

Anti-Racism Policy

Rudolph Walker Foundation

Policy owner	Chair of Trustees, on behalf of the Board
Approved by	Board of Trustees
Date approved	10 October 2025
Version	1.0
Review cycle	Every two years, or sooner following a serious incident or change in law
Next review due	10 October 2026
Applies to	Trustees, staff, sessional workers, volunteers, mentors, contractors and delivery partners

1. Purpose

The Rudolph Walker Foundation exists to help young people build confidence, skills and opportunity. Many of the young people we work with are Black or from other racially minoritized backgrounds, and racism is a live factor in their education, employment, health and contact with public services. A policy that only says we do not discriminate is not enough.

This policy sets out our position as an actively anti-racist organisation. It commits us not simply to avoiding racist conduct, but to identifying and dismantling racism where it appears in our own practice, in our sector, and in the systems our young people encounter.

2. Scope

This policy applies to everyone acting for or on behalf of the Foundation: trustees, employees, sessional and freelance staff, volunteers, mentors, students on placement, contractors and delivery partners. It covers conduct at our premises, at delivery venues and events, on outreach, in digital and online spaces, and in any setting where a person is identifiable as connected to the Foundation.

It applies to the treatment of young people and their families, colleagues, partners, funders, suppliers and members of the public. It also governs how we respond when our young people or staff experience racism from third parties.

3. Our position

The Foundation states without qualification that racism is harmful, unacceptable and incompatible with our charitable purpose. We recognise that:

- Racism operates at individual, institutional and structural levels, and that an organisation can produce racist outcomes without any individual intending harm.
- Silence and neutrality in the face of racism protect the person causing harm, not the person experiencing it.
- Black children and young people are frequently subject to adultification bias — being perceived as older, less innocent and more culpable than their white peers — with direct consequences for how they are policed, disciplined and safeguarded.
- Being an organisation led by and for racially minoritised communities does not make us immune to bias, including colourism, anti-Blackness, prejudice between minoritised communities, and the marginalisation of people who face racism alongside other forms of disadvantage.

We therefore accept a positive duty to act, and to be judged on outcomes rather than intentions.

4. Definitions

Racism: prejudice, discrimination, hostility or disadvantage directed at a person or group because of their race, colour, nationality, ethnic or national origin, including where this is combined with religion, migration status or language.

Institutional racism: the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen in processes, attitudes and behaviour that amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping.

Direct discrimination: treating someone less favourably because of race.

Indirect discrimination: applying a provision, criterion or practice that appears neutral but puts people of a particular racial group at a disadvantage, and which cannot be objectively justified.

Harassment: unwanted conduct related to race that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Victimisation: subjecting someone to detriment because they have raised a concern about racism, supported someone else's concern, or given evidence.

Racial microaggression: a brief, commonplace verbal, behavioural or environmental slight that communicates hostility or a negative racial message, whether intentional or not. Repeated microaggressions cause cumulative harm and are treated seriously under this policy.

Racist incident: any incident perceived to be racist by the victim or any other person. Perception is the starting point for our response; it is not the end point of our assessment.

5. Legal and regulatory framework

This policy is made under and read alongside:

- The Equality Act 2010, which makes race a protected characteristic and prohibits direct and indirect discrimination, harassment and victimisation.
- The Human Rights Act 1998, in particular Article 14 (prohibition of discrimination).

- The Children Act 1989 and 2004 and Working Together to Safeguard Children, where racism affects a child's welfare or safety.
- Charity Commission guidance on trustee duties, including the duty to act in the charity's best interests and to manage risk.
- The Public Order Act 1986 and Crime and Disorder Act 1998 in relation to racially aggravated offences and incitement to racial hatred.

Where we deliver services under contract to a public body, we will support that body in meeting its Public Sector Equality Duty and will comply with any equality obligations in the contract.

6. Our commitments

6.1 Governance and leadership

- The Board will receive a standing anti-racism and equality item at least annually, covering workforce data, participation data, incidents and progress against actions.
- A named trustee holds portfolio responsibility for equality, diversity and inclusion and reports to the Board.
- Recruitment to the Board will actively seek people with lived experience of the communities we serve, including care-experienced and justice-experienced adults, alongside the professional skills the Board needs.
- Anti-racism is treated as a governance risk and recorded on the risk register with named owners and mitigations.

6.2 Our workforce and volunteers

- Recruitment will use structured, scored criteria, diverse panels where practicable, and anonymised applications at shortlisting stage wherever the system allows.
- We will monitor the ethnicity of applicants, shortlisted candidates and appointees, and investigate any point in the process where candidates from a particular group fall away.
- Progression, development opportunities, pay decisions and access to senior roles will be monitored for racial disparity.
- We will not require staff or volunteers from racially minoritised backgrounds to carry unpaid, unrecognised responsibility for the organisation's anti-racism work.
- Staff and volunteers experiencing racism at work will be supported, believed and protected from victimisation.

6.3 Our work with young people

- Programme design, referral routes and outreach will be reviewed to ensure they reach young people who are underserved, not only those who are easiest to engage.
- We will monitor participation, retention and outcomes by ethnicity and act on unexplained gaps.
- Our curriculum, materials, imagery and guest contributors will reflect the heritage and lived reality of the young people we work with, without reducing them to stereotype.
- Young people will be told, in language they understand, that racism is not acceptable at the Foundation and how to report it.

- Where a young person discloses racism experienced elsewhere — at school, from police, from an employer, online — we will take it seriously, record it, support the young person, and where appropriate and with consent, advocate on their behalf.
- Behaviour management will be applied consistently, and we will check that sanctions and exclusions from our own provision are not falling disproportionately on particular groups.

6.4 Partners, funders and suppliers

- We will share this policy with delivery partners and expect equivalent standards from organisations working with our young people.
- We will raise concerns with partners, schools, commissioners and funders where their practice produces racially unequal outcomes for our young people, and we are prepared to withdraw from arrangements that cause harm.
- We will not accept funding or partnership on terms that require us to be silent about racism affecting our beneficiaries.

7. Responsibilities

The Board of Trustees owns this policy, approves it, monitors its implementation and holds the senior leadership to account for outcomes.

The Chair of Trustees ensures anti-racism remains a standing governance priority and that the Board receives honest reporting, including bad news.

Senior leadership is accountable for putting the commitments in section 6 into operational practice, for resourcing training, and for the quality and timeliness of incident responses.

Line managers and session leads must model expected behaviour, intervene when they witness racism, and escalate rather than manage serious incidents informally.

All staff, volunteers and trustees must comply with this policy, challenge or report racism they witness, and cooperate with any investigation.

The Designated Safeguarding Lead takes the lead where a racist incident involves a child or adult at risk, and applies the Safeguarding Policy alongside this one.

8. Reporting racism

Anyone may report racism: a young person, a parent or carer, a member of staff, a volunteer, a partner or a member of the public. Reports may be made:

- To any member of staff or session lead, who must pass it on the same day.
- To the Designated Safeguarding Lead where a child or adult at risk is involved.
- To the senior leadership, or directly to the Chair of Trustees where the concern involves senior staff.
- Anonymously, or through a third party such as a parent, teacher or advocate.

No one will be penalised for making a report in good faith, including where the report is not upheld. Deterring, discouraging or retaliating against a person who reports racism is itself a disciplinary matter.

Young people will be offered a route that does not require them to report to the person they have a concern about, and will be supported by a trusted adult of their choosing where possible.

9. Responding to a racist incident

Our response will be prompt, proportionate and centred on the person harmed.

- Immediate: ensure the safety of the person affected, stop the behaviour, and offer support. Where a criminal offence may have occurred, discuss reporting options with the person affected and, if a child is involved, follow the Safeguarding Policy.
- Within one working day: record the incident on the incident log with date, people involved, account given and action taken. Notify the Designated Safeguarding Lead and senior leadership.
- Within five working days: agree an investigation route — restorative, disciplinary, safeguarding or a combination — and inform the person who reported it of that route and expected timescale.
- Throughout: keep the person affected informed, offer support including time off, external counselling or pastoral support, and do not require them to sit in mediation with the person who caused the harm.
- At conclusion: record the outcome, feed back to those involved so far as confidentiality permits, and identify any change to practice, training or process needed to prevent recurrence.

Outcomes may include an apology and restorative process, training or supervision, redeployment, disciplinary sanction up to and including dismissal, removal of a volunteer or trustee, termination of a contract or partnership, exclusion from our provision, or referral to the police or a statutory body.

Where a young person is the person causing harm, our default is an educative and restorative response appropriate to their age and understanding, applied consistently and without adultification. This does not prevent us from excluding a young person where the safety of others requires it.

Serious incidents will be reported to the Board, and to the Charity Commission as a serious incident report where the reporting thresholds are met.

10. Racism from third parties

Our staff, volunteers and young people should not have to absorb racism from members of the public, service users' families, other agencies or partner organisations as a normal part of the work. Where this occurs we will support the person affected, record the incident, and take it up with the third party or their employer. We reserve the right to withdraw from a venue, contract or partnership where a third party will not address racist conduct.

11. Training and development

- All trustees, staff and regular volunteers complete anti-racism training as part of induction and refresher training at least every two years.
- Training covers recognising racism including microaggressions and institutional patterns, bystander intervention, adultification bias, and how to receive a disclosure well.
- Session leads and managers receive additional training on responding to and investigating incidents.
- Training is recorded, and completion is monitored by the senior leadership and reported to the Board.

12. Monitoring and accountability

- We collect and analyse ethnicity data for our workforce, trustees, volunteers and programme participants, on a voluntary and confidential basis and in line with UK GDPR.

- We report annually to the Board on workforce and participation data, incidents reported and their outcomes, training completion, and progress against the actions in this policy.
- We publish a summary of our anti-racism progress in our annual report.
- We seek direct feedback from young people, families and staff on whether the Foundation feels like a place where racism is challenged, and we act on what we hear.
- Where the data shows disparity, we will name it and set a corrective action with a named owner and a deadline, rather than restating our commitment.

13. Related policies

This policy should be read alongside the Equality, Diversity and Inclusion Policy, Safeguarding and Child Protection Policy, Code of Conduct, Grievance and Disciplinary Procedures, Whistleblowing Policy, Complaints Policy, Recruitment and Selection Policy, and Data Protection Policy.

14. Approval

This policy was approved by the Board of Trustees of the Rudolph Walker Foundation and takes effect from the date of approval.

Signed: *Deji Adeosun*

Name: Deji Adeosun

Position: Chair of Trustees

Date: 10 October 2025