

## Anti-Racism Practice Standards



CITY OF LONDON CORPORATION

DEPARTMENT OF COMMUNITY & CHILDREN'S SERVICES  
PEOPLE'S DIRECTORATE

## Preface

These standards are to be viewed alongside the City of London People Directorate's Anti-Racist Statement. They have been approved by the People Directorate Senior Management Team. With thanks to Hackney Children Services whose Children Services Anti-Racism Practice Standards were shared to help develop these City of London standards.

It is hoped that these practice standards, while specific to the People Directorate, could be used by other Directorates and Departments in the City of London Corporation as part of the broader anti-racism work being undertaken.

## City of London People Directorate Anti-Racism Position Statement

*"City of London People Directorate is committed to eradicating systemic racism, discrimination, injustice, making anti-racism a foundation of our practice. We will be a voice and force for change, for every child and family, adult and older person that we work for and with, to recognise and address the impact of racism on them within our practice, to apply our anti-racist principles in all of our interactions with and decision-making about them and to determinedly and actively, demand the same from our partners. We will be committed to calling out racism, discrimination, microaggressions and will ensure that this is addressed at all levels in the council to ensure that children and their families, adults and older people and the workforce are supported and valued.*

*Within City of London People Directorate, we acknowledge the harm and impact of racism and that the experience of our Black staff and those from other global majority ethnic groups, is not the same as that of our white staff and we are committed to ensuring that all voices are represented and heard at every level providing support to staff who experience work-based racism and microaggressions. To that end, making sure that our workforce reflects the community we serve, especially at a leadership level".*

In the City of London People Directorate we share a mutual expectation that every member of our service takes responsibility for their own learning and development with respect to anti-racist, anti-oppressive practice. We hold a further expectation that all staff will join us in creating a culture of critically reflective practice.

We recognise that discrimination experienced by children and their families, adults and older people is impacted by their intersecting identities and, while these are 'anti-racist' practice standards, it is our hope that staff will use this document as a guide to take a proactive anti-racist stance, but also use this as the foundation of an intersectional approach. As a result, this document should not and cannot be seen as a checklist that guarantees an inclusive practice.

Anti-racism is a process of actively identifying and opposing racism. The goal of anti-racism is to challenge racism and actively change the policies, behaviours and beliefs that perpetuate racist ideas and actions. We understand that race has always been present within our work, however, we need to get better at discussing these matters. We acknowledge that, for some, this might result in discomfort, and we remind you that growth takes place outside of our comfort zones, as we are beginning to question our own beliefs and assumptions about ethnicities and cultures.

In these standards, and in our practice, we do not use the term 'ethnic minority', as we recognise that people who experience the negative impacts of racism are from the global majority. We recognise that language is constantly evolving, and that there are valuable debates about many of the terms used in these standards. We welcome this, and these debates will continue to inform the



review of these standards. These standards represent City of London People Directorate's current preferred language.

**We expect all members of the City of London People Directorate to:**

- Acknowledge that we live in a racist society and know that, within a racist society, it is not enough to be non-racist: in our practice we must demonstrate that we are actively anti-racist;
- Educate themselves about anti-racist practice through self-directed learning;
- Participate in opportunities together to talk and think about their own and each other's anti-racist practice;
- Recognise that, in creating an anti-racist workplace, we will all experience moments of vulnerability, both for those speaking up about hurt personally experienced or witnessed, and for those needing to hear those statements, acknowledge them, and repair the harm.

**We expect all leaders across the People Directorate to continually demonstrate the following:**

- Proactively seek feedback using a variety of approaches that encourages feedback from everyone in their area of responsibility in relation to anti-racist practice;
- Receive criticism or concerns raised as a call to action and respond in a timely and constructive manner;
- Role model our Anti-Racist Practice Standards and hold those you manage to account, while supporting those you lead to meet these standards.

**What outcomes are we aiming to achieve with these Standards?**

- We want our children and families, adults and older people from the global majority to be active participants in all interventions, in a way that ensures they are treated with dignity and respect;
- We want to build a two-way learning experience that acknowledges the unique struggles that children and families, adults and older people face because of society and/or the systems that place them at a disadvantage due to their culture and/or ethnicity;
- We want our families to be willing and able to raise their concerns about racism and discrimination, because they can be confident that we are an organisation that takes this issue seriously;
- We want to reduce the disproportionality in our system, so that the cultural and ethnic background of the children and families, adults and older people that we work with in our system is proportionate to the diversity of our community;
- In wanting to ensure that there is a common purpose across the People Directorate, we want all our staff to engage in the use of these practice standards. And in doing so, we want our staff to feel confident and competent in challenging racism in all its forms, on behalf of our children and families, adults and older people.



# 1 How we work with children, families, adults and older people – the standards

- 1.1 We understand that racial and cultural stereotypes and prejudices – conscious and unconscious – underpin structural racism within our society and organisations, and we are all susceptible to these. We also recognise the specific impact of racism, for example, in relation to self esteem, internalised oppression, inequality/equal opportunities, racial harassment and bullying. To address this, we respect that children and families, adults and older people are the experts in their own lives, and we start from a position of not knowing. When we begin work with a child and family, adult or older person from a background that we are not familiar with, we take time to learn about their cultural frames of reference. At the same time, we understand that, within each culture, there are a myriad of stories and beliefs and that the ways in which each child and family, adult and older person interprets these will be unique.
- 1.2 We ask children and families, adults and older people whether English is their first language. If not, we always offer to provide an interpreter in a preferred language, and for the family or individual to take the lead in determining the role of the interpreter in their interactions. We understand that there are many reasons families and individuals might express that they do not need an interpreter, when in fact they may benefit from one. This could include that: they have sufficient English; they feel too embarrassed to admit that they need one; they may not want to cause any ‘trouble’; or they may be reluctant to ‘expose’ their personal stories to another person, particularly if their local cultural community is small. We accept that the onus is on us – not them – to ensure that we are communicating in a way that makes sense. This is why we are interested in the details – for example, which dialect a family or person speaks, or the language or languages they use with friends and loved ones.
- 1.3 We ask children and families, adults and older people to describe to us – in their own words – how they self-identify their culture and ethnicity.
- 1.4 We are curious about cultural heritage and customs for children, families and individuals, and how these shape them and the world as they see it.
- 1.5 We recognise that we will be perceived as representatives of our service and, at times, more widely as agents of the state. We understand that families’ and individuals’ experiences of racism – overt and covert – will inform how they respond to us and, therefore, how we must approach our attempts to engage with them. This might include fear of and resistance to our involvement, which can be based on legitimate concerns about disproportionality, histories of state brutality and discrimination, and stories that may have been shared in families and communities about the real risks of state involvement.
- 1.6 We responsibly initiate and validate conversations with children and families, adults and older people about their experiences of racism, big and small. We ensure that our practice is changed and improved on the basis of what we learn from these conversations. We advocate for our families, adults and older people where they are experiencing racism in the wider system.



1.7 Within our Children's Social Care and Early Help Service and our Education and Early Years Service we use the systemic model to examine and reflect on our own beliefs and biases and what we bring to every interaction we have with children and families. We will share our understanding of the Social GGRRAACCEESSS (Gender, Geography, Race, Religion, Age, Ability, Appearance, Class, Culture, Ethnicity, Education, Employment, Sexuality, Sexual Orientation, Spirituality) with all colleagues in the People Directorate to help inform their practice. In our Adults and Homelessness services we will use strength-based approaches that are underpinned by the principles set out in the Social GGRRAACCEESSS. See British Association of Social Workers 2000.<sup>1</sup>

1.8 We recognise the inherent power dynamics in the context of our work and that, because of their experiences of inequality, individuals and families from the global majority may feel less confident to challenge us and other professionals. In this context, we commit to clearly explaining our processes verbally and in writing, including our complaints process.

We ensure that children and families, adults and older people know their rights, and we support them in accessing advocacy services if they are struggling to make their voices heard.

1.9 We understand that the use of professional jargon and abbreviation is disempowering for families and individuals. We consider this in the context of those families and individuals who experience racism, who are already disempowered by our society and systems. We are committed to using clear, straightforward language in all our communication with and about children and families, adults and older people.

1.10 We are clear in our commitment to safeguard all children and adults in the City of London, in a way that promotes their identities, heritage and freedoms. This means we seek to offer solutions that fit with children and families, adults and older people and their heritage and values, and work in ways that support this. It also means that we will not allow neglect or harm to be done to children and adults in the name of religion or culture, and we will promote the safety and wellbeing of any child or adult and older person referred to us.

1.11 When working with vulnerable children and young people, we are alert to the risk of 'adultification'. This term describes how preconceptions of children (specifically Black children) may lead to them being treated and perceived as being more adult-like. We understand that if Black children are seen as less vulnerable and more adult-like, services may overlook their needs and disregard their legal rights to be protected, supported and safeguarded.

<sup>1</sup> BASW, 2002: [Social Graces: A practical tool to address inequality](https://www.basw.co.uk/social-graces) | [www.basw.co.uk](https://www.basw.co.uk)



## 2 How we talk about people

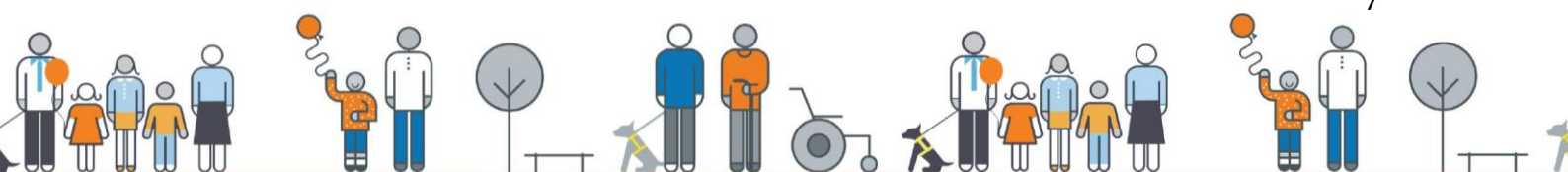
- 2.1 We use the term 'ethnicity', rather than 'race', in acknowledgement that 'race' is a social construct used to support racism. With that in mind, we use the word 'dual heritage', rather than 'mixed race'.
- 2.2 We use the language children and families, adults and older people use about themselves when describing identity.
- 2.3 We have conversations with all our children and families, adults and older people that invite them to share specific details about their heritage, culture and values. We recognise that terms like 'White', 'Black' and 'Asian' may have been used to collect data but do not always come from the families and individuals themselves, and are often too generic to be respectful or informative when we assign it to others.
- 2.4 When we have had these conversations, in our recording, we do not generalise. If someone shares the specific country or countries from which they or their extended family originates, we record this. Where relevant, we note whether someone is first, second, third or more generation in the UK. For example, if we learn that an individual's paternal and maternal grandparents were born in Jamaica, but migrated to the UK before having children, we say so. If we learn that someone's mother is from Ghana and their father is from Nigeria and they met and married in South Africa, before moving to London and having children, we say so.
- 2.5 We understand that the global majority are more likely to have had negative and discriminatory or racist assumptions made about them over time. With this in mind, we do not simply recycle information from previous records without giving individuals and families the opportunity to comment on, clarify and/or correct the content. Where there is a need to make use of historical documents containing harmful language, we will recognise this and amend/qualify/repair as needed.
- 2.6 Our Children's services teams use the systemic model of the Social GRRRAACCEESSS to critically examine how our beliefs and biases may influence the way we view children and families and interpret their behaviour, as well as the way they view us and interpret our behaviour.
- 2.7 This includes challenging each other to consider counterfactual scenarios such as 'If this child were a Nigerian boy rather than a white English girl, how would it change the way we're talking about them now? Why? Does that reflection help us highlight any assumptions, bias or stereotypes in our thinking and practice that we can now address?'
- 2.8 We are mindful of the power of language to contribute to the construction of damaging narratives about individuals and families.
- 2.9 Wherever possible we avoid the use of behavioural labels that can trigger preconceived ideas related to racism, such as 'aggressive', or 'emotionally unavailable'. Instead we describe patterns of behaviour in detail.





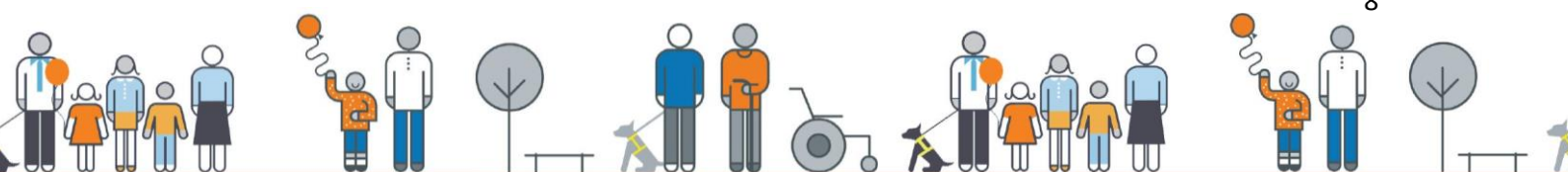
- 2.10 We are aware of dominant, ethnocentric, Western ideas that contribute to a system where 'different' behaviour can be labelled as problematic. For example, a young person speaking loudly, showing emotion, or avoiding eye contact may be described as 'aggressive' or 'disrespectful' in a Western context, but may alternatively be described as being passionate or assertive or lacking confidence.
- 2.11 We are proactive in considering the multiple contexts informing the ways children and families, adults and older people express themselves to enable us to take an ethnorelative position.\*
- 2.12 Our Children's services teams recognise that there are cultural differences in raising children and there is not a 'one-size-fits-all' blueprint for parenting.
- 2.13 When working with families from the global majority, we proactively consider whether our expectations are that they fit in with white-centred experiences and expectations of parenting, or our own personal experiences and expectations of parenting, rather than recognising and respecting differences, and how this may inform our safeguarding decisions both in terms of risk and celebrating strengths.

\* An acquired ability to see many values and behaviours as cultural rather than universal.



### 3 How we advocate for children, families, adults and older people

- 3.1 We actively embrace our role as powerful advocates in the system for children and families, adults and older people who experience racism. We accept a responsibility to support other professionals to challenge their own individual and institutional biases and assumptions.
- 3.2 When we are told about or observe racism – overt or covert – we will name this as ‘racism’ and we will support individuals or families to access the complaints processes and, where necessary, to escalate concerns to partner agencies to challenge and create change for those individuals or families.
- 3.3 We will log all incidents and observations of racism in the system to continue to support the discussion about and development of an anti-racist practice approach across the safeguarding partnerships in the City of London. Each Head of Service has access to this log, and staff should share their concerns with their Head of Service to gain advice on addressing the incident, ensure an impactful outcome, and log the concern.
- 3.4 We recognise that different organisations are at different stages of learning about structural and everyday racism, and our conversations should support the learning and embedding of anti-racist practice across the system. We expect professionals to wish to learn about and engage in such discussions to create change for our children, families, adults and older people.
- 3.5 If we meet with a professional or agency who is not willing or able to engage in a discussion about observed racism/microaggressions following observations of racism in practice, we will use the City and Hackney Safeguarding Children Partnership (CHSCP) or the City and Hackney Safeguarding Adults Board ‘Escalation of Concerns’ protocols to create change.





## 4 How we respond to feedback from families, adults and older people

- 4.1 When an individual or a family tells us that they feel they have experienced racism and/or discrimination from us, their complaint will be acknowledged and investigated promptly in accordance with statutory timescales. The complaint will be investigated impartially and confidentially. This will automatically trigger a review of the incident/event by the relevant manager who will investigate, with a staff member from a Black or global majority background to quality assure the complaint.
- 4.2 Complaints around racism or discriminatory behaviour are rarely in response to a definable incident; they are often broader, about the individual's or family members' general experience of the service. Our complaints process will acknowledge this and explore the influence of bias (conscious or unconscious) and structural racism and the impact of this on the complainant, rather than simply seeking to 'prove' or 'disprove' that racism or discrimination has occurred.
- 4.3 In parallel with the complaint investigation, or as a result of the outcome, performance management may be triggered where required. Upheld complaints should be addressed within the existing disciplinary procedures.
- 4.4 Where there are concerns that anti-racist or anti-discriminatory best practice has not been adhered to, all staff are encouraged to follow the council's bullying and harassment policy.
- 4.5 When an individual or family tells us that they feel they have experienced racism and/or discrimination, we acknowledge the importance of ensuring that their experience is validated, and the need to accept their experience and offer to learn from this. We will arrange for a case audit to be undertaken to review further learning.

## 5 How we respond when an individual makes a disclosure of racism, including in a meeting context

- 5.1 We will ensure that our commissioning arrangements and partnership agreements make clear our expectations of acknowledging the reality and impact of structural and everyday racism and our expectations of partner agencies taking forward proactive anti-racist practice.
- 5.2 As the lead agency for child and adult safeguarding and wellbeing, we will maintain accountability for the experiences that children, families, adults and older people have in the context of agencies that we commission to support them, and will also hold commissioned agencies to account to our Anti-Racist Practice Standards.
- 5.3 Throughout our work, we will proactively and regularly engage individuals and families in discussions about their experiences, including in relation to racism and discrimination and the impact of this on them. We will clearly acknowledge the reality of their lived experiences of racism in the context of structural and everyday racism.



- 5.4 Officers will support children, families, adults and older people in preparing for meetings with others where they wish to talk about their experiences of racism. Where this is planned, we will ensure that all other professionals are prepared for this discussion with a clear partnership agreement led by the Chair of the meeting acknowledging and accepting the individual's and/or families' perspectives and the reality of their experiences of racism.
- 5.5 We will respond to disclosures about racism by children, families, adults and older people as we would do about all other forms of harm – treating this harm as a safeguarding issue. We will take their concerns seriously and prioritise their emotional and psychological safety and wellbeing while enquiries, investigations and actions take place.
- 5.6 If a disclosure is made unexpectedly in the context of a meeting, we will listen to the individual or family, acknowledge their bravery in being able to speak out and share their views. We will let them know that their concerns will be taken seriously and investigated, and that they will be included and kept informed at all times.
- 5.7 We will inform partner agencies in the meeting that it is important to acknowledge the individual's lived experiences, encouraging partner agencies to share positive messages of support and acknowledgement, and be clear that an investigation will take place after the meeting. It is not appropriate for these enquiries to start in front of the individual, given the risk of further traumatising them should professionals respond defensively or be in denial.
- 5.8 Where an organisation has been identified as experiencing concerns about racism, the lead for the investigation will be a senior member of staff from within that organisation. If the concerns are about more than one agency then senior leads will need to be appointed from each agency to work in partnership to undertake an investigation. We will share our Anti-Racist Practice Standards with those agencies and ask that their investigation take a position that is consistent with our principles (acknowledging the reality of racism within our practice and our organisations) rather than defaulting to a defensive response focusing on the availability of so-called 'evidence'.
- 5.9 In the context of children and families, and in line with Local Authority Designated Officer (LADO) guidance, any serious allegations of harm by a child should be referred through to the LADO to bring together multi-agency investigations and to oversee the investigation.
- 5.10 We will meet with the child, adult, or older person after the meeting to explore how they feel, and look at the options for supporting them in response to the trauma of racism in the short, medium and long term. The lead professional (e.g. Social Worker) may need to access advice and guidance and/or specialist help to ensure that the support provided to the individual is effective in dealing with racialised trauma.
- 5.11 We will ensure that there is an immediate safety plan for the individual following their disclosure, and identify a trusted adult who can support them to process their experiences, develop and enhance their self-esteem, belonging and sense of identity.



- 5.12 We will ensure that a verbatim statement of the individual's disclosure is recorded in writing, that they are provided with a copy, and confirm with them that what we have recorded and what they have said is accurate.
- 5.13 We will have an initial conversation with professionals after the meeting about next steps – are there immediate actions they need to take? Are there clear learning needs in respect of understanding racism and anti-racism for the professional/agency that need to be promptly addressed?
- 5.14 We will also send a formal letter to the partner agency or agencies about whom concerns of racism have been raised, and ask them to investigate, ensuring that this is undertaken from the position of acknowledging and understanding the child's, adult's or older person's lived experiences of structural and everyday racism.
- 5.15 We will ensure that the outcome of the investigation is shared sensitively with the child, family, adult or older person, including any non-confidential actions that will be taken to address their concerns.
- 5.16 We will plan monitoring and review points in respect of the individual's experiences of racism and anti-racist practice by partner agencies following the completion of the investigation.
- 5.17 We will provide a support space for staff who experience racism, including for contracted staff. We are aware that our service users have often experienced trauma, and for reasons of addiction/illness/circumstance are not willing or able to manage their behaviour. However, it is not the intention that matters, it is the impact of racism that is important. We will report racist incidents as health and safety incidents.

6 How will we know that these standards are being adhered to?

- 6.1 We have a rolling quality assurance programme that measures compliance against these standards. This includes:
- Including the compliance of these standards in our Children and Family Quality Assurance Plan, and via the Adult Social Care Quality Assurance Framework
  - Individual and family feedback
  - Feedback from young people – for example, through the Children in Care Council
  - Staff surveys
  - Complaints reviews.

