Brighter Places
Building better futures

Anti-Racism Policy

V1.0

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

Should you require any reasonable adjustment to allow for engagement with this document please contact the policy author or lead

Our Values

We are Human	We listen to people's story, so they never feel like a cog in the machine. We keep our minds open and always take time to empathise and understand the needs of our communities, anyone who works with us and anyone who asks us for help. We treat people with respect and honesty. We collaborate with other organisations to achieve our goals, and we trust each other.
We Bring It	We think big. We work hard to achieve our goals and we're always ready for the next challenge. We bring everything we've got to everything we do – so we can build the best communities possible.
We Speak Truth	We trust each other and we're honest. Our working community is blame-free and supportive. This means we can make mistakes, own them, and learn from them without fear. We are open with the people we serve, and we keep the conversation going.
We belong	We believe in diversity, equality, dignity, and the freedom to be. Whoever you are, wherever you're from and whatever your life stories, you have a place in our communities. You are valued and you belong.

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1. Policy Statement / Purpose

This Anti-Racism Policy supports our commitment to eliminating racism and discrimination while promoting a culture of inclusion across Brighter Places. This policy seeks to deliver on a fundamental part of our EDI Strategy, which reflects our desire to promote a workplace and community free from racism, empowering every individual to feel valued, heard, and respected. This policy also supports our commitment to fulfilling our legal obligations under the Equality Act 2010.

This Anti-Racism Policy is applicable to all individuals associated with Brighter Places, including employees, agency workers, fixed-term contract workers, non-executive board members, temporary workers, self-employed contractors, consultants, secondees (including students), and volunteers.

Furthermore, this policy extends to our residents, partners, and all external stakeholders, ensuring that every interaction within our sphere is grounded in the principles of anti-racism and equality. We stand firm against all forms of racism and are committed to creating a supportive, inclusive, and fair environment for all.

2. Commitments

Brighter Places exists to serve our diverse local communities, whether through employment opportunities, working in partnership with other organisations or through providing homes for people. We recognise our responsibility to ensure racial discrimination forms no part of our business.

We must consistently apply our values; We are human, We speak truth, We bring it and We belong. Therefore, Brighter Places is committed to creating an environment where our colleagues, residents, and all stakeholders are treated with dignity and respect and have equal opportunities, irrespective of their race, ethnicity, or national origin. We recognise and aim to understand and address the structural and institutional inequities and unjust power dynamics that affect our colleagues, residents, and communities.

Brighter Places acknowledges that racism exists in our society and can manifest in various forms, including direct and indirect discrimination, harassment, and microaggressions. We are committed to active anti-racism, which involves not only being against racism but also taking proactive steps to create an inclusive and fair environment for all.

We pledge to:

- Champion diversity within our workforce and community.
- Implement a zero-tolerance approach to all forms of racist behaviour.
- Provide training and resources to support our colleagues in understanding and combating racism.
- Regularly review and improve our policies, procedures, and practices to ensure they align with our anti-racist values.

- Create a supportive and inclusive environment for all colleagues, residents, and stakeholders.
- Dismantle barriers to equality and ensure that our workforce reflects the diverse communities we serve.
- Protect all colleagues from racism and foster a working environment based on dignity, respect, and fairness.
- Improve the wellbeing, morale, and productivity of our colleagues by addressing racial inequalities.

3. Linked Documents

This policy is linked to all policies and procedures but specifically to:

- Complaint Policy
- Grievance Policy
- Disciplinary Policy
- Whistleblowing Policy
- Equity, Diversity and Inclusion Strategy
- Code of Conduct
- Recruitment Policy
- Learning and Development Policy
- Sickness and Wellbeing Policy
- Menopause Policy
- Modern Slavery Policy
- Reward Policy
- Domestic Abuse Policy
- ASB and Hate Crime Policy
- Allocations and Lettings Policy
- Aids and Adaptations Policy
- Data Protection Policy
- Worker Protection (Amendment of Equality Act 2010) Act 2023

4. Legal and Regulatory Compliance

- Equality Act 2010 - The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. As an employer and housing provider, we aim to ensure that people have equal access to services and employment opportunities. The Equality Act 2010 makes discrimination unlawful in relation to nine ‘protected characteristics.

- As a social housing provider, the Public Sector Equality Duty requires Housing Associations delivering public services to give 'due regard' to the need:
    - To eliminate discrimination, harassment and victimisation
    - To advance equality of opportunity.
    - To promote good relations (tackling prejudice and promoting understanding) Brighter Places is not a public body but is required to comply with the duty in the provision, allocation and management of social housing Regulatory requirement.
    - This policy meets the requirement of the regulatory framework which requires registered housing providers to respond to the needs of diverse residents.
    - Registered providers are required: to treat all residents with fairness and respect including protected characteristics and those with additional support needs.
- As a social housing provider, the Transparency, Influence, and Accountability Standard requires Housing Associations to:
    - Treat tenants and prospective tenants with fairness and respect.
    - Take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.
    - Take tenants' views into account in their decision-making about how landlord services are delivered and communicate how tenants' views have been considered.
    - Communicate with tenants and provide information so tenants can use landlord services, understand what to expect from their landlord, and hold their landlord to account.
    - Collect and provide information to support effective scrutiny by tenants of their landlord's performance in delivering landlord services.
    - Ensure complaints are addressed fairly, effectively, and promptly.

5. Policy Detail

5.1. Introduction and scope

- This document sets out Brighter Places' overarching policy on ensuring we are an anti-racist organisation and sets out how this will be achieved.
- Brighter Places aims to promote a culture where colleagues, residents, and all stakeholders are treated with dignity and respect, given equity of opportunity, included in the workplace and community, free to express themselves, valued and treated without any form of discrimination.
- Every Brighter Places stakeholder is expected to abide by this policy. It should be made freely available for all to access.
- It does not form part of the contract of employment or any other contractual obligation and may be amended at any time.

- Certain aspects of this policy are guided by the Equality Act 2010 and therefore make up statutory provisions.

5.2. Roles and responsibilities

CEO

- The Chief Executive Officer has overall responsibility for the implementation of this policy.
- They are responsible for ensuring Brighter Places meets its commitments under this policy and for reviewing its effectiveness.
- They have corporate responsibility to provide leadership for ensuring that this policy is reflected in all aspects of Brighter Places work.

Board

- The Board is responsible for providing leadership in promoting and enforcing the Anti-Racism Policy, ensuring it is integrated into Brighter Places' culture and operations.
- They are responsible for reviewing the policy effectiveness and promoting inclusive decision making, whilst holding the Executive team accountable for compliance and legal obligations.

Executive Team / Managers

- The Executive Team / managers are responsible for implementing the policy and ensuring that all colleagues are trained and aware of their responsibilities.
- They lead by example, ensure the policy is implemented, and provide resources for anti-racist initiatives.
- Ensure their teams understand and adhere to the policy, challenge unacceptable behaviour, and support colleagues in reporting racism.

Colleagues

All colleagues are responsible for:

- Contributing to an anti-racist workplace, challenging discriminatory behaviour, and reporting any instances of racism they witness or experience.
- Treating all people they meet through their work fairly, with dignity and respect.
- Supporting stakeholders and helping them to reach their goals.
- Giving information, advice, and guidance when appropriate.
- Reporting breaches of this policy or concerns where conduct may not be in fitting with the EDI Strategy or Policy.
- Conducting themselves to prevent bullying, harassment, victimisation and unlawful discrimination on the grounds of race (including colour, nationality, ethnic or national origin).

Residents & Stakeholders

- Residents and other Brighter Places stakeholders are responsible for adopting an inclusive and respectful community by adhering to any anti-racism related legislation.
- Residents and other stakeholders must report any incidents of racism or discrimination and actively contribute to a safe, equitable environment for all.
- Residents and other stakeholders are expected to cooperate with investigations.

5.3 Policy detail

Understanding racism

- **Racism**: Racism is the belief in the superiority of one race over others, often manifesting through discrimination, prejudice, or hostility toward individuals based on race, ethnicity, or skin colour. Our policy addresses direct discrimination, indirect discrimination, harassment, and victimisation as outlined by the Equality Act 2010.
- **Anti-Racism:** Anti-racism is the active process of identifying, challenging, and dismantling racism in all its forms. It involves recognising and opposing racist attitudes, behaviours, and policies, both individually and organisationally. Anti-racism requires a commitment to promoting equity, justice, and inclusion.
- **The Protected Characteristics**: The Equality Act 2010 states that it is unlawful to discriminate due to any of the following: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, ***race (including colour, nationality, ethnic or national origin)***, religion or belief, sex, and sexual orientation.
- **Direct discrimination**: Treating someone less favourably because of a protected characteristic, e.g., Excluding a person from accessing a service or job opportunity unfairly and unlawfully because of their nationality.
- **Indirect discrimination**: A provision or practice that applies to everyone but adversely affects people with a particular protected characteristic more than others and is not justified. e.g., Requiring job applicants to have a certain level of proficiency in a specific language, such as fluent English, for positions that do not actually require advanced language skills. While the requirement appears neutral and applies to all candidates, it disproportionately excludes applicants from non-English-speaking backgrounds, particularly those from immigrant or minority ethnic communities, who may be fully qualified for the job but do not meet the language requirement.
- **Harassment:** Harassment is defined as unwanted conduct that has the purpose or effect of violating the dignity of people in the workplace or of creating an intimidating, hostile, degrading, humiliating or offensive environment and includes unwanted physical contact.
- **Victimisation:** Victimisation causes disadvantage, damage, harm, or loss to an individual due to them claiming that they have been a victim of any of the above or have supported a victim of any of the above.

Examples of Racist Incidents at Brighter Places

- A racist incident at Brighter Places can be defined as any racially motivated hostile or offensive act or statement by a person from one ethnic group against a person from another ethnic group. Such acts or statements may result in physical harm or cause discomfort, pain, stress, fear, or anxiety.
- Racial harassment can take many forms, including but not limited to:
    - Insults or derogatory comments
    - Racist jokes
    - Graffiti with racial slurs or offensive symbols
    - Abusive letters, emails, or messages
    - Refusal to cooperate or work with others based on their cultural or ethnic background
    - Physical assault
    - Microaggressions
    - Possession or distribution of racist material
    - Vandalism or damage to property with racist intent
    - Theft related to racial motives
    - Racist comments during meetings, community activities, or social events
    - Ridiculing someone's cultural or ethnic heritage
    - Incitement of others to engage in racist behaviour

Dealing with Racist Incidents at Brighter Places

- Our approach to handling racist incidents includes:
    - Encouraging residents, colleagues, and visitors to report incidents whenever and wherever they occur.
    - Ensuring that all reports of racist incidents are taken seriously and addressed consistently.
    - Clearly communicating that racist behaviour is unacceptable within our community.
    - Investigating whether particular incidents are isolated or part of a broader pattern of racism directed against an individual, family or group within our community.
- Providing support, including counselling, if necessary, to both colleagues and residents affected by racist incidents.
    - Facilitating contact with approved external agencies if appropriate (e.g., local support groups, counselling services).
    - Offering counselling or other interventions for the perpetrator while making it clear that their behaviour is unacceptable.
    - Applying appropriate sanctions.
    - Implementing procedures for dealing with offenders.
    - Ensuring that individuals who report racist incidents are not victimised or retaliated against in any way.
    - Using community meetings, newsletters, and other communications to discourage racism and promote inclusivity.
    - Documenting all racist incidents thoroughly.
    - Reporting all incidents to the Exec, relevant committees and any external regulatory bodies as appropriate.

- Providing training to colleagues and volunteers to ensure racist incidents are always taken seriously and handled consistently.
- Developing or revising policies to effectively address racist incidents, behaviour, and discrimination within Brighter Places.

Promoting Anti-Racism
Brighter Places strives to be an inclusive organisation where our most valuable assets, our colleagues, are supported to feel valued as part of the community.

- To promote anti-racism, Brighter Places actively:
  - Accepts feedback from colleagues and residents on how we can improve.
  - Promotes work life balance, acknowledging that every individual will have their own needs and set of circumstances.
  - Has well-being groups and employee assistance programmes.
  - Engages with colleagues and the community to better understand needs.
  - Hosts learning and cultural events to promote development and bring people together.
  - Promotes a culture where discriminatory language and attitudes are actively challenged, and appropriate action is taken.
  - Actively works towards increasing the ethnic diversity of our colleagues to reflect the local community.
  - Builds relationships with local Black led organisations and learn from their experiences to better serve our community.
  - Gathers and analyses data to allow for better decision making.
  - All incidents of racism are taken seriously and investigated promptly. Victims of racist incidents are supported, and appropriate disciplinary actions are taken against perpetrators, including potential termination of tenancy or employment where necessary.

Anti-Racism for our Residents and Communities
Brighter Places will:

- Provide homes on a non-discriminatory basis, in line with the relevant local authority, making sure that criteria for allocation are non-discriminatory and that all decisions are open to peer review.
- Provide clear, accessible information about our services, standards, and residents' rights.
- Strengthen our complaints process to ensure accessibility and prompt resolution and make sure that our residents can easily make a complaint about any form of racism they have experienced in relation to our organisation and take all such complaints seriously.
- Take a zero-tolerance approach to hate crime. Taking appropriate action when required.
- Hold regular engagement meetings with our residents and stakeholders through our engagement panels to make sure that the voices of our residents are heard and that we use this information to guide our decisions.

- Monitor performance against tenant satisfaction measures, regularly engaging residents for feedback to drive improvements.
- Make opportunities for employment available to residents in line with our recruitment policy.

Equity, Diversity, and Inclusion for our People
Brighter Places will:

- Train our colleagues in equity, diversity, and inclusion and maintain a workforce who not only understand their rights and abide by both this policy and our EDI policy, but are sensitive to the needs, abilities, cultures, and diverse makeup of our resident groups and go the extra mile to respect their differences and understand their challenges.
- Clearly define roles, responsibilities and accountability, making sure that all colleagues know their duties under this policy.
- Make sure that decisions in recruitment and selection are based on merit. Selection procedures will be followed to eliminate bias and unlawful discrimination, and all recruitment decisions will be open to peer review.
- Make sure that colleagues are trained to help them to do their roles effectively, and that training is shared fairly and in a non-discriminatory way.
- Abide by the UK legislation e.g., the Equality Act 2010.
- Review employment practices, policies, and procedures to make sure they are fair and update them, along with this policy, to take account of changes in the law.
- Have a clear pay scale where colleagues are paid fairly and equally for the same job or jobs of equal value. Brighter Places will make sure that colleagues are not subject to discrimination regarding pay or other benefits based on their colour, nationality, ethnic or national origin.
- Provide a safe space for colleagues to raise complaints and take complaints of racist bullying, harassment, victimisation, and unlawful discrimination by anyone seriously. Taking action where our colleagues are discriminated, harassed, or victimised on the basis of their colour, nationality, ethnic or national origin.
- Hold colleagues/residents accountable for their actions.

Anti-Racism and our Partners
Brighter Places will:

- Make sure that the chance for working together and working relationships does not unfairly or unlawfully discriminate on the grounds of colour, nationality, ethnic or national origin
- At all times, the organisation aims to make sure that it is committed to providing a non-discriminatory service driven by our abilities, market values, our ethical and legal obligations, and the needs of the community.
- Decisions about business partnerships/relationships will be made using subjective and legal criteria.

- Strive to make sure that all other organisations, including our partners, are treated fairly and equitably.
- Make sure partners, contractors, and agencies tendering to work with or for Brighter Places are expected to show a strong commitment to equity and diversity and abide by the law. During the tendering process, Brighter Places reserves the right to ask for evidence of those commitments, as mentioned above.
- Share best practice and resources so we can understand our colleagues, residents, and resources.

Making a complaint about Discrimination, Harassment, and Hate Crime

- Brighter Places will not tolerate any form of racist discrimination, harassment, hate crime, or victimisation. Nor will any form of bullying be accepted within the organisation's culture.
- All complaints will be dealt with seriously, quickly, and confidentially.
- The investigating officer to a complaint should, during and after the investigation, consider the feelings of the complainant when deciding the severity of the action and harm caused, not merely how they, as individuals, would feel in that situation.
- All complaints shall be kept confidential where possible. Therefore, we ask that the victim tell Brighter Places at the earliest opportunity and limit who is made aware of the complaint unless there is a need for that person to know. For colleagues if you do not maintain confidentiality, it may be a disciplinary matter and can also be a form of bullying.

Colleagues

- Any colleague who feels that they have not been treated in line with this policy are entitled to raise the matter through the grievance procedure, which can be found in the Brighter Places Grievance Policy.
- Complaints about breaches of this policy should be addressed to the People Director. A complaint manager may be assigned, or the People Director, CEO or Chair of Board may deal with the complaint personally.
- If a conflict of interest is raised, they may be readdressed to CEO, or Chair of the Board.

Stakeholders

- Residents or any other stakeholder who feel that they have been a victim of racist discrimination, harassment, hate crime, victimisation, or any other form of abusive behaviour, where the perpetrator is a Brighter Places colleagues, may raise the matter directly with a Brighter Places member of colleagues or send a formal complaint via our Complaints Policy. Anti-social behaviour and hate crime should be reported in line with the Anti-social behaviour policy.

Whistleblowing

- Where an issue is found to be considered significantly immoral, unethical or illegal and believed to be warranted of blowing the whistle, this can be done via the Whistleblowing Policy.

Victimisation

- Should any stakeholder have complained and suffered retribution, we encourage this to be reported to Brighter Places under the relevant policy, as would any new complaint.
- Such behaviour is known as victimisation, which will not be tolerated and may also be illegal.

Failure to Abide by This Policy

- Breaches of this policy by colleagues will be regarded as potentially serious/gross misconduct which may warrant sanctions up to and including dismissal.
- Contractors, agency workers, and other non-employees who breach this policy may have their contractual agreement ended.
- Stakeholders who breach policy will initially be warned about their conduct, and in severe cases, we will withdraw our services or end business relationships.
- We will report the perpetrator to the authorities where a crime is believed to have been committed.

6. Training Requirements

- Brighter Places will provide EDI and anti-racism training to all staff, ensuring awareness and understanding of this policy.

7. Monitoring and Review

- The ongoing application of this policy is monitored via the Executive Team to ensure that it remains relevant, up to date and accessible to the relevant audience.
- We will monitor resident satisfaction and employee feedback regularly to gauge the effectiveness of our anti-racism initiatives.
- The policy will be reviewed at least every 3 years.

8. Data Protection

- Any personal data created or used in the application of this policy must be done so in line with the Brighter Places data protection policy and privacy notices.

- All data collected by Brighter Places about protected characteristics must be stored securely and not be shared without due regard. Statistical non-identifiable data may be drawn from this information; however, unless there is a need to know, such sensitive data must be processed as per GDPR.

9. Equity, Diversity and Inclusion

Where required, reasonable adjustments will be considered to support colleagues to engage with this policy. Please speak to the policy owner for assistance.

This policy and other associated documents can be made available in different formats please contact the policy author for more information.

10. Summary Roles and Responsibilities

Activities	Board	CEO	PGC	ARC	Exec	Managers	All colleagues	HR	Gov
Owner of the policy		x							
Monitoring & review of the policy	x		x		x				
Approval of changes to the policy	x								
Responsible for policy implementation	x				x	x	x		
Addressing issues in the implementation of the policy					x			x	
Version control of live policy									x
Training of colleagues						x	x	x	

TRANSLATIONS

If English is not your first language and you need a translation, we can get one for you.

ALBANIAN

Nëse anglishtja nuk është gjuha juaj amtare dhe keni nevojë për një përkthim, ne mund t'ua sigurojmë atë.

BENGALI

ইংরেজী আপনার মাতৃভাষা না হলে এবং আপনার কোন অনুবাদের প্রয়োজন হলে আমরা তা প্রদান করতে সক্ষম।

CHINESE

如果英文不是您的第一語言，而您需要翻譯的話，我們可以爲您安排。

GUJARATI

જો તમારી પહેલી ભાષા અંગ્રેજી ન હોય અને તમને ભાષાંતરની જરૂર હોય તો અમે તમને તે આપી શકીએ છીએ.

HINDI

यदि अँग्रेज़ी आप की पहली भाषा नहीं है और आप को अनुवाद की आवश्यकता है तो यह हम आपको प्रदान कर सकते हैं

KURDISH

Heke îngilîzî zimanê we yê yekem nîne û pêwîstîya we bi wergêr heye, em dikarin yekî ji we re bibînin

POLISH

Jeżeli język angielski nie jest Twoim językiem ojczystym i wymagasz tłumaczenia, możemy to zapewnić.

PORTUGUESE

Se o Inglês não é a sua língua materna e precisa de uma tradução, nós podemos obtê-la.

PUNJABI

ਜੇਕਰ ਇੰਗਲਿਸ਼ ਤੁਹਾਡੀ ਪਹਿਲੀ ਭਾਸ਼ਾ ਨਹੀਂ ਅਤੇ ਤੁਹਾਨੂੰ ਦੁਭਾਸ਼ੀਏ ਦੀ ਜ਼ਰੂਰਤ ਹੈ ਤਾਂ ਤੁਹਾਡੇ ਲਈ ਅਸੀਂ ਇਸਦਾ ਪ੍ਰਬੰਧ ਕਰ ਸਕਦੇ ਹਾਂ।

SOMALI

Haddii Ingiriisku aanu ahayn afkaaga kowaad oo aad u baahan tahay turjumaad, annagaa kuu samayn karra.

URDU

اگر انگریزی آپ کی پہلی زبان نہیں ہے اور آپ کو ترجمہ کی ضرورت ہے تو ہم آپ کے لئے فراہم کر سکتے ہیں۔

VIETNAMESE

Nếu quí vị không thao Anh văn và cần bản dịch, chúng tôi sẽ giúp quí vị một bản.