



ANTI-RACISM POLICY

June 2026



Approval: Academy Council

Policy Owner: Principal

Linked Policies: Safeguarding & Child Protection; Behaviour; Anti-Bullying; Equality Objectives; Equal Opportunities (Students); Staff Code of Conduct; Complaints; EDI Investigation Toolkit

This policy should be read alongside the School Behaviour Policy, which sets out the full range of sanctions available for serious discriminatory behaviour.

Review Cycle: Annual

1. Statement of Intent

Madeley School is committed to being actively anti-racist, not simply non-racist. We recognise that racism can be overt, subtle, systemic or unconscious and that its impact can be significant regardless of intent. We are committed to identifying, challenging and removing racism in our culture, curriculum, systems and daily practice so that all members of our community experience safety, dignity, belonging and opportunity.

We expect all pupils, staff, Academy Councillors, volunteers, parents/carers and visitors to contribute to a culture of respect, fairness and accountability. Racism, racist language or behaviour, and the minimisation or dismissal of racist harm will not be tolerated. Our approach is rooted in fairness, accountability and education.

Madeley School operates a zero-tolerance approach to racism.

Any racist language, behaviour or incident will be treated as serious misconduct.

Where evidence indicates that racism has occurred, the school will take decisive action, which may include suspension or, in the most serious or repeated cases, permanent exclusion, in line with statutory guidance and the school's Behaviour Policy.

This policy sits alongside, but is distinct from, the school's wider Anti-Discrimination & Equality Policy, recognising that racism requires a specific and focused response.

Zero tolerance does not mean automatic exclusion in every case; it means that all incidents are taken seriously, acted upon and addressed consistently, with responses proportionate to the nature and severity of the behaviour.

This policy is underpinned by the Equality Act 2010, which provides the legal framework for protecting individuals from discrimination and promoting equality of opportunity.

2. Aims

This policy aims to:

- Prevent racism and racist bullying through culture, curriculum and leadership.
- Provide clear shared language and definitions.
- Establish transparent reporting and response procedures.

- Ensure consistent recording, monitoring and governance oversight.
- Support those who experience racism and educate those who cause harm.
- Embed anti-racist practice within safeguarding, behaviour and equality work.
- Promote staff confidence and pupil voice in challenging racism.
- Move beyond compliance toward sustained cultural change.

3. Scope

This policy applies to:

- All pupils and students.
- All staff (teaching and non-teaching), agency staff and contractors.
- Governors/Academy Councillors and volunteers.
- Parents/carers and visitors.
- All school contexts including onsite, offsite, educational visits, transport, online learning and school-related social media.

4. Definitions

4.1 Racism

Prejudice, discrimination or antagonism directed at an individual or group based on race, colour, nationality, ethnic or national origin, culture or heritage. Racism can be individual, institutional or systemic.

4.2 Racist Incident

Madeley School adopts the principle that a racist incident is any incident perceived to be racist by the victim or any other person.

Incidents are recorded and then investigated. Perception is taken seriously and not dismissed. While perception is taken seriously and incidents are recorded on this basis, decisions regarding outcomes and sanctions are made following investigation, based on the evidence available and the balance of probabilities.

4.3 Racist Bullying

Repeated or targeted behaviour motivated by race or ethnicity that causes harm, fear or distress. A single serious incident may also meet this threshold.

4.4 Impact Over Intent

Phrases such as “I didn’t mean it” or “it was only banter” do not negate harm. Impact takes precedence over intent.

4.5 Everyday Racism and Microaggressions

Includes assumptions, stereotypes, silences, coded language and cumulative small harms. These are addressed proactively and not only when incidents escalate.

5. Applying an Anti-Racist Lens Across School Practice

Anti-racism is not confined to a single policy. It is a lens applied consistently across all key areas of school life.

Safeguarding

- Recognising racist harm as potential emotional harm. This includes recognising that racism may constitute emotional harm and ensuring patterns of racialised behaviour are identified and addressed through safeguarding processes.
- DSL involvement where thresholds are met.
- Safety planning and wellbeing support for targeted pupils.

Behaviour & Anti-Bullying

- Recording racist incidents distinctly.
- Proportionate sanctions alongside education and restorative work.
- Challenging “banter” and coded language consistently.
- This includes explicitly identifying and challenging racist language, behaviours and patterns, ensuring they are not minimised or treated as generic incidents.

Curriculum & Teaching

- Diverse and accurate representation. This includes actively identifying and addressing racial bias, representation gaps and stereotyping within curriculum content and delivery.
- Avoiding deficit narratives and stereotyping.
- Planned opportunities to explore identity, belonging and global context.

Pastoral Systems

- Monitoring incident patterns and hotspots. This includes monitoring racial patterns in behaviour, experience and belonging, and responding proactively to any identified disparities.
- Regular pupil voice and belonging surveys.
- Targeted interventions where needed.

Staff Conduct & Culture

- High expectations for professional language and challenge.
- Ongoing CPD on microaggressions and bias.
- Collective responsibility and not delegated ownership.
- This includes developing staff confidence to recognise, challenge and reflect on racial bias, including unconscious bias and microaggressions.

Governance & Accountability

- Termly anonymised incident reporting. This includes ensuring that data on racist incidents is scrutinised specifically to identify trends, disparities and areas for improvement.
- Policy review informed by data and feedback.

6. Roles and Responsibilities

Academy Council

- Approve and review the policy.
- Receive termly anonymised reports.
- Hold leaders to account for impact.

Principal

- Overall accountability.
- Ensures alignment with safeguarding and behaviour.
- Reports to Trust and Academy Council.

Senior Leadership Team

- Lead prevention, training and monitoring.
- Quality assures records and responses.
- Nominate a Single Point of Contact for complex cases. A named member of the Senior Leadership Team will act as the **Anti-Racism Lead**, with oversight of this policy, monitoring of incidents, and responsibility for escalation where required.
- The Anti-Racism Lead will also oversee the quality assurance of investigations and outcomes to ensure consistency, fairness and alignment with this policy.

This ensures consistency, accountability and clear leadership.

Designated Safeguarding Lead

- Advises where incidents meet safeguarding thresholds.
- Coordinates multi-agency responses. The involvement of external agencies will be determined on a case-by-case basis, depending on the nature and severity of the incident.

This may include, but is not limited to:

- Police (in cases of suspected hate crime or criminal behaviour)
- Local Authority safeguarding teams
- Prevent or safeguarding partners where relevant
- Specialist support services (e.g. hate crime support organisations)

Parental consent will be sought where appropriate, unless there is a safeguarding reason not to do so.

Heads of Year / Pastoral Leaders

- First line response.
- Family communication and follow-up.

All Staff

- Challenge racism immediately.
- Record accurately.
- Model inclusive language.

Pupils

- Treat others with dignity and respect.
- Report concerns.
- Contribute to pupil voice forums.

7. Prevention and Culture

- Curriculum representation and diversity.
- Regular staff CPD.
- Student voice and leadership opportunities.
- Inclusive displays and messaging.
- Assemblies, PD and tutor activities addressing belonging and identity.

8. Reporting Routes

Incidents can be reported by pupils, staff or parents/carers via:

- Trusted adults or pastoral staff.
- Anonymous reporting routes.
- Email or telephone.
- Behaviour/safeguarding recording systems.

No retaliation for reporting concerns will be tolerated.

9. Responding to Incidents – Procedure

1. Immediate Safety and Support
2. Record promptly as racist where perceived.
3. Investigate proportionately.
4. Communicate with families.
5. Sanctions and Education applied together.
6. Follow-Up and Monitoring

Investigation Methodology

All investigations involving behaviour, safeguarding or complaints must be conducted using the Madeley School Equality Lens Investigation Toolkit (Appendix E). Investigations will normally be completed within **3–5 school days**, unless

complexity requires otherwise. Parents/carers will be kept informed where delays occur.

This ensures:

- Decisions are fair and proportionate
- Equality duties are actively considered
- Language is neutral and evidence-based
- A clear audit trail exists for governors or external review

10. Thresholds and Escalation

Low-Level: Challenge, record, educate. Low-level racist incidents may include isolated comments, language or behaviours that are perceived to be racist but do not form part of a repeated pattern or cause significant harm.

Examples may include:

- Use of inappropriate or stereotypical language
- Casual or “banter-based” comments with racial undertones
- Misuse of terminology without full understanding

These incidents are still taken seriously, recorded, and addressed through education and restorative work.

Repeated: Formal sanctions, SLT oversight.

Severe/Safeguarding: DSL involvement, external referral if required.

Racist incidents are treated as serious breaches of the school’s Behaviour Policy.

Where an investigation concludes, on the balance of probabilities, that racist language or behaviour has occurred, the school may impose significant sanctions, including suspension.

Permanent exclusion may be considered where:

- The incident is severe,
- There is a pattern of repeated behaviour,
- There is serious harm or threat of harm,
- Or where the school believes continued presence would seriously undermine the safety or welfare of others.

The school’s decision-making threshold is the balance of probabilities, not the criminal standard of “beyond reasonable doubt.” Decisions are based on evidence, consistency and professional judgement, and are subject to senior leadership and Academy Council oversight. “Balance of probabilities” means that decisions are made based on what is more likely than not to have happened, based on the evidence available.

Where incidents may constitute a hate crime, the school may seek advice from or refer to the police.

Parents/carers will normally be informed and consent sought prior to referral.

However, in line with safeguarding responsibilities, the school reserves the right to proceed without consent where there is a risk of harm or where it is deemed necessary to protect individuals or the wider community.

Further detail on sanctions is set out in the School Behaviour Policy.

11. Recording, Monitoring and Governance

- Distinct racist incident logging
- Pattern analysis
- Termly anonymised reports to Academy Council
- Data informs CPD, supervision and curriculum adjustments

The Equality Lens Checklist within the Investigation Toolkit forms part of the evidence base for monitoring equitable practice.

All racist incidents are recorded on the school's safeguarding/behaviour systems and are visible to the Designated Safeguarding Lead for oversight and pattern monitoring.

12. Support for Those Targeted

- Pastoral and wellbeing check-ins.
- Safety planning where required.
- Access to counselling or external services.
- Avoid "moving the victim" as default.

13. Education and Consequences

- Proportionate sanctions.
- Structured re-education.
- Restorative approaches where safe and agreed.
- Escalation for repeated incidents.

14. Staff Conduct

Staff must challenge racism, avoid minimisation and escalate concerns appropriately. Incidents involving staff follow HR and professional conduct procedures.

15. Community and Partnership

Collaboration with families, Trust networks and external agencies to promote understanding and shared expectations

16. Complaints

Handled via the Complaints Procedure with equality considerations documented.

17. Review and Continuous Improvement

Annual review informed by:

- Incident data
- Pupil voice
- Staff feedback

- Community context
- Trust equality objectives

Appendices

Appendix A – In-the-Moment Response Scripts

- “We don’t use that language here.”
- “That comment is not acceptable, let’s pause.”
- “That could be hurtful even if you didn’t intend it.”
- “At Madeley we treat people with dignity and respect.”

Appendix B – Restorative Questions

For Harm Caused

- What happened?
- Who was affected?
- What could you do differently?

For Harm Experienced

- How did it make you feel?
- What do you need now?

Appendix C – Safe & Brave Spaces Principles

Safe: Respect, confidentiality, no ridicule.

Brave: Discomfort acceptable; disrespect not.

Boundaries: Harmful stereotypes not permitted; staff may pause discussion.

Appendix D – Anti-Racism Ambassador Terms of Reference

Purpose:

To support embedding the Anti-Racism Policy into everyday practice through staff support, pupil voice and data-informed improvement.

Line Management: Named SLT

Core Responsibilities

- Staff confidence and scripts.
- Curriculum “one-swap” encouragement.
- Pupil voice listening activities.
- Data pattern recognition.
- Support during community/global tensions.

- Promote reporting routes.

Not Responsible For

- Sanctions or exclusions.
- Sole ownership of anti-racism.
- DSL decision-making.

Outputs

- Termly summary report.
- Contribution to annual review.

Success Indicators

- Increased staff confidence.
- Clear incident recording.
- Positive pupil voice feedback.
- Evidenced curriculum adjustments.

Appendix E – Equality Lens & Investigation Toolkit

Mandatory reference document for all behaviour, safeguarding and complaint investigations

EDI - Investigation Toolkit

Purpose

To ensure investigations and decisions are fair, neutral, proportionate and bias-aware.

Core Components

- Equality Lens Checklist (protected characteristics and bias prompts)
- Neutral Language Guidance
- Investigation Fact Summary Sheet
- Welfare Follow-Up Form
- Parent-Facing Investigation Process Guide

Staff Expectation

Completion of the checklist and associated forms is expected for all significant incidents and attached to the pupil record / MyConcern as appropriate.