chains to create a level playing field for suppliers and partners owned by people from ethnic minority backgrounds. They've also committed to working with, and investing in, organisations who share their anti-racism values.

The first step is to know which organisations are in your supply chain, and to understand their ethnic make-up and how they live their anti-racism values. It's common for teams or divisions within an organisation to use

suppliers of which the wider organisation is unaware. Gather your data, then work out ways of diversifying the list to make it more representative of your customer base, your employee base, and your local or national context. For example, you may find that you currently prefer to work with larger organisations, which are less likely to have ethnic minority leaders or owners. Audit regularly to check that your suppliers remain diverse and aligned to your values. Don't be afraid to ask for evidence that they live by their values, and that they do value and prioritise ethnic diversity within their organisation. Think about how you'll respond if you discover that in practice they don't share your values. Will you end the relationship or will you be silent and complicit?

Many organisations span regions and nations, particularly through their supplier bases. So you may need to take account of cultural differences and varying approaches to anti-racism. What does anti-racism look like in each of the markets or regions in which you operate, or which support your supply chains? Are some of those cultures less focused on the topic of anti-racism? If so, how would this affect your ability to influence, and set standards for, third parties? A clear definition of what your organisation means by anti-racism, combined with an understanding of the cultural nuances in each of the regions in which you operate, will help you build a model of anti-racism that has a global reach tempered by local sensitivities.

Examples

[Legal & General](#) established voting and investment guidelines for companies that do not have ethnic diversity at the top.

[Coca-Cola](#) has a clear commitment to supplier diversity.

Further information

- [Attacked at work, rejected for jobs and harassed by colleagues: Asians around the world speak out on workplace discrimination - CNN Business](#)
- [Covid: Pulse oxygen monitors work less well on darker skin, experts say - BBC News](#)
- [Designing for diversity - Design Council](#)
- [Ten ways to design more inclusive products - UX Collective \(Medium\)](#)
- [Make a positive impact through anti-racist investing and banking practices - B Corporation](#)
- [Why you need a supplier diversity program - Harvard Business Review](#)
- [Supplier Diversity Council UK set up to help diversify supply chains – Recruiter](#)
- [Supplier diversity – Chartered Institute of Procurement and Supply](#)
- [Why diverse suppliers hold the key to business resilience – Reuters Events](#)

How to: write your anti-racism strategy

Anti-racist organisations create inclusion for all.

When your business processes and practices work for everyone, you have an organisation that's fair and equitable for all. This is why you should take an intersectional approach to developing your anti-racism strategy and associated action plans.

A simpler approach aimed at a single characteristic works well from a tactical point of view, but does not deal with the issues that everyone within that particular group faces. Which is why it's unlikely to be sustainable. For example, our nationwide focus on gender equality has increased female senior leadership – but only for white women. Operation Black Vote's Colour of Power Report (2021) noted that women accounted for 327 (28.1%) of the 1,164 most powerful people in British public life. Out of those 327, just 19 (1.6%) are from ethnic minority backgrounds. This is progress from Operation Black Vote's 2017 report, but nowhere near representative of society.

There's no avoiding the issue. You need a system-wide approach that accounts for multiple characteristics if you are to create and embed a genuinely anti-racist and inclusive culture within your organisation. And the approach you take would ideally be unique to you. When you take account of the factors that are specific to your organisation, such as sector, size, geographical spread, locations, regulatory frameworks, purpose etc, you end up with a unique set of circumstances. That said, there are common requirements – and having a clear strategy and action plan are two of them.

Getting started

In many respects your anti-racism strategy should be just like any other business strategy: it should have clear links to your other strategies (e.g. environmental, social and governance), be based on data, have a long-term vision (many corporate strategies are too short-term to count as genuinely strategic), and provide your organisation with a set of high-level priorities.

The vision – where are you now, and where are you going

A fundamental step towards developing a culture or behaviour is the ability to articulate what the 'end goal' looks like. When you know where you're going, you can work out how to get there. And of course you'll know when you've got there. Whatever you set your sights on has to be considered and sustainable. Quick and easy wins are nice to have, but not strategic enough to generate long-term culture change.

Your strategy, step by step

Get the right people in the room. They are likely to come from different levels within your organisation – to be people who carry out different job roles – together with HR, I&D and senior leadership. Get them to think about the following:

- What does an anti-racist culture look and feel like to your people – now and in the future? What does it look and feel like to outsiders – to customers and external stakeholders? The vision would include aspects such as a visibly

anti-racist leadership whose actions match their rhetoric.

- Understand your starting point. What is the current experience of all the ethnic groups in your organisation? And who is not there to ask? Remember that this is not merely an exercise in representation and diversity, but about inclusion which is where sustainable action comes from.
- Think about your organisation's "why" and the aims of your anti-racism strategy:
 - o Do you need to use the RACI matrix to explore who should be Responsible, Accountable, Consulted, and Informed in connection with your anti-racism strategy and action plan? Think about whether you need to carry out a SWOT or PEST analysis (Strengths, Weaknesses, Opportunities, Threats; Political, Economic, Social, Technological).
 - o Who will sponsor this work? In addition to executive sponsorship, your board should have oversight of all inclusion activity as this is a part of corporate governance.
 - o Why is an actively anti-racist culture important to your organisation? What is the purpose of it? What are the intended benefits? What are your organisation's risks of not addressing racism?
- How does anti-racism fit in with your existing vision and mission? How will it help you achieve them?
- How will you make your (legally obliged) zero-tolerance stance against racism clear across your organisation? And how will you demonstrate that it is not just words?

- How will you articulate this in your overall strategy, business plans, policies and processes? And in conversations with employees? How will you position your message to ensure it lands?
- Who is your strategy focused on? Is it employees only? Does it include consultants if you use them? Does it include external parties, such as stakeholders, customers or service users? What about suppliers and partners?
- What are the outcomes of your strategy?
- How will you know when you have achieved, and embedded, a strong anti-racist culture in your organisation? And how long do you think this might take?

“

Understand your starting point. What is the current experience of all the ethnic groups in your organisation? And who is not there to ask?

”

Your action plan, step by step

- Your action plan should flow from your strategy, and break your long-term aims into manageable but ambitious delivery objectives over each year.
 - Co-create your action plan with colleagues – and define the role of particular staff groups – do you want them to co-create or sign off or both?
 - Use your data to understand where you need to prioritise activity, what you should focus on, and what needs less targeted work. For example, if you have strong representation of Asian people in your organisation and poor representation of black people, focus your efforts on black representation rather than all ethnic minorities.
 - How will you resource your action plan? Who will deliver it? What budget do you need? You should treat anti-racism as you would any other strategic priority in your organisation.
 - Think about what works in your context. The appropriate anti-racism actions needed for a small regional organisation may well be different to those needed for a large multi-national.
 - Think about how to paint the picture for people. You should be able to explain why you are doing what you're doing to create energy and a move to action. Keep internal communication going for each step along the way.
 - Make sure every action is measurable. Objectives should be SMART (Specific, Measurable, Achievable, Realistic, Timely). You need targets and you shouldn't be afraid of them – they are different to quotas.
- Consider the following areas when designing actions:
 - * Data – improving disclosure rates, consistent and planned collection
 - * All HR and people-related practices, policies and processes
 - * Line manager and leadership ability to support inclusion in their leadership practice
 - * Psychological safety in your organisation, and particularly for ethnic minority employees
 - * Sponsorship, mentorship and equal access to opportunities
 - * How your learning and development programmes contribute to creating equity
 - * Creating allies and advocates
 - * The purpose of your network groups and any recognition or remuneration they receive
 - * Measurement and metrics to assess progress against all actions
 - * Communication plans
 - * Legal requirements
 - * How actions will link to other work streams: for example, if you are revisiting your procurement policy, how will you engage the procurement team in the work and encourage anti-racist practices? How will you ensure the policy is reviewed from all necessary angles (e.g. procurement, legal, inclusion etc) and not in silos at different times?

Once you've finalised your strategy you should start implementing and embedding it. Make your strategy ubiquitous: widely known,

frequently referred to, and used repeatedly throughout the organisation. Embed it as deeply as you would embed your overall business vision. And then review it cyclically as you would any other strategy. Should it be even more ambitious? Does it need updating in line with societal and global shifts in attitudes and in the use of language? Your action plan should be split by year and reviewed regularly in the same way you'd review any other business KPI.

Practical tips

- You must have firm and visible leadership commitment which should filter through the organisation to embed your anti-racist culture irrevocably.
- Make sure you can track progress. Create a framework with goals linked to achieving your vision. Know your starting point as well as your vision, and break each goal into discrete tasks, actions or initiatives to make the work feel manageable. You could do this through a KPI scorecard or any other method that works for your organisation.
- Communicate progress with the whole organisation. Make sure everyone knows how well you are doing at achieving your vision, and what it takes to get there. Celebrate successes (it's all-too-easy to play them down and lose energy) and address setbacks honestly and openly (making it clear what you'll be doing to get back on track).
- Include everyone. And keep asking for, and using, their feedback every step of the way. Everyone needs to know that you're keeping to the scope of your anti-racism strategy, that you're considering all voices and ideas, and that you're maintaining buy-in from your employees and stakeholders. Continue listening to your ethnic minority employees to understand how their experience improves – or doesn't – at every stage.

- To be effective, your strategy should be something that's achievable but probably not easy. Review it regularly to make sure it's fit for purpose and remains ambitious. By the time you're about three quarters of the way there, it'll be time to start the process again.
- When reviewing policies and processes, don't be afraid to metaphorically rip them up and start from scratch. It's much easier to design inclusion in from the start than to shoehorn it into something that already exists.

What gets measured gets done

Metrics are key to success. You need to know what works and what doesn't. And you need to be able to hold people accountable for achieving the required outcomes.

Your metrics will be unique to your organisation: they should be based on your own internal data and compared to appropriate local or national demographics and other relevant benchmarking data. Link your metrics to your purpose and track progress regularly. Celebrate when you're doing well; regroup and tweak whenever something's not working to build racial equity in the way you expected.

As with anything, you cannot measure progress if you don't know your starting point.

Auditing adherence

Auditing is more than merely taking a compliance-led approach to equity (i.e. ensuring you are not breaking the law). It should be about ensuring everyone in your organisation is following your policies, processes etc., and role-modelling your behaviours. Nobody is exempt – especially not your CEO, Executive Team and Board. The whole process will be undermined if certain people are exceptions to your rules and policies, or can use loopholes to avoid them. Exceptions are a breach of trust.

All complaints or suggestions of racism or discrimination must be properly dealt with – do not *do nothing*. If the complaint is not justified, have a conversation with the complainant to explain why. Go into this discussion with an open mind. There may be other issues beneath the surface that have contributed to the complaint, and which you know nothing about. If the complaint is justified, it must be dealt with, and the culprit must never be allowed to get away with it. Consider a ‘closing the feedback loop’ approach to mirror the way that organisations deal with customer complaints.

Subject senior leadership adherence to independent audit, exactly as you would for any other policy or process.

Embedding mechanisms for reviewing, auditing and progressing

If you follow the same review and recalibration process for your anti-racism strategy and action plan that you apply to other strategic business priorities, you’ll find that embedding the culture happens over time. Keep considering the following:

- Are you continuing to prioritise and promote anti-racism in your organisation?
- Are you holding regular culture reviews to track inclusion metrics and to monitor representation and other hard data?
- Are you reviewing your strategy and action plan cyclically, to prevent progress from stagnating?
- Are you considering the intersections in your data – and in granular detail – to understand where you may have groups that need a priority focus?
- Are you maintaining the anti-racism conversation in your organisation? Are there formal and informal mechanisms for talking? Are people comfortable talking about racism and anti-racism?
- Are you ensuring company-wide adherence to your anti-racist processes, without exception?
- Is each process subject to independent audit to prove adherence without exception?

Do what you say you’re going to do

No matter where you start your move to building an anti-racist culture, you must make decisions with intent, deliver on your plans, and speak honestly.

Be clear that anti-racism is not just about diversity (although diversity is clearly pertinent). A revolving door of ethnic minority employees will tell its own story.

Make sure that what you say externally matches what is happening inside your organisation. If there’s a mismatch, you’ll soon be found out, and your employer and consumer brands will suffer.

Your credibility is fundamental to your success.

Further information

- [Our commitment to anti-racism in the UK - EY](#)
- [Our commitment to racial equality and inclusion - The Co-op](#)
- [Race-equality strategy and action plan - The University of Sheffield](#)
- [Disability should be part of black history conversations: I’ve gone my whole life seeing people like me erased - The Independent](#)
- [Civil rights and feminism: find out about the black feminists who set up anti-racist groups and about the relationship between race and feminism in the 1970s - The British Library](#)
- [Have women of colour been written out of the women’s movement? - Google Arts and Culture](#)
- [I’ve seen first-hand the toxic racism in international women’s rights groups - The Guardian](#)
- [How science-funding giant Wellcome is tackling racism - Nature](#)
- [Meaningful metrics for diversity and inclusion - CulturePlus Consulting](#)

How to: write an ethnicity pay gap report

The introduction of gender pay gap reporting in 2017 (a provision of the Equality Act 2010) has forced employers to look at why there's a difference between the average hourly pay of their male and female employees. The data shows that women don't necessarily get paid less for doing the same work as men (though this is part of it), but that other factors hold them back. Women are more likely to be hired into lower-paid jobs, are less likely to be promoted into senior roles, and are less likely to receive a bonus or the training and development they need to advance their careers.

Reporting is a good thing. Since gender pay gap reporting became mandatory for organisations of 250+ employees, the pay gap has decreased. Transparency over pay has forced organisations to look at – and start to fix – the problems women face. Many women now take an employer's pay gap performance into account when they decide who they'd like to work for. It's absolutely a reputational issue for employers.

The principle behind the ethnicity pay gap is the same. There is plenty of research to show that an ethnicity pay gap exists in the UK and elsewhere. In 2018-19 the Government held a consultation on the topic. Ethnicity pay gap reporting is not yet a legal requirement, but there's pressure from numerous organisations to make it so. Most experts believe that it's coming. As a result, some employers have

begun to publish their data voluntarily, and even more are doing the work internally.

For organisations committed to being anti-racist, ethnicity pay gap analysis is a basic requirement. The numbers are just your starting point: to make sense of them you need to understand the experiences of your ethnic minority employees and the factors that are holding them back in your organisation. If you don't do the numbers, you won't know your starting point, which means you won't know what action you need to take. And if you don't take that action, you'll be perpetuating the inequalities behind the pay gap.

How should I report our ethnicity pay gap?

Since ethnicity pay gap reporting is not yet a legal requirement, there's no standard format for organisations to analyse and present their data. This hasn't stopped employers from doing the work voluntarily, but it does make comparisons difficult because employers can choose any format they like – potentially the format that shows them in the best light.

These are the steps we recommend:

- Plan
- Communicate the rationale (and later, findings)
- Data collection and storage
- Calculations and analysis
- Identify actions
- Review and refine

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Ethnicity pay gap reporting is not yet a legal requirement, but there's pressure from numerous organisations to make it so.

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Plan

This is a potentially sensitive undertaking, especially if your organisation is at the early stages of its anti-racism or inclusion journey, or your employees' trust in the organisation is low. So you need to make a careful plan for tackling your ethnicity pay gap report.

These are the factors you should consider:

- How will you communicate – during the data-collection process and when communicating the findings? What are the messages you want to get across? How will you deal with complaints relating to any discrepancies you find – or better yet, get ahead of the issue, i.e. if we find X discrepancy, we will take Y action to resolve it?
- How will you build trust to gather the data you need? Asking for and storing people's personal data is an exercise in trust, especially since people tend to be cautious about revealing their ethnicity (or sexuality, gender identity, and other personal characteristics) to their employer. Your data collection, use, and storage has to be GDPR-compliant, but you also need to be transparent about what data you're gathering, and why. And afterwards you have to do what you promise: if you say the data is for your ethnicity pay gap report, you must share the results. When the data your employees share with you doesn't go anywhere, they're less likely to trust you next time.
- How will you calculate the pay gap itself? There's no standard format so you can choose the format that's best for your organisation and your operational context. But don't choose a format that allows you to underplay your pay discrepancies. You will almost certainly be caught out, and trust

will go. You'll look like you're trying to hide something. Since gender pay gap reporting compares mean (average) and median pay rates, mean and median comparisons are a good place to start your ethnicity pay gap report. The more ways you compare, the more information you can gather from your results. Offering additional methods of comparison shows that you really are serious about understanding the way that pay relates to ethnicity in your organisation.

- You won't know what action, if any, you need to take until you've analysed your data. Although it's a good idea not to pre-empt the answers, good planning involves thinking about what solutions you'd be able or prepared to put in place, or what options you could have for different outcomes. For example, if you find that people from a particular ethnic group earn less than others at the same level, will you be able to increase their pay immediately? Would you need to offer some back pay? If your issue is one of representation, in general or at a particular level, how could you remedy this?

Communicating the rationale (and later, the findings)

Your organisation needs to know that you are planning to work out your ethnicity pay gap. If you've been working through this toolkit, you'll know the importance of regular and clear communication and its likely to be part of your anti-racism work – but it's always good to repeat, repeat, repeat. Talk about why pay gap reporting is important, not just for the sake of writing it down, but because it helps you to understand in more detail the experiences of your ethnic minority employees at work. It will help you pinpoint actions to remove obstacles and barriers. Think about how you position your message – it should be consistent with all your corporate communications on anti-racism.

Decide whether you'll publish your ethnicity pay gap externally or restrict it to internal sharing. It does have to be shared internally: ethnicity pay gap reporting, like gender pay gap reporting, helps to build your employees' trust that you are walking your talk on equality and inclusion. Publishing externally sends the message that racial equity is important to your organisation, aligns with your values, and is something you are actively working to achieve. External publication also overcomes the risk that someone might leak it anyway.

After you have analysed your findings, be ready for some honesty. If you perform a pay gap analysis you are likely to find some disparities. For example, you may find that people in your organisation are paid equally for equal work, but that a pay gap still exists because you are under-represented in certain areas. You would be in sparse company if you didn't find an ethnicity pay gap at senior leadership level. Be open about it within your organisation, and specific about the actions you will take to fix the disparity. In gender pay gap reporting there's no requirement to provide a narrative, but adding one is best practice. We recommend doing the same with your ethnicity pay gap. The narrative should provide context, explain how pay gap reporting works, and review your results. Do not use it to make your results sound better than they are.

At all stages of the process, and particularly when you share your findings internally, your employees will have questions. You should think about how you will respond to these questions (or answer them before they're asked) as part of your planning process.

Data collection and storage

You can't start work on your ethnicity pay gap until you've begun collecting the data. As ethnicity pay gap reporting is not yet

mandatory, no one knows which ethnicity categories employers will need to collect data for. We recommend using the categories from the most recent Census questions or from Office of National Statistics reports. Since the language of ethnicity is constantly evolving, the categories you choose for ethnicity analysis are likely to change more frequently than the ones you use for other protected characteristics. So it's good practice to explain which categories you're using, and why. You should also give people other reporting options, such as the ability to select multiple categories of ethnicity or write their response in a free-text box.

We also recommend capturing data on all protected characteristics – and other influencing factors such as socio-economic background – to help you carry out a deeper, more meaningful analysis.

See the data section of this toolkit for hints and tips on how to go about getting the ethnicity data you need. To avoid problems, you need to be up to speed on the regulations around data capture, use and storage. You can't compel employees to provide their data, so you have to build their trust in your motives and intended actions.

Calculations and analysis

Think about how you intend to calculate your ethnicity pay gap. Consistency is important for making future comparisons. To give yourselves as full a picture as possible, we recommend the following types of calculation. They go some way to ensuring you have comparable information for the time when ethnicity pay gap reporting becomes mandatory and there is a standard way of calculating it.

- Express the average hourly earnings of all ethnic minority employees as a percentage of white employees' earnings. This gives you a broad view on whether your ethnic minority employees as a whole experience disadvantage compared to their white British colleagues. This method is similar to the way that gender pay gaps are reported, though it does not account for the different outcomes for people from different ethnic backgrounds.
- Express the average hourly earnings of different ethnic minority groups as a percentage of white British employees' earnings. This gives you a detailed picture of whether any particular ethnic group is at more of a disadvantage in your organisation than any others. The data will help you understand why. For this analysis you'll need to consider which groupings you use. If yours is a small organisation, or one with low levels of ethnic representation, you may be unable to report at the most granular level due to the risk of disclosing someone's personal information. On the other hand, if you use more general categories, you may be missing some detail on the outcomes of particular groups.
- Show the proportion of employees from different ethnic groups by pay band or quartile. This helps you understand where

you may be lacking in ethnic diversity at various grades, and whether there are barriers to progression. Bear in mind that different organisations structure their pay bands in different ways, so you may not have a simple comparison.

- If there's no risk of breaching confidentiality, you could refine your analysis by incorporating other factors such as gender, age, disability, socio-economic background, part-time/full-time, and so on. This gives you even more detail. It could tell you, for example, that South East Asian men or mixed ethnicity women each have their own experience of you as an employer – one that's different to that of other ethnic groups.

The various calculation methods give you a rich set of data. Look at it critically to understand what inequalities exist in your organisation. Look at who is doing what, what they are being paid, and who may be experiencing barriers to progression. Delve into when and why people leave your organisation, how long they stay and whether they are promoted internally.

Identify actions

When you've carried out your analysis, you'll have a much better idea of what is causing the ethnicity pay gaps in your organisation. As with any other business issue, you have to resolve it through the root cause – for example, merely hiring more ethnic minority employees is not the same as creating an environment in which they thrive, have the same opportunities for learning and progression as their white colleagues, and have their performance judged in a genuinely meritocratic and objective way.

It's important, as mentioned, to communicate the findings of your ethnicity pay gap honestly, and to be genuine about the actions you intend to take to remedy any issues you've found. These actions should align with your overall

anti-racism or inclusion strategy, and should be carefully considered. Actions could include things like sponsorship, reverse mentoring, revisiting policies and processes, or creating bespoke development programmes. Take a look at other sections of this toolkit for more information.

Review and refine

Finally, review your process. For example, you may find that you could have communicated your plans more effectively, or that you needed to do more work on building trust to improve data-disclosure rates. Build these learnings into your process for next time.

Examples

Reviewing examples of ethnicity or diversity reporting will give you an idea of how other organisations present their findings, and the calculations they use.

- [Barclays](#)
- [Network Rail](#)
- [John Lewis & Partners](#)
- [PWC](#)

Further information

- [FTSE firms face tougher diversity rules under 'comply or explain' plan – Yahoo! Finance](#)
- [US stock exchange sets diversity rules for listed companies – BBC News](#)
- [Quarter of large firms now calculating ethnicity pay gap, research suggests – People Management](#)
- [Government must introduce mandatory ethnicity pay gap reporting, say TUC, CBI and EHRC – HR Review](#)

- [Zurich UK's 2021 ethnicity pay gap data signals 'more work to do' – Insurance Times](#)
- [Why is it important for organisations to report on their ethnicity pay gap? – Audeliss](#)
- [Bridge the gap: actions your business can take to close the ethnicity pay gap – CBI](#)
- [Why the race pay gap deserves the same attention as the gender pay gap – Pearn Kandola](#)
- [The importance of ethnicity pay gap reporting – HR Review](#)
- [Women may not be more pessimistic than men after all; why that matters for the gender pay gap – The Conversation](#)
- [UK gender pay gap reporting: a crude but effective policy? – London School of Economics blog](#)
- [Employers unable to report on ethnicity pay due to missing data – Chartered Institute of Personnel and Development](#)
- [UK government consultation on ethnicity pay reporting](#)
- [Ethnicity pay gap reporting – Equal Pay Portal](#)
- [The importance of ethnicity pay gap reporting and how to prepare – HR Review](#)
- [Ethnicity pay gaps: 2019. Earnings and employment statistics for different ethnic groups, using regression analysis to provide more insight into factors that affect pay – Office for National Statistics](#)



Section 3:

Building anti-racist behaviours

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Leading an anti-racist culture

Leaders are the prime influencers of organisational culture. What you say and do in your leadership role is likely to be copied throughout your organisation. As a senior leader, you are responsible for the culture – including anti-racism – so you have to ‘walk your talk’, just as you would for any other aspect of your leadership practice.

But in today’s fast-changing world, leaders can’t possibly have an in-depth knowledge of every subject, including anti-racism. What you need instead is the ability to be honest and the courage to show vulnerability. Understand your personal ‘why’ on anti-racism, and inclusion more generally, and show that you are an ally. This is how you start to make change happen.

So anti-racist leaders are important, but how do you lead an anti-racist culture?

Be accountable

As part of a leadership team you’re ultimately accountable for racial equity in your organisation. It’s a long-term commitment. Like any culture change, anti-racism takes time, effort and consistency to embed. And you can start by asking yourself the following questions:

- What do you want your leadership legacy to be?
- How can you make an impact?
- What must you do to create and sustain an anti-racist culture in your team, your area of activity, your organisation?

Set yourself some objectives

To move your organisation forward, you must set some goals and targets relating to racial equity and an anti-racist culture. Once you know where you’re going, you can track and measure progress.

Divisional, team, and individual targets and measures should flow down from your corporate targets. But make sure they are broad-based enough to support your overarching aims. For example, if you’re only targeting and measuring ethnic diversity without a focus on inclusion, you could end up with a revolving door of ethnic minority employees who leave because they do not feel your culture sets them up for equal success.

Without inclusion, you will struggle to achieve diversity in any sustainable way.

Even if your organisation has no plans to develop a set of corporate anti-racism goals, you can still give leaders some objectives. These objectives should make it clear that they are responsible for ensuring the fair treatment of staff, and that your organisation has zero-tolerance for racism.

Tips for leaders’ objectives

Objectives for leaders would include things like: working to ensure that your workforce is proportionally representative, creating a working environment in which everyone feels comfortable being themselves, or tracking instances of racism or prejudice and properly resolving them.

Your objectives should never be vague. A good rule is to check how SMART (Specific, Measurable, Achievable, Realistic, Time-bound) they are.

SMART: Increase our employee score from N% to M% for ‘I believe I can bring my whole self to work’ among members of department X – to be achieved by the time of our next employee survey in month Y.

NOT SMART: Improve employee engagement. There’s nothing measurable in this objective – the results, if any, will be entirely subjective.

Why not link performance-related pay to your leadership objectives?

As the adage goes ‘what gets measured gets done’. So, make sure your anti-racism and inclusion targets get measured. And then you’ll be able to link the results to performance-related pay. That would clearly signal how seriously your organisation takes anti-racism, and it would incentivise your leaders to deliver.

There are plenty of yardsticks you can use to measure anti-racism performance and tie it to performance-related rewards. We suggest linking a proportion of leadership performance pay to inclusion – of which anti-racism is one strand. Specific measurables can include:

- Number of race-related grievances and other complaints in a named department.
- Levels of ethnic representation in recruitment, hiring and team make-up.
- Employee engagement results for a named department, including scores and verbatim reports relating to race and inclusion.

- You should also track leaders’ wider efforts in building an anti-racist culture: for example, through sponsoring ethnic minority talent, challenging racial inequality, reviewing policies and processes and so on.

Turning the words into actions

Anti-racism rhetoric is nothing if an organisation’s actions don’t match its words. Here are some things you can do to keep your actions as strong as your words.

Know your organisation and yourselves

- Leaders should be ready to self-reflect. Question your own assumptions and patterns of behaviour in relation to race. If they fall short, fix them. For example, do you regard certain ways of acting as more professional than others, and does this assumption penalise some groups in some way? Do you find yourself silencing people of colour when they challenge? Do you hesitate to provide constructive work-related feedback to your ethnic minority employees? It can help to bounce your thinking off a trusted colleague. Be open about your willingness to challenge yourself in this way (and that you ask others for help).
- Take responsibility for learning about anti-racism more generally. Talk about what you’re reading or watching with your employees – this will help to set your expectations for anti-racism and to normalise the conversation. How much do you know about the various cultures that make up your team? And what do you know about the experiences of people within those cultures in terms of bias, microaggressions and racism? How are you building empathy to gain a greater understanding?

- Understand your organisation's relationship with race. Plot your employee demographics and develop a plan to resolve discrepancies. Understand the difference between positive action and positive discrimination. Know that representation in numbers does not equal racial inclusion or equity.
- Think about your organisation's external messaging. Does it match the reality of your employee experience? Are your communications undermining your anti-racism work or strengthening it? What harm could you be causing through performative anti-racism? Are you overselling your inclusion efforts to attract more ethnically diverse talent?
- Think about each member of your team and how their salaries relate to each other. Do you have equitable pay that's not skewed by ethnicity?
- Think about the way you distribute work, development opportunities and training among your team. Talk to your team members, individually and as a group, to make sure that everything is fair and transparent. Talk about development and learning with every member of your team. Understand where they want to take their careers, and what areas need developing to fulfil their aspirations. Instruct your direct reports to do the same with their teams and to cascade the behaviour to every level.

Be a role model

- Talk about race, even if it makes you feel uncomfortable – and do it often. The more you talk about it, the easier it gets. Be clear about where you stand on anti-racism. Discuss where your organisation is with anti-racism, talk about your vision and what you're doing to attain it.

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Make sure your personal actions and your organisational reality match your words.

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- Make sure your personal actions and your organisational reality match your words. For example, your commitment to racial equity rings hollow if your leadership team has no ethnic diversity and you're doing nothing to change it.
- Everyone gets things wrong sometimes – a wrong word or an approach that wasn't as inclusive as you thought. Apologise, correct it, and move on.
- Create psychological safety for your employees. Everyone should feel comfortable about challenging racist behaviours and structures, everything from overt discrimination to subtle acts of exclusion. Provide clear and transparent reporting processes with timescales and verifiable outcomes.
- Be visible. Don't sit on the fence: challenge when you notice stereotypes, microaggressions and subtle acts of exclusion, even if they're unintentional. Do it even when the only people in the room are white.
- Indifference to racism is a scourge. Galvanise your peers and your leadership to take the

lead on anti-racism in your organisation. Actively review your policies, processes, and behaviours, and update them where necessary. Take reports of racism seriously; embrace the spirit of the law in your zero-tolerance approach to racism.

- Provide examples of other organisations that take a progressive approach to racial equity. Encourage your organisation to match their level of ambition.
- Do not allow decisions that affect ethnic minorities to be made by white people in isolation. Your anti-racism work should be informed by those in your organisation who experience racism. Bear in mind, however, that although your ethnic minority employees will be very familiar with racism, they may not know how to resolve it or even want to get involved. Fixing the problem is your job as a leader.
- Always give credit to colleagues who come up with ideas. One form of racism involves taking credit for someone else's work. Insist on fair play and recognition throughout your teams.

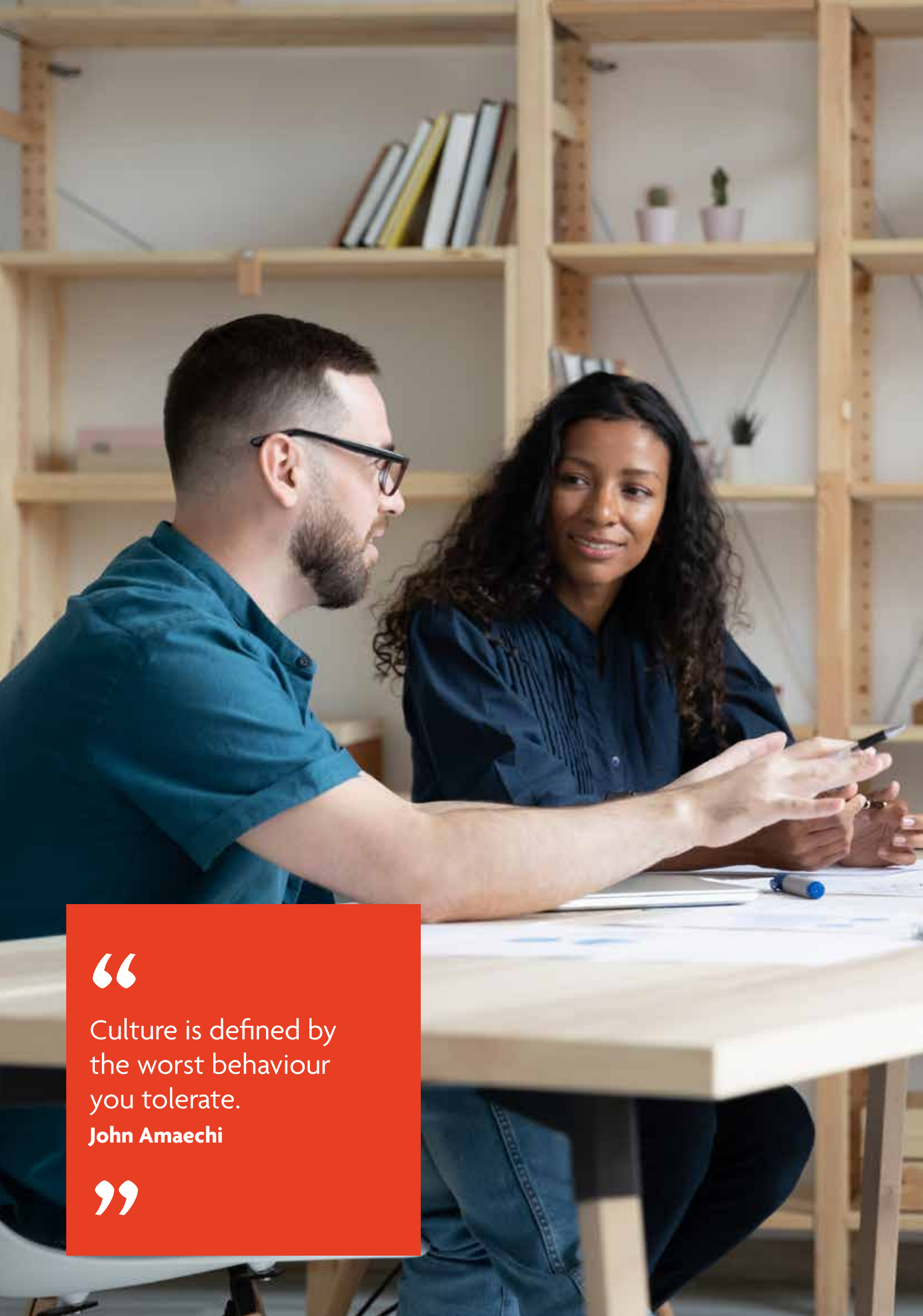
Practical steps towards change

- Be sure to provide adequate resources for anti-racism. How much budget do you need? How many people in a team?
- Put yourself forward as a sponsor or a participant in your organisation's anti-racism initiatives – e.g. volunteering for reverse mentoring or sponsoring an anti-racism workstream.
- If your organisation has targets on representation, make sure you are working to meet them. And if you can't meet them, be ready to explain why. If your organisation doesn't have targets, ask why.

Where appropriate, advocate for targets. At the very least, set targets for your own area of responsibility.

- Take note of those who are applying for jobs, promotions and pay rises – and those to whom they're being offered. Explore the discrepancies and put measures in place to fix them.

There are no surprises in any of these action points. Most are straightforward examples of good leadership. It's commitment that gets them going. Commitment and effort help to build and embed an anti-racist culture in your organisation. The alternative – not working to create a culture of anti-racism – is to condone racism.



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Culture is defined by the worst behaviour you tolerate.

John Amaechi

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Further information

- [Address the small infractions to create an inclusive culture](#)
- [“We have been risk-averse about inclusion for too long”: why performative action must go – Marie Claire](#)
- [The gap between minority experience and white perceptions of racism at work – Forbes](#)
- [“I’ll bring my full self to the job when the job shows up fully for me”: don’t expect your employees to show up as themselves when you don’t show up for them – Medium](#)
- [Why human leadership is key to delivering equity and inclusion – The Institute of Leadership and Management](#)
- [How to create a feedback culture that’s measurable and built on leadership behaviours – DDI](#)
- [How inclusive is your leadership? – Harvard Business Review](#)
- [Six steps leaders take to become anti-racist – Business Insider](#)
- [Improving ethnic representation is not enough to be anti-racist and inclusive. Addressing racial inequality: why creating a safe environment is important and how organisations can get started – The CBI](#)
- [Nike sets fresh diversity targets for 2025, and ties executive compensation to hitting them – CNBC](#)
- [The rigged test of leadership; Sophie Williams – TED](#)
- [Why inclusive leadership is important for modern business – CEO Magazine](#)
- [How to be an inclusive, anti-racist business leader if you are white – Reuters Events](#)
- [Driving diversity and inclusion in the workplace: the D&I strategy report – Robert Walters](#)
- [Mission statements don’t create cultures: today’s CEOs must take ownership – Forbes](#)
- [Race and ethnicity: putting words into action – Institute of Practitioners in Advertising](#)
- [Businesses must be accountable for their promises on racial justice – Harvard Business Review](#)
- [‘Responsibility structures’ are the key for diversity initiatives to succeed – HR Review](#)
- [The work of code-switching falls on white managers now – Fortune](#)

Engaging and supporting managers

All people managers have the potential to influence their overall organisational culture. These are the managers who run the day-to-day operations, and who take part in frequent direct conversations with front-line or customer-facing employees. They lead, recruit, performance-manage, and make a wide range of people-focused decisions every day of their lives.

Within their own teams, they set the tone and culture for inclusivity. They motivate their teams to deliver organisational goals, and have a big impact – positive or negative – on their team members' careers. They're the people who do the heavy lifting on the implementation of any business strategy – including anti-racism.

Managers can be the squeezed middle within your employee population. They often report to strategic leaders, which means they have to think about the big picture while having to deal with a high level of operational detail. In their daily role of managing, motivating, and leading a potentially large team, they often have to satisfy a range of conflicting priorities. They're often promoted into the role without ever getting the how-to-be-a-manager training. They do their best but have no idea if what they're doing is best practice.

To make culture change stick, you have to turn your managers into advocates early on. Here's how:

- Help them understand the need for, and the benefits of, an anti-racist culture. If

they haven't bought into your organisation's stance on anti-racism, they won't be willing to give it much time or effort.

- Explain what actions they have to take, and what outcomes they are expected to achieve – and how actions and outcomes will be monitored and rewarded.
- Give them all the tools, skills, strategies, etc. that they need for the task.
- Provide them with anti-racism training that focuses on the practical realities of managing and leading people in an anti-racist way.
- Give them the right amount – and type – of organisational support. This could involve in-depth training on anti-racism, or support to help them understand their own biases and how those biases could be affecting their teams.
- Explain the importance of their role in championing and role-modelling anti-racism and inclusion, celebrating diversity, and challenging bias.

For managers: how to create change by working on hearts and minds

Senior leaders are fundamental to creating and sustaining an anti-racist organisational culture. They must lead by example, through actions and words, to create an environment in which everyone feels valued for who they are.

The same applies at all levels of management. You too can lead an anti-racist culture within

your team; you can create your own anti-racist subculture as part of your organisation's overarching culture. Local change really is down to you. Your team culture depends on your leadership and management, your goals and priorities, and your behaviours.

How to go it alone when senior leadership is not on board

You may find that your leaders are not as passionate as you are about anti-racism or inclusion. In section 2 of this toolkit you'll find plenty of practical advice on how to get your senior management on board – to persuade them that anti-racism is vital to their employees and to the success of their organisation.

The big question is whether you can still develop an anti-racist team culture if you're struggling to persuade your leadership to do the right thing. What can you do if senior leadership don't want to be persuaded?

You can work with your own team. Even though you don't have buy-in for a strategy or a specific action plan or positive action, there are things you can change within your sphere of influence, and actions you can take to build anti-racism into your team's culture.

Suggested actions

- **Self-reflect**
Think about your own actions and behaviours, and how you can become more actively anti-racist. Anything from being careful to pronounce people's names correctly to looking at who you consider to be promotion-ready, and why.

You could reflect on how your management style creates the great – and not-so-great – practices within your team, and consider

how you could make incremental changes to consistently promote race equality and anti-racism. For example, do all your team members get the same opportunity to put their ideas across? Is everyone taken seriously? Is everyone held to the same performance and behavioural standards?

- **Be a visible role model**
Role model anti-racist behaviours and allyship, and be clear about what you expect from your team too. For example, always follow fair recruitment processes and challenge peers and leaders wherever you see unfair practices in action.

Take any race-related complaint seriously, and make changes where necessary. Take care not to take reports at face value: race-related issues are not always named, and may be hidden behind some other type of complaint. Deal with issues in a timely and transparent way.

Attend general and race-specific inclusion training and events to keep informed of related issues and wider debates. Inform yourself – don't expect your ethnic minority colleagues to educate you on racism and its effects.

- **Talk, and actively listen**
Talk about race equality and anti-racism, and how they show up at work.

Actively listen to your team members, and always take their experiences seriously.

Respond constructively to feedback – and actively request it to help you become a better anti-racist ally.

Create a space of psychological safety to ensure people can speak openly about their experiences, without worrying that they will be judged or dismissed. Be clear that

your ethnic minority colleagues are not expected to work on anti-racism. But if they choose to get involved, make sure they are recognised and rewarded.

- **Evaluate your team's policies, processes, and procedures**

Take a critical look at how things work in your area. Are you operating in an anti-racist way, or are there things you can change, formally or informally, to create racial equity? For example, think about the ways you recruit or promote people. Make sure you and your team follow the right processes to ensure fairness and avoid bias – for example, create diverse recruitment panels, monitor representation in your team, and rethink the way you assign salaries, especially to new starters if there are wide salary bands open to bias. Do this regularly and consistently.

- **Support your team to be anti-racist**

Make honest and constructive feedback a two-way street. Be clear about your intentions and role model accepting feedback without defensiveness.

Get your team to look at its ways of working to remove aspects where bias could creep in. As a point of best practice, introduce a requirement to carry out equality impact assessments on all areas within your control.

Be clear about celebrating and valuing contributions and high performance without regard to race or any other characteristic.

All these actions will help you build anti-racism into your team's subculture, and other areas within your control. Eventually, as your team grows increasingly inclusive and diverse, performance will improve. When they see your success, other areas of the organisation will begin to follow your lead. However, if you still don't have full commitment to anti-racism

from your senior leaders, you'll find culture change slower and more incremental. But that won't make it any less worthwhile or less sustainable.

Further information

- [Why middle managers could be the 'lynchpin' of inclusivity in the workplace – World Economic Forum](#)
- [The role of line managers in creating an inclusive culture - The diversity Project](#)
- [D&I: the missing link – Training Journal](#)
- ['Responsibility structures' are the key for diversity initiatives to succeed – HR Review](#)
- [How can boards create anti-racist companies? Boardroom table leaders have a role to play in dismantling systemic barriers, from embracing key values to devising strategies to drive change – Policy Options](#)
- [Six steps leaders can take to become anti-racist – Business Insider](#)
- [How leaders can master the art of culture change – EY](#)
- [A different type of climate change: the climate of inclusion – SIA Partners](#)
- [If you're expecting Diversity and Inclusion leaders to fix workplace racism, think again – Forbes](#)

Building trust and confidence among your ethnic minority employees

Why they don't trust you, and why you need trust

Trust is a fundamental component of inclusion. It's vital for ethnic minorities, who have had to deal with structural and systematic racism for generations – and faced the incivility of being side-lined by other equity causes they have helped to further. The gay rights movement became what it was through the support of black activists. And the feminism movement has long pushed aside women of colour in favour of white women¹. In the workplace, ethnic minority employees have endured decades of inequity, have been held to different standards, and had their abilities viewed differently by colleagues, managers and leaders.

So it's no surprise that employees do not trust their employers to live up to the promises they make as they begin to understand the realities of life and work for black and ethnic minority people.

Some organisations have been working on inclusion for several years. They talk regularly about how they believe their employees should be able to 'bring their whole selves to work'. Yet many ethnic minority colleagues still feel uncomfortable doing this because the culture doesn't feel inclusive to them.

Here are some ways the work environment contributes to this:

- If ethnic minority – and especially black – people are naturally loud or direct, they're likely to be labelled 'aggressive'.

- When ethnic minority people eat at work – especially if they bring their own lunches – they're likely to be negatively judged ("your food smells" etc).
- A person's style of dress or hair might be seen as 'unprofessional' by those who apply white Western standards.
- Peoples' accents and voices are easily classed as wrong, too loud, too difficult to understand (when they're not), etc. People still feel the need to change how they speak or act (code-switching) at work.
- To help people work with colleagues who don't listen to or include them, their leaders' best response – their professional feedback – is to suggest that they change themselves rather than dealing with the behaviour of their colleagues.

In a nutshell, ethnic minority people are still expected to assimilate to the norms of white culture.

But it's white people who need to work on this, not their ethnic minority colleagues.

How to build trust with your ethnic minority employees

According to the adage, ethnic minority people have to work twice as hard for half as much. While workplace inequities are not usually as extreme or overt as they once were, racism is still alive and well – and irrefutable when you look at the make-up of organisations across the world. There's plenty of work to do.

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In a nutshell, ethnic minority people are still expected to assimilate to the norms of white culture.

But it's white people who need to work on this, not their ethnic minority colleagues.

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This work will typically involve:

- Talent identification and management programmes
- Learning and development – informal and formal, including mentoring, sponsorship, formal education, coaching, and leadership development, as well as individual development and career plans
- Work and project distribution
- Progression and promotion opportunity and processes
- Pay and reward, including equal pay, transparency, ethnicity data collection and analysis, pay gap reporting
- Employee engagement data, including verbatim feedback
- Positive action plans and programmes – such as targeted development programmes

To build trust, be transparent about your actions and the reasoning behind them – and do it with everyone, not just with your ethnic minority employees.

You should also make it clear your ethnic minority employees are empowered to speak up about their experiences of racism in all its forms within your organisation. And you must show that you are taking their feedback seriously – and acting on it. If your ethnic minority employees are silent, this tells you something. Do they feel unsafe? Do they not trust you to fix the problems?

In everything you do, you should first run your ideas past your ethnic minority colleagues for their views. This is where employee network groups or employee resource groups can add real value.

The worst thing your organisation can do is make a commitment to change and then do nothing or concoct a window-dressing change.

Striking a balance between involving and burdening ethnic minority employees

As you plan your anti-racism programme, work collaboratively with your ethnic minority employees. Failure to include them in your plans perpetuates the idea that white people know what's best.

At the same time, be wary of placing the onus for solving racism on those who experience it. Ethnic minority people may not be experts in inclusion, and they may not want to do the work for free. And they definitely won't want their anti-racism work to overshadow their professional area of expertise in a society in which they could easily be called out for 'playing the race card' or 'acting like a victim'. It is stressful to take on a role in which they're constantly talking about and working on, a subject that is personally distressing and traumatic. Also, is it reasonable to ask ethnic minority colleagues to take on more work – probably for no extra pay – to solve a problem that affects them, but which they didn't create?

The best approach is to ask your colleagues how they'd like to be consulted on anti-racism work in your organisation. They may want to be kept informed and to be given an opportunity to comment on or veto certain things – for example, use of the term B.A.M.E. They may want to be involved in setting the direction of travel and your high-level work streams. They may be keen to take part in day-to-day delivery. Or they may prefer to have a collective voice via a staff network or employee resource group. Their views should be respected as you give them a genuine opportunity to be involved and heard on all key decisions.

Breaking trust is easy

The need to deliver on what you promise is a theme that runs through this toolkit. Failure to do what you say destroys trust in your organisation.

Here are a few examples of the types of actions that break trust:

- Organisations that publicly post their commitment to anti-racism, yet put no concrete action in place.
- Occasions when white senior leaders take public credit for the work of their ethnic minority employees on anti-racism.
- Organisations whose public commitment to anti-racism is contradicted by employees whose personal experiences do not match the rhetoric.

Trust is fragile, and easily broken. To maintain trust, ensure that your anti-racism work is earnest rather than performative, that you collaborate with (and give credit to) your ethnic minority colleagues, that you foster transparency and that you work consistently towards racial equity in your organisation.

Further information

- [The work of code-switching falls on white managers now - Fortune](#)
- [How imposter syndrome and racism overlap – and what can be done to tackle it](#)
- [Five black LGBTQ activists that shaped the civil rights movement](#)
- [Black LGBTQ+ figures, icons and inspirations, by Akira Holland](#)
- [Black trans women seek more space in the movement they helped start: – New York Times](#)

- [The bias of ‘professionalism’ standards – Stanford Social Innovation Review](#)
- [Employers ignore you if they can’t pronounce your surname – BBC News](#)
- [Employees who don’t trust their business on diversity ‘three times more likely to quit’ – People Management](#)
- [Half of BAME staff feel obliged to hide their personalities, survey finds – People Management](#)
- [Ethnic minority employees face ‘psychological burden’ of fighting racism at work – Metro](#)
- [Are charity anti-racism efforts becoming ‘the BAME person’s burden’? – Each Other](#)
- [Beware of burning out your black employees: Don’t ask them to solve your company’s diversity problem – Fortune](#)
- [People of colour have to ‘code switch’ to fit in with white norms – Metro](#)
- [For diversity consultants, the past year has been a rollercoaster – Vice](#)
- [Anti-racism: you may be doing it wrong. Here’s why – The Lily](#)
- [How corporate diversity initiatives trap workers of colour – BBC Worklife](#)
- [Britain’s big race divide: CNN poll](#)

Footnotes

- ¹ How western feminism imposed itself on the world – The Cut <https://www.thecut.com/2021/08/rafia-zakaria-against-white-feminism-book.html>

Racism and the Equality Act: everyone is responsible

In an anti-racist organisation, everyone is responsible for upholding the culture through their words and actions. But what does the law say, and who should be doing what?

The Equality Act 2010

The Equality Act 2010 applies to Great Britain, and makes discrimination on the grounds of nine protected characteristics (including race) illegal. In this context, race includes ethnicity, colour, ethnic or national origin and nationality. It applies to workplaces, public services, organisations that provide goods and services, clubs and associations, transport and public bodies.

Discrimination could be the result of an isolated incident or a rule or policy based on race. A discriminatory action does not have to be intentional to break the law.

Examples

Isolated incident:

An East Asian person applies for a job in a predominantly white area. Despite meeting all job requirements at interview, they are told they wouldn’t fit in, and the job is given to a white person with similar experience and skills.

Rule or policy based on race:

A school uniform policy threatens to exclude children with Afro-textured hair from school if they don’t wear it in tidy or acceptable styles based on what white people consider appropriate. This kind of policy

amounted to indirect discrimination in a case [brought by a child](#) and backed by the Equality and Human Rights Commission (EHRC). In 2021, [The Halo Code](#) was launched – a voluntary code that organisations and schools sign up to – to stamp out anti-black and race-based hair discrimination which is still common despite being illegal.

As well as the direct and indirect discrimination described here, Equality Act 2010 covers associative discrimination and perceptive discrimination, and makes victimisation and harassment unlawful.

Liability of individuals and organisations

An organisation will usually be held liable for the actions of its employees (and its contractors etc). Individuals who commit discriminatory acts can also be named as respondents together with the employer. All respondents, including individual employees, can be found liable for financial compensation. Under current case law, respondents are usually found to be ‘jointly and severally’ liable. In other words, the claimant can recover their full compensation from anyone held liable. Occasionally, the tribunal apportions liability, together with compensation amounts, for each liable party, but this is an unusual outcome.

Employers can avoid legal responsibility for the discriminatory actions of their employees if they can show that they took all reasonable steps to avoid the actions. But a 2021 case, *Allay (UK) Ltd v Gehlen*, showed that this is not an easy defence to mount. *Allay (UK) Ltd* argued that it

had taken action to prevent racial harassment from occurring because the perpetrator had undergone training on equality and diversity, and anti-bullying and harassment, two years previously. But the Employment Tribunal took the view that the employer's training had become 'stale'. What's more, the training had clearly been ineffective as the employee didn't see anything wrong with their actions, and not one colleague had challenged them. Worse, when the harassment was reported, management did not know how to respond. The Tribunal said that it would have been reasonable to arrange refresher training, and upheld the claim for harassment. Allay (UK) Ltd had not done enough to prevent racial discrimination or to develop an inclusive culture, to avoid responsibility for the actions of its employee.

What does this mean for your organisation?

If an employee puts in a claim, the Employment Tribunal will normally take into account loss of earnings, loss of pension, injury to feelings (based on three categories depending on the level of distress and injury experienced), and occasionally personal injury. Under the Equality Act 2010, there is no limit to the amount of compensation a tribunal can award for race discrimination. And the amount awarded for injury to feelings commonly reaches into tens of thousands. In 2019–20, the average award made by the Tribunal for race discrimination was £24,322. The highest award that year was £124,799.

Even if your organisation is one that doesn't get the straightforward human reasons for adopting an anti-racist workplace culture, it can't afford to ignore the legal, financial, and reputational costs of failing to ensure that neither it nor its employees discriminate.

In addition to your responsibility to not discriminate against any colleague based

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Under the Equality Act 2010, there is no limit to the amount of compensation a tribunal can award for race discrimination.

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on race, there are specific actions and responsibilities that may fall to different teams and individuals within your organisation. Some of these are explained below. Bear in mind that responsibilities may vary according to the context of your organisation.

Board – You set the vision and strategy with the CEO and executive team and hold them to account. Ensure you have a meeting during which progress on anti-racism is discussed. Demand to know what is going on in the organisation – numbers of race-related grievances, disciplinaries etc. Plus what action is being taken to drive a fully equitable culture. Think about how you can have oversight of the organisation's progress on anti-racism – this could be through reporting, setting up a dedicated committee, attending staff network or resource group meetings and so on.

CEO – You are ultimately responsible for your organisational culture. You own anti-racism, and you set the tone and the pace. As with other areas, you need to be willing to hold yourself and your direct reports to the highest standards when it comes to anti-racism, inclusion and equity. Lead through role-modelling the values,

policies and processes you expect from the rest of your organisation. Hold your teams to account on inclusion, and ensure their performance is also judged on anti-racism and inclusion. Be clear about your anti-racism agenda, and ensure your direct reports are in no doubt about what you expect of them.

Executive team/C-Suite – You must also set the vision, strategy and action plan for anti-racism with the Board and CEO and drive it. Translate them for, and apply them to, your own functional strategy. Be clear on behavioural expectations for all colleagues, and what inclusion and anti-racism look like in everyday activities. As with any leadership role, you must actively role-model anti-racism.

Senior leaders – Talk. And walk the talk. Build inclusive teams, be clear what you stand for, and be honest and transparent about what is happening (or not happening). Be accountable and hold each other and your teams to account on inclusion.

Individual employees – This means everyone at every level. You should behave inclusively, you should call out injustice and racism, and you should behave as effective allies.

Network groups – Your terms of reference should be agreed with your organisation because there are many ways of running a network or group. Is yours a group for providing support or will it be involved in setting policy or the agenda on racial equity? Or is it a forum for views on internal and external comms etc. Either way, your role is to challenge inequity.

Managers and team leaders – Build inclusive team cultures with clear behavioural expectations, and manage inclusively. Talk about race with your teams, celebrate inclusivity, and call out behaviours that don't meet your expectations. Deal with overt and covert issues connected to racism. Question

decisions and other actions that negatively impact your black and brown team members.

HR team – Make your policies inclusive and equitable, remove scope for bias, and make sure, and make sure they're followed by everybody. Take allegations seriously, make the consequences clear, and make sure the consequences apply when needed. Be clear on behavioural expectations – on anti-racist and allyship behaviours.

Inclusion and Diversity team – If you have an Inclusion and Diversity team, think about its responsibilities and how you set up the team for success. You can't expect junior people to lead a culture change without CEO and senior-leadership prioritisation. They should be there to support your organisation's anti-racism vision and strategy – not to deliver it. That's the job of everyone together.

Further information

- [Who is liable under the Equality Act – Stammering Law](#)
- [Employment law – race discrimination – Landau Law](#)
- [Black employees are being asked to fix institutional racism – Wired](#)
- [How to build an anti-racist business – Management Today](#)
- [How to be an inclusive, anti-racist business leader if you are white – Reuters Events](#)
- [How to ensure your workplace is anti-racist: HR must play a key role – People Management](#)
- [Eight things any CEO can do to advance diversity and inclusion right now – Forbes](#)



Setting up a successful Inclusion and Diversity team

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The nature of the work means it is often a personal vocation for practitioners who are passionate about building equity in workplaces.

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Many organisations have roles specifically for improving organisational inclusion and diversity (I&D). They may be standalone posts or full teams. The size, weight, and structure of the team reflect the organisation's size and complexity, and the strength of executive and board-level commitment to equality.

According to O.C. Tanner's 2021 Global Culture Index report ¹, only 52% of UK leaders have communicated their inclusion and diversity goals, and only 33% have dedicated senior employees or sponsors. Reasons include a lack of priority for diversity among leaders, employee ambivalence, and a general lack of commitment within the organisation.

For inclusion professionals – who are more in demand than ever – it can be difficult knowing which I&D roles to accept. The nature of the work means it is often a personal vocation for practitioners who are passionate about building equity in workplaces. Disappointingly, many organisations that advertise I&D roles do not support equity building; some actively impede it.

These are the warning signs to look out for in your organisation:

- Your organisation and its senior leaders are not committed to anti-racism and inclusion, or their commitment is performative and doesn't translate into tangible action and results.
- The role does not come with the power to make change because: the level of seniority

is too low, the reporting line doesn't enable meaningful change, the budget or the team is too small, or the structure of the role is ineffective.

- The organisation hasn't mapped out the objectives of the role, the skill levels required, or any of the other factors that would make it effective.
- The post-holder is expected to lead culture change alone, without ownership and accountability from senior leadership (including CEOs and board members who are ultimately responsible for inclusion and equality).

How to prepare for a successful I&D appointment

- Be clear about the role's remit and the skills you are looking for. How does the role link to your strategy and how will success be measured? Are you looking for someone with change-management skills? Project management? Service design? Policy development? Data analysis? When it comes to the softer, interpersonal skills, are you looking for an influencer, a visionary, or a leader?
- Think about the needs of your organisation and the professional background that would make a good fit. I&D professionals come from a range of backgrounds, including HR, volunteering, the public sector, and social-justice campaigns. Sometimes it helps to spread your net wider – to bring in someone from

Building an anti-racist culture

A toolkit produced by Inclusive Employers

another sector, from a different type of organisation, or with a non-typical career history who will challenge you to do things differently.

- What experience level are you looking for, and why? What does the role pay? Ask yourself whether what you're asking for exists in the market. I&D is a new field with no standard career path and recently developed qualifications. Does your new hire need to have worked in the field for as long as you think they do?
- Who does the person report to? If you're serious about making change, I&D should really report to the CEO. Many organisations have a reporting line into the HR Director, but ideally your I&D team should be working alongside HR, not reporting into it. This also sends the message that inclusion and anti-racism are business-wide responsibilities.
- Where does the role sit within your organisation in terms of power and influence? What is the budget? The team size and structure? Is it enough for your delivery expectations?
- Be mindful of the emotional toll I&D work takes on people. Think about how you will support them in your organisation, formally and informally.
- Think about development and future career paths for your successful candidate, just as you would for any other discipline.
- Be realistic about your expectations for the role. Are you really going to be able to implement and embed a full I&D plan if your hire is on a 12-month, fixed-term contract? Candidates within the I&D talent pool can spot a performative post a mile away, so make sure you're bringing in this role at the right time, and with the full intention to make a success of it.

Further information

- [UK firms have a long way to go with diversity and inclusion – The HR Director](#)
- [How to lose a chief diversity officer in six months – Medium](#)
- [Restructure your organisation to actually advance racial justice – Harvard Business Review](#)
- [Is HR a hypocrite when it comes to D&I? – HR Magazine](#)

Footnotes

- ¹ <https://www.octanner.com/uk/global-culture-report.html>

Employee networks and employee resource groups

Staff networks are traditionally grass-roots, employee-led groups for under-represented demographics. Their historical role was to provide a support network for colleagues to discuss their experiences at work, and to organise cultural and celebratory events. They first appeared in the 1960s when networks formed to focus on race and ethnicity. Today, organisations often have networks relating to various protected characteristics or to other marginalised groups, from gender and disability to carer responsibilities. The purpose and remit of these groups often depend on the organisational context.

What's the difference between a staff network and an employee resource group (ERG)?

For the most part, the concepts are indistinguishable because the terms are interchangeable. Historically there was a difference: staff networks were supportive spaces and ERGs were more business-focused. In practice, what a staff network or an ERG does varies from organisation to organisation. Each organisation decides for itself what it wants its groups or networks to achieve.

In recent years ERGs have become more prominent as leaders learn of the value they bring. They are efficient mechanisms for sharing information on inclusion and anti-racism across employee groups; they provide

organisations with a forum for ethnic minority employee voices; they contribute to the organisation's anti-racism work; and they give everyone access to role models from within that demographic.

Should you have an ERG or network group?

The choice depends on the nature of your organisation, its size, and its demographics. You need to ask your employees what they want, and you have to take account of your organisational culture: for example, do collaboration, connecting, and story-sharing come naturally? Some organisations have groups linked to particular identities; others have one group for all employees from marginalised groups.

Setting up your group for success

If you're planning to set up an ethnic minority ERG in your organisation, here are a few points to consider:

- **Who are the stakeholders?**
To give your ERG the best chance of success, employees and the organisation should work together on its set-up and its day-to-day work. Interested parties will include the network itself together with your HR, Employee Engagement, and Diversity and Inclusion teams. You also need a supportive and active executive-level sponsor.



- **What is your ERG's purpose?**

Is it to provide a safe space in which your ethnic minority colleagues can support each other, or will it contribute to your organisation's anti-racism work? Or both? How will your ERG feed into your organisation's decision-making?

- **What is your ERG's remit?**

What is in or out of your ERG's scope? Will it promote anti-racism in your organisation? Mark events such as Black History Month? Support the organisation's anti-racism work? Be a critical friend in designing policies and processes? Will it ensure you're properly consulting on any changes that will affect your ethnic minority employees?

- **How will your ERG operate?**

What is its structure and terms of reference, and how will it work? Who appoints its chair and committee, and what's their appointment process? How often will it meet? Who does what? What will its budget be, and will that be enough? Will the chair and committee members have enough time to do a proper job: will they get time away from their core roles or be paid for their time? How will the organisation and executive sponsor help the ERG achieve its goals? How do the chair and committee make room for new talent, and how should they spread their workload? This is work that benefits the organisation; your employees should not be expected to do it for nothing.

- **How will you maintain enthusiasm and momentum?**

Think about how you'll keep people engaged in the group over the long term. What will you do if interest and membership wane? How would you reinvigorate the group? How do you create a talent pipeline?

Think about succession planning and ways of maintaining momentum when network members move on, step down, or take on a different role.

- **How will your ERG communicate?**

It needs a name – maybe even branding and a logo. Think about how your ERG will communicate with its members, the organisation, senior leadership, and any other stakeholders. It needs to show that it's achieving something and generating value for the organisation. And you need to show that you're acting on its feedback and ideas.

- **How will you develop and reward your ERG?**

How does the ERG's work filter into SMART¹ objectives and your performance-management processes? How will you appropriately recognise and reward the contributions of members and officers? What skills will members develop, and how can they be linked to progression in their core roles?

- **How will your various ERGs collaborate?**

If you have, or are planning, a series of networks to cover a range of characteristics (ethnicity, disability, LGBTQ+ etc.), are there ways you can get them together to share and build best practice, and to create a deeper understanding of intersectional experiences?

By putting thought into your ERG, you help your organisation understand its value, and you give group members a stronger sense of what their effort will achieve. A well-thought-through ERG sends a positive message about how seriously your organisation takes anti-racism, how highly it prioritises the work needed to make it happen, and its belief that anti-racism is as valuable as any other activity the organisation engages in.

What if your organisation is too small to have its own network?

Most industry sectors have their own sector-wide ethnic minority network groups. Some are meant to provide a safe space for ethnic minorities. Others provide practical career development through, for example, mentoring programmes. And some work to create equity at sector level. These groups will be well-known within your industry sector – and probably feature in its press reports. Think about how joining forces with them could support your organisation's plans – and how you could mutually benefit from working together.

Need more help?

For more support, get in touch with Inclusive Employers. Inclusive Employers helps organisations set up ERGs for success, and advises on a wide range of activities, including setting ERG strategy to align with organisational I&D objectives, and working with ERG members on personal branding, confidence and influencing skills.

Further information

- [How to set up an ERG for black and ethnic-minority colleagues – Chartered Institute of Personnel and Development](#)
- [How employee networks can help boost a company's bottom line – London School of Economics](#)
- [Factsheet: steps to start and run an employee network - Business in the Community](#)

Footnotes

¹ SMART objectives: Specific, Measurable, Achievable, Realistic, Time-Bound.

Maintaining anti-racism in hybrid and remote environments

Throughout this toolkit we talk about building trust; normalising the conversation on race; and challenging racism, prejudice and bias. But how easy is building and maintaining any kind of organisational culture in a world where increasing numbers of people are either working in a hybrid way, or are fully remote? There are fewer opportunities for in-person and spontaneous conversations, or for group meetings in the office. For organisations with employees who are unable to work from home – such as retailers, care providers, medical staff and housing employees – changing work patterns have amplified existing inequalities because ethnic minority employees are over-represented in many of these roles. These organisations have already had to navigate the complexities of ensuring balance and fairness between home and on-site working in their employee populations.

Employers are increasingly looking to move to a hybrid way of working, with relatively few committing to complete freedom on where a person carries out their work. This is understandable: organisations need to have a good idea of how much office space and other resources they need. So most are taking a pretty fair approach: consulting with employees and setting how much time people will be in the office and how often they'll be working at home. At the same time, they're accounting for

business needs and for cohesive team-working, while balancing all of this against the costs or the potential savings.

Along the way, there have been concerns about how employers ensure that every employee is treated equitably without regard to their place of work or their ethnicity or any other protected characteristic. You need to think about these issues when preparing your hybrid working strategy and plans.

Whether working remotely or in the office, everyone has a different experience of work

For some people, remote working is a blessing. Numerous reports say that people feel happier working at home, often those who no longer have to endure the daily round of workplace microaggressions and subtle acts of exclusion. For others, such as those with caring responsibilities or health conditions, the flexibility of working from home has made it easier to perform at their best. For many, the need to always be at their desk – presenteeism – has fallen by the wayside.

For others, however, remote working is more like a curse. There are as many reports of employees hating the new regime. People living in shared accommodation struggle with living and working in their bedrooms, many people lack the space to work comfortably at home, others have found it difficult to work when trapped in a domestic space filled with personal challenges. Many struggle to cope with the lack of in-person social contact.

Everyone is different; everyone needs different things to perform at their best. That's why, to begin with, you'll probably find it difficult to navigate the complexity of everyone's needs. But that's the nature of anti-racism and inclusion work. The gains in the long run are always greater. Employers from sectors that operate with a mixed workforce may well find that they already have internal expertise and experience in this area. The challenges of COVID-19 may well have put them in a strong position.

You don't necessarily need to change everything, but there are some additional things you should think about.

Leaders and managers play a key role

It doesn't matter where your employees work; an anti-racist culture is about ensuring your people feel that they belong, that they are valued and respected, and that they are treated the same as their white colleagues. It can be helpful to think in detail about two different strands:

- How employees experience your culture wherever they happen to be working
- How you ensure everyone is treated equally, no matter who they are or where they work

To ensure equity and a strong culture outside of your office environment, you, too, have to get comfortable with changing the way you do things. As organisations move towards hybrid working, there will be added complexity in the way they connect those in the office with those at home. You need to think about how this will work in practice.

Think about how you work in your team:

- How do you keep your anti-racism culture, commitments and actions at the forefront of your organisation when you're not all in the same place?

- How might ethnic minority employees experience a hybrid or remote workplace differently? Think about how microaggressions show up in a virtual world, for example.
- Are there ways to ensure you give everyone the opportunity to contribute?
- How can you ensure everyone has equal access to leadership or management, to the same work opportunities, and to the same tools for the job?
- How can you celebrate difference when working in different locations?
- How can you create spontaneous(ish!) moments for people to connect, when they can't do it in person? Coffee roulette has been popular at Inclusive Employers for exactly this reason. Alternatively, you could try scheduling in some team time so that people can catch up – but not about work.
- How do you ensure people who aren't often in the office or regularly involved in online team meetings, are recognised equally for their performance?
- How do you ensure everyone feels part of the team, whether they are in the office or elsewhere? How do you check that meetings add value or that they're scheduled at reasonable times of day? Do you need an agreement about core meeting hours to enable people on more flexible or part-time schedules to take part?
- How do you stop your employees from working too many hours and burning themselves out? You may be clear that you do not want to see presenteeism in your team – but it's harder to see this in action if you are not all in the office. Think about how you create an environment where employees can be honest with you about their workloads.

We advise co-creating your plans with your

employees, whether as a team or organisation-wide. Ask for suggestions, ideas, and thoughts. Be open to feedback: ask people what they feel is or isn't working, or what new ideas they'd like to try. Be open, honest, and transparent. Treat it as an iterative process: you can always build on something or even stop something if it's not working.

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It doesn't matter where your employees work; an anti-racist culture is about ensuring your people feel that they belong, that they are valued and respected, and that they are treated the same as their white colleagues.

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Engage and consult with employees

If you have staff networks, employee resource groups, or a union presence, lean on them for their expertise and networks. They can help you by sharing feedback and ideas from employees in under-represented or marginalised groups. Be ready to make changes to your hybrid and remote-working policies, and to any other relevant policies. As always, make sure you communicate changes you're making transparently, and that you credit these groups in your communications.

Remote on-boarding

Many people took up new roles in new companies during the pandemic. There have been some excellent stories of employers thinking through the practicalities of onboarding new employees remotely. And there have been examples of poor practice.

Here is our advice for setting people up for success:

- Revisit your onboarding process. Think about how it can work just as well remotely as it does in person, and how you can build anti-racism into it.
- Think about how onboarding might be different for ethnic minority colleagues. For example, what opportunities are there for building their personal network within your organisation? How can you build their trust? How can you be clear about your stance on anti-racism so they feel comfortable speaking up if something happens?
- Think about how you can best train people on your systems and processes if you can't do the training in person. Remember that everyone absorbs information in a different way.
- Have a conversation with each new joiner about the best way for them to work and learn in a hybrid or remote setting. Some people will be confident about spontaneously contacting people they've never met; others, less so. Some may be comfortable with learning new systems and processes remotely; others may need someone to demonstrate it in person.
- Create a schedule for a new joiner. Think about who they need to meet and when. Set these meetings up for them before they join you. Think carefully about how you can support them to build a network in their first few months.

- Consider how you will welcome them to your team – and how your team can welcome them. Put a buddy system in place. If your new starter joins remotely, make sure you use video technology in your first few meetings. It is disconcerting and unwelcoming to join a new organisation and never see your line manager's face.
- Talk to them about your inclusion and diversity values, and demonstrate them in your interactions. If you have a staff network or employee resource group, tell them how they can join it.
- Ask new starters for feedback on their experience of joining your organisation remotely. Then act on it: continue to improve processes and policies.

For hybrid and remote working to be successful, you need a considered and holistic approach that builds in equity. Don't be afraid to make changes and tweaks. New ways of working are here to stay. In the coming years, the organisations that have built in equity and inclusion will be in a stronger position to attract talent and create high performance.

Further information

- [Fostering a culture of belonging in the hybrid workplace – Harvard Business Review](#)
- [With hybrid work schedules, employee equity is an increasing concern – Tech Republic](#)
- [How to implement an anti-racist workplace with a virtual workforce – Radical Candor](#)
- [What psychological safety looks like in a hybrid workplace – Harvard Business Review](#)
- [Why there has been an influx of staff making discrimination claims – People Management](#)
- [What's next for remote work: an analysis of 2,000 tasks, 800 jobs, and nine countries – McKinsey](#)

How to: deal with detractors

Building an anti-racist culture is an exercise in culture change. It takes time and effort, and if it's going to work, it needs the support of numerous people across your organisation. The aim of this toolkit is to help you and your colleagues make the practical changes needed to create and sustain an anti-racist culture in your organisation.

The ways people respond to culture change work follow a predictable pattern: they fall into three broad groups:

1. A group who are really engaged and supportive of your mission.
2. Another group – usually the largest – who aren't averse to change but may be cautious in voicing their support. These people are usually doing well in their roles and within the current cultural climate; they need persuading that change is worth the time and effort.
3. And finally, there's always a small group who do not believe in the culture you're trying to build, and who do not want to come with you on the journey. These people are your detractors.

How do you win over detractors?

It can be done. Here are a few ways to help get them on board:

- **Listen to their concerns**
Concerns about anti-racism work are not uncommon. Your job is to listen to them, and to take them seriously. Sometimes all

people need is a bit of context or data to ease their concerns. Sometimes they can pick a useful hole in an idea that wasn't as robust as you may have thought. And sometimes these apparent detractors are actually your biggest supporters – they're just picking up on inconsistencies or problems to give you a better chance of success. Acknowledge detractors' concerns, and then go back to them to explain how you have taken their points on board.

In the context of anti-racism and inclusion, always bear in mind that culture change is about equity for everybody. You are not setting out to favour one group of employees over another. You are instead trying to remedy an existing inequitable situation that favours one group above all others.

- **Explain what's in it for them**
Most people are not completely altruistic. So tell your detractors how they will benefit from an anti-racist culture. Describe the benefits for the organisation and what employees of the organisation get out of it – not just their ethnic minority colleagues. Creating a sense of belonging for everyone, the personal benefits of being part of a higher-performing culture, and how being surrounded by people who are brilliant at what they do motivates everyone to do better.

To help people understand race and ethnicity concerns, you could make a comparison with the gender equality movement. Use it as an example of how a combination of regulatory, business, and societal changes have improved

opportunities for women – although the world is still some way from gender equality.

- **Explain the facts**

Some people simply won't understand why you're doing it. To get them on board, you have to explain the logic. Give them the facts about racism: how it works and how it affects ethnic minorities at work.

Make sure you have evidence to hand – a mix of statistics and real-life, relatable examples. Avoid using the USA as an example because your British colleagues will switch off; they'll take it as evidence that racism is not a UK issue.

Your aim is to build a consensus around the need for change, from which you can invite ideas and contributions for helping to make that change.

What about those who can't be persuaded?

A small minority may never be persuaded that there's a need for racial equity in business or in life. In some cases, your efforts to persuade them will just entrench their views. Cut your losses; don't waste more time or resources that would be better used elsewhere. And take heart that your organisation is not alone. Most – perhaps all – organisations have their share of anti-racism detractors.

Here are some tips for making the best use of the situation:

- Don't demonise or exclude your detractors. You are creating an anti-racist culture, and that requires everyone to feel they belong in your organisation.
- Focus your anti-racism and inclusion work and communications on the people who count: on your advocates and on everyone else who is coming on the journey, no matter what their speed.

- Be clear to all about your organisation's values, behaviours, and code of conduct. Explain that every employee has to adhere to them whatever their private beliefs. You might find it helpful to remind colleagues that discrimination of any sort is not just unacceptable within your organisation, it's illegal under the Equality Act 2010.
- Use frequent nudges to reinforce this message. For example, you could talk about how the variety of employee perspectives and viewpoints in your organisation leads to better business outcomes.
- If you have vocal detractors, you may have to explain that freedom of speech does not extend to hate speech, nor does it imply freedom from consequences. Since every employee has signed up to your organisational values and code of conduct, they are bound by them for all work-related activity. Hold everyone, irrespective of grade or performance achievements, accountable for upholding the values and behaviours they agreed to when they joined your organisation. Allowing some people to deviate damages the trust your employees hold in the organisation.
- Consistency pays off. You will create an anti-racist culture in which respect and belonging are lived values. Persistent detractors will feel the cultural and organisational pressure to conform. Eventually they face a choice: to get on board with the organisation's values or to get off the bus.

Further information

- [Free speech at work – People Management](#)
- [Changing company culture requires a movement, not a mandate – Harvard Business Review](#)
- [The Equity Effect report – Henley Business School](#)
- [Managing resistance to change: overview – Prosci](#)
- [What majority men really think about D&I, and how to engage them in it – Coqual \(formerly Centre for Talent Innovation\)](#)
- [The scientific way to train white people to stop being racist – Quartz](#)
- [How to get the wrong people off the bus – strategy + business](#)
- [Organisational culture and cultural change factsheet – the Chartered Institute of Personnel and Development \(CIPD\)](#)
- [Cultural change that sticks – Harvard Business Review](#)
- [Changing mindsets and behaviour, one 'nudge' at a time – McKinsey](#)
- [The 'not here' syndrome: racism denial, workplace inequity, and the futility of speaking out – Stanford Social Innovation Review](#)
- [How do we fix the fallout for women and minorities? The Financial Times](#)
- [Why 'woke' became toxic: the term 'woke' has become so divisive that it is harming support for the issues it is meant to be highlighting – Al Jazeera](#)

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Culture change is about equity for everybody. You are not setting out to favour one group of employees over another. You are instead trying to remedy an existing inequitable situation that favours one group above all others.

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How to: deal with race-related issues

Nobody wants or expects to have to deal with race-related issues in their team. But racism is still a fact of life, and your ethnic minority colleagues do experience it at work. Some report it; some don't. Either way, you need to root it out. Which means you have to encourage more people to report racism, and when they do, you have to take action to stop it.

How to respond when someone in your team reports a race-related issue

- **Listen and take it seriously**
Don't attempt to minimise the experience or excuse the behaviour. Even if there's no bad intent, it doesn't mean that the action isn't racist.

Keep the person informed about what will happen next. Explain each step and how long it will take. Update them regularly; silence suggests that nothing is happening.

Ensure they feel safe and secure after they've reported the incident or situation. Give them a guarantee that reporting racism will not alter your perception of them or their role. And make sure you live up to your guarantee.
- **Take action – do not do nothing**
Follow your organisation's policy and process on bullying and harassment (or any other relevant policy and process).

Deal with the actual issue as well as the underlying causes. For example, to eliminate

bias you may have to review and update the process that allows it.

Think about the tools at your disposal: from obvious remedies such as disciplinary processes to mediation or coaching.

- **Follow up**
Always follow up with the person who reported the incident to let them know the outcomes. You cannot disclose details of another employee's personal performance and disciplinary matters, so you'll need to think about other ways to show that something has been done.

If the result is not what the reporter wants to hear (e.g. you can't reasonably give them what they've asked for, or the positive-action initiative they've complained about is justified by your workforce data), you have to explain your decision – and its reasons – clearly, honestly and respectfully. For example, if your office is too small to provide a space for prayer, explain the constraints and then work with the person to find an alternative that does work.
- **Be human**
If there's friction between individuals in your team, find ways to help them resolve it. Some people, for example, don't realise they are committing subtle acts of exclusion or that a common phrase is racist. Often, a simple conversation is enough to stop the behaviour. On the other hand, if you have to go down a formal route, don't shy away from it.

Your objective is to create the most equitable outcome. If you know what this is, you'll find it easier to choose the most appropriate remedies.

- **Use data**

Log your complaints in a way that makes it easy to see patterns or trends. This will help you spot recurring issues and give you the supporting data to deal with them. If your organisation provides HR reporting, make sure you're reviewing it. If it doesn't, ask your HR team to provide you with what you need.

Support for tackling race-related issues

Not all race-related issues are straightforward, and some may be too big for you to resolve alone. Find out what support your organisation offers to help managers resolve them. Support could include:

- Clear policies and processes, including coverage for microaggressions and subtle acts of exclusion
- Training on anti-racist management and leadership
- Direct help from your HR team or your Inclusion & Diversity team
- Your peers
- Your line manager
- A coach or mentor

Support for your team

Your job is to be a supportive line manager, but there should be other sources of support that you can suggest to your colleagues if they are experiencing racism, such as:

- Staff network or employee resource groups
- Union or staff forum representatives
- Employee assistance programme

- A coach or mentor
- Mental health coaches
- Your HR team or Inclusion & Diversity team
- A trusted colleague or friend – but be clear that this is purely for personal support and in addition to other organisational support

Further information

- [Information and advice for anyone dealing with bullying - National Bullying Helpline](#)
- [Discrimination because of race – Citizens Advice Bureau](#)
- [New guidance on supporting people of colour and black colleagues – Mental Health First Aid \(MHFA\) England](#)
- [Is it time for HR to review how it investigates racism complaints? – People Management](#)
- [If you're ever called out as racist at work, remember these four steps – Forbes](#)

Section 4: Building anti-racist policies and processes

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Fair pay – salary bands and reward structures

There's plenty of research to show that **ethnic minorities are paid less** for the same work than their white counterparts. The gap is even wider for ethnic minority employees who are also **female** or disabled or from a different socio-economic background.

Salary bands – enablers of pay discrimination?

Many organisations, especially large or public-sector employers, have a reasonably considered approach to role levels and salary bands, which they use as a framework for reward strategies and policies. Pay structures help organisations pay their employees fairly and avoid pay discrimination. They also provide clarity for employees on progression, including pay rises and development. Most organisations align their pay and reward structures to their vision, mission, values, and behaviours.

Employers might use any one of a number of pay structures depending on which approach works for them. Their choice is influenced by factors such as geographical spread, type of organisation, number of grades, the organisation's outlook on employee development and progression, and so on. In some industry sectors, organisations use independent salary data for common job roles: a third party gathers the data from participating organisations in a way that enables organisations within the sector to benchmark their salaries. This approach has its flaws because it relies on the good will of the organisations that choose to participate. In short, there's no perfect way of designing pay

grades: it's a complex area, so no matter which option you take, you will still have challenges to resolve.

Some organisations map every single role to a specific grade and salary. Others have bands so wide, the difference between the top and bottom of the grade can be as much as £30k to £50k. There are advantages and disadvantages to every approach.

When it comes to equality, wider bands have their pitfalls. Since they're designed to enable a level of discretion on salaries for new starters, for promotions, and for switching people to new roles, they have an inbuilt susceptibility to bias. The element of discretion is well-intentioned: it allows employers to base pay on expertise and experience. But there's always a suspicion of bias. How can you be sure, for example, that bias is not the reason why an ethnic minority starter joined towards the bottom of the band, while a white new starter joined nearer the top? Now that employers are beginning to look at their ethnicity pay gaps, they will see many more of these alarm-bell-ringing anomalies.

To make pay bands work, you need a system of checks and balances. You need to know that you are not inadvertently inviting racial discrimination into your pay and reward policies and processes.

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Different Women felt that race was a more significant barrier to their progress than gender, in both the UK and the US. They felt that white women were perceived more positively, had more opportunities in the workplace and that the gender agenda was led by and focused on white women.

Different Women, Different Places 2 report (2018)

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Pay transparency

Pay transparency is a key element of building trust in your organisation's commitment to racial equity. Nevertheless, many organisations are uncomfortable about employees sharing salary information with each other. Yes, there are long-standing social taboos and an element of organisational power dynamics, but the only logical reason for maintaining salary secrecy would be the knowledge that pay inequity exists within the organisation.

Not all organisations keep their salaries secret. Public sector employers are often required to publish anonymised salary information because they have to account for how they spend taxpayers' money.

In other organisations, salaries are visible to employees but not published externally. Visibility builds trust and removes the possibility that some people earn different pay for the same job. This does, however, assume that everyone has an equal chance of getting the job, which research tells us is not the case.

It's worth looking afresh at your policy on pay transparency and, if your salaries are confidential, asking yourselves whether you really need to keep things that way. If your organisation doesn't already have salary equity, you'll need to make a concerted effort to resolve the issue, while implementing moves towards salary transparency. Be honest with employees about the work you're carrying out – this will help you to build trust.

Negotiating salary

Do not assume that ethnic minority candidates will feel comfortable negotiating salaries, especially if your organisation has wide salary bands. Research shows that ethnic minorities are less likely to be hired, promoted, or receive pay rises than their white counterparts – and that they're less likely to ask. Make sure you have an open and transparent conversation

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with successful applicants about roles and promotions. Since societal inequalities mean there's likely to be a pay gap in favour of white employees, never base your salary offers on applicants' previous or most recent salary. If you look at the issue objectively, the salary that an applicant earned for a previous role is irrelevant to the salary that they should be earning for their new role and responsibilities.

Benefits

In most organisations, benefits tend to be standardised. Benefits such as pension contribution and annual leave are not usually the subject of negotiation. Some employers link their allowances to seniority or length of service. If you are one of these, it's worth revisiting the rationale for the policy, and making sure you have transparency and clear internal communication about it.

Other employee benefits are discretionary, and therefore prone to potential bias. To minimise

the chance of bias, set clear parameters around the granting of these benefits. For example, if you have a policy around compassionate or unpaid leave: who is the decision-maker and what should they base their decisions on? Why would they turn down a request? Do they make their decisions in isolation, or is there a clear process for monitoring decision-making and for overruling a decision if you find that bias was involved?

Rewards and bonuses

Ethnic minority employees are also likely to receive less recognition – and therefore lower performance pay and bonuses – than their white counterparts. Your rewards processes should be clear and transparent, and aligned with your performance-management processes. To remove racial bias and inequity, you should regularly and critically review your processes.

In section 2 of this toolkit, we discuss linking senior leadership pay to achieving anti-racism and inclusion objectives. There is a strong argument for extending this connection to all line managers, with adaptations to reflect their level of seniority and degree of control within the organisation. This kind of approach changes the dynamics. All managers would then have a personal – as well as organisational – interest in pursuing racial equity across their area of control. Forward-thinking employers such as Barclays have already implemented this¹.

Network leads should not work for free

If you have an employee network or resource group, you should reward the people who do the work. These groups add a huge amount of value to their organisations. They provide support to under-represented groups of employees, and they guide their employers on anti-racism and inclusion work. Their contribution is time-consuming

and emotionally difficult, but often carried out by people who are so passionate about equality, they do the work in addition to their contracted duties. So it's only fair to have a clear and open policy and process for adequately rewarding these people. Consider how you allocate time for this work in their schedules, how you pay them, and how they are rewarded for their work. And finally, make sure their contribution is recognised and valued by your organisation through employee profiles, awards, and other items in your recognition repertoire.

Further information

- [Role of the Remco: how to achieve good governance of pay, people and culture: roadmap for HR leaders seeking to broaden the remit of remuneration committees – Chartered Institute of Personnel and Development](#)
- [Pros and cons of salary transparency – Culture Amp](#)
- [Pay transparency: what is driving the interest and how should people professionals respond? – Chartered Institute of Personnel and Development](#)
- [Why radical transparency about salaries can pay off – The Financial Times](#)
- [If people are our most important asset, why aren't businesses measuring and rewarding their CEO's commitment to workforce development? – Chartered Institute of Personnel and Development](#)
- [Beware the downsides of pay transparency - Financial Review](#)

Performance, talent and succession management

- [McDonalds to tie executive pay to diversity – Benefits Pro](#)
- [Inclusion without clear lines of accountability is pointless: here's why – Forbes](#)
- [There's a sense black people are being paid less – BBC News](#)
- [Driving diversity and inclusion in the workplace: the D&I strategy report – Robert Walters](#)
- [Black professionals 'twice as likely' to be turned down for a pay rise, says major study – The Independent](#)
- [Ethnic minority applicants less likely to be hired or promoted at Bank of England – Sky News](#)
- [Different women different places 2 report – Different Women](#)
- [London ethnicity pay gap at almost a quarter – Personnel Today](#)
- [Equal pay – Equality and Human Rights Commission](#)
- [Ethnic minority workers far less likely to receive pay rises than white counterparts, research warns – People Management](#)

Footnotes

- ¹ [Barclays mentions inclusion objectives for all in their 2020 diversity and inclusion report https://home.barclays/content/dam/home-barclays/documents/investor-relations/reports-and-events/annual-reports/2020/Barclays-PLC-Diversity-and-Inclusion-Report-2020.pdf](https://home.barclays/content/dam/home-barclays/documents/investor-relations/reports-and-events/annual-reports/2020/Barclays-PLC-Diversity-and-Inclusion-Report-2020.pdf)

Research has found that ethnic minority employees are less likely than their white colleagues to be rated in the top two performance-rating categories. They're also much less likely to be identified as having high potential¹.

If you analyse your own workforce data, you might find that your performance assessments and outcomes are lower for certain ethnic groups than they are for white colleagues – and possibly others. This is another example of bias, by which certain groups are held to higher standards than other groups. In other words, they are being expected to work harder for less reward.

Look at your data to understand why this is happening, and how you can put processes in place to prevent these types of discrepancies. You should take a full-circle approach to your performance-management process.

Preventing bias in the first place

- Train all line managers on bias, inclusive management, and the importance of treating everyone fairly. For best practice, repeat the training once a year before the start of your performance-review process.
- Give everyone – managers and employees – clear, high-quality guidance on the review process and how it should work. For a more rounded view of a person's performance (with less room for individual bias), managers should request feedback from stakeholders who work with their team members.

- Conduct a robust review of your organisation's policies, processes and systems. Then update to remove any scope for bias while still recognising individual differences.
- Your performance review process should cover an employee's adherence to your organisational values and behaviours, as well as their commitment to your business objectives. It's difficult to objectively assess the former, so it's worth setting up a values and behaviour framework to provide examples of what each corporate value or behaviour looks like when met, not met, or exceeded.
- Bear in mind that the annual performance-review process should not be the only time your employees receive feedback from management. Conversations should be regular throughout the year, with a mix of formal and informal feedback. Inclusive Employers has an [Inclusion Passport](#) to help members conduct these conversations.
- There is evidence that ethnic minority employees are less likely to receive useful or constructive feedback from management. This creates yet another barrier to development and progression. Women in particular are more likely to receive feedback based on their personality instead of their [performance](#). The provision of high-quality, constructive, developmental feedback is therefore a key part of building racial equity into your culture.

Monitoring processes to ensure bias hasn't crept in

- Each review should be further reviewed by a third party to ensure that everyone is being held to the same standard, and that no bias has crept in. The reviewer could be the line manager's manager or a HR representative.
- Analyse performance scores by demographics to check that no groups are being systemically discriminated against. If you find discrimination, you must be open about your discovery, and work to resolve the issue. For the ethnic group affected, you should be honest with them too. Do not sweep the evidence under the carpet. This would be another example of gaslighting - and they probably already know they're being scored lower. Check also to see whether certain groups are being systematically over-scored, and take action here too.
- You also need a process of appeal for performance scores. It should be clearly signposted, and the process itself must be transparent and free from bias. Employees and line managers should be aware of the steps involved in an appeal, and employees should feel able to challenge scores they believe are unfair without fear of reprisal.
- Finally, check regularly that line managers are correctly following performance-review processes, and carrying out (and applying) the required training. These checks should apply to all levels of seniority.

Talent management and succession planning

Many organisations still use McKinsey's nine-box grid to identify and categorise their talent and formulate their succession

planning. The model dates from the 1970s and is highly subjective: line managers rate their employees based on their perception of performance and potential. Line managers are more likely to rate people highly if they spend more time with them, have more things in common with them, or get on well with them. The process invites line managers to assess their ethnic minority employees against an unequal set of expectations and standards. If that is indeed what they do, the succession-planning process cements racial inequity into an organisation.

In practice, bias is probably rife. The process is often performed by the line manager alone, with no challenge from peers or HR colleagues (who may not know the individuals or their potential). The process is rarely transparent: employees often have no idea where they've been placed on the nine-box grid – if they even know the process is taking place.

So how can you create equity?

You need an objective process to identify your high-potential employees, to understand the skills and talents in your organisation, and to plan people's career progression. If you do it well, you'll also improve your organisation's performance, retention and engagement.

Your process needs to be aligned to your organisation's strategy. For example, if you have set targets for representation, include them in the process. If you're not meeting the targets, you need to work out why and fix the problem. For example, by challenging biases in line managers or making development opportunities available to those who need them.

Work out ways to appraise your employees' technical and professional skills. What skills do they have, what skills have they developed?

How high (or low) is their skill level? How quickly do they learn new skills? Are the skills transferable to other areas of your organisation? Are they skills that will be more valuable in the future or will they become obsolete as technology and society change? Are you looking at hard and soft skills? For example, what leadership behaviours will be important in the future? There's currently a global shift away from traditional, command-and-control or detached leadership styles, and a move towards collaborative, inclusive, and open styles of leadership.

Think about the process. How can you stop line managers having to make these decisions alone and unchallenged? Build a process that embeds accountability and is open to challenge. For example, you could track the ethnic diversity of your organisation's talent, and challenge your colleagues' perceptions. Make the process transparent and hold open conversations with employees. You will probably find talent among under-represented groups that is more ambitious than their line-manager perceptions would have you believe. Or better qualified than those who have previously been flagged as top talent. You may well find that ethnic minority employees are not bothering to apply for promotions or other opportunities because they don't believe they'll be successful. This is more likely if you have little ethnic diversity in the top tiers of your organisation.

Carry out equality impact assessments on these processes to ensure you are not inadvertently embedding the same biases into something new. Ask employees for their feedback and input into the process, and take action where appropriate. Take a look at the section on equality impact assessments for more information.

All these actions will help you make more objective assessments about your talent pool. They'll help you advance the right people, increase inclusion within your culture, and improve your organisation's performance.

Some of the basics

- Effective leaders are constantly thinking about talent and succession – and not just thinking about it when they need to fill in a form.
- Use your workforce data: you should know where ethnic minority colleagues are experiencing barriers to progression, so build opportunities and interventions to eliminate the barriers. Step in, for example, if black women are routinely losing out on promotions, and your data shows that they're disproportionately under-represented on your management and leadership development programmes.
- Be open. Let all employees know how you identify and develop talent in your organisation, and what opportunities are available for everyone. The opportunities could include mentoring, reverse mentoring, sponsorship, technical skills qualifications, informal and formal development programmes, and so on.

Anti-racism training – and anti-racist training

Further information

- [Your performance feedback is probably biased: here is what you can do about it – The Ready Set](#)
- [HR must do more to help the progression of BAME talent, report warns – HR Review](#)
- [Driving diversity and inclusion in the workplace: the D&I strategy report – Robert Walters](#)
- [The fairness factor in performance management – McKinsey](#)
- [Court review of ethnic diversity and inclusion – Bank of England](#)
- [Succession planning for senior leadership – EY Parker Review 2020 report](#)
- [How to spot high-potential employees – People Management](#)
- [“I’ll forever have to prove myself”: the reality of climbing the ladder as a woman of colour – Stylist UK](#)
- [Women and minorities facing corporate sidelining in FTSE 100 firms – HR](#)

Footnotes

- ¹ [Business in the Community Gender and Race Benchmark 2014 - We Are The City https://wearethecity.com/business-community-gender-race-benchmark-2014-top-10-private-public-sector-employers/](https://wearethecity.com/business-community-gender-race-benchmark-2014-top-10-private-public-sector-employers/)

So, you’re working on developing your anti-racist organisational culture, and are busily plugging in the components, including essentials such as training, learning, and development. But how do you train your employees on what an anti-racist culture is and what you expect of them?

First things first: a single training intervention on anti-racism or inclusion or unconscious bias will not create the shift in mindset that you need, nor any sustained change in behaviours or culture. Worse, if poorly thought-out, this half-hearted approach can exacerbate issues around race and racism. It can do more harm than good. And while we’re on the subject: don’t shy away from the language of anti-racism. If you are talking about race, then say so. Using words like ‘inclusion’ and ‘equality’ as euphemisms to soften your message only serves to entrench systemic racism. If you still cannot name the problem, how can you hope to resolve it?

Anti-racism training

What should it include?

To create and sustain an anti-racist culture, you have to weave anti-racism through everything your organisation does. It should shape your entire learning and development offer in a way that’s effective, useful, constructive – and ongoing.

Start with a learning needs analysis to identify any gaps, then use your data to understand what you need within the unique context of your organisation. Frame everything in terms

of the outcomes you are trying to achieve. As part of your communication strategy, talk about your organisation’s commitment to anti-racism throughout the training, and provide tailored examples that relate to your organisation’s operations.

Depending on your organisation’s needs, you may find the following useful: specific training on racism and anti-racism; understanding race and culture – and feeling comfortable talking about them (cultural and race fluency); challenging racism and microaggressions/subtle acts of exclusion; and bias. It may be helpful to cover positive action initiatives in your organisation so that your white colleagues understand their purpose and how they work. Everyone should understand the requirements of the Equality Act 2010 and the duties it imposes on them.

Don’t forget to explore whiteness as an ethnicity. Your aim is equality, so no suggestion of otherness for ethnic minority employees, and no hint of whiteness as the ideal. Best practice would include intersectionality: how race combines with other characteristics such as gender, disability and socio-economic background.

Take care to keep your messages, learning, and organisational aspirations and expectations consistent throughout your organisation. Which means that everyone in your organisation has to take part in your anti-racism training – including senior leaders, executive team members, and board members. Good practice is to mix groups to reinforce the message that anti-racism is everyone’s responsibility.

Make your training interesting and engaging, and capable of covering differing levels of complexity to suit your colleagues' varying levels of knowledge. Design it so you can explore more complex concepts as your colleagues' experience of anti-racism matures.

Finally, your anti-racism training strategy should be long-term. Build in relevant interventions for new starters followed by appropriate refresher training at relevant intervals. For example, you may require all employees to carry out some form of annual refresher training on anti-racism. But you might also want your managers to freshen up on bias before the annual review process begins.

How do you design it? Should it be face-to-face or online? What works best?

Start by thinking about the formats for your various training interventions. What works best for each element? Some subjects work best as facilitated discussions, and some lend themselves to group work or personal learning. In others, colleagues could talk about their own personal experiences of racism (through direct experience, as a witness, or as someone who challenged it) or anti-racism (what white colleagues have learned, how they've applied their learning, their path to allyship, etc). Online learning is also an option. It works best as part of a suite of interventions or for specific subjects, such as understanding the legal responsibilities for racism and anti-racism that apply to individuals and organisations.

Factor in different learning styles to make learning relevant to the purpose of each training intervention. You may find that repeating certain messages in different ways helps more people understand the subject and become more comfortable discussing and challenging issues when they find them. Another useful tool is the provision of preparatory work before certain sessions, as

well as post-training work or commitments. Space out your interventions to let people work on one thing at a time, digest what they're learning and put it into practice – and then build on it at the next intervention. Think of your training programme as a marathon rather than a sprint. The process takes time, but it is sustainable and manageable.

In the spirit of inclusion, incorporate all viewpoints and open up discussions and debates in a psychologically safe environment. For example, many organisations have debated the use of the term 'B.A.M.E.' (Black, Asian and Minority Ethnic). Some people don't think it properly captures the myriad of ethnic and cultural backgrounds it is intended to cover. As with many things relating to inclusion and anti-racism, there is never a single, correct answer. Learn instead how to navigate these conversations and apply anti-racism in a practical way across your organisation.

Your anti-racism learning and development programme doesn't need to be exclusively formal, class-based learning. There are many resources available for those who want to learn more – articles, podcasts, books (fiction and non-fiction), TED talks, videos and so on. There are various resources suggested throughout this toolkit, but you could always start your own resource library and ask your colleagues to populate it. Setting up a library encourages everyone to think critically about race, and to learn about its various nuances and perspectives.

Is it working? And how on earth can you tell?

The big challenge with behaviour-based learning and development is knowing whether and how the message has reached people's hearts and minds.

Think about the practical nature of the training interventions you're delivering, and what

outcomes you're aiming for. For example, if you're giving colleagues the skills and knowledge to challenge microaggressions and other forms of everyday racism, how would you know if your approach is working? And what if your aim is to raise understanding of the realities of racial inequality so that people become more inclusive in their daily lives? In everything you do, the challenge of assessing outcomes is the same.

Here's an example: in customer service training, it's common to ask participants to commit to an action. Best practice says that line managers should talk through these actions with the participant, incorporate them into annual objectives, and then monitor them through the performance-management and review process. But don't leave it there: work with managers and leaders across your organisation to create ongoing opportunities to discuss and learn about anti-racism in a safe environment.

All training interventions should be evaluated by participants after every session. Use their feedback to make improvements. Learning and development teams or external consultants should also evaluate your anti-racism training package as a whole, as well as its individual components. This will tell you what's working well and what can be changed, updated, removed, or replaced by something else. As best practice, you should seek feedback from your ethnic minority colleagues, possibly through your employee network or resource group. They'll tell you whether your offering is appropriate. From a big-picture perspective, a programme that is successful in changing the culture will improve employee-engagement scores relating to inclusion, discrimination and other related areas. It's worth monitoring these as well.

Anti-racist training – is all other training actively anti-racist?

This is a small, but important, point

It's worth spending time reviewing all the other learning and development opportunities offered by your organisation to check that they too support your values on anti-racism. This includes everything from mandatory compliance training such as health and safety and GDPR to leadership development.

Consider the content – the language, images, and words you use. For non-mandatory interventions, look at the demographics of who is accessing these development opportunities and understand the 'why'. For any form of development that helps employees advance their careers, you need to know whether your ethnic minority employees are getting the same opportunities. Be transparent about this within your organisation: if you see a development opportunity that favours one group over another (whether by design or due to a lack of representation), you need to talk about it and say how it will be remedied.

All of these activities help to show that you are leading by example from a corporate perspective. And they ensure that you don't inadvertently undermine your organisation's stance on anti-racism and limit your chances of creating real and lasting equality.

Who should deliver anti-racism training?

Anti-racism is a shared responsibility. While it's critical to the anti-racism journey that people should hear authentic voices, this type of training should not rest solely on the shoulders of people who experience racism first-hand. So be mindful of the impact on your ethnic minority colleagues and consultants. Know that anti-racism work can still be impactful and create change when delivered by allies:

your goal is to raise awareness, build an anti-racist culture and create racial equity in your organisation. You don't always need to hear about a traumatic experience to make this happen.

Further information

- [Why anti-racist education should emphasize resilience - Quartz](#)
- [How to design employee experiences that drive better DEI outcomes, and improve the workplace – Business Insider](#)
- [Unconscious bias training alone will not stop discrimination, say critics – The Guardian](#)
- [Identifying learning and development needs: factsheet – Chartered Institute of Personnel and Development](#)
- [Why ineffective diversity training won't go away – BBC Worklife](#)
- [What does cultural competency look like in the workplace? – Built In](#)
- [Why is cultural intelligence so important right now? – D&I Leaders](#)
- [Race fluency – BRAP blog](#)
- [It's not so much culture, as cultural fluency, that's important – Mark Hannant for LinkedIn](#)
- [How to deal with emotional triggers in DEI training – Fast Company](#)

Development programmes aimed at ethnic minority colleagues

Ethnic minority employees in the UK face systemic discrimination in progressing their careers, a fact that many organisations now recognise.

By interrogating their workforce data and understanding the barriers to entry and progression for ethnic minority employees, employers are beginning to think of ways to redress the balance. They want to move towards achieving equitable outcomes for their ethnic minority employees.

One of the tools they're using is development programmes tailored to ethnic minority employees. They're a way of equipping them with the skills and networks to advance their careers. These programmes typically provide more content than standard development courses. They could, for example, offer support for navigating discrimination within the workplace, dealing with imposter syndrome, building confidence in ability, and so on. Many alumni find them incredibly valuable, both in terms of skills and confidence building and networking opportunities.

These programmes are an example of positive action. They target talented employees from under-represented groups to create a talent pipeline into more senior roles. As with any form of positive action, there's no guarantee of promotion or other professional opportunities. Programme alumni must apply for roles in the same way as everyone else; appointments are always based on merit.

In an equitable world, where workplace racism doesn't exist, these schemes would not be necessary. So take care how you apply them.

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They exist because the ethnic minority talent in organisations is not being fairly recognised, developed, and progressed by leaders and managers.

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They shouldn't be a form of sticking plaster, nor should they replace your existing talent programmes. They exist because the ethnic minority talent in organisations (assuming they have made the effort to hire it) is not being fairly recognised, developed, and progressed by leaders and managers. So think carefully about whether you need one, and also about the time when you will no longer need it.

Should you have a specialist programme?

Specialist programmes can be brilliant if deployed carefully. These are the things you should think about:

Be clear on your why

Who is this programme for, and why? For example, what grade or level is the programme aimed at? Is it for anyone from an ethnic

minority background, or does your data indicate you need to focus on a particular ethnic group?

How will it benefit them? After all, ethnic minority talent doesn't usually lack the skills required for progression; it's equal recognition and opportunity that's lacking. In effect you're setting up a programme for ethnic minority employees to prove their worth. This inevitably requires them to devote time and energy to the task – time and energy that their white peers do not need to expend to progress.

Work out the 'what'

What will your programme look like? For example, will it lead to a formal qualification? Will it require academic study or is it more holistic? What skills are you looking to develop in the target group? What time commitment will you expect from them?

Is your programme specific to your business and industry sector, or is it designed to be more general? For example, general leadership skills compared to skills tailored to your organisation's culture or market niche?

Is the focus on technical skills, people skills, leadership skills, or a combination? Will you also be equipping participants with the skills to navigate the barriers they face at work (even as you work to remove these barriers)?

Do not design your programme in a silo. Always collaborate with relevant stakeholders – especially the under-represented groups the programme is aimed at.

Communication

Be clear about the reasons you're offering a development programme specifically for your ethnic minority employees. White colleagues who do not understand racism often object because – to them – it looks like you're giving your ethnic minorities preferential treatment. The reality, of course, is that they're being held

back by the colour of their skin; they should not need an extra piece of paper to prove they're as capable as their white colleagues.

Be aware that objections from white colleagues may create a hostile environment that discourages ethnic minority colleagues from taking up these opportunities. They do not want to be labelled as a 'diversity hire'. So you must explain clearly to everyone in your organisation exactly how these programmes work, and make it clear that subsequent promotions or appointments are entirely based on merit. That's what the law says: everyone has to apply for the role in the same way, and the one who performs best at interview or assessment is the one to be appointed. You can find out more about positive action vs positive discrimination in section 2.

Clarity of message

Make sure your ethnic minority colleagues do not feel as though they are the problem. The reason they haven't progressed is because they haven't had equitable access to opportunities. It's not because they lack the talent or capability, and it's not usually because they lack the qualifications or experience. The talent is there, but it's been ignored.

If you are thinking of setting up a targeted development programme, you must also look at the other factors (institutional and structural issues etc). You cannot focus solely on developing ethnic minority staff. Doing the latter only is unacceptable: it sends a message that the problem is with those employees, not with the organisation and with society in general.

Outcomes

Are you developing your ethnic minority staff, but still not giving them progression opportunities? Have you thought about what they actually need?

As with any development or training initiative, you need to track participation and outcomes, request feedback, and then act on it. That will keep your initiative up to date and as good as it can be.

What happens next?

If you do create a programme to facilitate the development of your ethnic minority employees, you must also plan for what happens once they've completed it. You cannot expect them to go back to the same role with no prospect of progression. If you can't offer progression or, at the very least, a plan for where you see them going in your organisation, you risk disengaging, alienating, and losing them. Make sure you prepare line managers on offering suitable support and opportunities on their return.

This type of development programme should never be a standalone. It must run in parallel with your broader culture-change work. If you can't create sustainable and holistic change, you run the risk of further marginalising your ethnic minority colleagues.

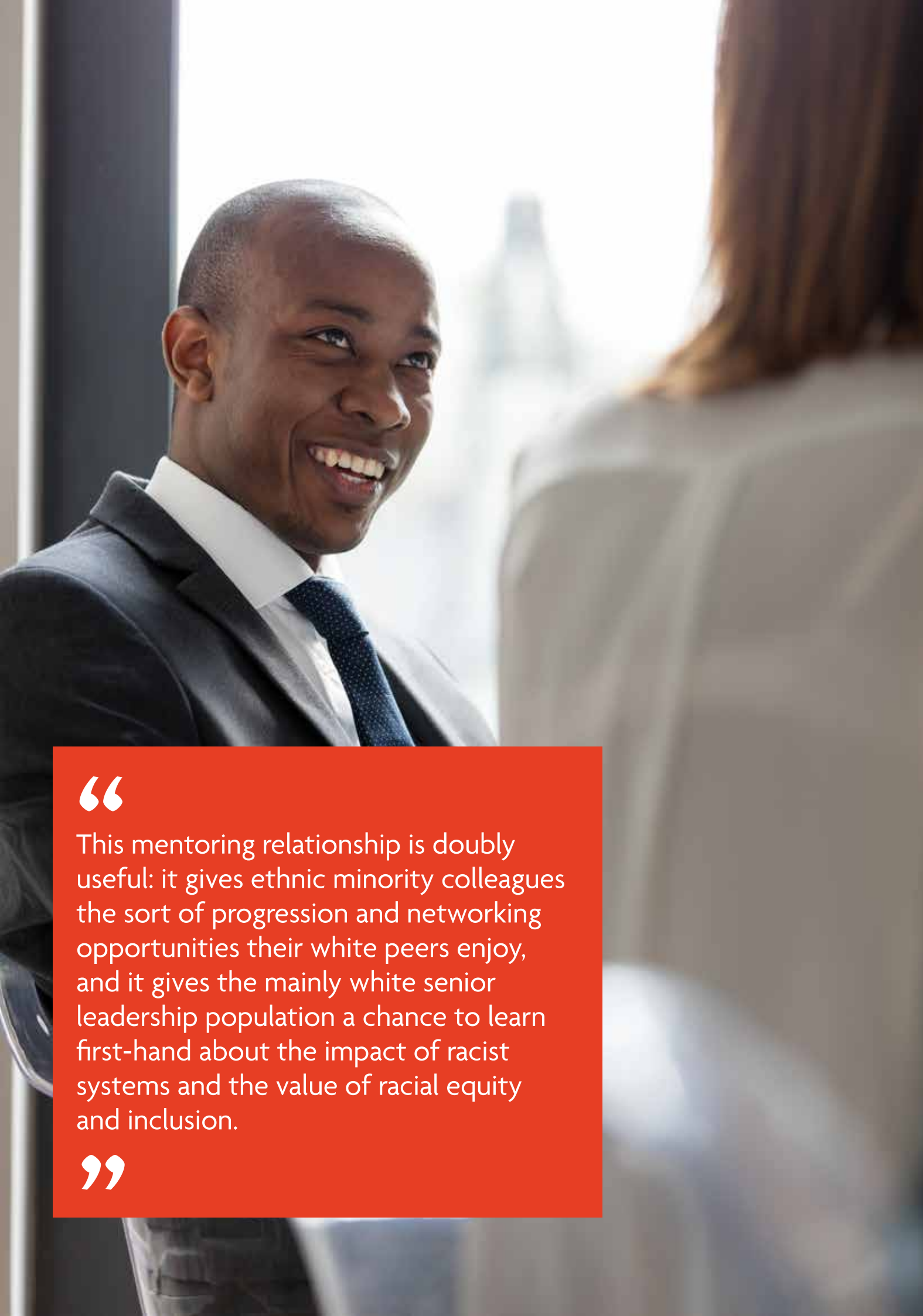
Organisations that are too small for ethnic minority development programmes

- Consider sector-specific programmes, such as the social housing sector's [Leadership 2025](#) programme. Sector-based development opportunities are also great for networking. Your industry body or other industry partners may have more information.
- Alternatively there are other programmes out there that are not sector-specific. Take a look at the [Black British Business Awards' Talent Accelerator programme](#), for example.
- If you already run general programmes that are open to everyone, take a look at the way they work. Are your ethnic minority

colleagues under-represented on them? Are they less likely to be offered a place? A simple solution may be to make sure that participation in development opportunities is representative of your organisation, or of the ethnic diversity levels you're targeting as part of your organisation's anti-racism strategy.

Further information

- [The racism of the 'hard-to-find' qualified black candidate trope – Stanford Social Innovation Review](#)
- [Progression of employees from a BAME background: identifying and overcoming the barriers – Kingsley Napley](#)
- [How imposter syndrome and racism overlap, and what can be done to tackle it – Pearn Kandola](#)
- [Driving diversity and inclusion in the workplace: the D&I strategy report – Robert Walters](#)



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This mentoring relationship is doubly useful: it gives ethnic minority colleagues the sort of progression and networking opportunities their white peers enjoy, and it gives the mainly white senior leadership population a chance to learn first-hand about the impact of racist systems and the value of racial equity and inclusion.

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Reverse mentoring

Reverse mentoring is similar to traditional mentoring, but it's the senior leaders who are being mentored by their more junior employees. The rationale for reverse mentoring is that both sides of the mentoring relationship benefit from the other's skills and learnings; it's a two-way street. Reverse mentoring also helps to dispel the notion that a mentoring relationship is about senior leaders offering development based on favouritism and subjectivity.

In the context of anti-racism, ethnic minority employees act as mentors to senior white colleagues in return for mentorship on leadership and progression etc. This mentoring relationship is doubly useful: it gives ethnic minority colleagues the sort of progression and networking opportunities their white peers enjoy, and it gives the mainly white senior leadership population a chance to learn first-hand about the impact of racist systems and the value of racial equity and inclusion.

If you're planning a reverse-mentoring scheme, make sure it's fully thought through and that it doesn't amplify existing inequalities through maintaining, rather than breaking down racial power structures. Reverse mentoring should never be an organisation's only anti-racism initiative; it has to be complemented by a suite of formal learning and development options.

Planning a reverse-mentoring programme

Before you start designing a programme, think about these points:

- Goals – what do you want to achieve? Do you need reverse mentoring? What are you hoping to gain for the organisation, the mentors, and the mentees? You need to know your aims so that you can track whether you've met them. Aims could include improved progression for ethnic minority employees, more inclusive leaders, or something similar.
- Do people want to participate? Are you likely to have enough interest from ethnic minority colleagues to be mentors?
- Support for mentors and mentees – what is available already, and what do you need to put in place.
- Voluntary or mandated? We recommend your programme is voluntary to avoid alienating colleagues, causing unhealthy friction, or increasing bias.

Design your programme

Build collaboratively

- Don't design in a bubble. Work with relevant stakeholders to scope and design the programme – this could include participants and your staff network or employee resource group. Think about how your programme will meet the needs and desires of mentors and mentees.

- Think about ways to build and maintain psychological safety for participants.
- What will the scheme look like? How will it be structured, for example how often will participants meet? And for how long? Will they have homework? How will you deal with any issues, for example if mentor and mentee clash? What if mentors feel overburdened because your white leadership has not really committed to learning from the process? How will mentors be able to report any incidents which feel harmful? How will you ensure the power dynamic between the parties is well-managed – your junior ethnic minority employees may need help to feel comfortable enough and safe enough to provide feedback to white senior leaders.
- How will you reward your ethnic minority mentors who are giving up their time to work on anti-racism with your leaders?

Pre-programme briefing

- Think about how participants will be briefed or trained about the programme. How will you set behavioural expectations? Will you expect them to do pre-reading or homework? Do you need to equip people with skills in how to be a good mentor and mentee?

Post-programme

- Think about what happens after the programme ends. Will you leave it to mentors and mentees to decide whether they want to continue their relationship?
- How do you track progress and outcomes: the learnings of the mentees and how they apply them, and the career progression of the mentors?
- How do you use participant feedback to hone the programme?

Sustainability

- How often will you run the programme? Does the size or ethnic make-up of your organisation mean that it will be a one-off programme, or would it be better to keep the programme going for new participants?
- What does success look like to your organisation? Is there a point at which you will no longer need the programme? How will you know?
- Is there an opportunity to involve other organisations from your sector in your programme? Would that increase impact and opportunities across the board?

Pairs and relationships

- Put serious thought into how you pair mentors and mentees. Both parties should be able to offer something to the other. For example, does the mentee lead an area that the mentor is interested in working in or progressing to? Try not to pair people who interact regularly. You want to avoid existing power dynamics and you need mentors who are willing to be candid with their mentees without fear of harming their own careers.
- Develop a framework of behavioural competencies, learning styles and experiences, to help reduce the likelihood of personality or values clashes.
- Make sure your mentors will gain something tangible from the scheme. If not, this will become another case of tokenism, and another example of how ethnic minority people invest emotional labour on top of their day jobs for the benefit of white people, without recognition or reward.
- Time and commitment. Be really clear about how much time people will be

expected to commit to the programme. Also check the level of commitment among participants. Superficial participation will be counter-productive. If your organisation's big enough, you could raise the status of the programme by making participation competitive – including an application and interview process.

Pilot and test

- You can always tweak your programme with new learnings. You can do this in a variety of ways: by making your first cohort a pilot or by running a shorter pilot first.
- Take qualitative feedback at all stages from all stakeholders, especially participants. Ask open-ended questions to find out what has and hasn't worked, and to understand how to improve it. You could find that reverse mentoring is not the right approach for your organisation or that your organisation has not yet reached the right level of maturity. For example, if you've not yet got your anti-racism basics in place, you could struggle to make a success of reverse mentoring. Be prepared to look at other options or schedule it later.

Monitor progress and outcomes

- You need to know how the programme is working for mentors and mentees. Take feedback at every stage and, in the case of mentees, think of ways to gauge how much they're learning about the impact of racism in your organisation, and what actions they're taking to ensure equality.
- Track the progression of your mentors to understand the benefits they're getting from the programme. Are they making connections and building senior-level networks? Are they exposed to more developmental project work to showcase

their skills and abilities? Are they ready to progress their careers?

- Use these insights to keep honing your scheme to make it better for later cohorts.

Organisation too small for a programme? Too few ethnic minority employees to make it work?

- Look for sector-wide programmes run by industry or trade bodies or other groups.
- Consider a reverse mentoring scheme that brings in a variety of groups who are under-represented at senior levels (or in general) in your organisation – for example disabled people, LGBTQ+ people, women, etc.

Further information

- [Meet the bar's first reverse mentor and mentee – Counsel Magazine](#)
- [Cambridge may drop BAME mentoring of white academics – The Guardian](#)
- [We need mentorship at an executive level to achieve greater diversity – City AM](#)
- [Reverse mentoring scheme gives senior leaders fresh perspectives – Deloitte](#)
- [Problems amid progress: improving lives and livelihoods for ethnic minorities in the United Kingdom – McKinsey](#)
- [Second-generation ethnic minorities are achieving great success in education, but this does not translate into equal success in the labour market – Institute for Fiscal Studies](#)

How to: design robust policies and processes

All organisations have a set of people-related policies and processes to help everyone understand their responsibilities in the workplace. To be useful, policies and processes should be clear and specific while allowing a degree of flexibility to accommodate changes within the organisation and in the external environment. What you have in your organisation depends on its size and context.

You may also have policies and processes relating to customers, service users or other stakeholders.

Most organisations have a process for reviewing policies over time. Frequency of review depends on the nature of the policy and the likelihood it'll need an update. For example, your benefits policy could be reviewed every year to keep up with market trends, while reviews of your inclusion and diversity policy could take place every three years because the law doesn't change that often.

In all cases - whether updating what you already have or designing from scratch - you should check that your policies and processes support anti-racism. For major revisions it can be easier to start afresh. When you work on something that already exists, it's tempting to revise what you already have instead of creating something that's fit for purpose in today's world. This can be more difficult because people become attached to something that is already there. They believe that it's the right approach, which is not always the case.

However you approach the task, the aim is the same: to make your full suite of policies and processes anti-racist. Since people wrote your policies, the policies are susceptible to the biases of their authors. They are also a product of the times in which they were written so they could potentially uphold racist biases, views or practices that contribute to racial inequity in your organisation. That's why they need a regular review.

So here are some tips to help you design and develop anti-racist policies and processes:

- **Know your aims**
What is the aim of the policy or process you're working on? Does the current version achieve the outcomes you expect? Is the approach still appropriate?
- **Be brave**
You don't have to tweak what you already have. Sometimes it's easier and more productive to start from scratch. This way, you can be sure you're designing something that works for everyone.
- **Get the evidence**
Look at the data connected with the policy or process you're reviewing. Can you see any barriers to racial equity? What's creating the barriers? How can you remove them? Are you thinking about race and ethnicity in isolation or are you taking an intersectional approach? Does the policy have a potentially negative effect on parts of your business where ethnic minority groups have the biggest representation? Gather both quantitative and qualitative data to understand what's really going on.

- **Consult**
Consult with your ethnic minority employees and other under-represented or marginalised groups, for example, disabled people or those with caring responsibilities. Take care to consider characteristics such as, religion and socio-economic background because they're so intertwined with ethnicity. Ask them to explain the impact of your policy or process on them, and act on their feedback. Include them in the decision-making connected with your policies and processes, and involve them in the final sign-off process. All these actions will help you make your policy or process as inclusive as possible. If you have an employee network or employee resource group, they will be able to add value here.
- **Carry out an equality impact assessment (EIA)**
An EIA helps you pick up any inadvertent or unexpected impacts your policy or process may have on particular groups. You can then make changes to ensure that what you create is fit for purpose and does not cause or perpetuate any kind of discrimination. To find out more, see the section on EIAs.
- **Transparency**
Adopt a consultative and transparent approach to policy design or redesign. Explain why you're suggesting changes or a new approach. What is the problem you're trying to solve, or the issue you're trying to mitigate against, through your policy or process? Make sure it's clear that your changes create equity.
- **Consistency and governance**
Be clear that all policies apply to all employees – and everyone is expected to follow them. Anything less is tokenistic, perpetuating unfairness, and losing trust. Also think about governance: how will you be sure that the policy does what it's supposed to do, and how will you monitor adherence? Should training be provided to support the policy? How can people report a lack of adherence to the policy or process, and how will you resolve these issues? How can you ensure your ethnic minority colleagues feel safe about reporting, and that they'll be confident you'll listen and take appropriate action to resolve the issue?
- **If you work in HR**
HR is a key player in building an anti-racist culture; the team's influence on the way an organisation deals with racism is immense. So your HR colleagues also have to take an anti-racist approach, starting with reflecting on how their own unconscious bias or discomfort could be stopping them from dealing fairly with complaints and reports of racism. For an independent view, it may be helpful to ask your staff network or employee resource group whether ethnic minority employees feel supported by HR, and whether they feel anti-racism policies and processes are effective – and used appropriately – by both HR and the wider organisation.

How to: take an anti-racist approach to recruitment

Further information

- [“A lot of talk, but not much action”: are charities finally ready to tackle institutional racism? – Third Sector](#)
- [What an anti-racist business strategy looks like – Harvard Business Review](#)
- [Dr Ibram X. Kendi on building anti-racist workplaces – Great Place to Work](#)
- [Is it time for HR to review how it investigates racism complaints? – People Management](#)
- [Why employers should police out of work behaviour – People Management](#)
- [Why all employers must learn how to become actively anti-racist – HR Magazine](#)
- [Implicit racial bias and the anatomy of institutional racism – Centre for Crime and Justice Studies](#)
- [Black Lives Matter: HR professionals and their role in tackling racism, and what we are doing at Thrive Law – Thrive Law](#)

Recruitment is key to your anti-racism work, given the impact it has on the overall ethnic make-up of your organisation.

But how do you make sure you're recruiting inclusively? How do you attract a more diverse range of candidates to your organisation? More to the point, how do you check that you're not just hiring people who fit your existing culture instead of creating a high-performance environment in which all perspectives and ideas are valued equally?

The work is not difficult, but it is detailed – and it takes rigour. Start by making sure that your recruitment team (and external agencies, if you use them) is aligned with your organisation's anti-racism strategy and goals. And be aware that they are not the only players in this game: you need to work with various teams and colleagues including hiring managers, HR, and leadership.

In the sections below we look at the end-to-end recruitment process and provide some best-practice pointers on anti-racist (and inclusive – to account for intersectionality) recruitment.

Preparation

- Understand your employer brand: where you sit in your market, your reputation for inclusivity, and whether your culture really matches the one portrayed by your website and external comms. Since Glassdoor now rates UK organisations for inclusivity based on employee reviews, you need to know how your organisation scores, and what that score says about you. If it's not a great

story, don't be afraid to talk about how you have been reflecting and are making genuine changes.

- Check your website. Your communications team may have done this already as part of your organisation's anti-racism work, but make sure you too have reviewed content relating to inclusion and anti-racism. Look at your commitments and the language you use so you can be sure to be consistent.
- Review all your job descriptions, role profiles, and adverts to ensure they are inclusive and anti-racist. Think about:
 - o **The language you've used:** Is it gendered? Could it discourage under-represented groups from applying? Is it full of jargon and technical terms that won't make sense to someone who hasn't previously worked in your organisation or sector? Is the job title inclusive? Do you really need a native English speaker or someone who is fluent in English?
 - o **Your expectations of applicants:** Are you excluding people because you're demanding unnecessary experience and qualifications? Are you insisting on degrees from certain universities that you know attract a certain demographic? Does the role even require a degree? Does it make sense to measure experience in terms of years rather than skills or achievements (the people with the most years of experience aren't necessarily the strongest performers)?

o **Flexibility and reasonable adjustments:**

What are the options for flexible working, home-working, job-sharing and so on? How do you ensure that your application and interview process takes reasonable adjustments into account? For example, some organisations now provide interview questions in advance for neurodiverse applicants, while others pay for childcare or transport for interviews. Make sure that information about flexibility and reasonable adjustments is clear and easy to find.

o **Under-represented characteristics:**

What wording should you use to encourage applications from people who have characteristics that are under-represented in your organisation? Be as specific as you can – for example, “as an inclusive employer, we’re keen to receive applications from [characteristic or background] as this group is under-represented in our organisation.”

o **The role itself:** You do not have to hire someone who meets every single wish-list item on a job description. Be clear about the skills that are genuinely essential and those that applicants could grow into.

o **Salary and benefits:** Don’t waste people’s time: be clear about pay and benefits. Benchmark salaries regularly and think about the width of your pay bands. Could wide pay bands create an opportunity for bias during the negotiation process? If so, how do you ensure that ethnic minority applicants

are not offered lower salaries than white applicants?

- Think about how the role information is presented. Is it accessible or available in accessible formats? Is there a named person that applicants can speak to if they have questions or need any support? If you use recruitment software – for sifting through applications, for example – how do you know that bias has not been built into the system? Think about the way you gather people’s data during the application process – how you explain why you are asking for it, and how you store it. See our section on employee data and benchmarking for more detail on this. Examine your recruitment-partner relationships: find out how they work to be anti-racist in their recruitment practices. If you’re a hiring manager using your internal recruitment team – ask them the same questions.
- Think about application closing dates and interview dates. Do they coincide with any major religious festivals? If you wouldn’t expect people to apply during Christmas, why should you expect them to apply during Eid?

Sourcing candidates

- How and where are you planning to advertise the role? How do you reach under-represented groups? Do you advertise vacancies on platforms that are used by under-represented groups, such as online forums, networking groups and magazines? What about professional forums such as networking groups, events, and conferences designed with ethnic minority talent in mind? For entry-level

positions, are you looking at local schools or considering the diversity of the universities you’re recruiting from? If you’re using agencies, choose specialists who focus on ethnic minority talent.

- How long do you advertise roles for? In recent years, organisations have begun reserving the right to close applications earlier than stated if they get too many applications. As a result, some of the best roles are available for a couple of days only. Short timescales tend to exclude the most marginalised people – those with caring responsibilities or who need to spend more time on their application. Wherever possible you should advertise every role internally and externally for a set period of time. Make exceptions only when you are required to do so by law, for example in cases where you are restructuring and are legally required to match at-risk people with internal roles before opening an application process. Openly advertising roles provides fair opportunities to all, and lets you benchmark your internal candidates against the market. Colleagues who are not yet ready for the next step can then see for themselves what their development needs are, and you can work with them to be successful at the next opportunity.
- If you’re using recruitment agencies, how well do they understand your expectations, your stance on anti-racism and inclusion, and the under-represented groups you’re trying to attract? Have you thought about specialist recruiters who focus on ethnic minority talent?
- If you’re trying to attract people who are under-represented in your organisation,

have you prepared internal candidates who could be ready for the next step? Could you use your internal networks? Or advertise via sector groups and networks? For example, if your sector has development programmes to help specific groups progress, they could provide a ready-made talent pool.

Shortlisting candidates and pre-screening

- Are you removing information from all applications, such as names or educational institutions, that could be subject to bias?
- Who is shortlisting candidates? How can you avoid bias creeping into the process? Have you considered setting up a diverse group to whittle down the longlist?
- Have you committed to diverse shortlists? If not, then you should. Under no circumstances should you accept shortlists that aren’t diverse. If you’re only getting shortlists of white people, you need to find out why ethnic minorities are failing to apply for your role or failing to get shortlisted. When you’ve fixed the problem, start the search again. A word of warning on diverse shortlists: [research](#) shows that when organisations specify shortlists with just one person to broaden diversity, that person is unlikely to be successful. But when they specify two or more people, they account for 50% of hires.
- Think about the inclusivity and accessibility of your pre-screening processes, such as competency tests or screening calls. Always check beforehand to find out if applicants have particular needs.

Interviews and selection

- Wherever possible, put together a diverse interview panel who have been trained on, and are comfortable with, inclusive recruitment practices. They should be capable of robustly challenging potential bias in themselves and in each other.
- Have a clear and transparent interview process – including questions and scoring criteria. Remove as much scope as you can for bias. For example, how do you ensure your panel does not look for culture-fit?
- Make sure the criteria for selecting the successful candidate are transparent and fair. Since you're building an anti-racist and inclusive culture, check that your interview questions explore candidates' alignment with your organisational values as well as their competencies for the role. Ensure that panel decisions stand up to scrutiny and challenge, and that panel members can show they've hired fairly.
- Ensure that your salary negotiation process is open and fair – and that you start the conversation proactively with the successful candidate rather than assuming they'll negotiate if they're not happy with your offer. Do not base salary offers on what someone was earning in their previous role – this is a sure way to prolong pay gaps. Decide in advance which factors you'll take into account to support an offer at any particular point within the salary band. Decisions should not be made by just one individual.
- For candidates who are not successful, please provide constructive and useful feedback. Tell them why they were not chosen and suggest areas for development.

Closing the loop

- Ask for feedback on the inclusivity of the recruitment process – not just from the successful candidate but from people who left the process at various points. Build on the areas where you're doing well, and work to improve areas that could be better.

Onboarding

Work to make your onboarding process as inclusive and welcoming as possible, and reflective of your organisation's values. Check in with new starters regularly, share information with them, and get to know them and their needs – for example, any reasonable adjustments. Think about how you can induct them into your team in a fully inclusive way. Talk to them about your organisation's stance on anti-racism and inclusion, introduce them to your staff network or employee resource groups, and discuss your values and behaviours.

Finally - organisations often let certain people break the rules to get the result they want. For example, how many organisations do you know that advertised a role internally only – and for a brief period – while taking care to let their preferred candidate know it was available? Actions of this type do not go unnoticed; they undermine your anti-racism work. Apply your policies and processes consistently to everyone in your organisation

Look for someone who adds to your culture, not someone who must bend to fit in

When people talk about hiring candidates who fit their culture, they're talking about candidates with whom they have a natural affinity – people similar to themselves. They base their decisions on some kind of gut feeling; they don't take a dispassionate or unbiased approach.

The problem with hiring people in this manner is that you end up with a homogenous group of people who think in similar ways, and who have similar life experiences and views. You lose out on the business and performance benefits of a diverse workforce.

Hiring for 'culture-add' is about hiring people who bring new elements to your organisation's culture. In other words, people who think differently, come from different places and backgrounds, have different life and work experiences, and bring complementary skills to your organisation.

Company culture is subjective. If you think of it as something that people need to fit into, you increase the likelihood of bias and unfair outcomes. The more homogenous your organisation, the more likely it is that your culture reflects the dominant demographic. It penalises anyone who doesn't bow to the pressure to fit in.

There is, however, a positive way to think about this. If you prioritise recruiting people whose values align with your organisation's values, you create a workforce that believes in your purpose, is passionate about your mission, and values the way you work. The identities and backgrounds of the people you recruit won't matter. They may well be different to most of your employees, but they'll work just as hard and they'll care just as much about making your organisation brilliant at what it does. The added benefit is that they bring new ideas, perspectives and experiences. They bring fresh approaches to help you solve long-standing problems and generate new ideas and products.

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If you prioritise recruiting people whose values align with your organisation's values, you create a workforce that believes in your purpose, is passionate about your mission, and values the way you work.

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How to: approach equality impact assessments

Further information

- [The racism of the 'hard-to-find' qualified black candidate trope – Stanford Social Innovation Review](#)
- [The bias battle: how software can outsmart recruitment prejudices – The Guardian](#)
- [AI-assisted recruitment is biased. Here's how to make it more fair – World Economic Forum](#)
- [How to make sure the job offer you make is truly equitable: seemingly small actions can manifest in job offers that pile privilege on some and hold back others – Fast Company](#)
- [Eight thoughtful ways to build more inclusive interview practices – Fast Company](#)
- [How technology can help build an inclusive and diverse culture – HR Review](#)
- [Reducing bias in recruitment: why the phrase 'good fit' should always be challenged – Pearn Kandola](#)
- [Are appointments doomed to bias? – Pearn Kandola](#)
- [Address the small infractions to create an inclusive culture – SHRM](#)
- [The hiring strategies that will fire up your company culture – Odgers Berndtson](#)
- [Culture fit is dead, long live culture add – Chapple](#)
- [The dangers of hiring for cultural fit – Wall Street Journal](#)
- [Strength lies in differences – Local Gov](#)
- [Why some tech workers are turning down jobs at TikTok \(London\) – CNBC](#)
- [How to align recruitment with company values – HR Zone](#)
- [How to hire for culture add vs. culture fit – The Enterprisers Project](#)
- [How to challenge the status quo in traditional leadership behaviours – Forbes](#)
- [Mission statements don't create cultures: how today's CEOs must take ownership – Forbes](#)
- [The coded words of job adverts that reveal important clues – BBC Worklife](#)
- [If there's only one woman in your candidate pool there's statistically no chance she'll be hired – Harvard Business Review](#)
- [Why your corporate values on diversity and inclusion may be hurting your business – Forbes](#)
- [Life isn't fair – but your workplace can be – People Management](#)
- [How HR can promote racial equity and tackle discrimination today – HRD Connect](#)
- [Majority of HR leaders are beginners when it comes to D&I, finds Josh Bersen – HR Magazine](#)
- [Research: how companies committed to diverse hiring still fail – Harvard Business Review](#)

What is an equality impact assessment (EIA)?

For some organisations, particularly in the public sector, EIAs are a legal requirement of the Equality Act 2010. Organisations use EIAs to check that policies, services, and initiatives do not discriminate against anyone – and to promote equality of opportunity within these.

EIAs are a great tool for understanding what more you need to do, or could do, to create equity for ethnic minorities and other groups – especially through inviting the contributions of stakeholders such as ethnic minority colleagues. They help you add structure to your thinking through a series of questions that help you rigorously test the impact a decision might have on any group.

EIA use does not have to be limited to organisations that are required to carry them out: they are just as useful for any employer that wants to gauge equity consistently in its work. And you can apply them in a variety of contexts: customer-facing, external, internal.

Carrying out an EIA is good practice when developing any policy, strategy or initiative because it helps you understand the effect of that activity on an under-represented or protected group. The assessment helps you resolve the issue before further disadvantaging that group.

An EIA's purpose is to avoid putting barriers in the way of under-represented groups, and to remove existing barriers. The process is all about making sure you're doing things in a fair way without a negative impact on already marginalised groups.

Why should I carry out an EIA?

An EIA helps you achieve equity in all that you do, which is a key aspect of anti-racism. An EIA also saves you time, effort and money. For example, it could stop you launching or introducing something that would not be fit for purpose or which inadvertently creates, perpetuates, or increases inequality. EIAs are an effective way of making sure you consult with, and involve, those affected, instead of making biased decisions or assumptions.

Who should carry out an EIA?

Anyone who is planning to implement anything new – a change, initiative, product, service, or strategy. Depending on the context of your organisation, you might want to consider setting up an independent internal panel to review or carry out EIAs – see this example from [Lambeth Council](#).

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Organisations use EIAs to check that policies, services, and initiatives do not discriminate against anyone – and to promote equality of opportunity within these.

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When should I do an EIA?

You should carry out an EIA whenever you're planning a material change to a policy or service – and whenever you're developing something new. The EIA helps you understand whether your action will have a disproportionate effect on ethnic minority colleagues, service users, or customers, or on any other protected group.

You can also use an EIA to assess how equitable your existing policies, services and initiatives are. This is really useful during your organisation's cyclical policy review process.

How do I carry out an EIA?

There's no fixed format for an EIA. Each exercise is unique depending on your organisation and what you intend to do. Its purpose is to find out what impact, if any, your initiative will have on your ethnic minority colleagues or other disadvantaged groups. So you have to think about the effects of your initiative in the most open-minded and wide-ranging way. It can be helpful to think of an EIA as a series of questions about who might be affected, how, when, and in what way. If it helps, you could look at some of the questions other organisations have posed in their EIAs, to get you started.

Nevertheless, any existing set of questions is no more than a starting point. You have to think through your own project to tease out your own unique truth: what adverse effect, if any, will your initiative have on your ethnic minority employees? Seek advice from your ethnic minority colleagues and network groups before you start. They will help you frame your investigations in ways that prevent them from being tainted by your own biases or assumptions.

Do not treat an EIA as a box-ticking exercise. The most effective EIAs are those that

emanate from an inclusive mindset. So think about each question holistically; the questions are meant to help you achieve better outcomes for everyone.

Once you have the answers, you need to analyse the data to understand what the impact will be. You also need to note any potential negative effects on any particular groups, and be prepared to make appropriate changes to remove the possibility of disproportionate impact. Document your actions at each stage of the process and use evidence to back up your statements. For example, consult with different groups of people and use their feedback to support your results and the solutions you implement.

Throughout the process, you must comply with GDPR legislation. If you're not sure how this applies, check with your organisation's data protection officer.

What questions would help foster an inclusive mindset?

- **What are you trying to achieve?**
 - o Can your plan help you reduce discrimination or inequity? How?
 - o How can it promote equality of opportunity?
- **How do you engage your stakeholders?**
 - o In the context of racial equity you should be thinking about individual ethnic groups as well as all ethnic minority employees. Also think about all the protected characteristics that fall under the Equality Act 2010, as well as issues like social mobility and people with caring responsibilities.
 - o Also think about which teams in your organisation need to be included in the process: for example, operational colleagues, legal experts, or IT teams.

- o Take some time to think about who might be missing – and how you can remedy this.
- o How will you inform and involve these groups in a meaningful way? How will you incorporate their feedback?

- **Think about the impacts**

- o Have you thought about the potential for unintended or unexpected consequences of your plans?
- o How does your initiative impact the people it will affect? What will their experience be? Will it impact the outcomes or opportunities they may have?
- o How many people are likely to be impacted? And how significant will the impact be on them? For example, if you plan to introduce a positive action development programme for ethnic minority employees, it will probably affect a small proportion of your workforce, but could have a strong positive outcome by promoting inclusion of that group. Alternatively, you may find that a plan is likely to have a negative impact on a large group of people – so you would need to revisit it.

- **How are you identifying and documenting inequity when you find it?**

- o Gather both quantitative and qualitative evidence. How do you carry out research to fill in any gaps in your knowledge?
- o Make sure you're able to document the reasons behind your decisions. For example, if you decide to go ahead with your plans, be ready to provide evidence that it doesn't impact anyone, or that you are able to mitigate against any minor negative effects.

- **Consider your options**

- o Can you make tweaks to your proposal, or is there another – and better – way forward now that you've reviewed the feedback?
- o Who decides whether to go ahead or not? It is best practice to ensure that no one individual makes decisions alone, that there are clear parameters for people to work to, and that there is an appropriate way to check and challenge decision-making. Consider contracting the terms of engagement with your working group early in the process, and provide an environment where everyone understands it is safe to challenge and debate.

- **The fundamentals**

- o Make sure your plan is realistic and has budget. Be clear on how you will implement it successfully – what does implementation look like?
- o Think long term: how will you measure success? Do you need to capture certain data at certain points? What does ongoing stakeholder engagement look like, and how will you ensure you're still engaging the right groups? How will you report positive and negative effects? What's the process of making changes if it doesn't work as planned, or the outcomes are not what you were hoping for?

Is there ever no impact?

In organisations where completing an EIA has become a box-ticking exercise – or where the assessors haven't had proper training or guidance – you're likely to find that people frequently suggest changes or new ideas in full confidence that there's no effect on any group. Or they'll claim that carrying out an EIA is not required for the project they're working on.

You need to be sure that claims of this type are justified. Make people understand that it is their job to provide evidence that there's no impact. They cannot claim there's no effect if they haven't conducted an EIA, consulted appropriately and produced the evidence of a rigorous process.

Who should I consult with?

It's easy to make assumptions about what people need, how they will experience something, or what they will feel about it. The reality is that no one can possibly know what other people need, think, or feel, especially if they come from a different background or have a different experience of life. So don't take a guess.

For every EIA you should take feedback from the following groups:

- The group that the policy, service or initiative is aimed at – for example, customers or employees. If you are looking at something that impacts everyone, regardless of their demographic profile, make sure you consider the impacts on people from all protected characteristics. Also consider any additional factors that may influence how someone experiences your policy or service, such as socio-economic background or working patterns.
- Your staff network or employee resource group. If you have several groups relating to different identities or characteristics, engage with them all.
- If you're carrying out an EIA on something that will affect your customers or service users, think carefully about how you can gain the views and feedback of a broad range of customers. Do not rely on a homogenous group of easily accessible customers.

Where else can I get information on who might be impacted, and how?

Try to include quantitative and qualitative data.

If you are working on something that will impact your employees, think about matters such as:

- workforce demographics
- recruitment, promotion and development data
- employee survey results

If your plans are customer-facing or apply to service users, think about your customer or service user survey feedback, complaints data, and customer or service user demographics or personas.

You'll find more suggestions for the type of data you could include in an EIA in the 'Employee data and benchmarking' section of this toolkit.

Tips for successful EIAs

- Consider providing a guide or training on best practice for colleagues that need to complete EIAs.
- Build EIAs into your governance structure. For example, if your organisation requires all business cases to go to your executive team or a steering group for approval, make it clear that they will not consider any business case without a high-quality EIA.
- Encourage your employees to think about racial equity and inclusion more generally when looking at this type of work. It's much easier to build in inclusion from the beginning than to add it in later.
- Communicate your expectations of EIAs and what good looks like. Try profiling successful real-life examples in your internal communications.

Review and audit

EIAs are a snapshot in time. They enable you to measure the outcomes of your policies or services so you can check that you're getting the results you hoped for.

The context in which you operate continues to change. The factors that change include the law, best practice (for conducting EIAs, for capturing and using personal data, and so on), and society. To keep up, you need to carry out regular reviews of your policies and services, including how you carry out your EIAs.

Finally, make sure you audit adherence to your EIA policy. If you specify that every new or updated policy and service must have a high-quality EIA, take care not to let anything new slip through without one.

If you'd like some support with designing or conducting your EIA, the [Inclusive Employers](#) team will be happy to help you.

Further information

- [Research briefing: the public sector equality duty and equality impact assessments – The House of Commons Library](#)
- [Equality Impact Assessment: review of the General Buller statue – Exeter City Council](#)
- [Equality Impact Assessment Guidance – Equality and Human Rights Commission Public Sector Guidance](#)
- [How to undertake an equality analysis – Housing Diversity Network](#)
- [Equality Impact Assessment toolkit – Sandwell and West Birmingham Hospitals NHS Trust](#)

Each section of the toolkit has its own list of articles, reports and other relevant information. Here we list a few other resources that could help expand your knowledge. It's a broad range of materials to read, watch, and listen to.

Read

Reports

- [Race in the Workplace: the McGregor Smith review](#)
- [Lammy Review into the treatment of, and outcomes for, Black, Asian and Minority Ethnic individuals in the Criminal Justice System](#)
- [Ethnic Diversity Enriching Business Leadership: 2020 update report from the Parker Review](#)
- [Minority Report: Race and Class in post-Brexit Britain – the Runnymede Trust](#)
- [Moving the dial on race – a progress report on workplace inclusion – CMI](#)
- [The Ethics of Diversity – Institute of Business Ethics](#)
- [Driving diversity and inclusion in the workplace: The D&I strategy report - Robert Walters](#)
- [Global Culture Report 2021 – OC Tanner](#)
- [Who we are is how we'll grow – Accenture](#)
- [Diversity wins: how inclusion matters – McKinsey](#)
- [The race equality code](#)

- [Writing the Future: Black and Asian authors and publishers in the UK marketplace – Spread the Word](#)
- [Voices of the under-represented: What's stopping young Black men getting on in the digital and construction sectors? – Greater London Authority](#)
- [Welcome to Gen Z – Deloitte](#)
- [The Colour of Money: How racial inequalities obstruct a fair and resilient economy – The Runnymede Trust](#)
- [Black people, racism and human rights \(2020\) – House of Commons and House of Lords Joint Committee on Human Rights](#)
- [Social mobility and ethnicity – The IFS Deaton Review](#)
- [The UK leadership diversity report 2021 – Odgers Berndtson](#)
- [The Cornerstone Report: access to venture capital. Founder journeys and the barriers to inclusive investment](#)
- [Celebrating City Women: Black and Asian women in the City of London 1600-1860 – Chihyin Hsiao](#)

Non-fiction

- [Natives: race and class in the ruins of empire – Akala](#)
- [White Privilege: The Myth of a Post-Racial Society – Kalwant Bhopal](#)
- [I Am Not Your Baby Mother: what it's like to be a black British mother – Candice Braithwaite](#)

- [Why I'm no longer talking to white people about race – Reni Eddo-Lodge](#)
- [Brit\(ish\) – Afua Hirsch](#)
- [How to be an anti-racist – Ibram X. Kendi](#)
- [It's Not About The Burqa – edited by Mariam Khan](#)
- [My hair is pink under this veil – Rabina Khan](#)
- [Mixed / Other – Natalie Morris](#)
- [Black and British: a forgotten history – David Olusuga](#)
- [Chinese Whispers: the true story behind Britain's hidden army of labour - Hsiao-Hung Pai](#)
- [Partition Voices – Kavita Puri](#)
- [Me and white supremacy – Layla F. Saad](#)
- [Superior: the return of race science – Angela Saini](#)
- [The Good Immigrant – edited by Nikesh Shukla](#)
- [Inglorious Empire: What the British Did to India – Dr. Shashi Tharoor](#)

Fiction writers

- [Bernadine Evaristo](#)
- [Brit Bennett](#)
- [Caleb Azumah Nelson](#)
- [Candice Carty-Williams](#)
- [Chimamanda Ngozi Adichie](#)
- [Jeanine Cummins](#)

- [Kiley Reid](#)
- [Malorie Blackman](#)
- [Mike Gayle](#)
- [Mohsin Hamed](#)
- [Rohinton Mistry](#)
- [Tayari Jones](#)
- [Vikram Seth](#)
- [Zadie Smith](#)
- [Hanya Yanagihara](#)

Watch

Documentaries

- [The Windrush scandal: sitting in limbo \(BBC iPlayer\)](#)
- [Black and British: a forgotten history – David Olusuga \(BBC iPlayer\)](#)
- [Our NHS: a hidden history – David Olusuga \(BBC iPlayer\)](#)
- [Panorama, Let's Talk About Race \(BBC iPlayer\)](#)
- [Is Britain racist? By Mona Chalabi](#)
- [The myth of race: is there any biological basis for categorising humans by race?](#)
- [What the British did to India – Dr Shashi Tharoor talks about his book at Antidote festival in Sydney Opera House](#)

Film and TV shows

- Steve McQueen's Small Axe series (BBC iPlayer)
- The school that tried to end racism (All 4)
- Desmond's (Netflix)
- The Trial of the Chicago Seven (Netflix)
- When they see us (Netflix)
- Noughts and Crosses (BBC iPlayer)
- Kim's Convenience (Netflix)

Listen to

Podcasts

Most of these are available wherever you get your podcasts from, but we have also linked to them directly.

- [Talking inclusion with... an Inclusive Employers podcast](#)
- [Why the government's race report sparked a furious backlash – The Guardian](#)
- [Three Pounds in my Pocket with Kavita Puri](#)
- [About Race with Reni Eddo-Lodge](#)
- [Advancing Racial Equity 4.0 with Shereen Daniels](#)
- [What Would the Aunties Say with Anchal Seda](#)
- [The Diversity Gap podcast with Bethany Wilkinson](#)

External content links live as of September 2021

Thank you

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- The Guinness Partnership
- Every person from the myriad of organisations who took the time to tell us about their anti-racism work
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- And to those activists, allies, and advocates who continue to push for equity: your work remains as vital as ever

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