

Anti-Racism Policy

Version number	Date approved (including committee)	Reason for production/revision	Author	Proposed next review date
V1.0	Q1 2023-24 EDIC & ExCo	New Policy Review every 3 years	Head of HR	Q1 2026-27 and as required

Related policies

- Disciplinary Policy
- Grievance Policy and Procedure
- Student Code of Conduct
- Student Complaints
- Single Equality Policy
- Code of Conduct and Professional Responsibility
- Freedom of Speech
- Student Disciplinary policy
- Zero Tolerance policy

External Reference

- Equality Act 2010

The Prevent Duty (2015)	No	
Data Protection	Yes	This is in accordance with all other confidential information that is held about employees with HR.
Equality Impact Assessment	Yes	ICMP rejects all forms of racism and racial discrimination, and is committed to the elimination of racial discrimination in all aspects of the learning and working environment. Racial discrimination, harassment or vilification of students, staff or visitors will not be tolerated.

ANTI-RACISM POLICY

1. Introduction

ICMP is committed to providing a learning and working environment free from racial discrimination, harassment, and racial vilification and to ensuring that the wellbeing of students, staff and visitors are not unfairly disadvantaged or disrespected because of their race (including colour, nationality, descent or ethnic or ethno-religious or national origin). The experience of racism is often compounded by other forms of discrimination. This Policy acknowledges intersectionality and the importance of taking all forms of discrimination into account in education and awareness programs aimed at eliminating racism in education and employment.

2. Our Commitment

ICMP celebrates and values the diversity brought to its workforce by individuals, and believes that the organisation will benefit from engaging staff from a variety of racial, ethnic and national backgrounds, thus allowing it to meet the needs of a diverse student population within a multi-cultural society. ICMP will treat all employees and students with respect and dignity and seek to provide a positive, working and learning environment free from racial discrimination, harassment or victimisation.

ICMP will seek not only to eliminate discrimination, whether overt or covert, but also to create a working and learning environment based on positive relations between members of different racial groups. To this end, ICMP undertakes to provide training and support for employees, to consult with ethnic minorities employees about their experience of the working environment and to provide diverse images in any material which it produces for learners and employees. The aim is to create a positive inclusive ethos where issues of racism, stereotyping and discrimination can be discussed openly, and in confidence where appropriate, with a shared commitment to challenging and preventing racism and discrimination, to respecting diversity and difference, and to encouraging good relations between people of different racial groups.

Equitable representation of Black, Asian, Ethnically Diverse, and Global Majority within curriculum will be overseen by a new Learning, Teaching, and Assessment Committee working group (Equality of Opportunity) which will report to the EDI Committee. This will be aided through the following initiatives: the working group shall review the 'EDI Practices' section of every Module Leader Report which will help inform CPD activities surrounding representation; work in partnership with Access & Participation who has representation at the heart of its Plan and mission; cultivating a culture of respect (#MyNameIs initiative, for example); ensuring that learning, teaching and assessment activities are designed to allow the student to express themselves and not adhere to notional practices or identities set by assignment tasks; we value the student's cultural background and lived experience as meaningful context for their work.

ICMP acknowledges that this policy should be developed in consultation with employees and relevant stakeholders.

3. Definitions and Scope

- 3.1 References to racial discrimination or racism within this document refer to discrimination on the grounds of a person's colour, race, nationality, ethnic origins or national origins.

3.2 ICMP recognises that institutional racism can exist and that no organisation is immune to it. ICMP will endeavour to continually challenge this and work towards a racism free organisation.

3.3 This guidance is intended to assist ICMP in meeting its duty to eliminate discrimination on the grounds of race in relation to employment.

3.4 Although this guidance refers to employees throughout, ICMP recognises its wider responsibilities to provide a dignified and positive working environment free from racial discrimination for all who work on its premises.

4. Principles

4.1 ICMP rejects all forms of racism and racial discrimination, and is committed to the elimination of racial discrimination in all aspects of the learning and working environment. Racial discrimination, harassment or vilification of students, staff or visitors will not be tolerated.

See Section 6 for information on reporting racism.

4.2 ICMP is committed to actively challenging racism, irrespective of how it is expressed. Racism and racial discrimination can present in different and varied ways, including direct and indirect discrimination, racial vilification, race-based harassment, hostile work or learning environments, lateral violence, and casual comments (e.g., microaggressions or “jokes”). It is the shared responsibility of the ICMP community to combat racism and challenge racist expressions whenever it is safe to do so, irrespective of how they manifest or are intended. Active bystanders can have an especially important role in combatting racism by reporting this through our Zero Tolerance campaign.

4.3 Education will promote awareness of racism and its impacts. ICMP has a responsibility to ensure that students, staff, and visitors are made aware of what constitutes acceptable standards of behaviour within ICMP and ICMP’s rejection of racism. As a global university, our teaching culture will foster and develop global citizens who can collaborate with people from all ethnic, cultural, and racial backgrounds to achieve success. ICMP staff should ensure that academic course design, curriculum content, teaching methodologies, and the student experience are culturally safe, respectful, and inclusive of diverse perspectives.

4.4 Making complaints of racism is supported. ICMP has a responsibility to manage complaints sensitively and fairly, and to inform staff, students, and visitors of their options for making complaints. Those who experience racism in any form are encouraged to report the incident(s), and to seek support. Complaints or allegations about racism will be handled in accordance with the Student Complaints Procedure, Student Misconduct Procedure, Grievance Policy and Procedure and the Zero Tolerance Campaign.

5. Division of Responsibilities

5.1 The Corporate Board are responsible for ensuring that:

5.1.1 people from different racial groups are given an equal opportunity to be members of the organisation, and in the event of significant under-representation of any group, the organisation will consider what steps can properly be taken to address that under-representation;

- 5.1.2 the strategic plan includes a commitment to race equality;
- 5.1.3 inclusion training features as part of the operational policies stemming from the strategic plan;
- 5.1.4 they are aware of the organisation's statutory responsibilities in relation to race legislation as an employer and service provider;
- 5.1.5 they are familiar with the Anti Racism policy.
- 5.2 The Chief Executive and the Executive Committee are responsible for ensuring that:
 - 5.2.1 they lead in creating a positive, inclusive ethos that challenges racist or inappropriate behaviour on the part of the managers, staff or learners;
 - 5.2.2 they are aware of the organisation's statutory duties in relation to race legislation;
 - 5.2.3 all aspects of policy and activity are sensitive to racial issues;
 - 5.2.4 the procedures for the recruitment and promotion of staff enshrine best practice in equal opportunities;
- 5.3 Managers are responsible for ensuring that:
 - 5.3.1 they are aware of the organisation's statutory duties in relation to race legislation and the Anti Racism policy;
 - 5.3.2 all aspects of policy and activity are sensitive to racial issues;
 - 5.3.3 racial group monitoring information is collected and analysed;
 - 5.3.4 the procedures for the recruitment and promotion of employees enshrine best practice in equal opportunities;
 - 5.3.5 peer review reports include criteria on racial issues where appropriate;
 - 5.3.6 curriculum areas are required to assess performance in relation to racial issues and take action as appropriate;
 - 5.3.7 the publicity materials present appropriate and positive images about minority ethnic groups;
 - 5.3.8 appropriate training and development is provided to support the appreciation and understanding of diversity;
 - 5.3.9 they implement the above and make recommendations to the appropriate people.
- 5.4 Employees are responsible for ensuring that:
 - 5.4.1 they are aware of the organisation's statutory duties in relation to race legislation;
 - 5.4.2 their lesson content and teaching resources demonstrate sensitivity to issues of cultural diversity;

5.4.3 they challenge, or where appropriate report, prejudiced and discriminatory behaviour by learners, guest speakers, outside contractors or other employees, whether intentional or unintentional;

6. Reporting and complaints

6.1 ICMP will seek to provide a supportive environment for those who make claims of discrimination or harassment.

6.2 Acts of racial discrimination (direct or indirect), harassment, victimisation or abuse will be treated as a serious disciplinary offence.

6.3 Employees who feel they are being discriminated against on racial grounds by other employees should raise the matter under the relevant procedure (Grievance Policy and Procedure, Zero Tolerance Policy) - which will, if the accusation is upheld, be treated as a serious disciplinary offence.

6.4 If, in the course of their work, ICMP employees suffer racial discrimination from members of the public, ICMP will take appropriate action and provide appropriate support.

6.5 Any racist behaviour directed against employees by students will be dealt with under the student disciplinary procedure.

Appendix A - Definitions and Acronyms

Active bystander	Active bystanders may take action to stop the perpetration of a specific incident of violence; reduce the risk of violence escalating and prevent the physical, psychological, and social harms that may result; and strengthen the conditions that work against violence occurring.
Affiliate	Conjoint and visiting appointees; consultants and contractors; agency staff; emeriti; members of University committees; and any other person appointed or engaged by the University to perform duties or functions for the University.
Direct discrimination	Direct discrimination occurs when a person, or a group of people, is treated less favourably than another person or group because of their background or certain personal characteristics.
Indirect discrimination	Indirect discrimination occurs when there is an unreasonable rule or policy that is the

	same for everyone but has an unfair effect on people who share a particular attribute.
Intersectionality	Intersectionality refers to the ways in which different aspects of a person's identity can expose them to overlapping forms of discrimination and marginalisation.
Lateral violence	Lateral violence refers to behaviours that include bullying, conflict, and social exclusion, that stem from complex historical, cultural, and social dynamics. It often occurs when people work together to attack or undermine another individual or group, and can be a sustained attack on individuals, families, or groups.
Microaggression	A subtle statement, action, or incident that discriminates against or offends members of a marginalised group. Microaggressions can be intentional or unintentional.
Race-based harassment	Some examples of race-based harassment include ridicule (e.g., name calling, use of derogatory slang, racist jokes), physical or emotional intimidation (e.g., physical threats or abuse, display of threatening or offensive slogans or graffiti).
Racial discrimination	Treating someone less favourably because of their race, colour, descent, national origin, or ethnic origin than someone of a different 'race' would be treated in a similar situation, or to impair that person's human rights or fundamental freedom in any field of public life. It also includes treating someone unfairly if they are a relative, friend or colleague of a particular race. Some examples of racial discrimination include restricted access to services and facilities, restrictive workplace practices (e.g., employment procedures, working conditions), or exclusion from work or study activities.
Racial vilification	A public act that encourages or incites others to hate, have serious contempt for, or severely ridicule a person, or group of people, because of race, colour, nationality, descent or ethnic or ethno-religious or national origin. Public acts include communications that can be seen or heard by the public (eg print, radio, video or online), signs, flags or clothing seen by the public or distributing and sharing

	<p>information to the public. A public act that threatens or incites violence towards a group of people on the basis of race is a criminal offence that may be referred to the Police.</p>
<p>Racism</p>	<p>Racism can take many forms, such as jokes or comments that cause offence or hurt, name-calling or verbal abuse, harassment or intimidation, or commentary in the media or online that inflames hostility towards certain racial groups. Racism can also take the form of unfair treatment of people because of their race. . Racial discrimination occurs when a person is treated less favourably, or not given the same opportunities, as others in a same or similar situation, because of, or substantially because of their race, the country where they were born, their ethnic origin or their skin colour. Racism that is racial hatred can also be against the law, e.g., doing or saying something in public, including in the workplace, classroom, library or online based on the race, colour, national or ethnic origin of a person or group of people, which is likely to offend, insult, humiliate or intimidate.</p>
<p>Vicarious liability</p>	<p>Vicarious liability is when an employer can be legally responsible for acts of discrimination or harassment that occur in the workplace or in connection with a person's employment. Employers can be held vicariously liable for discrimination and harassment that occurs in the workplace, or in connection with a person's employment.</p>