

## **ANTI-RACISM POLICY**

### **Policy statement**

The Company is committed to promoting equality, diversity and inclusion; building a supportive culture that actively values difference. We will recruit, develop and retain the most talented people, regardless of their background. We promote a culture of dignity and respect, treating all staff fairly, as individuals and actively challenging discrimination, should it ever occur.

Our aim is to create a workforce that is truly representative of all sections of society and our customers, and for each member of staff to feel valued, respected and that they can be successful. We embrace diversity in our workforce and recognise the many benefits that diversity of experiences, cultures and perspectives bring, working with our people to identify and break down any barriers that may exist.

We use the term 'Anti-racism' to reinforce the Company's commitment to eradicate racism, which prevents true racial equality and inclusion. We will work to identify and eliminate racism in its many forms, by changing the systems, policies and practices, structures, attitudes and cultures which hinder racial equality.

Our position and approach to equality, diversity and inclusion including race is detailed in the Company's Equality, Diversity and Inclusion policy, which also covers our approach to all other types of diversity and associated discrimination. This policy is supplementary to this and provides more details purely in the context of race. This guidance is provided for clarification purposes and not to replace the Equality, Diversity and Inclusion policy.

N.B. For the purpose of this document the term race will be used to mean race, colour, nationality and/or ethnic or national origins.

To achieve racial equality, the Company will:

- Treat staff and other individual stakeholders with whom we work, with fairness, dignity, and respect.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, and where individual differences and the contributions of all staff are recognised and valued.
- Protect staff from discrimination on the basis of race.
- Ensure that the policies, strategies and behaviours that promote racial equality, diversity and inclusion within the workplace are in place; reviewing them regularly to take account of changes to our approach or the law.
- Review internal processes and outcomes to identify and eliminate barriers to racial inclusion whilst ensuring fairness and consistency.
- Recruit, promote and reward based on merit (apart from where there are necessary and limited exemptions and exceptions allowed under the Equality Act e.g., when casting for a specific role), irrespective of racial difference and background, in a fair and transparent way.
- Work to identify and remove unnecessary barriers for our staff seeking opportunities through training, development, and promotion, irrespective of race.
- Value racial and cultural diversity and encourage our staff to celebrate their culture and be proud of their differences.
- Support members of staff with different religious or cultural needs where practical, for example through the provision of appropriate spaces for prayer and adaptation of working patterns.
- Make opportunities for training, development and progress available to all staff, providing the support to allow them to reach their full potential.
- Provide access to diversity training to raise awareness and understanding of difference and the impact bias can have on unconscious behaviours and decisions.
- Empower our staff to raise concerns about racial discrimination issues they feel are important and to have confidence they will be dealt with professionally and appropriately, irrespective of how they present.
- Take a zero-tolerance approach to bullying, harassment, victimisation and unlawful discrimination by fellow members of staff, customers, suppliers, visitors, the public and any other people our staff come into contact with, in the course of work activities. Such acts will be dealt with as misconduct under the Company's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- Use our voice to fight racism and advance the cause of racial equity within our industry.

### **Scope**

This policy applies to the conduct of all staff in the workplace and also to conduct outside of the workplace that is related to your work (eg at meetings, social events and social interactions with colleagues) or which may impact the Company's

reputation (eg the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to the Company).

### **Eliminating discrimination - The Legal Framework**

The Equality Act (2010) prohibits discrimination, harassment and victimisation on the basis of Protected Characteristics, including Race.

It defines different types of discrimination:

- *Direct Discrimination* occurs where a person is treated less favourably because they, or someone with whom they are associated, has one or more Protected Characteristics. e.g., refusing to promote a member of staff on the basis of their colour would be direct discrimination on the Protected Characteristic of the employee's race. Other types of direct discrimination are:
  - Associative discrimination - this is direct discrimination against someone because they associate with another person who possesses a Protected Characteristic e.g., an employee is discriminated against because their partner is black.
  - Perceptive discrimination - this is direct discrimination against an individual because others think they possess a particular Protected Characteristic, even when they do not e.g., where someone believes the individual is a Gypsy or Traveller.
- *Indirect Discrimination* occurs where an individual's employment is subject to a provision, criterion or practice which puts them and other people with the same Protected Characteristic at a particular disadvantage when compared to others without that characteristic and that provision, criterion or practice cannot be objectively justified e.g. For example, a policy banning cornrows or dreadlocks would be more likely to affect certain racial groups than others.
- *Victimisation* occurs where an individual is subjected to a detriment because they have either made or supported a complaint or grievance under the Equality Act (2010), or because they are suspected of doing so. e.g. Someone makes a complaint of discrimination on the basis of race and is deliberately ignored by team members as a result.
- *Harassment* occurs where there is unwanted conduct related to a Protected Characteristic that has the purpose or effect of violating the victim's dignity or of creating an intimidating, hostile, degrading humiliating or offensive environment. An individual can complain of this behaviour even if it is not directed at them and they don't need to possess the relevant characteristic(s) themselves e.g. making racist jokes or using derogatory names or slang. (Please see our Anti-Harassment and Bullying Policy for further details).

The Company recognises our legal and moral duty to tackle discrimination and will not permit any act of discrimination, harassment or victimisation on the basis of race or any of the Protected Characteristics.

### **Positive action**

Positive action aims to promote equality by improving outcomes for groups of people who are under-represented or disadvantaged, which may apply to people of particular racial groups. In these instances, it is possible to encourage specific groups to take advantage of employment opportunities, or to provide specific training and development interventions for them. The Company may at times, take positive action to address under-representation related to race. Examples of positive action may include targeted adverts to recruit people from ethnic minority backgrounds.

### **Diversity monitoring**

The Company may collect demographic information relating to race as part of its recruitment and promotion processes and within employment with the purpose of identifying barriers to inclusion and eliminating unlawful discrimination. Where barriers are identified and action is appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to participation.

Any information gathered will be collected and stored in line with the Data Protection Act (1998) and General Data Protection Regulation (2016) and will only be used for monitoring and reporting purposes.

## **Unconscious discrimination**

The Company recognises that discrimination on the basis of race, does not necessarily occur as a result of a conscious decision and will work to identify and eliminate unconscious bias including, but not limited to, general assumptions, stereotypes, micro-inequities and the application of requirements, conditions or criteria.

## **Responsibilities**

All staff have a responsibility to:

- Treat all staff, customers and visitors with dignity and respect at all times.
- Value the differences that exist between people.
- Not discriminate against, harass, or victimise members of staff, visitors or customers, or encourage others to do so.
- Challenge unacceptable behaviour displayed by members of staff, visitors or customers, reporting the issue as appropriate, even if it is not directed at them.
- Complete equality, diversity and inclusion training and development activities as requested, to encourage the promotion of equality, diversity and inclusion.

In addition, managers have a responsibility to implement this policy and to bring it to the attention of their teams.

They will:

- Lead by example, promoting an inclusive working environment where discrimination, harassment and victimisation will not be tolerated.
- Encourage diversity and awareness of diversity issues.
- Ensure that decisions made during recruitment or employment are free from discrimination.
- Act with fairness and consistency at all times.
- Create a culture where staff feel able to raise complaints or issues, without fear of reprisal.
- Treat any complaints of discrimination, harassment or victimisation seriously, dealing with them promptly and confidentially, in accordance with the relevant policy.

## **Dealing with Discrimination**

The Company will not tolerate any acts of unlawful or unfair discrimination (including harassment) committed against an employee, contractor, job applicant or visitor because of their race.

If you believe that you may have suffered discrimination because of your race, where possible, you should raise your concern with your line manager or another member of staff in a relevant position of seniority or Trade Union representative. Alternatively, you may decide to raise the matter through The Company's Anti-Harassment and Bullying Policy or the Grievance Policy.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the appropriate procedure. The Company will ensure that individuals who make such allegations in good faith will not be victimised or treated less favourably as a result. However, false allegations of a breach of this policy which are found to have been made in bad faith will be dealt with under the Discipline Policy.

We take a strict approach to breaches of this policy. If we suspect that you have committed an act (or acts) of discrimination or harassment or otherwise acted in breach of this policy, you will be subject to our Disciplinary Procedure or Anti-Harassment and Bullying Policy. This may result in disciplinary action being taken against you. In serious cases, this behaviour may constitute gross misconduct and, as such, may result in dismissal without notice (or payment in lieu of notice).

## **Review**

This policy will be reviewed every three years (or earlier if required by legislative or business changes).

**This policy has been in operation since October 2021 and will be reviewed in October 2024.**

## Appendix - Terminology Note

### **Race**

Race is a socially constructed concept to categorise people by specific and clearly identifiable characteristics, often including physical traits. There are no distinct biological races. However, The Equality Act 2010, protects people from discrimination on the basis on the Protected Characteristic of Race, which includes colour, nationality and/or ethnic or national origins so it is acceptable to use the term within this wider definition.

### **Ethnicity**

Ethnic group or ethnicity is a broader term. It refers to a community which has a shared history that distinguishes it from other groups; possibly a cultural tradition of its own, a common geographical origin and/or a common language and literature. Everyone has an ethnicity. In the UK census, there are 18 different ethnic groups used, in addition to an 'Any other' option. These include different ethnic origins of people who identify as white, including Gypsy or Irish Traveller, recognising that a wide range of people can face barriers, discrimination and the impact of negative stereotypes as a result of their ethnic origin.

### **BAME/BME**

BAME (Black, Asian and minority ethnic) and BME (Black and minority ethnic) are sometimes used as an umbrella term to describe people who are not white. However, the people who may fall under this umbrella term are not homogenous groups; they are all different and have identities, experiences and face barriers which are unique to them. For this reason, the Company will not use the term BAME or BME and will instead refer to people by their actual ethnicity or where this is not appropriate and people of the ethnic group are under-represented, using the terms ethnic minorities or people from ethnic minority backgrounds.

**Racism**

Racism means racial inequality, where someone experiences detrimental treatment on the basis of their race. Racism can manifest itself in many ways and can be both conscious and unconscious. It is most easily recognised at a personal level through a display of prejudice, ignorance and stereotyping but can also be present within systems, policies, processes and customs and practices which operate to exclude people from ethnic minority backgrounds.