



# ANTI-RACISM Corporate Policy

<b>Title of Policy Document</b>	<b>Anti-Racism</b>
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Lead person	Keira Lyons
Signed off by	 Chief Executive
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## 1. INTRODUCTION

- 1.1 Creative Support aims to foster a culture of equality, inclusion and respect for people of all races, ethnicities and cultures.
- 1.2 This policy outlines our ethos as an anti-racist organisation. It now replaces our Black Lives Matter Manifesto (2020) by embedding our original commitments and incorporating the developments made since the Manifesto was introduced.

## 2. ANTI-RACISM VALUES STATEMENT

- 2.1 Creative Support is a firmly Anti-Racist organisation. Our commitment encompasses:
- The work we do to prevent racism
  - The ways we acknowledge and respond to racism if it does occur
  - A proactive approach to creating inclusive workplaces where people of all races and ethnicities feel seen and supported
- 2.2 We maintain a **zero tolerance approach** to racism or discrimination in any and all forms as defined by the Equality Act 2010, including harassment, victimisation, indirect and direct discrimination.
- 2.3 We foster inclusive workplace cultures where every individual feels a sense of belonging, without the need to assimilate to Eurocentric standards and norms. We embrace all forms of cultural expression including through hair, clothing and food, and ensure that the values and beliefs that underpin these expressions are welcomed.
- 2.4 Creative Support's approach to Anti-Racism is shaped by the needs and experiences of staff of colour. We create working environments that openly discuss race and culture, and all staff are encouraged to engage with one of the several avenues for feedback and co-production should they wish.
- 2.5 We are committed to celebrating events and traditions that represent the diversity of cultures and religions held by people across Creative Support. We offer resources and guidance for managers and teams to adopt these celebrations in their services.
- 2.6 We take an intersectional approach to Anti-Racism. We understand that people's lived experiences are nuanced and multifaceted, and that identities extend beyond a single protected characteristic. We acknowledge that overlapping experiences, such as discrimination on the grounds of gender, sexuality, disability or religion (Equality Act, 2010) can intensify the impact of racism, just as racism can exacerbate other types of discrimination.
- 2.7 This policy maintains the commitments made in our Black Lives Matter Manifesto (2020), including:
- *To listen carefully and learn from the experiences of staff of colour*
  - *To support the mental wellbeing of our staff and people supported of colour*
  - *To encourage awareness of the reality and historical roots of racism and bias*

Anti-Racism	Version 1	Issued February 2026	Approved by: 
-------------	-----------	----------------------	---

- *To take positive action to address racial inequalities for our staff and the people we support*
- *To practice in an anti-discriminatory, anti-oppressive and empowering manner*
- *To recognise how different factors in our lives and wider society (including race, gender, class, sexuality) impact on each other and can increase disadvantage and oppression*
- *To reinforce a culture that values diversity, authenticity and cultural expression for all staff and people supported.*

2.8 We recognise our responsibility to contribute to wider societal change and creating processes that work to mitigate the disadvantages that people of colour experience.

2.9 We acknowledge that despite preventative action, racism may still occur. In line with our zero tolerance approach, any incidents of racism of any kind must be reported and Creative Support will take all appropriate action to address it.

### 3. SCOPE

3.1 The policy applies to all aspects of our work and to everyone involved with Creative Support including staff members, people we support, tenants, volunteers, and agency staff members.

3.2 We recognise that racism is more often (and more substantially) experienced by people of colour, and this is reflected by the support and provisions outlined in this policy.

3.3 This policy should be read in conjunction with:

- Anti-Discriminatory Practice
- Equal Opportunities
- Bullying and Harassment at Work
- Anti-Social Behaviour, Hate Crime and Harassment
- Responding to Racism from Someone Supported
- Halo Code

### 4. LEGAL FRAMEWORK

4.1 Under The Equality Act (2010), race is one of nine characteristics protected from discrimination by law.

4.2 Creative Support adheres to the provisions of the following legislation:

- *Equality Act 2010*
- *Racial & Religious Hatred Act 2006*
- *Human Rights Act 1998*
- *Employment Rights Act 2025*
- *Employment Rights Act 1996*
- *Protection from Harassment Act 1997*
- *Crime and Disorder Act 1998*
- *Agency Workers Regulations 2010*

Anti-Racism	Version 1	Issued February 2026	Approved by: 
-------------	-----------	----------------------	---

- *Anti-social Behaviour, Crime and Policing Act 2014*
- *Anti-social Behaviour Act 2003*

## 5. KEY DEFINITIONS

- 5.1 **Anti-Racism:** an active commitment to working against racial injustice and discrimination. Making conscious and thoughtful decisions regarding our own behaviours and how they influence our biases and actions.
- 5.2 **Race:** the colour of a person's skin, their nationality (including citizenship) or their ethnicity. It can also refer to a person's national origins, which may not be the same as current nationality.
- 5.3 **Race descriptors:** terms to describe an individual's race, taking into account skin colour, nationality and/or ethnicity. Descriptors include (but are not limited to) Black, White, South Asian, East Asian or dual heritage.
- 5.4 **Racism:** The belief or ideology that each race has distinctive characteristics which gives some superiority over others. Racism can manifest in a number of ways:
- *Overt racism: direct, visible or obvious forms of racism*
  - *Covert racism: subtle, indirect forms of racism that can be between people, or embedded within structures and policies.*
- 5.5 **Microaggressions:** verbal, nonverbal or behavioural indignities that communicate derogatory attitudes or notions towards a person of colour. They may be intentional or unintentional, and the perpetrator may be unaware of their behaviour. However, the impact of the continuous experience of microaggressions can be painful.
- 5.6 **Anti-social behaviour:** Includes acts which interfere with the peace, comfort or convenience of any person or which causes or are likely to cause nuisance, annoyance or disturbance to any person (*Anti-Social Behaviour, Hate Crime and Harassment policy*).
- 5.7 **Hate crime:** A hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by hostility or prejudice based on a personal characteristic (*Anti-Social Behaviour, Hate Crime and Harassment policy*).

## 6. LANGUAGE

- 6.1 Creative Support recognises that importance of language and the vital role it plays in shaping our understanding and experience of race.
- 6.2 We acknowledge that language related to race and identity is ever-evolving and are committed to using terminology that is appropriate and consistent across all Creative Support publications, communications, and social media.

Anti-Racism	Version 1	Issued February 2026	Approved by: 
-------------	-----------	----------------------	---

- 6.3 Creative Support uses the term ***people of colour*** in this policy and other publications as a way to collectively refer to all racial and ethnic identities that most commonly experience racism. This has been agreed with the EDI Network, and reflects the terminology most commonly used in anti-racism and social justice movements. Our use of this term reflects our aim of acknowledging and addressing the shared impacts of racism across different racial groups.
- 6.4 The term *people of colour* does not negate the use of individual descriptors when describing one person, or a group of people of the same race, nationality or ethnicity. In these instances, we encourage people to use more specific descriptors (e.g. Black, South Asian, Nigerian) based on the preferences of the person or people.
- 6.5 The EDI Team are responsible for staying connected to broader societal discourse and liaising with the EDI Staff Network to ensure that our use of language remains current and inclusive.
- 6.6 All staff should familiarise themselves and ensure they are using up-to-date language when talking about race and culture. Any questions should be directed to the EDI Team.
- 6.7 Managers and colleagues should support each other in using appropriate language. This includes a responsibility to identify and inform colleagues where they are using inappropriate language.

## 7. TRAINING

- 7.1 Creative Support are committed to providing continuous training and learning opportunities to ensure that all staff members have the skills, knowledge and confidence to uphold our anti-racist ethos.
- 7.2 All staff are required to complete mandatory Anti-Racism Training as part of their induction. This training encourages self-reflection on race and racism both within the workplace and in society more broadly, and provides practical knowledge and tools for the workplace.
- 7.3 Additional training is required for senior staff and managers, focusing on their role and responsibility as leaders within an inclusive and Anti-Racist culture.
- 7.4 Trainers will be accompanied by a Co-Trainer with Lived Experience for all Anti-Racism training delivery.
- 7.5 Any bespoke or ad-hoc training requests for staff or people we support regarding anti-racism should be directed to the EDI Team.

## 8. EDI TEAM

- 8.1 The Equality, Diversity and Inclusion (EDI) Team support with embedding anti-racist practice across the organisation. The team offer:

Anti-Racism	Version 1	Issued February 2026	Approved by: 
-------------	-----------	----------------------	---

- Advice and guidance to managers on creating inclusive workplaces or responding to challenges
- Case Review & Action process for any incidents of racism
- Peer welfare support to staff members of colour who have experienced any form of racism at work
- Training for staff teams and people supported (on a case by case basis)
- Facilitation of the EDI Staff Network and other co-production roles and processes
- Active calendar of initiatives and resource creation to embed an inclusive culture, support practice and continued individual development

8.2 Any staff member can contact the EDI Team directly for support, advice or guidance by emailing EDI@creativesupport.co.uk. This includes bank and agency members of staff who would like support for a matter relating to Creative Support.

## 9. PARTICIPATION AND ENGAGEMENT

9.1 All staff members have a duty to uphold our Anti-Racist Values and to challenge practice that does not align with our ethos.

9.2 Any staff member with a particular interest in supporting our Anti-Racist approach can contribute through our EDI Staff Network, becoming an EDI Champion, and Anti-Racism Training Co-Trainer, or participating in any ad hoc co-production opportunities.

9.3 **EDI Champions** are approachable and supportive peers within services whose role is to role model anti-racist practice, promote information and initiatives, listen and signpost colleagues to further support. EDI champions are not responsible for providing formal wellbeing support or for responding to racism beyond that of any other colleague. EDI Champions will share any concerns or disclosures relating to racism with the EDI Team so that appropriate support can be offered.

9.4 **The EDI Staff Network** holds meetings at regular intervals throughout the year to provide a safe and inclusive space to discuss experiences and/or challenges related to race and culture. The EDI Network is open to all members of staff, and where possible, staff should be able to attend this within work hours. A member of the EDI Team is present at each meeting to ensure that feedback and suggestions are captured and contribute to ongoing anti-racism work across the organisation.

9.5 We welcome open comments and feedback from staff members, people we support and other stakeholders in respect of this policy and our working practices.

## 10. REPORTING RACISM

10.1 Creative support holds a firm zero tolerance approach to racism, as expressed in our Anti-Racist Values statement. No staff member should accept racism or consider it as part of their role.

Anti-Racism	Version 1	Issued February 2026	Approved by: 
-------------	-----------	----------------------	---

- 10.2 People experiencing any form of racism at work are encouraged to tell their manager, or if not appropriate, another member of senior staff to implement the incident or grievance procedure.
- 10.3 We understand that it can be challenging to articulate an experience of racism, especially to someone who does not have a lived experience of it. If this is the case, staff can contact the EDI Team directly (EDI@creativesupport.co.uk) to receive specialist support from a member of the team who has experienced racism.
- 10.4 Reporting racism should not be left to those who experience it. All staff have a duty to challenge racism and to support one another to do so. Everyone should be safe and supported to use the reporting structures available.
- 10.5 Staff who witness racism should report it to their manager or another senior staff member, regardless of whether or not the incident affects them directly.
- 10.6 Any staff member experiencing racism has the option to use formal reporting procedures to seek resolution. Employees may wish to raise their concern as a “grievance”, the procedure for which is explained in the *Grievance Procedure Policy* and the *Creative Support Employee Handbook*.
- 10.7 Any form of racism from someone supported must be reported as an incident and recorded on an Incident Form, the procedure for which is set out within our *Incident Reporting Policy* and *Responding to Racism from Someone Supported Policy*.
- 10.8 Any staff member can contact the EDI Team for additional support with reporting racism.

## 11. RESPONDING TO RACISM

- 11.1 We operate a zero tolerance approach to racism in line with other public services, and are committed to responding to every reported incident to effectively support and protect those affected.
- 11.2 In the first instance, welfare support for staff members who experience racism should be provided locally. Managers should offer immediate welfare support following an incident, ensuring that racism is acknowledged as a distinct issue. Welfare support should focus on the impact racism has had on the person, and should be documented in the person’s supervision file.
- 11.3 All Incidents of racism should then be reported to EDI and HR (either directly or via the incident reporting procedure, as set out above) for further support and guidance on protective measures, welfare support and necessary action required.
- 11.4 Reported incidents are reviewed jointly by EDI and HR. Service directors will also be informed of incidents in their areas. Managers will receive support to take appropriate action, including guidance, resources, and support with developing a tailored action plan. Any staff member of colour who has experienced racism will receive additional welfare support from the EDI team, with HR support offered where necessary.

Anti-Racism	Version 1	Issued February 2026	Approved by: 
-------------	-----------	----------------------	---

- 11.5 Monitoring and review of all instances or challenges experienced regarding race and racism is undertaken by the EDI Team to inform Creative Support's practices and ensure the efficacy of both responsive and preventative actions in place.

Anti-Racism	Version 1	Issued February 2026	Approved by: <i>Anna Lunt</i>
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