Developing an anti-racism strategy

Explore the six principles the CIPD recommends to help you create a racially inclusive workplace

Racial injustices and ingrained inequalities are apparent in society and evident in UK workplaces. To address the root causes of racial inequality (racism), employers need to maintain a zero-tolerance approach to workplace discrimination – as is required by the Equality Act 2010 – and commit to planned action. This guide outlines six principles (which build upon our initial call for an approach based on four key principles) to help organisations develop an action strategy to help end systemic racism and address racial inequalities at work.

Race discrimination is illegal in the UK as per the Equality Act 2010. As such, employers must enact their policies if allegations of racial discrimination occur, while individuals are within their rights to raise a grievance should they experience race-related discrimination.
However, although everyone should have equal access to work and opportunity to reach their potential (regardless of any aspect of their identity, background or circumstance), barriers to access and in-work progression continue to exist in many organisations. High-profile government-initiated work has encouraged action on racial diversity and inclusion, but more recent studies, such as the Parker review update on UK FTSE board composition and research by Cranfield School of Management included in the Parker update report, show there is currently inertia. Ethnic minorities in the UK are less likely to get in – and get on – in the workplace compared to their white counterparts, while the significant lack of racial diversity at the top of UK organisations remains unacceptable: The number of non-white CEOs stands at 4%, while just 2% of FTSE100 CFOs are non-white.

To root out racism, employers need to critically appraise their organisational culture from top to bottom and address racism at a systemic level by looking at where it is embedded in their own organisations. Race inequality cannot be tackled half-heartedly or by sporadic, one-off, disconnected initiatives; employers’ actions need to be well planned, strategic, sustainable and taken seriously. Employers must stand against the cause (racism) and the effect (inequality). In the words of Baroness McGregor-Smith in her 2017 independent review for Government, ‘The time for talking is over. Now is the time to act’. Our role, as people professionals, is to do precisely that.

**Why all organisations need an anti-racism strategy**

Racism is a deep-seated issue in society, maintained by discrimination and prejudice. It’s also clearly apparent in UK workplaces. In her independent review for government, Baroness McGregor-Smith found: ‘There is discrimination and bias at every stage of an individual's career, and even before it begins. From networks to recruitment and then in the workforce, it is there’.

Whilst workplace inclusion is essential, racism needs to be expressly addressed, given the long-standing lack of progress on race equality in our society and workplaces. It needs to be named and consciously addressed, alongside - and separate to - an overarching commitment to inclusion.
Systemic change is needed to tackle the fundamental ways an organisation operates, including its policies and processes. It’s key to providing the foundation for change, setting out clear expectations for the organisation and its people as well as clear objectives to work towards.

Taking action is not just ‘the right thing to do’. Without action to develop inclusive workplace cultures where people with a diverse range of identities and backgrounds feel able to perform at their best and progress in their organisation, we face an underutilisation of talent through a failure to enable everyone to achieve their potential and contribute fully.

In her research, McGregor-Smith points out that, although one in eight of the working-age population is from a Black and Minority Ethnic (BME) background, only one in sixteen of top management positions are occupied by BME individuals. She also cites 2017 figures from BEIS, which demonstrate the significant economic contribution that could be realised from action: ‘The potential benefit to the UK economy from full representation of BME individuals across the labour market through improved participation and progression is estimated to be £24 billion per annum, which represents 1.3% of GDP in the year to June 2016.’

Change at the workplace level can influence wider societal change, which can influence positive change in the workplace. Change is needed in both spheres to create lasting racial equality and inclusion.

Use of the terms ‘BME’, ‘BAME’ and ‘ethnic minorities'
We recognise that any one term will not resonate with everyone. As such, we advise employers to be sensitive in the language and terminology used when talking about race and ethnicity, being sure to engage and invite input from both their own staff and external experts.

In this guide, we follow the Race Disparity Audit’s recommendation, referring to ‘ethnic minorities’ rather than the terms BME/BAME, which highlight particular groups while omitting others. BME refers to Black and Minority Ethnic, while BAME refers to Black, Asian and Minority Ethnic. But research conducted by the Race Disparity Audit suggests that very few people recognise these acronyms, while few ethnic minorities identify with them.

However, both terms are widely used by government departments, public bodies, the media and other groups when referring to ethnic minority groups in the UK. We therefore reference the terms BME and BAME only in relation to research that has already been conducted using these terms (such as the government review by Baroness McGregor-Smith and previous CIPD research).

People of Colour (PoC) is a term prevalent in the USA and gaining popularity in the UK. While it lends itself more to common parlance, it shares the issues of defining ethnic groups in relation to the white majority and that of masking issues.

We also recognise that terms like BME and BAME encompass people from a diverse range of backgrounds, cultures and traditions who’ll likely be facing different barriers in the labour market, in career progression, and in their experiences at work. The Policy Exchange (Saggar et al 2016) highlights the problem of conflation. ‘Each ethnic minority group has its own cultural tradition and history, occupies a certain place on the socio-economic ladder, is on its own distinct trajectory, and sometimes has several internal divisions,” it says. “Looking at ‘BME’ or ‘BAME’ alone does nothing to tell us who is making progress and who is falling behind. Moreover, improvements in minority representation could be made by improving the lot of those already doing well rather than increasing the representation of those who need it most.’

**The people profession’s role in addressing racial inequality**

The people profession plays a central role in making sure employers address race inequalities at work. They're ideally placed to challenge and address organisational culture and people management practice at all stages of the employee lifecycle to ensure that workplaces are built on the fundamental principles of trust, equality, fairness and inclusion.
Employers may be uncertain about where to start, especially in smaller organisations without an HR function or people management professional to provide them with insight and guidance. But, this isn't a reason to do nothing, or to shy away from conversations about race. Instead, it's a signal to industry bodies, including the CIPD, to provide additional insight, support and guidance for employers, starting with the need for a well-thought-out, comprehensive strategy.

Everyone in the organisation is responsible for creating and maintaining an inclusive workplace. Although we focus on the role of people professionals (namely, HR leaders and managers) play, this should not be at the expense of the personal responsibility we all need to take to tackle racism in organisations. A systemic, holistic approach is required if we're to address the grassroots causes of prejudice and discrimination – from all of us. This is something for people professions to bear in mind and help encourage.

Six principles to inform your anti-racism strategy

The following principles to help employers and people professionals develop a robust anti-racism strategy for their organisations stem from discussions with internal stakeholders and external groups. While applicable to all organisations, they're not intended to be prescriptive, and each organisation should shape these principles to suit their own unique contexts.

1. **Clarify** the organisation’s stance and values: Set clear expectations of what the organisation stands for and maintain zero-tolerance to racism.
2. **Co-create** a systemic approach for practical action by working across the organisation: Scrutinise all operational processes, ways of working and people management policies.
3. **Commit** to sustained action through visible leadership and a willingness to change: Sustained action needs a long-term plan, led with firm commitment from the top.
4. **Critically** appraise your people management approach from end to end.
5. **Connect** your people by creating safe spaces, systems and times to talk, share experiences and learn from each other: Ensure your plan is informed by employee voice, and bring in experts where necessary.
6. **Communicate** your messages consistently and ensure the conversation is two-way: Leave the workforce and wider stakeholders in no doubt about your key messages. Ensure they are reflected in people's behaviour, in the organisation's operations, and in the organisation's interactions with stakeholders.

1. Clarify the organisation’s stance and values
Employers need to maintain a zero-tolerance stance on racial discrimination in the workplace as per the Equality Act 2010, and the organisation's employees, partners, suppliers and the broader public need to be aware of this stance.

It's therefore essential to clarify the organisation's position on anti-racism and discrimination. This will form the cornerstone of your plan to tackle the barriers ethnic minorities face in entry and progression in work, ensuring the organisation better represents the diversity of today's societies

**Recommendations**

- Start by establishing achievable goals.
- Recognise the importance and sensitivity of the subject.
- Your stance should be developed and tested with input and feedback from people with a diverse range of backgrounds. Invite input from internal staff and consider external experts who can provide different perspectives based on their lived experience and expertise.
- Publicly stipulate the organisation's position of anti-racism to all stakeholders, including employees, investors, suppliers, partners, and customers.
- Ensure that external messages genuinely match the organisation's commitment to change- all stakeholders will expect their lived experience of working at your organisation to espouse your stance and values, or see visible progress towards them.
- To prevent confusion over what constitutes racism, provide practical examples of overt racism and everyday racism (including micro inequities/aggressions and incivilities) in supporting communications as well as what anti-racism is and involves.

**Further reading**

- [FAQs about race in the workplace](/knowledge/fundamentals/emp-law/race-discrimination/race-workplace-faqs/)
- [Building inclusive workplaces](/knowledge/fundamentals/relations/diversity/building-inclusive-workplaces/)
- [Inclusion health checker tool](/knowledge/fundamentals/relations/diversity/inclusion-health-checker-tool/)
2. Co-create a systemic approach for practical action

Lasting change will not come from ad-hoc and narrow steps towards promoting race inclusion at work, which can set expectations for change but fail to deliver, sending the message that the organisation isn’t serious about taking action.

Instead, a systemic approach must be adopted to identify and tackle the causes of race inequalities and discrimination at work. Look across the entire organisation, scrutinising all operational processes, ways of working and people management policies.

Identifying the structural, cultural and policy barriers right across the organisation (which are maintaining workplace inequalities) is a crucial step. Action should be steered by data and insight. An evidence-based approach will get to the grassroots of issues and identify where action needs to be focused. The issues and appropriate solutions will differ between organisations, so having a deep understanding of your own business and its context is critical.

**Recommendations**

- The organisation's stance and values should guide the creation of a systemic action plan that is principles-based and outcomes-driven.
- Ensure your anti-racism strategy and action plan are resourced appropriately, including time, expertise and budget.
- Action should be evidence-based, steered by data and insight. All business functions, especially people professionals, are likely holding a wealth of unmined data about your workforce make-up, customer base and people's views of your organisation, which can yield valuable intelligence about the changes needed.
- It's likely that useful data sits across many parts of your organisation, and will need to be brought together to create a holistic picture of people's true work experiences, the experiences of those who interact with your organisation, and those who don't.
- If your knowledge of the makeup of your workforce is limited, consider the most appropriate way to gather this data. Ensure your outward engagement is racially inclusive. For example, in marketing and consumer research, make sure ethnic minorities are genuinely consulted.
Think about the extent to which other employers in your supply chain understand and echo your stance/values on diversity and inclusion and request that recruiters, partners and consultants demonstrate diversity within their own organisations.

When examining how people’s different experiences at work and their views of your organisation differ, avoid making generalisations. CIPD research indicates that the term ‘BAME’ encompasses people from a wide range of backgrounds, cultures and traditions who face different barriers to career progression.

Be aware of the complex and interconnected nature of issues that affect people’s work experiences. ‘Intersectionality’ refers to the fact we all have multiple identities which shape our life experiences. We therefore can’t look at diversity and inclusion through entirely separate lenses; we need to be mindful of the potential interplay of overlapping identities.

Further reading

- [Confronting Racism at Work: A Reading List](https://hbr.org/2020/06/confronting-racism-at-work-a-reading-list)
- [Diversity and inclusion in the workplace](https://www.cipd.co.uk/knowledge/fundamentals/relations/diversity/factsheet/)
- [How to break down the barriers to BAME employee career progression to the top](https://www.cipd.co.uk/news-views/cipd-voice/issue-13/barriers-bame-career-progression/)
- [Addressing the barriers to BAME employee career progression to the top](https://www.cipd.co.uk/knowledge/fundamentals/relations/diversity/bame-career-progression/)
- [Evidence-based practice for effective decision-making](https://www.cipd.co.uk/knowledge/strategy/analytics/evidence-based-practice-factsheet/)
- [Evidence-based](https://peopleprofession.cipd.org/profession-map/core-purpose/evidence-based)
- [Setting up an employee forum](https://www.cipd.co.uk/knowledge/fundamentals/relations/communication/guide/)

3. Commit to sustained action through visible leadership and a willingness to change

Leaders play an immense role in fostering – or damaging – racial inclusion efforts by virtue of their positional power and influence on the organisation’s culture, values and ethics. To ensure that change is long term and sustainable, organisations and leaders need to uncover and address racial equality barriers. Traction requires leadership and sustained action, so you’re one step closer to ensuring a more inclusive workplace if board members, governing bodies and senior leaders express a genuine appetite for change by visibly role-modeling behaviours and attitudes from the top.

**Recommendations**
• Appoint a race champion within your leadership team to take responsibility for progress and to focus attention on delivering change.

• Ensure that diversity and inclusion is a permanent item on the board’s meeting agenda.

• Regularly review progress on your strategy, evaluate the effectiveness of activity, and make changes where needed.

• Encourage leaders to educate themselves about race, to talk openly about race, and to encourage discussions internally and externally to support change.

• Encourage senior leaders and managers to be visible at diversity and inclusion events (such as those organised by the employee resource group) and to listen to external speakers (whether through videos, webinars or podcasts).

• Communicate the message that to champion race inclusion or to take a stand against racism and discrimination you don’t have to be from an ethnic minority background - but that you do need to listen to the experiences of ethnic minority employees and do not assume you know what is needed to address the problem.

• It follows that a leader should not feel compelled to lead the change just because they have a particular personal characteristic.

• Urge leaders and senior managers to develop their knowledge and confidence to talk about diversity and inclusion in their internal and external engagements; for example, in conference addresses, all-staff briefings and interviews.

• Introduce a diversity-related reverse or mutual mentoring programmes so that leaders have a better understanding of lived experiences in relation to race.

• Assess whether you have enough race inclusion expertise in the organisation to inform action and challenge thinking at the top. Consider bringing in additional expertise in the interim via consultants.

Further reading

• Addressing the barriers to BAME employee career progression to the top (/knowledge/fundamentals/relations/diversity/bame-career-progression/)(report)

• Race and employment (/knowledge/fundamentals/emp-law/race-discrimination/factsheet/)(factsheet)

• Race inclusion in the workplace (/news-views/viewpoint/race-inclusion-workplace/) (CIPD viewpoint)

• Tackling racial disadvantages and discrimination in the workplace (/news-views/cipd-voice/issue-15/tackling-workplace-racial-disadvantages/) (CIPD Voice)

• Diversity management that works (/knowledge/fundamentals/relations/diversity/management-recommendations/) (report)

4. Critically appraise your people management approach from end to end
People professionals play a vital role in helping deliver against an organisation's anti-racism stance and values to attract a wider, more diverse talent pool, and in developing a workforce that reflects the organisation's customer base and wider society.

So it is important to critically assess your people management approach to create a fair and inclusive workplace culture where to be different is an asset, not a problem. As a function, HR must review the organisation’s people management approach from end to end through multiple inclusion lenses, including race, to address blockers and biases in hiring, performance management, career progression, and reward. HR also needs to work closely with line managers to ensure that espoused policies and organisational rhetoric are played out in reality. HR can play a valuable role as critical friend by holding up a mirror to the organisation – leverage it.

**Recommendations**

**Take a zero-tolerance approach to racism**

- Build cultures of trust, where employees experiencing racism feel confident to come forward and know that they’ll be listened to.
- Treat allegations of racism seriously and always take action.

**Review your processes**

- Review your policies and processes end to end, including hiring, recruitment, appraisals, promotion, pay, progression, retention and exit. Although they should at the very least comply with race discrimination law, they must be underpinned by principles that actively value and encourage respectful and positive attitudes to differences.
- Take an evidence-based approach when reviewing policies and processes, drawing on quantitative and qualitative data and feedback.
- Ensure that any changes and decisions made are visibly fair and transparent, communicating the reasons for the change.
- Invite the ERG (employee resource group) to review policies and processes and give feedback, but don't expect them to be policy-writing specialists.

**Examine your data**

- Examine the make-up of your workforce through your data, the ethnic diversity at all levels and in all areas, and by occupation and seniority.
Look at the ethnicity categories you use to collect data. If you are a larger organisation, ensure they can be benchmarked against reliable external sources to determine what counts as under-representation or concerning issues.

- Interrogate your data to uncover the structural and cultural barriers that are maintaining workplace inequalities.
- Analysing and probing your workforce data will help to uncover any sticking points. For example, review whether you regularly collect information on employee sentiment via surveys. Consider analysing these findings by ethnicity, if you can still preserve employee anonymity.

**Recruitment**

- What channels are you using to recruit talent? Are you varying how and where you’re doing your outreach? Are images and language used inclusive? Are you confident your line managers are recruiting and promoting fairly?
- Are recruiters acting on your behalf aware of your values and commitment? If they fail to provide a diverse shortlist, challenge them. If your organisation is under-represented in relation to ethnic diversity, look into using recruiters with a track record of appointing people from diverse ethnic backgrounds.
- Consider using blind recruiting at first-stage shortlisting and analyse the conversion to interview and offer stages.
- Make sure your interview panels are as diverse as possible for shortlisting and interview stages

**Progression**

- Critically examine progress of different groups in the organisation and where there may be glass ceilings. Share that insight across the business.
- Ensure clearly applied criteria is used for performance evaluations, bonuses or other benefits like secondments, deployment, stretch projects and career breaks.
- Offer ethnic minority staff in the organisation access to mentoring/shadowing to support them with their career progression. This could be with internal or external people/organisations.
- Introduce reverse or mutual-mentoring schemes, where diverse groups (including those from ethnic minorities) mentor senior leaders and managers, promoting a culture of inclusion in the organisation.

**Pay**

- Introduce ethnicity pay reporting to uncover inequalities and where action should be directed. Publishing your figures and accompanying action plan for change can communicate the message that you’re serious about creating an inclusive workplace.
Evaluate

- Review the outcomes of process and policy changes, evaluate, and don’t be afraid to try something different if a course of action isn't working.

Further reading

- Race discrimination (/knowledge/fundamentals/emp-law/race-discrimination/) (topic page)
- Addressing the barriers to BAME employee career progression to the top (/knowledge/fundamentals/relations/diversity/bame-career-progression/) (report)
- Race and employment (/knowledge/fundamentals/emp-law/race-discrimination/factsheet/) (factsheet)
- Race inclusion in the workplace (/news-views/viewpoint/race-inclusion-workplace/) (CIPD viewpoint)
- Tackling racial disadvantages and discrimination in the workplace (/news-views/cipd-voice/issue-15/tackling-workplace-racial-disadvantages/) (CIPD Voice)
- Diversity management that works (/knowledge/fundamentals/relations/diversity/management-recommendations/) (report)

5. Connect your people by creating safe spaces, systems and times to talk, share experiences and learn from each other

Whether overt or through unconscious bias, we know that racism still occurs in the workplace. Organisations need to provide ethnic minority employees with safe channels to express their voice and share their experiences. An employee resource group (ERG) can help enable this. The benefits of ERGs are numerous, from galvanising action and challenging poor practice to fostering a broader climate of inclusion within the organisation and bridging the gap between co-workers and senior leaders. For employees, ERGs can provide a sense of belonging and community and an opportunity to work with the organisation to bring about change. For an organisation, ERGs can be a valuable resource to advise on the work experience of people with that particular characteristic, identity or background, and act as a sounding board for ideas - including your products and services.

Recommendations

- Set up an ERG to provide a safe, supportive space for people to meet – a place that allows them to have a consistent, clear voice. Encourage non-ethnic-minority active allies to join.
- Resource the ERG and ensure that it’s supported by senior executives.
- Actively consult with the ERG, inviting them to contribute their views from their lived experience in both society and as an employee of the organisation. An ERG can be an invaluable resource to advise and inform organisational decisions while helping HR ensure that the people management approach is as inclusive as possible.
- However, there must not be the expectation that the ERG will solve the organisation's problems or ‘teach’ the rest of the organisation.
- Employees should also be aware of formal whistleblowing processes so they know they have a voice mechanism, no matter what.
- Facilitate training to ensure that employees better understand issues of institutional racism. Encourage employees to learn how to talk about and address racism in the workplace – however uncomfortable it may make them feel.
- Consider ways to raise visibility and awareness of diverse cultures, background and circumstance. Give people time and space to share their stories if they want to, and learn about other cultures and other people’s experiences. For example, encourage staff to attend events organised by the ERG or ‘lunch and learn’ sessions run by HR.
- Make educational materials available and encourage personal responsibility for developing knowledge and racial literacy.
- Consider your support mechanisms, such as employee assistance programmes and mental health training (through initiatives like Mental Health First Aiders (https://mhfaengland.org/)). This might be appropriate given the emotional impact of the topic and the potential for conflict.

**Further reading**

- [Building inclusive workplaces](https://www.cipd.co.uk/knowledge/fundamentals/relations/diversity/building-inclusive-workplaces/) (report)
- [Barriers to BAME employee career progression to the top](https://www.cipd.co.uk/knowledge/fundamentals/relations/diversity/bame-career-progression/) (report)
- [Race and employment](https://www.cipd.co.uk/knowledge/fundamentals/emp-law/race-discrimination/factsheet/) (factsheet)
- [Diversity management that works](https://www.cipd.co.uk/knowledge/fundamentals/relations/diversity/management-recommendations/) (report)
- [Setting up an employee forum](https://www.cipd.co.uk/knowledge/fundamentals/relations/communication-guide/) (guide)

**6. Communicate your messages consistently and ensure that communication is two way**

Senior leaders and people managers need to engage in ongoing, responsive, two-way dialogue with staff to ensure that employees feel listened to and valued. Genuine communication between employers and employees provides a voice for people, and an opportunity for the organisation to listen, identify and act on concerns raised. This helps to ensure standards of behaviour are clear to everyone and promotes a culture of personal responsibility for treating people with
respect and dignity. This is especially relevant for conversations around race, which require a high degree of sensitivity. We need to create open, safe environments for people from ethnic minority communities to express their views and experiences to help raise awareness amongst the many who do not have the lived experience of racism in its many different forms. This lays a vital foundation (of shared understanding) from which we can then move forwards.

Starting the conversation about ethnicity at work isn't always easy, and some organisations simply don't know where to begin. We know that many people are reluctant to talk about race for various reasons, whether it’s for fear of saying the wrong thing, failing to recognise inequalities of opportunity at work exist, feeling people aren't interested, or feeling like one won't be listened to.

**Recommendations**

- Communicate clearly, carefully, sensitively and with consistency of message. Consistency is essential for culture change. Highlight your willingness to engage and learn, to be challenged and to have emotionally charged conversations. Acknowledge that these conversations might be uncomfortable at first.
- Ensure senior leaders are involved in communication and that the conversations are two way.
- Regularly invite communication, ensuring all employee groups feel comfortable and able to have a voice, and change your approach if communication is not forthcoming.
- Ensure mechanisms are in place for employees to feel confident and safe in highlighting issues about inequality and sharing their views on matters affecting them at work. Ensure all employees know about these mechanisms, how to access them, and that they feel comfortable doing so.
- Ensure that disadvantaged and disconnected groups have access to mechanisms through which they can express their voice. For example, make issues of racism and exclusion a part of engagement surveys, with action plans set against them.
- Think about who's communicating the message and their credibility based on prior actions.
- Acknowledge previous failings within the context of the current situation to demonstrate understanding.
- In designing your communications, identify internal stakeholders and external stakeholders – both supporters and detractors – and design your messaging accordingly. Think about the words, tone and images you use, and avoid tokenism and stereotyping.
- Live your values through your external communications and engagement:
  - Reach outside of normal channels and connect with community groups to show support and learn.
  - Question external conferences that don’t have diverse ethnic representation in their presenters/speakers before deciding whether to send staff there.
• Question events in which there are no ethnic minority people in the lineup of speakers or nominees for awards before deciding on sponsorship.

Further reading

• [How to break down the barriers to BAME employee career progression to the top](https://www.cipd.co.uk/news-views/cipd-voice/issue-13/barriers-bame-career-progression/). (CIPD Voice)
• [Employee voice](https://www.cipd.co.uk/knowledge/fundamentals/relations/communication/voice-factsheet/)(factsheet)
• [Talking about voice: employees’ experiences](https://www.cipd.co.uk/knowledge/work/future-voice/employee-experiences/)(report)
• [Race and employment](https://www.cipd.co.uk/knowledge/fundamentals/emp-law/race-discrimination/factsheet/)(factsheet)
• [Five actions you can take to foster inclusion](https://www.cipd.co.uk/knowledge/fundamentals/relations/diversity/five-actions-fostering-inclusion/)(guide)

Addressing racism and racial inequality in the UK is a societal issue, a moral issue, and a business issue - and a business priority. White privilege and white fragility can blind senior leaders to issues relating to race or can silence people from raising concerns. Shying away from this issue isn’t an option. The first step to introducing change and ensuring action has real traction is to have conversations about race – no matter how uncomfortable they may make people feel. Employers need to be able to surface, understand and address issues within the organisation. An honest conversation is the necessary first step to do this.

We’ll be developing and expanding this guide to help members and people professionals root out racism and become anti-racist organisations — check back regularly for new information and resources.

**DISCLAIMER:** The materials in this guidance are provided for general information purposes and do not constitute legal or other professional advice. While the information is considered to be true and correct at the date of publication, changes in circumstances may impact the accuracy and validity of the information. The CIPD is not responsible for any errors or omissions, or for any action or decision taken as a result of using the guidance. You should consult a professional adviser for legal or other advice where appropriate.

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