

Reporting Racist Incidents Policy

Last updated December 2021

This policy will work to underpin our commitment to creating an inclusive and anti-racist organisation. As part of that commitment, we want to ensure our staff who are subject to racism feel fully able to report it. We also want to provide the opportunity for staff to consider different options around reporting such incidents.

What is the scope of this policy:

At Leap we believe that lived experiences matter and our commitment towards anti-racism requires us to hear and learn from all instances of racism as they occur.

These instances may be serious incidents of racism, or racist comments, either experienced or observed. For example, It could be an observation of how the organisation is taking decisions, or in how it informs choices being made.

It can be through any comment or action that may be subtle but expresses a prejudiced attitude; perhaps unconsciously or unintendedly, also known as micro aggressions.

We want to assure employees at Leap in our commitment to anti racism by ensuring that our organisation supports employees through a process that takes concerns around racism seriously, acts upon them and provides learning is a step towards this.

This policy is to be read in conjunction with Leap's **[Anti-Bullying and Harassment Policy]** and **[Whistleblowing Policy]** which outline Leap's zero tolerance approach to all forms of bullying and harassment, including racism. These policies guide processes that ultimately may result in following Grievance or Disciplinary procedures – these remain relevant and can be followed by staff wishing to raise concerns about racism.

The intention of this particular policy is to provide a framework for additional steps to those set out within the policies referred to above. This is to ensure that concerns that specifically involve racism are reported, resulting in all instances of racism being known by the organisation; employees should feel that no instance or experience is too small. This framework also intends to ensure that these issues are escalated and heard in the right way.

Who does this policy apply to?

Everyone has the right to be respected with dignity and respect at work and for Leap to feel a safe space; free from racism, marginalisation and hate.

This policy applies to all employees at Leap Confronting Conflict.



Young people, trainers, trustees, external partners or funders who wish to raise any concern or complaint about any unacceptable behaviour they experience or witness whilst working with Leap , please refer to the [Complaints Policy](#) which can be accessed through our website.

At Leap we strive towards excellence in all that we do in our work towards giving young people the skills to manage conflict in their lives, reduce violence in their communities and help lead our society. We believe in learning about ourselves and our practice, working together, taking responsibility for our actions and creating a safe environment for each other.

How will this be communicated?

This policy will be included within the Staff Handbook and will be placed on our HR system and Sharepoint. It will be circulated to all employees and will be included in inductions for new employees. All managers will be trained on new policies as they are introduced.

What is my responsibility in relation to reporting incidents of racism?

Every member of the Leap community has a role to play in preventing all forms of racism.

Our community is responsible for fostering a culture in which inclusion, equality and diversity considerations are embedded in all work areas, creating an environment where people feel comfortable to say when they witness or are subjected to inappropriate behaviour and that all procedures relating to harassment and discrimination are followed.

We expect that everyone reads and seeks to understand this policy and that anyone raises a concern about anything that feels uncomfortable as soon as it arises. In so doing, we encourage people to seek the support that they need to be able to carry this out.

Our Procedure in relation to reporting concerns about racism:

You may witness an incident, or you may experience racism within Leap and this section of the policy outlines what you need to do to report concerns and how they will be dealt with.

These procedures work in conjunction with Leap's [**Anti-Bullying and Harassment Policy**] and [**Whistleblowing Policy**] which outline Leap's zero tolerance approach to all forms of bullying and harassment, including racism. These policies guide processes that ultimately may result in following Grievance or Disciplinary procedures.

The procedures set out below are **additional steps** to those set out within the policies referred to above. This is to ensure that concerns that specifically involve racism are reported, resulting in all instances of racism being known by the organisation; staff should feel that no instance or experience is too small. This framework also intends to ensure that these issues are escalated and heard in the right way.

How do I report a concern?

Who this policy applies to:

If you witness an incident you believe to be racism or you experience racism by a Trainer, stakeholder partner, supplier or client (or other) you should report the incident to your line manager or someone you feel comfortable with.

Safeguarding matters must follow the [Reporting Concerns policy](#) and procedure which is usually to report directly to the Designated Safeguarding Lead.

Young people, trainers, trustees external partners or funders who wish to raise any concern or complaint about any racism that they experience or witness whilst working with Leap , please refer to the [Complaints Policy](#) which can be accessed through our website.

If you witness an incident you believe to be racism or you experience racism by another employee:

Under this policy, where concerns or complaints involve racism these will be handled, whether they are at an informal or formal stage, by the Chair of the Inclusion and Diversity Committee.

1 An Informal Complaint:

Leap recognises that complaints of racism, can sometimes be difficult and that it may not be appropriate for you to raise the issue through our normal grievance procedure. In these circumstances you are encouraged to raise issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you or confidentially through HR [complaints@leapcc.org.uk]). There will be an anonymous form on the website for those that do not wish to be connected to the reported incident.

Stage 1:

- The Manager hearing the concern will liaise with HR to ensure a consistent approach is taken to the handing of complaints.
- The employee raising the concern will be given the following initial options as informal approaches:
 - To be supported in speaking directly to the person who has made the racist comment or action or micro-aggression.
 - For HR or a member of the SMT (as chosen by the complainant) to speak directly to the person who has made the racist comment or action or micro-aggression.
 - To bring the complaint to the attention of the organisation without the person being confronted, so that a training issue can be identified.
- The employee making the complaint can choose to share the impact that the comment/action has had on them (or choose not to). The staff member can also express a view about what action they would like to see happen as a result of the complaint.
- HR will confirm in writing the outcome of whichever option the employee making the complaint chooses with any specific follow up actions clearly outlined.
- The employee will be offered support throughout the process. This could be from HR, their manager or a trusted person of their choice.
- The Chair of the Inclusion and Diversity Committee will be notified of the concern raised together with a summary of the actions taken, outcomes and learning for the organisation.
- The number, nature and resolution of complaints of racist incidents will be reported to the Inclusion and Diversity Committee on a quarterly basis.

Stage 2:

If the above approach does not achieve what you would like it to, or if you experience racism from your own manager, you should raise the issue with the **Chair of the Inclusion & Diversity Committee**

The Chair of the Inclusion & Diversity Committee, working with HR, will discuss the option of trying to resolve the situation informally through:

- Telling the person who has made the racist comment or action or micro-aggression, without prejudging the matter, that there has been a complaint that their behaviour is having an adverse effect on a fellow employee.
- That such behaviour is against our policy
- That continuing such behaviour could lead to a serious disciplinary offence.

It may be possible for this conversation to be held without revealing your identity (if this is what you want) but also that the conversation will be held and treated confidentially.

It is also possible to involve a neutral third party (a mediator) to facilitate a resolution of the problem and this will also be discussed at this stage.

Resolution of an informal complaint:

If your complaint is resolved informally, the person who has made the racist comment or action or micro-aggression will not usually be subject to disciplinary action.

However, In exceptional circumstances – such as a serious allegation of racial harassment or in cases where a problem has happened before – a decision to investigate further, with a potential outcome of more formal action, may be taken, even if you have raised a complaint informally. This will be shared with you before this step is taken.

2 Raising a Formal Complaint:

Where the informal approach fails or if the behaviour is more serious or you wish to make a formal complaint, you can be supported to bring the matter to the attention of the **Chair of the Inclusion & Diversity Committee** as a formal written complaint and HR can ensure you are given assistance in this.

If possible, please include brief written details of the following:-

- the name of the alleged perpetrator;
- the nature of the alleged behaviour;
- the dates and times when the alleged behaviour occurred;
- the names of any witnesses; and
- any action already taken by you to stop the alleged behaviour.

On receipt of a formal complaint we will take action to separate you from the alleged perpetrator to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged perpetrator to another work area or suspension with contractual pay until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and will carry out a thorough investigation. You have the right to be accompanied at such a meeting by a manager, trade union representative or another work colleague of your choice and you must take all reasonable steps to attend. Allowances will be made regarding your workload to support you across this process.

Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

Upon the conclusion of the investigation (or within five working days) a draft report of the findings and of the investigator's proposed decision will be sent, in writing, to you and to the alleged perpetrator.

If you or the alleged perpetrator are dissatisfied with the draft report or with the proposed decision this should be raised with the investigator within five working days of receiving the draft. Any points of concern will be considered by the investigator before a final report is sent, in writing, to you and to the alleged perpetrator.

If the report concludes that the allegation is well founded, the perpetrator will be liable to disciplinary action in accordance with our **disciplinary procedure**. An employee who receives a formal warning or who is dismissed for harassment/bullying may appeal by using our disciplinary appeal procedure.

You have the right to appeal against the findings of the investigator in accordance with the appeal provisions of the **grievance procedure**. You should submit your appeal within fifteen days of the final report being shared with you

Disclosure and Confidentiality:

- If you bring a complaint of racism you will not be victimised for having brought the complaint.
- All complaints raised will be treated seriously and in confidence.
- If the matter is ultimately dealt with through other Leap procedures such as the Disciplinary Procedure or even ultimately result in court proceedings, it might require the person raising the concern to provide further information or give evidence.
- Leap encourages staff to feel empowered to trust the organisation speak out about any serious concern. Leap also encourage staff to put a name to a disclosure wherever possible as anonymous allegations can be less powerful.
- Leap does however undertake to consider anonymous allegations
- All complaints of racism, whether formal or informal, will be reported to Leap's full board at the next board meeting following the complaint. Where appropriate, and depending on circumstance, complaints may be anonymised
- Safeguarding matters must follow the [Reporting Concerns policy](#) and procedure which is usually to report directly to the Designated Safeguarding Lead

Related policy documents:

This policy and procedure should be read alongside the following organisational policies and procedures:

- Leap's Code of Conduct
- Inclusion, Diversity and Equality Policy
- Anti-Bullying and Harassment Policy
- Whistleblowing Policy
- Complaints Policy

Data Protection:

When an individual makes a disclosure, we will process any personal data collected in accordance with the data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Support:

- Leap will take steps to minimise any difficulties which may be experienced as a result of making a disclosure.
- Where appropriate, Leap will seek to provide additional assistance by contacting outside agencies who will provide specialist advice and support, with the individual's permission.
- Leap will provide additional support to victims of harassment, until the case is resolved.
- Leap understands that staff need to feel assured that the matter has been properly addressed and will, subject to legal constraints, inform those making disclosures of the outcome of the investigation.

You may find it helpful to access support through external advice agencies such as:

- Victim Support
- Citizens Advice
- Young Minds
- <https://www.citizensadvice.org.uk/law-and-courts/discrimination/hate-crime/how-to-report-a-hate-incident-or-hate-crime/>
- <https://www.met.police.uk/true-vision-report-hate-crime/>
- <https://www.victimsupport.org.uk/more-us/why-choose-us/specialist-services/hate-crime-services/>
- https://www.report-it.org.uk/organisations_that_can_help
- <https://www.supportline.org.uk/problems/hate-crime/>
- <https://www.stophateuk.org/>
- <https://tmg-uk.org/>
- <https://www.equalityhumanrights.com/en>

Responsibility and Monitoring:

- The Chief Executive and Board of Trustees have overall responsibility for the operation of this procedure.
- A confidential register will record all complaints made, this will be held confidentially for inspection only by the Board of Trustees.
- The Chief Executive will report annually to the Board of Trustees on the operation of the Procedure any disclosures made during the period. The report will ensure that individuals are not identified.