

RACE Equality Code – 4 Principles Statement

REPORTING - A clear commitment to be transparent to all stakeholders through the disclosure of required, concise and current information on the progress and impact of RACE initiatives across the organisation. Openness and transparency will be actively pursued and valued in order to create the right environment for change.

Your statement will describe your commitment to gather appropriate data and publishing it to demonstrate accountability. Are you happy with how your organisation reports on race, is information transparent and accessible by all stakeholders?

Checklist

- Outline your commitment to be open and transparent.
- Describe progress that you expect to see.
- Provide high level plans in making an impact on race equality.
- Provide details of targets that will be published.
- Provide details on the expected impact of race initiatives.
- Describe how you will disclose data.

Your statement

Outline your commitment to be open and transparent

As we have transitioned into the Staffordshire and Stoke-on-Trent Integrated Care Board (SSoT ICB), our workforce is a diverse mix of talent and experience that represents the wealth of diversity from the rural towns and villages of Staffordshire to the historic industrial city of Stoke-on-Trent. We have met many of the challenges of compliance, but we recognise there is still work to do to make the best of Equality Diversity and Inclusion (EDI). This includes eliminating any barriers for ethnic groups to develop, advance and achieve their potential.

We have made great progress from being an organisation that looked at EDI from a compliance perspective. We are now moving towards a more inclusive culture that engages with and offers opportunities to all the workforce. We want SSoT ICB to be the best place that it can be, to be as inclusive as possible and passionate about EDI.

As commissioners of health and care services across Staffordshire and Stoke-on-Trent, the ICB also has a significant role in leading by example to reduce inequalities and health inequalities by working collaboratively with our NHS provider, local authority and other public bodies and the voluntary and community sector partners. Reducing race inequalities and health inequalities across our population and workforce is one of our main priorities.

One step towards becoming a more inclusive organisation, where everyone is appreciated for what they bring and contribute to the organisation, is to evidence through our actions. Success will be determined by the continued development of a culture in the ICB and the wider ICS where EDI is everyone's business, and all are welcome to contribute to this aim.

Describe progress that you expect to see

In adopting the Race Equality Code (REC), race equality and the wider EDI agenda will continue to be recognised and embedded across the ICB. This should lead to improved staff retention, satisfaction, health and wellbeing, and improved decision making. A reduction in health inequalities and inequalities will ultimately benefit both staff and the diverse populations we serve.

The ICB leadership team will own the race equality initiatives and agenda across the organisation to ensure the progress we expect:

- Improved satisfaction in staff experience, improved retention and reduced turnover – achieved through staff temperature check and staff survey results
- Health and wellbeing – staff and sickness rates, employee assistance programme, Staff Psychological Hub access and outcomes.

Provide high level plans in making an impact on race equality

In developing the ICB's Board Assurance Framework (BAF) – Strategic Risks for 2023/24, there are clearly defined ambitions to:

- Address inequalities in access, experiences and outcomes from health and social care services
- Work in partnership with communities to achieve social, economic and environmental community development.

Race and equality links to the ICB's health inequalities agenda that is incorporated into the Integrated Care Partnership Strategy – where tackling inequalities in outcomes, experience, and access are a continuous focus.

The ICB's process for Equality and Health Inequalities Impact Assessments is embedded into the ICB's commissioning process. However, more focus is required to bring this essential EDI tool into parity with the process for Quality Impact Assessments, where governance and risk measures are well established.

This year's ICB Annual EDI Action Plan's main emphasis will be delivering the Race Equality Code actions and the ICB's commitment to EDI with a focus on race equality. We will achieve this through:

- Linking the outcomes of the staff survey to the EDI agenda, triangulating data, quarterly staff temperature checks, and using the information and baseline data to identify gaps
- Working with Roger Kline as a system initiative which will build on the 'No More Tick Boxes' review report and associated toolkit and national People Plan 'Six High Impact Actions on Recruitment'
- Time Out session (formerly development days), to improve on raising awareness, networking and connections, and the power of allyship.

Provide details of targets that will be published

The ICB is working towards agreeing a range of individual and organisational targets which will be routinely reviewed, assessed and published.

- Board-level diversity will be a key target in which we will measure progression against race and the wider equality agenda
- Nine indicators of the Workforce Race Equality Standard
- Ten indicators of the Workforce Disability Equality Standard
- Three domains and 11 outcomes of the Equality Delivery System.

In the short to medium term, the ICB will be considering and implementing positive action initiatives for future potential leaders from ethnic diverse backgrounds in the form of job shadowing through:

- Considering the introduction of bi-annual observational activities – time is spent observing the work of your host, watching what they do on a day-to-day basis
- Regular briefings – shadowing a host for specific activities over a period of time, where the individual receives a mini brief beforehand and a follow-up debrief
- Reverse mentoring – where a minimum of three employees mentor more senior members of staff around a range of race and equality matters through their own lived experiences and observations.

Provide details on the expected impact of race initiatives

We expect the impact to be positive in several ways. The ICB will be able to identify where it is in relation to EDI and the implications of being in that position. It will help develop a leadership which is representative of the populations we serve or the workforce as a whole – whichever is the greater. Meanwhile we understand that race equality is not just about numbers, but rather culture, relationships, skills, talent and organisational performance.

By looking at targets and individual plans, we hope to raise awareness to better understand the recruitment process and how we improve recruitment for ethnic diverse candidates.

Implementing the Race Equality Code will support initiatives such as reverse mentoring which will be recommended to the current Executive Team. It will also encourage our thinking and planning for organisational transition and change.

[Describe how you will disclose data](#)

Information will be scrutinised by the ICB Staff Engagement Group and Ethnic Diverse Group (Staff Network), and published through the ICB intranet platform IAN and staff communication systems. Race equality and the wider EDI information and data will be shared and discussed through range of committees, processes and procedures – including but not limited to:

- The ICB Board and People Committee
- Monthly meeting between the executives and senior leaders
- The ICB seven portfolios, which deliver the ICB strategic commissioning and workforce priorities, aims and ambitions.
- Community and People Assembly
- Equality Health Inequalities Impact and Risk Assessments (EHIIRAs) – governance process to be established (similar to the ICB Quality Impact Assessment process) – Quality Committee
- Potential Team Brief on EHIIRAs.

This information will be published through a range of internal and external reports including the ICB Annual Public Sector Annual Report (including Workforce Diversity Profile), WRES Report, Equality Delivery System Report and the annual ICB Equality Action Plan.

ACTION - A list of the measurable actions and outcomes that contribute to and enable a shift in the organisation's approach to be delivering positive and sustainable change in race equity and equality. Without a set of targets and detailed plans for their achievement, real change will not happen, and organisations will not be accountable.

Your statement will describe how you have developed appropriate actions and determined who is accountable within the overall inclusion agenda. Are you satisfied that the actions your organisation is taking are robust enough to make a real difference to race equality and that the board is accountable?

- Who is accountable within the overall inclusion agenda?
- Provide detail on the outcomes you expect to see
- Describe how your race action plan will be integrated in your overall accountability framework
- Highlight 3-6 actions that you will be working on in the next 18mths
- Describe how the Board will be held to account on the actions listed above

Your statement

[Who is accountable within the overall inclusion agenda?](#)

The Chief Executive, directors and Board members will be responsible for the overall inclusion agenda with a commitment to EDI as demonstrated and communicated by the ICB's top leadership. The ICB adopts an 'Everybody's Responsible' approach – which is promoted and encouraged through staff Team Briefs and Time Out sessions.

The Commissioning Support Unit's EDI team work daily with ICB staff in delivering a range of activities. These include equality assessments and procurement evaluations work with staff networks. They will be working closely with the ICB's Diversity Champions to develop and increase their understanding of EDI and to offer opportunities to be actively involved in delivering the agenda.

A key point to note is that the ICB does not work in isolation on this agenda – we work collaboratively within the system, linking in with other NHS, public body and voluntary sector colleagues in delivering a range of race equality initiatives to meet local, regional and/or national requirements.

Provide detail on the outcomes you expect to see

The ICB will expect to see progress against the following EDI-related outcomes:

The Equality Delivery System's three domains and the 11 outcomes that support them.

1. Commissioned or provided services
2. Workforce health and wellbeing
3. Inclusive leadership.

ICB Equality Objective 3 (EDS Domain 3) looks at 'inclusive leadership'. The three outcomes below link to several Race Equality Code actions which have a focus around leadership assurance and accountability, where race equality can be assessed and measured:

1. Board members and senior leaders (Band 9 and Very Senior Managers (VSM)) routinely demonstrate their commitment to equality
2. Board/Committee papers (including minutes) identify equality and health inequalities-related impacts and risks and how they will be appropriately discussed, mitigated and managed
3. Board members, system and senior leaders (Band 9 and VSM) ensure levers are in place to manage performance and monitor progress.

Other details on the outcomes SSoT ICB would expect to see include:

- Working with the workforce on the staff survey priorities and measuring outcomes
- Outcomes from the ICB 2023/24 Equality Action Plan which includes the REC 31 actions
- Workforce Race Equality Standard (nine indicators)
- Recommendations and actions resulting from Equality Health Inequalities Impact and Risk Assessments
- Ensuring that Equality, Diversity and Inclusion is considered throughout the ICB procurement process through the setting of relevant EDI questions and an evaluating process.

Describe how your race action plan will be integrated in your overall accountability framework

The ICB's Race Action Plan will form part of the ICB's overall EDI Annual Action Plan until such time where the outcomes demonstrate that race equality is an integral part of the ICB's culture. The overall Action Plan will be monitored on a quarterly basis by the ICB and its delegated sub-committees – namely the People, Culture and Inclusion Committee who would feed back into the ICB Board on a quarterly basis.

At a system level, the ICB will also work alongside system-wide colleagues – it will not work in isolation on certain aspects of its Race Action Plan. We will work collaboratively within the system linking in with other NHS provider colleagues in delivering positive action approaches, including:

- Inclusion School Session – Featuring Roger Kline's Race "No More Tick Boxes", it sets out heavily referenced key steps that organisations must take if they are to redress the current patterns of discrimination and waste of talent
- Workforce Race Equality System Champions Programme
- Reciprocal Mentoring for Inclusion Programme

- New Futures Programme – a positive action leadership and personal development programme that is offered to system colleagues from an ethnic diverse heritage
- Developing Aspirational Leaders – a clinical lead initiative aimed towards clinical staff.

Highlight 3-6 actions that you will be working on in the next 18 months

R1	Ensure EDI reporting and information is readily available and visible for increased accountability, for example on the website or intranet
	Focus on ensuring that WRES reporting reflects the RACE Equality Code recommendations for reporting
	Once first WRES report is done, ensure the findings and context are socialised in Time Out sessions
A1	Communicate the rationale behind and importance of disclosing data to the wider workforce
	Use HR data to drill down across different racial groups and intersectionality
A5	Measure the impact and added value for the workforce of actions and programmes for developing a diverse talent pipeline
	Consider whether targeted action is required to address any pockets of underrepresentation identified in the data
	Ensure that steps taken to identify and develop talent are followed up on, with opportunities for progression and promotion
C2	Ensure there are meaningful race diversity targets in place, to address Board and Senior Leadership Team representation, with corresponding KPIs and actions in place.

Describe how the Board will be held to account on the actions listed above

The ICB Board will be held to account through its governance process and accountability frameworks. EDI will be incorporated into the ICB Risk Register to help inform management decisions and EDI priorities. The ICB leadership are actively promoting their Leadership Compact, which is to be made mandatory at the start of all formal meetings. The compact sets out how we expect leaders to consistently role model the behaviours we expect to see.

Board paper front sheets ask specific equality-related questions about whether Equality and Health Inequality Impact Assessments have been carried out, and if not, why not. It also asks if there are any impacts on protected characteristics.

It will be the intention that each Board member will be allocated an equality objective.

COMPOSITION - A set of key indicators that create tangible differences in race diversity across all levels of the organisation. The narrative around what is acceptable will need to change through dialogue and data, and this will lead to challenging conversations leading to necessary decisions which the organisation is committed to making.

Your statement will describe what data will be collated and how success will be measured. as your organisation gathered the appropriate data. Are you satisfied with the targets that your organisation has decided upon, and that they are challenging enough?

Checklist

- Outline indicators that will be used to support race equality
- What is your approach to gathering data?
- What data will you be gathering?
- How will the organisation gather data to measure indicators?
- What are 3-6 KPI's/targets that you will be measuring?
- How will you triangulate and analyse the data that is collected to understand equality impact?
- Describe any resources required to achieve the indicators outlined

Your statement

Outline indicators that will be used to support race equality

The ICB uses the following indicators to support race equality:

- WRES – Indicator 9, Board representation by race
- WDES – Indicator 10, Board representation by disability
- Implementing the Model Employer Strategy – increasing black and minority ethnic representation at senior levels across the NHS
- Workforce Diversity Profile Report
- Public Sector Equality Duty
- Midlands WREI Strategy and Six High Level Actions
- Equality Delivery System
- Equality Health Inequality Impact and Risk Assessments
- Invitation to Tender (ITT) and Procurement Evaluations.

What is your approach to gathering data?

The ICB currently has a well-established process in place for the collection of workforce data disaggregated by protected characteristics:

- Workforce Profile Data
- Recruitment Data
- NHS Staff Survey
- Training Data (Monitoring Forms)
- Equality Delivery System data – link to performance and management data
- Occupational Health – request as part of the contract to look at the data.

What data will you be gathering?

The ICB will gather the following data disaggregated by protected characteristics:

- Staff experience (disproportionate/adverse impact)
- Evidence of the ICB's ethnic diverse staff taking up positive action initiatives
- Bullying and harassment
- Representation across pay bands
- Service user data
- Disciplinary and grievances
- Freedom to Speak Up data
- Performance management and reporting data.

How will the organisation gather data to measure indicators?

- ICB Annual EDI Action Plan – main focus on implementing the REC actions
- Equality Delivery System
- Workforce Diversity Profile Data
- Feedback from the NHS Staff Survey
- WRES – Indicator 9, Board representation by race
- WDES – Indicator 10, Board representation by disability
- Race Disparity Ratio
- A Model Employer – increasing black and minority ethnic representation at senior levels across the NHS
- Service user data
- Disciplinary and grievances
- Freedom to Speak Up data
- Performance management data

- Reference to People Assembly and the Health Inequality link
- Exit interviews.

We will provide a summary of different but related equality diversity and inclusion data sets, presented in a way that makes the information easy to understand and will monitor progress against race equality targets. Data sets include:

- WRES metrics
- Staff Survey results
- Equality Delivery System (three domains and eleven outcomes).

What are 3-6 KPIs/targets that you will be measuring?

1. The ICB workforce is representative of the communities we serve at all pay band levels
2. Improving access to training opportunities, initiatives and progression for ethnic diverse staff
3. Board diversity and governance functions to demonstrate progress against race equality
4. WRES metrics.

How will you triangulate and analyse the data that is collected to understand equality impact?

The EDI team currently analyse data from a range of data sources and measure against benchmarked figures and/or previously reported data. Data sources can include:

- Staff temperature check-ins
- Freedom To Speak Up activity and intervention
- Staff Survey results and actions
- Data from the NHS Electronic Staff Record
- WRES
- Population Health Data
- Portfolios have a link in to Equality and Inclusion
- EHIIRAs
- ICB Annual Report

Describe any resources required to achieve the indicators outlined

- EDI and People Function team
- Support from Execs and Board
- Staff network groups and system-wide networks
- Support to work in collaboration with system partners
- Staff Engagement Group
- Diversity Champions
- WRES Champions
- Execs and Senior Leadership team
- Explore access to funding as a system.

EDUCATION - A robust organisational framework that develops the ethical, moral, social and business reasoning for race diversity at all levels of the organisation. This will be underpinned by inclusive and embedded programmes of continuous professional development (using the principles) through which perspectives and prejudices will need to be challenged, and systemic and institutional practices acknowledged.

Your statement will describe how all stakeholders will be educated around race and the commitment to creating an inclusive and belonging environment. Are you confident that you have considered how your organisation will educate staff at all levels of the organisation and all the key stakeholders that work with your organisation around race equality?

Checklist

- How will all stakeholders that work with the organisation be educated around race equality?
- How will you educate staff at all levels on race equality?
- How does your commitment support overall equality as a business imperative?
- What work will you do to create an environment for supporting equality for race at all levels?
- How will you ensure that consistent education and awareness is provided?
- What negative systemic and institutional practices have you acknowledged and have plans to address
- What perspectives and prejudices need to be challenged?

Your statement

How will all stakeholders that work with the organisation be educated around race equality?

How will you educate staff at all levels on race equality?

How does your commitment support overall equality as a business imperative?

What work will you do to create an environment for supporting equality for race at all levels?

How will you ensure that consistent education and awareness is provided?

Education around race equality and the wider EDI agenda will be predominantly delivered through:

- Continuing to build on EDI training and awareness programmes
- Board training around EDI including race equality
- Equality-related awareness articles published on the staff intranet and through staff weekly updates.

Education is an important piece of the ICB's organisational change effort. It can generate enthusiasm, build momentum, create synergy and, at its best, help people to have "ah ha" moments of personal insight. It can help people break old, inefficient patterns and move into new, more productive ways of doing business. But educating an organisation around EDI must be done as part of a comprehensive organisational strategy if it is to have a long-term impact.

Many people have some anxieties or may even feel uncomfortable talking about race equality. This can be expected, because we may not be comfortable in a situation in which we may be viewed as deficient, dependent, needing to be 'fixed', are going to be put on the spot, or at the mercy of an authority figure. Unfortunately, adult-learning situations sometimes have this effect, which may reinforce any negative preconceptions.

To dispel these notions and to set the appropriate tone, it will be useful to understand and openly establish the roles everyone fulfils. However, the ICB must first understand and role model a belief in a true learning partnership between its leadership, management and staff.

Effective roles

ICB leaders have a huge role to play in the success of this diversity effort. Staff will look to them to see if the commitment to EDI is real, or just lip service. Leaders will demonstrate their commitment through their actions and involvement. Inclusive leadership including race equality in the ICB will be measured through the NHS Equality Delivery System Domain 3 'inclusive leadership', where:

- 3a) Board members, system leaders (Band 9 and VSM) and those with line management responsibilities routinely demonstrate their understanding of, and commitment to, equality and health inequalities
- 3b) Board/Committee papers (including minutes) identify equality and health inequalities-related impacts and risks and how they will be mitigated and managed
- 3c) Board members and system leaders (Band 9 and VSM) ensure levers are in place to manage performance and monitor progress with staff and patients.

The ICB will support its leadership teams by letting them know their role and responsibilities in relation to race equality and the wider EDI agenda. This will be done through specific training, for example the Inclusion School programme, and the development and implementation of a reverse mentoring programme.

In coaching our managers, the ICB will remind them that it's in their interest to focus on EDI issues. We will help them to see and understand the social, moral, cultural and economic benefits. This will be achieved through a range of initiatives including management training programmes around fair and inclusive recruitment and the ICB-mandated Unconscious Bias training, which is a requirement for all staff.

MUST Report

Set priority levels, for example

- *High – within next 3 months*
- *Medium – within next 12 months*
- *Low – within next 24 months*

No.	Actions	Priority	Owner
R1	Ensure EDI reporting and information is readily available and visible for increased accountability, for example on the website or intranet.	Complete/High	EDI team
	Focus on ensuring that WRES reporting reflects the RACE Equality Code recommendations for reporting.	Medium (ICB publishing dates)	EDI team
	Once first WRES report is done, ensure the findings and context are socialised in Time Out sessions.	Medium (ICB publishing dates)	EDI team
A1	Communicate the rationale behind and importance of disclosing data to the wider workforce.	High	EDI team/Head of People
	Use HR data to drill down across different racial groups and intersectionality.	Medium	EDI team
A2	Ensure the role of Executive and Non-Executive Leads and Champions is embedded explicitly.	High/Medium	Chief People Officer
A3	Ensure review of employee life cycle has been performed, including recruitment, appraisals, and progression and that initiatives and processes are communicated internally.	High	Head of People
A4	Consider the whole Board evaluation process in terms of what is assessed and compare across the ICS and ICB.	TBC	TBC
A5	Measure the impact and added value for the workforce of actions and programmes for developing a diverse talent pipeline.	Medium	System/Head of People
	Consider whether targeted action is required to address any pockets of underrepresentation identified in the data.	Medium	Head of People/EDI team
	Ensure that steps taken to identify and develop talent are followed up on, with opportunities for progression and promotion.	Medium	Directors
A6	Following on from work on collecting data around recruitment, consider how best to utilise data to update recruitment practices.	Medium	Head of People
	Continue to track how the switch to home-based roles impacts representation.	High/Medium	EDI team/People Function team
C1	Ensure there is description available for the Board's policy on overall diversity.	High/Medium	Chief Executive and Chief People Officer
C2	Ensure there are meaningful race diversity targets in place, to address Board and Senior Leadership Team representation, with corresponding KPIs and actions in place.	High/Medium	Chief Executive and Chief People Officer
E1	Continue work being done on rolling out 'Comfortable being uncomfortable' training requested by staff.	Complete	People Function team
E2	Review staff survey results for decision making, outcomes, and progress.	High/ongoing	Head of People
E3	No further actions required.	N/A	N/A

Your comments

We confirm that the MUSTS of the RACE Equality Code (shown above) have been incorporated in our overall annual EDI Action Plan.

SHOULD Report – Comply or Explain

No.	RACE Code Action/Review Required	Partial/None	Tick if you intend to comply or write an explanation if don't intend to comply
R2	Document and report the organisation's race strategy, which should: <input type="checkbox"/> Highlight the approach to integrating race within the overall EDI strategy <input type="checkbox"/> Include the necessary resources (including a ringfenced budget) <input type="checkbox"/> Include Board-level commitment to transformational change.	Partially Compliant	✓
A7	Improve diversity in the talent pipeline, including: <input type="checkbox"/> Implementing a robust talent management strategy to fill current senior vacancies and future leadership pipelines <input type="checkbox"/> Embedding mentoring and sponsorship schemes in the organisation <input type="checkbox"/> Ensuring all new entrants to the organisation receive a proper induction, which includes clear and transparent information on career pathways <input type="checkbox"/> Identifying ways to increase participation levels from underrepresented groups of students in key programmes.	Partially Compliant	✓
A8	Measure the effectiveness of mechanisms to identify, develop and promote Black and other ethnic group employees, including: <input type="checkbox"/> Focusing on creating a pipeline of Board-capable candidates <input type="checkbox"/> Reviewing and monitoring that the Senior Leadership Team appropriately reflects the diversity to the organisation.	Partially Compliant	✓
A9	Review governing documents to ensure race is fundamentally and consistently embedded. <input type="checkbox"/> Ensure accountabilities and responsibilities for race are documented in role descriptions for board and senior management <input type="checkbox"/> Ensure discourse on race inform Board and Committee discussions and decisions <input type="checkbox"/> Regularly review policies, processes and behaviours to make certain that race equity is embedded.	Partially Compliant	✓
A10	Have an accountability framework in place to ensure clear accountability for the performance criteria and targets that have been set for race equality, to include: <input type="checkbox"/> Racial diversity objectives for Board members and Senior Leadership Team members <input type="checkbox"/> Performance criteria with targets monitored, including mandatory content and frequency of reporting to the Board <input type="checkbox"/> How Board and Senior Leadership Team actions, as a result of monitoring, are reported.	Partially Compliant	✓
A11	Make clear that supporting equality in the workplace is the responsibility of all leaders and managers through: <input type="checkbox"/> Integrating equality into performance reviews and remuneration <input type="checkbox"/> Including a clear race diversity objective in all leaders' annual objective setting/appraisal (covering their responsibility to support fairness for all staff) <input type="checkbox"/> Include race diversity as a key performance indicator for all leaders (to ensure that they take positive action seriously).	Partially Compliant	✓
A15	Ensure existing Board Directors mentor and/or sponsor Black employees within the organisation, to ensure their readiness to assume senior leadership positions internally.	Partially Compliant	✓
A16	Ensure candidate pools are ethnically diverse by: <input type="checkbox"/> Using a Market Map to identify roles with the most potential for ethnically diverse candidates <input type="checkbox"/> Targeting networks and connectors as part of the recruitment campaign <input type="checkbox"/> Reaching out to diverse recruitment channels and advertise widely <input type="checkbox"/> Regularly review diversity in the organisation's recruitment, development and retention strategy.	Partially Compliant	✓
A18	Ensure the panel in the interview process is ethnically diverse and, <input type="checkbox"/> Ensure that the selection and interview process is undertaken by more than one person <input type="checkbox"/> Include individuals from underrepresented backgrounds to help eliminate bias <input type="checkbox"/> Ensure at least one person on the panel has undertaken recruitment and selection training <input type="checkbox"/> Consider including external independent experts on the selection panel.	Partially Compliant	✓
C3	Set clear targets to increase race diversity on the Board and management teams, in particular: <input type="checkbox"/> Having no less than one Black Board member and one Black member of the Senior Leadership Team within one year of adoption of the Code <input type="checkbox"/> Documenting and implementing a recruitment strategy to increase Black representation on the Board and management teams <input type="checkbox"/> Where the size of the organisation means this is not practical, then shadowing and co-opting or similar methods can be explored to demonstrate compliance.	Non-Compliant	✓

E5	<p>Explain to all members of the board and management teams that it is a requirement of their role to promote and support race equality within the organisation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Train all leaders/managers on how to set and review race equality objectives and outcomes <input type="checkbox"/> Train all leaders/manager on how to support board and management teams when responsibilities or targets to support race equality are not being met <input type="checkbox"/> Regular awareness training on equality, diversity and inclusion to continuously build lived experience and cultural intelligence. 	Partially Compliant	✓
E6	<p>Provide sponsor programmes to promote Black talent in the organisation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Education and support should be provided to the Board and management teams in the organisation, to allow such programmes to be structured and meaningful. 	Partially Compliant	✓
E8	<p>Ensure the management teams, executive boards and all those with a role in the recruitment process in the organisation, undertake comprehensive race awareness and diversity training:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide additional training to the mandatory race awareness and diversity training. 	Partially Compliant	✓
E9	<p>Educate applicants at induction as to career progression routes within the organisation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Information should include the proportion of employees by race at each level of the hierarchy in the organisation. 	Partially Compliant	✓

COULD Report – Comply or Explain

No.	RACE Code Action/Review Required	Partial/None	Tick if you intend to comply or write an explanation if don't intend to comply
R6	Publish within the Chair and /CEO statements in the annual report (or similar published document) specific comments on the steps being taken by the organisation to improve ethnic diversity. Such comments should make specific reference to the number of Black people in leadership where the data suggests there is a lack of representation.	Partially Compliant	✓
A19	Identify and develop a pool of Black and individuals from diverse backgrounds with potential or hold management positions as part of a cross-sector sponsorship/mentoring programme.	Partially Compliant	✓
A20	Encourage and support candidates developing oversight, leadership and stewardship skills drawn from diverse backgrounds, to carry out activity that will enable them to compete on merit and provide them with development time to: <ul style="list-style-type: none"> <input type="checkbox"/> Take on board roles internally (for example, within subsidiaries) where appropriate, observe board meetings, as well as board and trustee roles with external organisations <input type="checkbox"/> Undertake training, leadership and development programmes that provide the necessary skills. 	Partially Compliant	✓
A22	Seek out opportunities to provide work experience to a more diverse group of individuals by: <ul style="list-style-type: none"> <input type="checkbox"/> Looking for opportunities beyond the standard social demographic. <input type="checkbox"/> Ceasing the practice of unpaid or unadvertised internships. 	Partially Compliant	✓
A23	Critically examine organisational entry requirements to ensure that the organisation focuses on potential achievement. <ul style="list-style-type: none"> <input type="checkbox"/> Ensure that entry requirements do not place too much weight on which university or school the individual attended for their education. 	Partially Compliant	✓
C10	Monitor ethnic representation at all stages of the recruitment process (including at application, shortlisting, interview and appointment).	Partially Compliant	✓
E12	Publish job history synopses for the Board and management teams, together with narrative as to how success has been achieved to educate employees on possible career paths at the organisation. As the purpose is to educate staff, such information does not need to be published outside of the organisation.	Non-Compliant	✓
E13	Provide adequate and appropriate resources for staff to promote race equality within the organisation. Such resources may include a central portal or virtual learning environment containing the policies and procedures, training materials and forums to improve accessibility and ensure open communication at all levels within the hierarchy of the organisation.	Partially Compliant	✓