Meeting of ICB Board

Date: Thursday 6th March 2025
Time: 12:15 – 15:30
Location: Vassall Centre, Gill Avenue, Bristol, BS16 2QQ

Agenda Number:	6.4	
Title:	**Anti Racist System statement and approach**	
Confidential Papers	**Commercially Sensitive**	No
	Legally Sensitive	No
	Contains Patient Identifiable data	No
	Financially Sensitive	No
	Time Sensitive – not for public release at this time	No
	Other (Please state)	No

Purpose: Discussion

Key Points for Discussion:

The paper outlines the findings of the "Too Hot to Handle" report on racism in the NHS and proposes actions for the BNSSG system to become anti-racist.

NHSE SW's Leading for Inclusion strategy aims to create supportive environments where every staff member can thrive, focusing on leadership, culture, and accountability. System partners are already working on developing anti-racist and pro-equity statements and action plans, which any system-level work must support.

The proposed actions include publishing a system wide anti racism pledge, following this with a system statement, created through focus groups, and developing an overarching framework that can be used to implement cultural change and ensure impact.

The proposed framework includes leading from the front, growing cultural competency, increasing visibility, tackling inequality, and regular review, it emphasises the importance of leadership, culture, and accountability in addressing racial inequalities. Implementing the proposed actions will require staff time, engagement, insights, communications professional support, psychological support professionals, and use of system partner accommodations.

The overall aim is to improve the experience of racialised colleagues, build an inclusive culture, and support psychologically safe workplace environments across the BNSSG system.

Recommendations:	To approve: • The initial system anti racism pledge • Support of system wide focus groups as outlined in the paper
Previously Considered By and feedback :	Board seminar session
Management of Declared Interest:	N/A
Risk and Assurance:	• Continued Discrimination: If the work is not undertaken, staff members may continue to experience discrimination and reduced opportunities. • Increased Frustration: Undertaking the work without input from colleagues with lived experience and without specific measurable activities may lead to increased frustration and further reduction in engagement. • Re-traumatising Staff: Without appropriate support within focus groups, there is a risk of re-traumatising staff from racialised communities. • Alienation of Colleagues: Not all colleagues may agree with the focus on racism, and some may feel alienated by the work undertaken. These risks highlight the importance of careful planning, inclusive engagement, and providing appropriate support to ensure the success of the anti-racism initiatives.
Financial / Resource Implications:	• Staff time –EDI leads & releasing staff to take part in focus groups. • Engagement, insights and communications professional support. • Psychological support professionals from system partners • Use of system partner accommodations in which to run events, and associated facilities support
Legal, Policy and Regulatory Requirements:	In the UK, race discrimination is covered under the Equality Act 2010, which includes direct and indirect discrimination, harassment, and victimisation. Failure to tackle workforce racism can lead to legal consequences such as employment tribunal claims.

How does this reduce Health Inequalities:	Healthcare studies showed patients generally fare better when care was provided by more diverse teams
How does this impact on Equality & diversity	The overall aim of this work is to provide the foundation to improve the experience of our racialised colleagues across BNSSG building an inclusive culture, treating people equitably and without discrimination
Patient and Public Involvement:	N/A This is focused on the health & care workforce
Communications and Engagement:	Plans discussed with BNSSG EDI Leads group and BNSSG ICB communications team. Further guidance will be taken to ensure appropriate messaging and in workshop development.
Author(s):	Samantha Hill
Sponsoring Director / Clinical Lead / Lay Member:	Jo Hicks, Chief People Officer

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Discussion Item: 6.4

Anti Racist System statement and approach

1. Background

The [Too Hot to Handle](#) report states: "this report is not is a report which tries to prove racism is widespread in the NHS. We are more than convinced it is and you should be too". The report findings show that:

- racial assumptions and stereotypes are widespread,
- there are a lack of development opportunities,
- there are extensive microaggressions displayed within relationships,
- concerns raised are often minimised and there is little support

The findings of the report link to findings from Employment Tribunals across the data and the data as reported within Workforce Race Equality Standards and annual staff surveys.

Research shows that leaders at every level need to be comfortable talking about race, must listen with attention to concerns, problem sensing and embedding accountability, acting in a proactive and preventative way.

In September 2024, the Chief Executive Group Away Day held a session on Anti Racism, and a paper was brought to board in October with a proposed anti-racist statement for the BNSSG system. The board were in agreement that a statement would be a positive step but felt that it was important for staff and community voice to be included.

NHSE SW have a Leading for Inclusion strategy this aims to turn the tide, creating supportive environments where every member of staff can thrive, making the South West the best place to work. The three strategic aims are:

- Leadership - Our leaders will lead with compassion, humility and inclusivity creating positive human relationships
- Culture & Policy - We will develop a culture of trust, openness and psychological safety where everyone feels, valued, has a sense of belonging and is able to reach their full potential
- Accountability - We will be intentional around our ambition holding each other to account for the delivery of our aims

Any work undertaken at a system level will need to incorporate the overall aims and purposes of the leading for inclusion strategy.

2. Work to Date

It should be noted that a number of system partners are already undertaking work in relation to developing anti-racist* and / or pro-equity** statements (and associated action plans) and therefore any work undertaken at a system level must support this rather than add additional layers of complexity. See Appendix A for activity to date and / or planned for 25-26.

3. Proposed Action - Workforce

There are two key areas of focus moving forward:

Statement(s)

Working with the EDI Leads from across our system we will look to hold a series of focus groups with staff members. The proposal is that we take a trauma informed approach, with a recognition of the impact of structural racism and intergenerational and cultural trauma alongside specific single or multiple experiences.

These groups would look at what anti racism means to participants and what anti racism system would look like, hear and feel and would then, through co-production, would result in a system statement.

There is a recognition that this will take time and therefore there has been an ask for a initial pledge that indicates intention. Initial proposed wording is;

> "Our vision is that Bristol, North Somerset and South Gloucestershire (BNSSG) will become an anti-racist system. We understand that any words must have action and to do that we must listen and build trust. That is why we are taking time to listen to your voice. Over the coming months we will be actively seeking your feedback on our aims and will take careful consideration to feed this into any words and actions we make.
>
> Aims:
>
> - To increase our workforce racial and ethnic diversity at all levels, reducing disparity gaps throughout the all stages of the employment journey.
>
> - We will debias our policies and processes to ensure inclusivity and equity.
>
> - We will make our system a safe space to speak up on racism and aggravated racialised behaviours.
>
> - We will use the information and learning from this process to feed into our wider pro-equity approach towards all marginalised individuals.
>
> The board of the ICB is responsible for leading our anti-racism actions and ensuring that measurable improvements, resulting in meaningful change, are made."

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We would anticipate these focus groups would take a minimum of 6 months (see Appendix B for proposed project plan).

Framework / Action Plan
Our EDI Leads across the system are clear that a statement or pledge alone will further alienate our colleagues from racialised workforce communities and we will therefore also need to have a framework or action plan to ensure that we are implementing cultural change that will deliver impact.

We will work with our partners to ensure that we bring together a framework that encompasses the current NHS EDI requirements (High Impact Actions, WRES, staff survey and EDS findings) and supports sovereign organisation action planning, alongside system working where this is practicable.

At this early stage the proposed framework would have five key areas:

- Lead from the Front
  - We will provide dedicated EDI Resource at senior level to enable impact
  - We will champion targeted support sessions with dedicated time to enable attendance
  - We will hold ourselves to account and be transparent when something goes wrong, ensuring reflective practice
- Grow Cultural Competency
  - We will listen and learn by creating safe spaces and security to raise racist behaviours and practice.
  - We will work to change our culture so that we foster positive relationships where people with lived experience of racism feel empowered to speak up and trust there will be change
  - We will continue to engage with our workforce and communities to make sure we are understanding the experiences of our Black, Asian and Minority Ethic staff and service users
- Increase Visibility
  - We will increase our workforce diversity at all levels
  - We will clear the disparity within our ethnic pay gap
  - We will debias recruitment processes at all stages to support an equitable approach
- Tackle Inequality
  - We will review and debias our policies and processes that have been part in the creation of institutional racism.
  - We will provide targeted support and phycological safety for our workforce with lived experience of racism
  - We will eliminate conditions and environment in which bullying, harassment and physical harassment occur.
- Review Regularly
  - We will closely monitor our progress against each action and be transparent with our reporting.
  - We will regularly review our policies, processing and support offering to make sure that they continue to remove bias and are fit for purpose.

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- We will review our statement and action plan as we would any other form of business, updating accordingly and giving it the same level of attention and priority as all other areas.

See Appendix C for proposed framework.

The framework will be iterated as a result of feedback from the listening events and clear accountability measures with evaluation metrics developed.

3.2 Financial & resource implications

- Staff time – this will be both in terms of EDI leads supporting this work but also in releasing staff to take part in focus groups.
- Engagement, insights and communications professional support.
- Psychological support professionals – we would like to ask for psychological support professionals to support listening events, these would need to come from organisations across the system who directly employ these individuals, and we would ask for approval for this.
- Use of system partner accommodations in which to run events, and associated facilities support.

4. Risk implications

- The risk in not undertaking this work is continued ineffectual impact with staff members continuing to experience discrimination and reduced opportunity.
- The risk in undertaking this work without input from our colleagues with lived experience and without following up with specific measurable activity is increased frustration, and further reduction in engagement.
- Without appropriate support within any focus groups we risk re-traumatising our staff from racialised communities.
- We must acknowledge that not all colleagues 'agree' with the focus on racism and may be alienated by the work undertaken. Improved understanding and learning for staff without lived experience may also be a traumatic process.

5. Legal implications

Race discrimination is covered under the Equality Act 2010, which includes direct and indirect discrimination, harassment, and victimisation. Employers are legally required to prevent race discrimination in the workplace. Failure to tackle workforce racism can lead to legal consequences such as employment tribunal claims, financial penalties, and reputational damage. It can also result in a toxic work environment, decreased employee morale, and productivity issues.

6. How does this reduce health inequalities

The Journal of National Medical Association states "positive associations between diversity, quality and financial performance. Healthcare studies showed patients generally fare better

when care was provided by more diverse teams." (Diversity improves performance and outcomes, Vol 111, Issue 4, August 2019, pp 383-392)

The "Grow Cultural Competency" and "Tackle Inequality" elements of the proposed Workforce Framework / Action Plan will help the workforce to assess the BNSSG population need, design services and deliver services in a way that supports anti-racism. This will contribute to BNSSG ICB and Integrated Care System reducing healthcare inequalities.

7. How does this impact on Equality and Diversity?

The overall aim of this work is to provide the foundation to improve the experience of our racialised colleagues across BNSSG building an inclusive culture, treating people equitably and without discrimination. This work aims to support psychologically safe workplace environments across the BNSSG system.

This work can support a pro-equity approach across all protected characteristics.

8. Definitions:

*Anti-racist - One who is supporting an antiracist policy through their actions or expressing an antiracist idea (Ibram X. Kendi, How to be Antiracist')

**Pro-Equity - being just and inclusive and consistently taking action to eliminate the root causes of inequities.

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Appendix A – Anti Racism Work Underway or in planning stages

	Anti Racism Work underway or in planning stages
AWP	- EDI objectives for board members - Focus on Patient & Carer Race Equality Framework (PCREF), deliver to strengthen commitment to being anti racist organisation - A phased approach to developing a BAME talent pool at band 7 and above - Taking learning from Make it Right programme and incorporating into psychological safety work - Established a Prevention of Bullying and Intimidation Task and Finish Group - Established a trustwide Violence and Aggression Reduction Group - Refreshed the Appraisal Best Tool for Employees and Managers - Recruit and train more Independent Equality Advisors for the Disciplinary process and review its deployment. - Link with trustwide Race Equity Advisory Network to ensure that antiracism and discrimination is included in the roll out of Restorative Just Culture Training.
BCC	- Race and Health Equity Group - Race Equality Strategic Leadership Group working with public sector city partners can work together to improve the opportunities and experiences of racially minoritised individuals - Race Equity Practitioners Group, delivering Race equality conferences, race and the city programme of events, H.R. Data product - Bristol Race Equality HR Data product development and updates - One City events inc recruitment events - One City Boards
BNSSG ICB	- EDI objectives for board members - Inclusive recruitment review to be undertaken with associated action plan. - Activities to support a zero-tolerance approach to discrimination and improved reporting mechanisms and support for staff impacted by discrimination and harassment. - A review of our policies and processes related to disciplinary is also required to removing bias from this process. - Recording of protected characteristic information for talent and learning activities.

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	• Anti racism training for all staff planned for 25-26
NBT	• EDI objectives for board members • Evaluate the impact of the Diverse Recruitment Panel Pilot; extend/embed best practice into Divisions • Continue to promote Positive Action recruitment and training programmes • Commence anti-racism training across 3 cohorts: SLG, Champions, staff groups • Develop an anti-racism vision and approach across UHBW and NBT following both Boards' commitment to being anti-racist organisations • Cultural ambassadors embedded across organisation • Undertake deep-dive into ethnicity related casework and share outcomes and actions • Staff listening events in planning stages ahead of anti racism statement creation.
NS Council	• Collaborative work with Weston college & UHBW • Anti-racism motion approved in April 2022 with action plan to support delivery • Creation of a reverse mentoring scheme (now known as Mutual Mentoring) with our Corporate Leadership Team and members of our REACH Staff Group • Inclusive Leadership Development – Focus on Race Equality training for our Leadership Delivery Team, with over 100 participants • Exploring the Leadership Role in relation to Anti-racism for our Corporate Leadership and Executive Team • Launch of a RESPECT Guide – support for those who experience racism at work • Monitoring customer complaints by protected groups to review for patterns in relation to anti-racism • Working with Adult care providers to ensure their staff have access to appropriate resources to support anti-racist practice • Improved North Somerset ESOL offer • Introduced a process for community tension monitoring • Encourage bids to public health grant to have a focus on improving the health of people from ethnic minority groups • Successful Race Equality Week and Black History Month celebrations
One Care	• Respect campaign for general practice • Awaiting NHSE High Impact actions for general practice

Sirona	• EDI objectives for board members • The continuation of the EDI Taskforce to continue progressing it's work on Anti Racism throughout 2025. • To foster a more diverse and inclusive workplace, unconscious bias training, reviewing recruitment strategies and endorsing staff to attend anti racism training has been recommended. • Equality Diversity and Inclusion Taskforce to continue to monitor recruitment data, to create a sustainable method of shortlisting and selection training for recruitment teams to be able to deliver to recruiting managers. • Development of guidance for managers and staff following focus group with that staff that have experienced racism and discrimination from patients. • Development of an organisational stance on racism and discrimination. • Career progression and talent management. An 'Aspiring Band 6' programme focussing on international workforce has been developed. This will be continued with continual input from the Equality Diversity and Inclusion Taskforce. A career development staff survey will be sent out to Global Majority staff to focus on understanding barriers to career development. Global Majority career coaching for talent management. • Development of new workforce strategy. • Royal Collage of Nursing Cultural Ambassador Programme to launch. • Anti racism training delivered
SG Council	• Organise Black Southwest Network • Mandatory training for all staff on Race Awareness • Mandatory training for all manager Race Awareness – managers go on both the staff and manager training (All social care both children's and adults regardless of job role) • Proactive Intervention 2-hour session reflective practice – these are bitesize sessions around community cultural awareness • 1:1 session with social workers on an ad hoc basis. This is provided to help support the social worker to help understand the service users' needs delivered by SARI • EDI Induction training • Practical implementation of equal practice
UHBW	• EDI objectives for board members • Divisions have EDI objectives in their Culture and People plans.

	- Bridges Programme, a positive action recruitment programme, continues to support Ethnically Minoritised colleagues with their career development. Options for Bridges+, the next stage of the Bridges programme will be explored, to determine the best approach for career development support into bands 7 and above - Creating Pro-Equity training for HR colleagues which will cover anti-racist practice. - Embedding Respecting Everyone approach. - EDI advocate scheme has been reviewed, with a refreshed approach launching summer 2024. 30+ staff listening events, creation of anti-racism statement, action plan development ongoing. - Anti racism training for all staff planned for 25-26
System Wide	- Make it Right Programme (delivered 2022-2023) - Believe Programme (delivered 2021-2023) - Inclusive Recruitment system review and toolkit development & positive action framework (https://bnssghealthiertogether.org.uk/staff-and-partners/inclusive-recruitment/) - Staff network support inc target information on training & career opportunities via EDI newsletter. - Anti Racism task and finish group – developing system wide guidance on tackling racism with zero-acceptance approach (workforce lens).

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Appendix B – Proposed Project Plan

TASK	START	END
Engagement and guidance		
Anti-racism guidance	8/7/24	31/3/25
Engagement statement	18/12/24	12/03/24
Engagement plan creation / collab	20/12/24	31/4/24
Organisational engagement	1/5/25	31/8/25
Review/analyse feedback	1/9/25	1/10/25
Statement and framework		
Anti-racism framework	28/6/25	31/10/25
Anti-racism statement	28/6/25	31/10/25
Promote statement to workforce	1/11/25	31/1/26
Promote framework to workforce	1/11/25	31/2/26
Gain workforce feedback on statement and framework	1/11/25	31/1/26
Review/analyse feedback	1/2/26	28/2/26
Promote widely across workforce	1/3/26	
Gain workforce feedback on statement and framework	01/3/26	1/6/26
Training and policy review		
Anti-racism training	1/5/25	31/8/25
System policy review	1/4/25	1/9/25
Listening workshops (feedback and discussion following training)	12/6/25	20/8/25
Review/analyse feedback	21/8/25	6/9/25
Publish learning to feed into framework	30/9/25	

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Review			
3 month feedback link		1/11/25	1/3/26
Review/analyse feedback		02/3/26	1/4/26
Publish feedback summary		8/4/26	
6 month feeback link		8/4/26	1/10/26
Review/anaylse feedback		02/10/26	12/10/26
Publish feedback summary		19/10/26	
12 month feedback link		19/10/26	19/10/27
Review/analyse feedback		20/10/27	1/11/27
Publish feedback summary		8/11/27	

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and South Gloucestershire**
Integrated Care Board

Appendix C – Proposed Framework

Lead from the front	Grow cultural competency	Increase visibility	Tackle inequality	Review regularly

Authentically Anti-Racist Practice

Lead from the front	Grow cultural competency	Increase visibility	Tackle inequality	Review regularly
We will provide dedicated EDI Resource at senior level to enable impact

We will champion targeted support sessions and ensure dedicated time is available to attend

We will hold ourselves to account and be transparent when we get something wrong, ensuring reflective practice. | We will listen and learn by creating safe spaces and security to raise racist behaviours and practice.

We will work to change our culture so that we foster positive relationships where people with lived experience of racism feel empowered to speak up and trust there will be change.

We will continue to engage with our workforce and communities to make sure we are understanding the experiences of our Black, Asian and Minority Ethic staff and service users. | We will increase our workforce diversity at all levels.

We will clear the disparity within our ethnic pay gap

We will diversify recruitment panels at all stages to support a debias approach | We will review debias our policies and processes that have been part in the creation of institutional racism.

We will provide targeted support and phycological safety for our workforce with lived experience of racism.

We will eliminate conditions and environment in which bullying, harassment and physical harassment occur. | We will closely monitor out progress against each action and be transparent with our reporting.

We will regularly review our policies, processing and support offering to make sure that they continue to remove bias and are fit for purpose.

We will review our statement and action plan as we would any other form of business, updating accordingly and giving it the same level of attention and priority as all other areas. |

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