



NHS NorthWest
Anti-Racism Framework

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Forward from Evelyn Asante-Mensah OBE Chair NW BAME Assembly and Anthony Hassall NHS North West Regional Chief People Officer



We have made a commitment as a region to embrace the intentionally inclusive language and approach of becoming actively anti-racist organisations. We all recognise the history and impact of institutional racism across our organisations and the harm caused to both our colleagues and communities through the continued inequalities we still see across our society.

This document provides a framework for all our regional NHS organisations to embrace both the spirit of those commitments but to also put into action quickly the steps needed to turn powerful words into the actions needed to reduce the inequalities we still see everyday across our workforce.



From higher rates of bullying & harassment, disproportionate referrals into disciplinary processes, recruitment and selection where ethnicity still impacts your chance of appointment after shortlisting all these issues and many more needed to be tackled intentionally and as a priority by all our organisations.

As intentionally inclusive leaders it is vital that we look at each of the areas set out in this anti-racist framework and seek to embed the change needed to transform our own departments and teams into places where this activity is not seen as just a nice to do but is seen as mission critical to all that we stand for and that messaging is backed up by senior colleagues across the region being clear that actions to tackle inequalities are a priority in all that we do.

In using the framework leaders should use the practical steps and suggested actions to support existing change activity, to add focus to future equality action plans and to build on any long term inclusion strategies you may have. While there is not a one size fits all solution to advancing equality within any one organisation we hope that the guidance and structure provided will help with the task of co-creating the solutions that will work for your organisation easier.

Why does an intentionally anti-racist approach matter?

Racism is very real both in society and across our NHS organisations. Yet despite a large number of reports and pledges over the years we have seen inequalities persist and some areas even get worse.

The NHS is built on a founding principle of equality and social justice. That the service is free at the point of need, anchors the NHS is social egalitarianism and makes equal rights part of our core business.

We have seen a growth of hate incidents and racism across our communities in the UK despite existing equality and human rights legislation. Its more important than ever that as public sector organisations we are contributing to ensuring racism has no place in our society and is addressed across the communities we serve.

Racism and discrimination are major drivers behind the health inequalities we still see today. Its our role as a health care system to be intentional in tackling those inequalities we see across our communities, but we should also be ensuring discrimination experienced by our staff is not contributing further to the problems we see.

Our Anti-Racism Journey



Becoming an intentionally anti-racist organisation is a continuous journey that involves organisations continually reviewing their progress and being intentional about their actions for change.

The Fear, Learning, Growth Zone tool can help you as both an individual and an organisation to consider honestly where you are on that path to become more anti-racist.

Anti-Racist Zones	Approaches to move through the zones
Fear	- Provide clear factual information that challenges and supports the overcoming of any fears.
Learning	- Consider more development building on any existing learning. - Steps and opportunities that increase confidence with existing learning
Growth	- Empower inclusive leaders through allyship programmes and activities

Five Anti-Racist Principles

1. Prioritise
Anti-Racism

2. Understand
Lived Experience

3. Grow
Inclusive Leaders

4. Act
Tackle Inequalities

5. Review
Progress regularly

1. Prioritise Anti-Racism – What does this mean?

As the NHS we have always been instinctively supportive of equality as social justice is the bedrock and foundation of our creation as an institution back in 1948. However prioritising Anti-Racism work is more than simply caring about equality or stating support for inclusion its about ensuring we are giving it the same attention and response as other mission critical work we manage across the NHS.

The two main commodities we give to a task or area of work when we prioritise it is both time and resources. When equality activity is seen as an add on or a nice to do other mission critical work is seen as more important, time and resources are directed elsewhere and progress around tackling inequalities slows and stops.

Organisations need to commit to the principle that anti-racism work matters and ensure leaders see it as a priority for them as well. There will always be competing time and resource pressures when it comes to managing any large organisation, but anti-racist organisations understand that by investing the time and resources needed to tackle the inequalities that exist across their workforce and in services in the long term is more effective and will support them in meeting their other long term goals.

A good check to see how much you are personally prioritising this work is to consider asking yourselves as leaders how much of your time have you actually spent on anti-racism work in the last month?

Prioritise Anti-Racism – What does this look like?

We have highlighted four key drivers that organisations should consider reviewing and taking more action to ensure they are prioritising Anti-Racism across all that they do:

1. **Leading from the front**

Leadership matters and while being a leader often involves the management of multiple priorities the amount of dedicated time we give to an issue is a key indicator of how much we have prioritised that area of work.

2. **Dedicated EDI Resource**

The amount of dedicated resource we have allocated to focus on an area of work is a key indicator of how much it has been prioritised. EDI Professionals are experienced experts who can support leaders with this work. They must however be considered an important part of the organisations leadership for their activity to be impactful and transformational over the longer term.

3. **Mission Critical**

Anti-Racism activity need to be at the heart of all work across an organisation, not simply a central equality action plan. Organisations that have got this right can clearly demonstrate how anti-racist practice is considered mission critical in plans around service delivery and the development of their workforce.

4. **Actions Not Words**

Organisations that are committed to anti-racism do more than the minimum ask, their work is driven by a desire to transform and have a big impact on the inequalities they see. This should be clearly visible in the activity and actions of any anti-racist organisation.

Prioritise Anti-Racism – Making it happen

Key Drivers	Direct deliverables	Resources
1. Leading from the front	<ul style="list-style-type: none"> - Executive EDI Lead has a clear role description including annual PDP goals - Executive EDI Lead must Chair/Co-Chair an EDI committee at least quarterly 	Change the Race Ratio - Guidance from KPMG Board Diversity – More Action Less Talk
2. Dedicated EDI Resource	<ul style="list-style-type: none"> - Dedicated EDI Lead in place and as a minimum must report into a direct report of an Executive Director. - Must be considered part of the wider senior leadership team to support and enable change. 	Why companies need a chief diversity officer Competency Framework for Equality & Diversity Leadership CIPD Diversity Management that works
3. Mission Critical	<ul style="list-style-type: none"> - Evidence of how the organisation has acted to make anti-racism work mission critical must be published annually within the organisational annual report 	Embed anti-racism in the NHS
4. Actions Not Words	<ul style="list-style-type: none"> - An organisation must have set and published at least one stretch goal that goes beyond legal or NHS assurance frameworks compliance. 	CIPID – Go Beyond Legal Compliance Fact Sheet

2. Understand Lived Experience – What does this mean?

It is everyone's responsibility to tackle racism not just Black, Asian & Minority Ethnic colleagues, but meaningful involvement of people who experience racism and inequalities across your organisation will ensure decisions on how to tackle it are informed by real insights that reflect the different challenges people may face.

Meaningful involvement of people you would like to share their lived experiences involves committing to acting on what you hear and embedding their voices into change focused activity and decision making. Leaders need to be intentional in seeking out lived experience perspectives and consider what may be preventing some people feeling able to be involved.

When reaching out to seek the lived experiences of Black, Asian & Minority Ethnic communities it's important that leaders acknowledge and value intersectionality and understand the need to get more than a single person's perspective. When engaging others to hear their lived experiences we should be intentional in ensuring we are hearing from a diverse range of voices rather than simply identifying a single individual to invite into a space.

Sharing lived experiences can have a weathering effect on people's wellbeing and any activity that looks to involve and encourage others to share their lived experiences to support leaders and an organisation make better decisions should also include a clear and intentional focus around the wellbeing of those involved.

2. Understand Lived Experience – What does this look like?

We have highlighted four key drivers that organisations should consider reviewing and taking more action to ensure they are understanding the lived experience of their workforce:

1. Listen and Learn

Leadership matters and while being a leader often involves the management of multiple priorities the amount of dedicated time we give to an issue is a key indicator of how much we have prioritised that area of work.

2. Empowering Your Talent

As well as hearing the lived experiences of staff it's important that the under utilised potential of talented leaders from ethnic minorities is considered and empowered to support decision making. Where can you diversify the decision makers in a space and how can you ensure the full talent potential of your diverse workforce is being used.

3. Growing Cultural Competency

Connecting a diverse range of lived experiences with leaders is vital to improving the cultural competency of an organisation over a longer period of time. Leaders who understand their colleagues, service users and local communities are better placed to make decisions that are fair for all.

4. Data Plus

Organisations need to be intentional about understanding the experiences of Black, Asian & Minority Ethnic staff and service users.

2. Understand Lived Experience – What does this look like?

Key Drivers	Direct deliverables	Resources
1. Listen and Learn	<ul style="list-style-type: none"> - An executive director must attend BAME staff Network Meeting at least four times a year 	CIPD – Guide to establishing staff networks
2. Empowering Your Talent	<ul style="list-style-type: none"> - Set up a local BAME leadership council within your organisation - Ensure BAME talent is intentionally included across organisational talent programmes. Numbers should reflect the need for positive action to increase diversity within leadership roles. 	NHS England WRES Board Briefing - BAME Leadership Council Case Study
3. Growing Cultural Competency	<ul style="list-style-type: none"> - At least 50% of all Executive Directors and their direct reports have been part of a race equality reverse mentoring programme over the last 3 years. 	Leadership Academy Reciprocal Mentoring Programme
4. Data Plus	<ul style="list-style-type: none"> - A detailed breakdown by ethnicity of the staff survey report should be presented to the board annually including the involvement of BAME staff network members to ensure more than just data is presented. 	Building Narrative Power for Racial Justice and Health Equity Kings Fund lived experiences of ethnic minority staff in the NHS

3. Grow Inclusive Leaders – What does this mean?

Inclusive leadership is vital if an organisation aims to be anti-racist in all that it does and aims to tackle the inequalities they see across their workforce and services.

Where an organisation has a mature inclusive leadership culture you will see diversity clearly represented at all levels across the workforce and one where colleagues feel they belong and are included at work. On that journey growing an inclusive leadership culture it's vital that there is an approach and strategy for reducing inequalities not just at the top of the hierarchy but also a commitment to increase diversity and reduce inequalities across middle leadership too.

Too often the focus around developing Black, Asian & Minority ethnic leaders has been on providing them with more skills and academic development to help them move up to the next level in the leadership ladder, which reinforces a deficit stereotype rather than tackling the institutional racism that has been holding them back. Positive action measures should be targeted around going around the bias and prejudice that has led to ethnic minority colleagues not been given the opportunities to demonstrate the skills they have.

Inclusive leadership is not a destination but a continuous journey to look at how you can do more to reflect and own your own privilege, understand others more, act to tackle bias in the decisions you make and to ensure that change is seen as a positive step to tackle inequalities and injustice rather than simply a threat to the status quo.

3. Grow Inclusive Leaders – What does this look like?

We have highlighted four key drivers that organisations should consider reviewing and taking more action to ensure they are prioritising Anti-Racism across all that they do:

1. **Visibility Matters**

Our most senior public sector leaders should come from a wider diverse range of backgrounds and should broadly represent the communities they serve. This diversity and visibility helps build communities' trust in our institutions and also leads to better decision making overall.

2. **Where is Your Talent?**

Understanding your talent trajectory in respect to Black, Asian & Minority Ethnic colleagues helps an organisation know where reactions need to be to increase diversity and tackle departmental or structural inequalities. Diversity should be visible across all levels of an organisation.

3. **Levelling Up Middle Leadership & Inclusion**

If we only focus development on our most senior leaders, commitment to change is often not followed through by those leaders tasked with implementing decisions across the organisation

4. **Real Opportunities**

We have seen for a long time sending colleagues on dedicated learning programmes as the solution to under representation in leadership roles. But so often that development doesn't lead to an opportunity for promotion and centres the idea that Black, Asian & Minority Ethnic colleagues need to work harder and learn more in order to achieve the same as their white peers.

3. Grow Inclusive Leaders – What does this look like?

Key Drivers	Direct deliverables	Resources
1. Visibility Matters	- An organisations Board of Directors diversity by ethnicity must match closely the diversity of the local population or at the minimum include 1 Black, Asian or Minority Ethnic member (which ever figure is higher).	NHS England a case for diverse boards NHS Confederation Taskforce on increasing Non-Executive Director Diversity in the NHS
2. Where is Your Talent?	- Must have set targets and a published talent trajectory for BAME representation across every level of the organisation.	CBI - develop a strong talent pipeline from entry level to executive roles CBI – Practical Guide Bridging the Gap
3. Levelling Up Middle Leadership & Inclusion	- All leaders at Band 8A and above must have a PDP goal agreed around equality, diversity & inclusion and a process to report annually the percentage of these goals that have been met.	Deloitte Six traits of inclusive leadership Northern Care Alliance NHS Foundation Trust Intentional Inclusion Model
4. Real Opportunities	- An organisation should have a dedicated positive action secondment or stretch projects programme in place to give Black, Asian & Minority Ethnic colleagues the chance to gain experience to support with career progression.	Personnel Today – Black Jobs Matter

4. Act to Tackle Inequalities – What does this mean?

Let my actions speak for themselves is a famous saying but that represents the mantra by which an organisation truly committed to anti-racism needs to run by. Words alone can often become a shield through which organisations are able to justify either consciously or unconsciously their inaction over time, whether they have followed through with meaningful actions or not to tackle an inequality.

Initiatives like the Workforce, Race Equality Standards, Model Employer plans and others are not a solution in themselves, but can be a positive tool to measure existing inequalities and target actions to have the biggest impact. These tools need to be used actively to support equality activity across an organisation rather than simply as an assurance framework completed once a year and not looked at again.

The inequalities we see across our communities today will only be addressed when organisations use their resources collectively in partnership to tackle their main causes. Building a critical mass of activity built around neighbourhoods, localities and our region as a whole is key to seeing the numerous health inequalities and social injustices that harm so many being relegated to history instead of being a painful reality of today many are forced to live with.

The amount of action needed to tackle inequalities is large it reflects the generations of institutional racism and injustice developed over decades in this country. But when viewed as mission critical and delivered through embedded priorities across all areas of an organisations structure the task is not insurmountable and the outcomes will be transformation for our communities as a whole.

4. Act to Tackle Inequalities – What does this look like?

We have highlighted four key drivers that organisations should consider taking more action around to ensure they are tackling inequalities:

1. **More Than a Tick Box**

While assurance frameworks have at times been labelled as just a tick box for an organisation to deliver against, this doesn't have to be the case. Tools like the Workforce Race Equality Standards and others can be used to prioritise, leverage and monitor real change. Anti-Racist organisations use all the resources and tools available to them to achieve their goals of reducing inequalities and tackling discrimination.

2. **Zero Tolerance Matters**

Being anti-racist is an active stance and means more than simply not acting to do harm, but actively tackling the harm we see. Organisations that are on the journey to getting this right are clear in the zero tolerance they have for racism from anyone including colleagues and service users. It's vital that organisations consider how they are handling these types of incidents and are constantly learning to do more to tackle racist abuse.

3. **We Do This Together**

Many inequalities are too big to tackle on your own as a single organisation. It's vital organisations work in partnership to tackle racial inequalities we see across our communities. When looking at Health inequalities NHS organisations should be working with their local community and other statutory sector bodies to tackle these collectively rather than them staying in the too hard to do pile.

4. **Fair and Just**

The processes which exist across an organisation that look at grievances and disciplinaries for staff should feel fair and equitable for all. Where this is not the case the outcomes experienced by colleagues lead to mistrust and a clear weathering affect on the wellbeing of Black, Asian & Minority Ethnic Staff.

4. Act to Tackle Inequalities – What does this look like?

Key Drivers	Direct deliverables	Resources
1. More than a tick box	<ul style="list-style-type: none"> - The organisation must be able to demonstrate two years of consecutive improvements against at least five Workforce Race Equality Standard Measures. 	NHS England WRES Team Best Practice Case Studies
2. Zero Tolerance Matters	<ul style="list-style-type: none"> - The organisation must of communicated clearly that it takes a zero tolerance approach to racist abuse from service users or staff members. - A sample audit must be carried out of reported racist incidents annually with key learning identified on how the organisation can better response to racist incidents. 	BME Charter for medical schools to prevent and address racial harassment BBC News Hospital CEO on zero tolerance
3. We do this together	<ul style="list-style-type: none"> - The organisation can demonstrate progress over the last 12 months of reducing an an identified health inequality. - The organisation can demonstrate working in partnership to reduce a specific health inequality. 	Kings Fund – Addressing Race inequalities needs engagement NHS England Health Inequalities Hub
4. Fair and Just	<ul style="list-style-type: none"> - The organisation can evidence diverse representation within their disciplinary and grievance processes. 	NHS England WRES Best Practice Case Studies

5. Review Progress Regularly – What does this mean?

The NHS is no stranger to performance measures and the need to be intentional about tracking progress with a clear and detailed approach. However when it comes to anti-racism and wider equality, diversity and inclusion activity this has often lacked the same rigour in monitoring performance as other areas of our organisations.

Research from the USA (Why Diversity Programmes Fail Prof. Frank Dobbin and Prof. Alexandra Kalev Harvard Business Review July-August 2016) has shown us that one of the most important aspect to diversity and equality activity is grounding this work in social accountability and taking time to measure and be clear about whether progress is being made.

While an organisation may have implemented actions elsewhere to tackle and reduce the impact on bias within decision processes and decision making, it's vital that the same consideration is taken when reviewing an organisations overall performance around anti-racism and equality as a whole. What this means in practice is ensuring progress is reviewed by more than simply the people that have led or commissioned any activity and that there is intentional consideration to the diversity of those involved in reviewing and monitoring progress.

As an NHS we are the biggest employer in the country but yet as we are split up into 100s of separate organisations we often look inward for ideas and feedback around change. As a North West region through the work of the BAME Assembly we have an opportunity to collaborate and ensure reviewing organisational progress is a task we support each other with, with ideas, success and failure shared in equal measure to support our anti-racism journey.

5. Review Progress Regularly – What does this look like?

We have highlighted four key drivers that organisations should consider reviewing and taking more action to ensure they are prioritising Anti-Racism across all that they do:

1. **How are we performing?**

It's vital that organisations consider the management of performance around inclusion as seriously as they monitor performance of other areas of work. Leaders at all levels should have an understanding of how their area is doing in relation to key targets.

2. **What's our approach?**

Becoming an anti-racist organisation takes a clear intention to deliver a range of actions and measures consistently over a prolonged period of time. Understanding where the organisation is on its journey to become anti-racist is vital.

3. **Our Voices Matter**

The voices of Black, Asian & Minority Ethnic people should be at the heart of an organisation considering where they are on their journey to become anti-racist. This helps ensure that actions that have been meaningful and had an impact are prioritised and where progress hasn't been made this isn't hidden by positive activity and behind the detail of a report.

4. **Open and Transparent**

To have credibility around a statement that an organisation is anti-racist it's vital the label is not just coming from the organisation themselves but that the statement is supported by the community it serves.

5. Review Progress Regularly – What does this look like?

Key Drivers	Direct deliverables	Resources
1. How are we performing	<ul style="list-style-type: none"> - An organisation must use an EDI performance dashboard that is presented quarterly to at least a sub group of the board and include performance against the race disparity ratio, WRES and other race specific targets. - Organisation should record and publish their ethnicity pay gap annually 	Health Education England Diversity Performance Dashboard Civil Service Diversity & Inclusion Dashboard
2. What’s our approach	<ul style="list-style-type: none"> - Organisation should review progress against each of the key drivers and direct deliverables within the NHS North West Anti-Racism Framework at least annually. 	NHS North West Black, Asian and Minority Ethnic Strategic Advisory Group
3. Our Voices Matter	<ul style="list-style-type: none"> - The organisation should bring together annually Black, Asian & Minority ethnic staff to review EDI progress and any learning be built into the following years plans. 	HPMA Newsletter - The Value of Lived Experience
4. Open and Transparent	<ul style="list-style-type: none"> - The organisation should submit an application to the BAME Assembly to receive feedback against their Anti-Racism framework at least every two years. 	PWC – Diversity and the Case for Transparency

The BAME Assembly Anti-Racist Accreditation

The North West BAME Assembly's mission is to support NHS organisations from across the region to become Anti-Racist and to be at the forefront of challenging racism and tackling inequalities by people in our communities and our workforce.

To achieve this mission the assembly recognises that there will need to be intentional and sustained actions by all NHS organisations to turn the commitment to become an anti-racist organisation into a reality. So often in the past many communities have felt that pledges and commitments to equality haven't been followed through and the assembly feel it has a role to ensure that when we use the phrase "anti-racist" organisation here in the North West our communities and workforce can have confidence in what that means.

Recognising the number of assurance and compliance mechanisms that already exist, the BAME Assembly Anti-Racist Organisation Accreditation has been developed to be both clear on what's needed to implement and simple to apply when an organisation is ready to receive their assessment. Following the completion of a short application form that asks for examples of evidence across each of the five principles of our anti-racism framework. A panel of assessors brought together by the BAME assembly will judge whether an organisation has delivered against the minimum direct deliverables for each domain.

The make up of the assessment panel:

- ❑ Four BAME Assembly Members
- ❑ One NHS Provider or ICS EDI Lead
- ❑ Two BAME Staff Network Chairs
- ❑ Head of Equality from NHS England Northwest

Process for The BAME Assembly Accreditation

Self Assessment

- ❑ Review organisation against each of the dirt deliverables under the five principles of the anti-racism framework. If happy all have been completed move to application stage.

Application

- ❑ Complete application form downloaded from the BAME Assembly internet page. Each of the direct deliverables will require written evidence how they have been delivered by your organisation.

Assessment Panel

- ❑ The assessment panel will meet twice a year to review applications from organisations wanting to receive the BAME Assembly Anti-Racism Accreditation.

Publish & Review

- ❑ Organisations that are successful in receiving will have their name published on the BAME Assembly internet page, case studies shared via NHS England events and be able to use an Anti-Racism graphic on their website and email signatures.

Additional Anti-Racism Resources

National Education Union Anti Racism Framework – [Click Here](#)

NHS Leadership Academy Allyship Toolkit – [Click Here](#)

NHS Leadership Academy Resources on Racism – [Click Here](#)

NHS Employers Resources to Tackle Racism – [Click Here](#)

NHS England WRES 2020 Data Analysis Report – [Click Here](#)

NHS England Patient Carer Race Equality Framework – [Click Here](#)

NHS Race and Health Observatory – [Click Here](#)

NHS Confederation BME Leadership Network – [Click Here](#)

Produced by the Northern Care Alliance



Equality@nca.nhs.uk