



The Prince's
Responsible
Business Network



Report

RACE AT WORK CHARTER 2023: COMMITMENT THREE

October 2023



REPORT

RACE AT WORK CHARTER REPORT 2023: COMMITMENT THREE – ZERO TOLERANCE OF RACIAL BULLYING AND HARASSMENT

The Race at Work Charter, launched in 2018, has seen an increase of signatories from 85 employers at launch, to over 1000 signatories in 2023. 238 employers completed the Race at Work Charter Survey 2023. This amount of employers participating has more than doubled compared to previous years, with 114 employers participating in 2020 and 108 employers participating in 2019.

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COMMITMENT THREE OF THE RACE AT WORK CHARTER

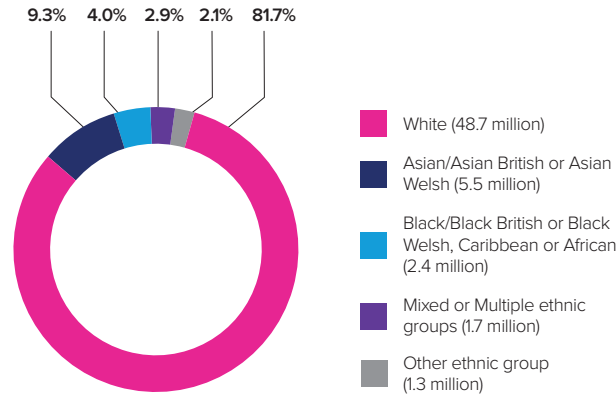
Commit at Board Level to zero tolerance of racial harassment and bullying.

This commitment was established at the launch of the Race at Work Charter in 2018 and built on to ensure that employer policies also included customers, clients, service users and contractors.

This commitment asks leaders at the top of the organisation to commit to tackling racial harassment and bullying, with both internal and external stakeholders, and asks all employers to take action that fosters inclusion. Recent Business in the Community (BITC) researchⁱ highlighted that 25% of ethnically diverse employees reported that they had either witnessed or experienced racial harassment or bullying from managers, whilst 31% said that they had witnessed or experienced racial harassment or bullying from customers, clients, service users and contractors.

With ONS Census 2021 data evidencing that 18.3% of the resident population of England and Wales are from a Black, Asian, Mixed Race or other ethnically diverse background, transparency and representation have never been more important. It is also key to note that ethnically diverse people also make up almost one in five (19.3%), of the working-age population.

Figure 1: Population of England and Wales by broad ethnic group categories: Census 2021



Source: Census 2021 Ethnic Group TS021

For more information please see BITC's [Race Regional Factsheets](#).

Vicki Potter, CHRO and Services Director, Oxford Instruments Plc, said:

“Our approach is founded on our values of inclusivity, innovation, trust and being purposeful. We strive to create a workplace where everyone feels valued, everyone is treated equally, and all voices and viewpoints are heard. These values are not simply the right way to do business – they are also fundamental to the success of our business. It is only by representing all sections of society, and a wide range of viewpoints and experiences, that we can truly understand our customers, and create the positive impact we seek through our purpose: to enable a greener, healthier, more connected advanced society.”

CHARTER EMPLOYER TRENDS 2019–2023

BITC’s Race at Work 2021 surveyⁱⁱ found that there was an increase in the percentage of employees reporting that their employers gave them support and information to call out bullying and harassment in the workplace. There was an increase from 42% in 2018, reported by employees of all backgrounds, across the UK workforce. In 2021, 50% of White and White British employees said yes to receiving support from their employer, compared to 46% of Black, Asian, Mixed Race and ethnically diverse employees saying yes to receiving support from their employer.

A clear policy on tackling bullying and harassment in the workplace, wherever it is found, is essential to building an inclusive culture where everyone feels they are a valued member of the workforce.

We recommend that periodic reviews of policies on bullying and harassment that support employee wellbeing are regularly undertaken to ensure that they remain effective. Surprisingly, there has been a decrease in the number of employers conducting these reviews from 38% in 2020 to 25% in 2023 (See *Figure 4*).

Trend question: Do you have a clear policy which sets out zero tolerance on racial harassment and bullying from managers, colleagues, customers, and contractors?

95% of employers participating in the Race at Work Charter 2023 survey said yes to having a clear policy which sets out zero tolerance on racial harassment and bullying from managers, colleagues, customers and contractors. This has remained constant, compared to 95% in 2020 and decreased slightly from 97% in 2019.

Figure 2: Percentage answering yes to ‘Do you have a clear policy which sets out zero tolerance on racial harassment and bullying from managers, colleagues, customers, and contractors?’



Source: BITC Race at Work Charter Employer Surveys

Professor Nic Beech, Vice-Chancellor of Middlesex University (January 2020–October 2023), said:

“We are on a journey to becoming a genuinely diverse and inclusive, global community. Our Race Equality Action Plan helps us focus our resources to bring about meaningful change. I have also long had a personal commitment to EDI, for example as an academic through my research and as a founding member of the Chartered Management Institute Race Board. I am also on a personal journey towards understanding EDI better. Reverse mentoring from students and staff have helped me question my assumptions, explore privilege and vulnerability and gain some insight into the lived experiences of our staff and students.”

Trend question: Do you encourage your employees to call out bullying and harassment if it is observed in the workplace?

99% of employers in this Race at Work Charter Survey 2023 said yes to this question. This has remained fairly constant compared to 98% in 2019 and 99% in 2020.

Figure 3: Percentage saying yes to ‘Do you encourage your employees to call out bullying and harassment if it is observed in the workplace?’

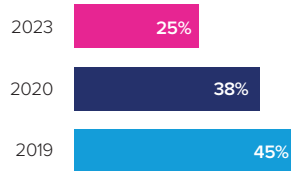


Source: BITC Race at Work Charter Employer Surveys

Trend question: Has your Board conducted or commissioned a review into harassment and bullying?

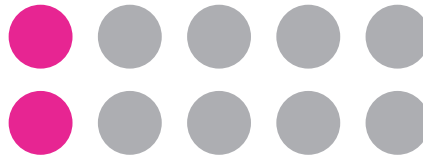
In 2023, **25%** of employers said yes, they had commissioned such a review. However, this action has been steadily decreasing, compared to 45% in 2019 and 38% in 2020.

Figure 4: Percentage saying yes to ‘Has your Board conducted or commissioned a review into harassment and bullying?’



Source: BITC Race at Work Charter Employer Surveys

The second part of the question asked whether those that had reviewed had also shared the review with the workforce and only 20% of the Race at Work Charter 2023 Survey respondents said yes to that question.



As mentioned previously, Race at Work Charter Commitment Three was built on in 2021, following the results of BITC’s Race at Work Survey with YouGov which found that employees not only experienced and witnessed bullying and harassment from managers and colleagues but also from customers, clients, service users and contractors. While it is great to see that most employers have updated policies, there

Diane Bennett, Anti-Racism Executive Sponsor, General Counsel and Company Secretary, Cadent Gas Ltd, said:

“Becoming an Anti-racist organisation is one of our three ED&I priority areas, alongside fair and inclusive processes and inclusive leadership. I am proud to be the Exec Sponsor for this. Our ambition means much more than “not being racist”; we are taking positive steps to be actively and demonstrably inclusive to ethnic minority colleagues (and colleagues to be) – benefitting from diversity of views and reflecting the communities we serve.”

is no evidence that employers have reviewed the impact of their policies. Of the 25% who conducted a review, only one in five had shared the results with their employees.

The increased trend in convening listening groups is a very positive one, however, it is very important that employers take action, based on what they hear from their employees.

A review should be commissioned by the Board to:

- Ensure that heads of units have KPIs to reduce racial harassment and bullying complaints, using disaggregated employee opinion survey results as performance indicators of improvement.
- Review and report data collected on the nature of complaints and/or the diversity of employers bringing complaints of racial harassment and bullying.
- Use insights to identify negative trends and behaviours and design interventions with key stakeholders across the organisation to stamp these out.
- Communicate the importance of employee health, wellbeing and an inclusive culture

ACTION EMPLOYEES ARE TAKING

1. Convening listening groups to hear from ethnically diverse colleagues on their lived experiences within the organisation.
2. Reviewing Dignity at Work policies and bullying and harassment policies.
3. Regular tracking of reports on bullying and harassment monthly and quarterly.
4. Regular listening group meetings to ensure that colleagues feel heard by the leadership team, who then follow through with actions to address concerns highlighted.
5. Creating an open and inclusive culture with activities throughout the year to encourage discussion, and education, enabling all colleagues to share their experiences and backgrounds.
6. Establishing a formal whistleblowing policy so that staff know they can report any wrongdoings confidentially.
7. Setting up a confidential call line so that staff can report any incidents.

Sonia Rossetti, Regional Head Corporate Affairs Brand and Marketing EA, Standard Chartered Bank MD, said:

“As a bank like no other, we constantly collaborate with clients and colleagues in many of the world’s most dynamic markets. Given our unique status, I am passionate that across the Europe and Americas Region we build and cultivate a culture that is both inclusive and diverse. Having a workplace where every colleague feels they have equal access to opportunities and shared experiences irrespective of their age, ethnicity, nationality, or orientation is vitally important and fundamental to fulfilling our purpose to drive commerce and prosperity through our unique diversity, benefiting our clients and stakeholders. Elevating and improving diversity and inclusion is constant and not something we should shy away from. Whilst collectively we continue to make good progress in this area, we all have a role to play every day to drive this forward and help us become the best possible bank.”

BEST PRACTICE IN ACTION

In this section, the following employers share more detail on how they approached ethnicity data capture and transparency in the workplace:

- A.F, Blakemore & Son Ltd
- Cooley
- Danske Bank (UK) Limited
- Lincolnshire Co-op
- Trust Payments
- University of St Andrews

A.F. Blakemore & Son Ltd

A.F. Blakemore's success has been built upon a distinct culture. Focused on positive and friendly relations with colleagues, customers and the communities they serve, the company takes a zero-tolerance approach to bullying and harassment. Last year A.F Blakemore reviewed their Equality, Inclusion & Diversity (EID) and Dignity at Work policies, relaunching them with a series of initiatives to support their commitment to an inclusive and friendly workplace culture. This included working in partnership with BITC to develop a Race at Work training programme, which has since been rolled out to nearly 500 managers across the business, with the purpose of exploring and breaking down barriers that block opportunities for ethnically diverse people and take positive action to eliminate any form of discrimination, ensuring equity across all aspects of employment. Race at Work listening groups, in addition to regular listening groups, have also run annually, to hear from ethnically diverse colleagues on their lived experiences within the company and ensure they feel heard by the leadership team, deal with any concerns, signpost to the appropriate support services if required and inform strategy in continuously improving the culture. A dedicated confidential bullying, harassment and discrimination reporting line has also been established, which includes a QR code on communications to ensure awareness and

accessibility to all colleagues. Any incidents are thoroughly investigated and reported monthly at Board level to ensure transparency and awareness at leadership level, demonstrating commitment to zero tolerance. A.F Blakemore also use the annual Colleague Engagement Survey 'Your Voice' to provide them with a measure of what colleagues think and feel in relation to equality, bullying and harassment. 91% of colleagues in the 2022 survey agreed or strongly agreed that 'people of all backgrounds and identities are valued equally at A. F. Blakemore'.

The "Let's talk about race" was an in-person, 3 hour session rolled out wider and deeper than we've ever done any face to face training before and has been delivered to over 600 managers. We've since made this into an e-learning module for all colleagues to complete across our whole business. This has been adapted to suit the medium and audience.

"In 2022, we committed to advancing racial equity. Whilst we have made some progress, we recognise there's still work to do through accountability across the leadership team. We have acknowledged we need to improve ethnicity representation at all levels, especially in leadership. We updated our EID policy in 2022, as well as a series of initiatives including 'Race at Work' training for over 400 managers. The establishment of an EID Steering Group with

regular reporting to the Group Board ensures we remain focussed on living our value; ‘We are one inclusive team’ and meeting our commitment to advancing racial equality.” Caiore Blakemore, Group Board Director and Responsible Business Director

Cooley

Cooley is a firm with the concepts of Diversity, Inclusion, Equality (DEI) and justice woven tightly into their identity, culture, brand and core business. In 2020, Cooley’s board of directors approved a bold and robust DEI Action Plan in their ongoing efforts to fight systemic racism, bias and injustice, in order to build a workplace that reflects equality for all. As a result, Cooley is committed to striving to achieve the following goals by January 1, 2026:

- Increasing the percentage of women in the partnership to at least 35%.
- Increasing the percentage of ethnic, racial and LGBTQ+ diversity, among all lawyers, to at least 32%.
- Increase the percentage of ethnic, racial and LGBTQ+ diversity among all managers and directors to at least 37%.

Additionally, the firm continues to deepen its commitment by mandating inclusive leadership training for all firm leaders.

Danske Bank (UK) Limited

Origins – Danske Bank’s Race Equality Network – is committed to providing a safe space for colleagues from ethnic minority backgrounds to share and discuss their experiences free from prejudice, judgment or stereotyping. The aim is that it will help to raise awareness amongst colleagues on race equality and cultural diversity which also benefit, customers and wider society in Northern Ireland. Over the last 12 months, Origins has achieved the following:

- Increased the representation of ethnically diverse individuals on Danske Bank’s website.
- Assisted with the capturing of diversity data to include the makeup of ethnic minority colleagues.
- Launched Origins ‘Yammer’ community to encourage wider support and feedback for initiatives, including publishing awareness posts and articles.
- Hosted a Race Language Fluency event to encourage open and honest conversations in the workplace.

- Introduced an onboarding to support ethnic minority individuals in the workplace.
- Organised a successful fundraising day for Ukraine raising over £4,000 to increase awareness of the effects of conflict on colleagues, family and friends and highlight support for Ukraine.
- Introduced external communications to highlight and show support for celebratory holidays from a range of religious denominations.
- Colleague testimonial videos were recorded and circulated, sharing emotive personal stories and experiences, displaying the impact Origins has had.
- Collaboration event with the Gender Diversity Network to encourage intersectionality and bring light to issues affecting those of different genders and ethnic backgrounds.
- Executed CV skills and interview workshops with Ukrainian refugees to build confidence, share tips and encourage career development.
- Contributed to the development of Guiding Principles for Menopause Support to ensure inclusion of menopause from an ethnic minority perspective.

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- Participated in BITC Race at Work “Tackling Race Inequality in the Workplace” to share best practice and learn from other organisations in this space.
- Volunteering event with local charity to support ethnic minority communities in Northern Ireland to thrive.

“At the heart of our organisation are our people and every person should feel supported, included and accepted. Our Race Equality Network, Origins, joins our other affinity networks in helping to ensure that all colleagues feel they belong here. Northern Ireland has a growing migrant workforce which is something to be celebrated and encouraged. Our colleagues and our customers have many origins and this is something we need to focus on, with support from all facets of the organisation, including our Belong ambition.”
Caroline van der Feltz, HR Director

Lincolnshire Co-op

Lincolnshire Co-op has several different business areas spread across the East of England, with different roles and working patterns. Therefore, it is important to the organisation that everyone feels welcome and included at work. In an effort to create an open and inclusive culture, Lincolnshire Co-op hosts activities throughout

the year to encourage discussion, and education and to enable all their colleagues to share their experiences and celebrate their backgrounds. Given the diverse nature of the organisation accessible communication is important. As a result, Lincolnshire Co-op has channels that incorporate everyone effectively and create a shared space. The Colleague App was launched in 2019 and is the main communication channel between colleagues, accessible 24 hours a day through their phone, laptop, or tablet. It has several functions, including wellbeing and employment support, and a separate feed which is focused on events. It has a varied programme which covers a broad range, from awareness days to learning and development opportunities. The Colleague App is a key element in ensuring a constant and two-way conversation and education space around all issues of inclusivity and is part of the company’s ongoing encouragement for colleagues to engage with other areas of the business for mutual learning. There have been several posts encouraging conversations around race and ethnicity. In October 2022 Lincolnshire Co-op celebrated Black History Month. Following the theme of ‘sharing journeys’ they highlighted the long history of migration within the UK and how the United Kingdom has always been a mixture of different cultures and identities, noting some of the many

Black people who have been part of our history, from Britain’s first Black aristocrat, Elizabeth Dido Belle, to Sandra Murphy, a winner in the Black Business Awards 2020.

“Our business provides a breadth of essential services, from food to pharmacy, it is important to us that we represent the communities we serve. We are fully committed to creating a diverse and inclusive environment in which every colleague and customer feels that they belong and knows that they are valued. The pandemic and cost of living crisis have highlighted tackling racial, and all, inequalities is imperative in creating a more resilient community. As the Race Champion for Lincolnshire Co-op I am passionate about taking every opportunity to develop and deliver inclusive best practice across all our business areas.”
Heather Lee, Head of People Performance

Trust Payments

Last year, Trust Payments developed a Diversity and Inclusion Steering Group to improve policies and procedures, reflecting their commitment to Diversity and Inclusion (D&I) in the workplace. The D&I Committee contribute to the development of Trust Payments Diversity, Equality, and Inclusion initiatives. It is run as an open forum for like-minded colleagues to discuss relevant topics and changes they believe need to be

made to create a more diverse workforce and inclusive workplace as well as an opportunity to share experiences, lend support and network around the company.

Policies: Trust Payments published its first company-wide Diversity & Inclusion policy, which summarises the responsibilities and behaviours expected of all employees and the company's approach to incidents of discrimination. To further support their commitment to being an inclusive employer, Trust Payments will also be introducing a Dignity at Work Policy. As they continue to evolve as an inclusive employer, they believe it is key to take a firm stance against any bullying, harassment or discrimination and promote that the organisation welcomes those from all cultures and backgrounds. This new policy will provide guidance on how to avoid behaviours that hinder a culture of trust and respect. Trust Payments ran a course to bring to life the company's recently launched Diversity & Inclusion Policy, highlighting their commitment to equality and appreciating the value of diversity at Trust Payments, all while recognising the responsibility of preventing discrimination and harassment. The next step will be for executive and senior leadership teams to attend further training on 'Consciously Inclusive Recruitment'.

Recruitment: Trust Payments is conducting an end-to-end review of its hiring and training processes and exploring new ways and spaces to connect with under-represented groups. The organisation aims to create a truly sustainable diverse and inclusive workforce that includes diversity and inclusion around mental health, socio-economic background, menopause and accent, for example, going beyond simply improving statistics around protected characteristics.

Early careers: Following their successful Kickstart Scheme, Trust Payments is rolling out a new 'early careers' programme looking at school leavers, graduates and young talent. By having a strong early career programme, they are able to discover new insights and perspectives through employees who haven't previously worked in financial services or the FinTech sector. Trust Payments value having a diverse workforce and are ensuring that they recruit from diverse backgrounds for this programme. They believe that diversity helps to attract new talent, improve the culture of the company and boost the wellbeing and productivity of their colleagues.

University of St Andrews

The University of St Andrews launched an online Report & Support tool in 2020. The tool enables and encourages staff, students and members of the wider community to report discriminatory behaviour. This could include racism, microaggressions, bullying, harassment, sexual violence and harassment or concerns about the safety and wellbeing of others. A new section on racism was added to [Report & Support in 2022](#).

in response to requests from the Black, Asian and Minority Ethnic (BAME) Network of staff and student members. The EHRC's 'Equality Act statutory guidance' and 'Tackling racial harassment: universities challenged' publications were utilised to create webpage content. This includes information on legal definitions of racial discrimination, harassment, hate crimes and victimisation. This specific section provides information about racism such as what support is available, how to report racism and how to support someone you know who is experiencing racism. To demonstrate visible senior-level support for this provision, an [online video](#) was created, with an opening message by the Principal and Vice-Chancellor. Definitions and examples were then explained by key members

from the Student BAME Network, Rector's Office, Race Equality Charter Chair and the Students' Association. To self-evaluate the University's progress in relation to ethnicity and race, a Race Equality Charter Staff/Student Survey was run from November 2022 to January 2023. Additionally, to assist with the communications of the survey launch, a similar video was created to the format of the Report & Support version. The [video](#) featured staff and students of colour occupying different levels and roles, commenting on experiences at the University.

Principal's Report & Support [video message](#):

"At the University of St Andrews, we abhor racism. As a truly inclusive community, the staff and students of the University of St Andrews must not only condemn it; we must identify and challenge whenever it occurs – whether that is within our community, or in our society more broadly, whether it is overt and systemic, online or in person. That process starts by reporting and addressing racism. It is not enough to be a bystander: each of us must feel confident identifying racism and challenging it using all the resources available to us." Dr Rebekah Widdowfield, Vice-Principal People & Diversity

Lambeth Council Cllr Holland –
Leader of Lambeth Council, said:

"In London local government, we celebrate great diversity within our workforces and this representation is a strength of our sector. However, despite the impactful work that takes place, we must rally momentum to continue addressing barriers and hardships that still exist for our Black colleagues today. Especially, as we consider the challenging landscape that lies ahead, and how this may disproportionately affect different communities. We must continue to strive to achieve greater race equality and inclusion in our workforces and in our communities. Lambeth Council are proud to be signatories of the Race at Work Charter this supports our commitment to take active steps to model the attributes of an antiracist and anti-discriminatory organisation."

References

- ⁱ [BITC Race at Work 2021 Scorecard report](#)
- ⁱⁱ [BITC Race at Work 2021 Scorecard report](#)

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