

**CFCCA**

CENTRE FOR CHINESE  
CONTEMPORARY ART

# **Internal Audit of Policies and Processes**

**People Management and Equality & Diversity**

# Executive Summary

The Centre for Chinese Contemporary Art (CFCCA) began life in 1986 and is a unique art gallery with a year-round programme of exhibitions, events and artist residencies orientated around Chinese culture. It has over 30 years' experience of working with artists and describes itself as the "go to place to discover new artists and explore relevant global issues from different international perspectives".

CFCCA's website declares that its 1997 move out of Manchester's China Town was a bold statement about the new direction of the organisation with a focus to encourage larger "mainstream" audiences to engage with Chinese arts. A subsequent 2001 grant from Arts Council England enabled CFCCA to consolidate its position and establish a flagship RIBA award-winning exhibition centre.

A CFCCA curator handed in their resignation on 16 January 2020 and left the organisation on 15 February 2020. In response to this resignation, a critical open letter was published in 2020 from a Chinese artist (who withdrew from one of CFCCA's projects). The letter appeared at a time of heightened anti-Chinese hostility around Covid-19 (Coronavirus) and made several criticisms and allegations of racism and an anti-Chinese atmosphere at CFCCA.

CFCCA made a decision to carry out a "revisioning process" in 2019. CFCCA stated that this process was delayed due to Covid until the autumn of 2020 and has not yet been completed. The organisation then commissioned an independent internal audit of its policies and processes (people management and equality &

diversity) at the start of 2021. The Diversity and Inclusion audit identified a number of failings in terms of CFCCA's approach to human resource management and to race/diversity.

The independent audit also found that the essence of the criticisms and allegations in the open letter about CFCCA correlate with the opinions expressed in interviews with current and previous staff and artists, and with the outcomes of examining procedural documents, among other things.

## Summary of headline findings of the audit

The investigation findings and conclusion are based on common participant views. All members of the organisation were able to impart and provide any information they wished to support the process. It is not within the scope of this process to judge participants' responses. At the time of this review the board gave explicit assurances that participants were free to disclose any information they wished to in a safe space. Some participants fed back issues of concern with Diverse Matters but were either unaware of their ability to, or unwilling to, make a formal complaint.

The scope of the review, as instructed by the commissioning Board members, considered historical as well as current issues. It is therefore not possible to include all specific dates. Comments are based on participants' feedback of their interactions with CFCCA over various time periods.

## Methodology

The review considered the following:

- \* Documentation submitted by the Board of Trustees
  - a) CFCCA Business Plan 2018-2022 Executive Summary
  - b) Appendix vi – Equality and Diversity Action Plan 2018-22
  - c) CFCCA Equal Opportunities Policy and Action Plan 2018-22
  - d) CFCCA Employee Handbook (May 2019)
  - e) Letter from staff regarding CFCCA racial representation
  - f) Letter in response to concerns of CFCCA racial representation
  - g) Staff feedback for Board equality audit – responses v2 (December 2020)
- \* Series of online letters, articles and open letter statements by freelance artists, and CFCCA's responses
- \* Completed questionnaires by individual staff team members (11) – developed by Diverse Matters (DM) and sent solely to DM to ensure confidentiality and anonymity
- \* Confidential one-to-one interviews – individual staff (9)
- \* Confidential one-to-one interviews – associate artists (5)
- \* Confidential one-to-one interviews – volunteers (3)
- \* SurveyMonkey questionnaires (9)
- \* Existing HR policy, practices and tools
- \* CFCCA job descriptions
- \* Board of Trustees feedback (2)

### 1. CFCCA's Business Plan 2018-2022

Self-reported performance on the five corporate objectives has, in the main, been positive. However, the success measures of these objectives are largely orientated around external stakeholders, without the corresponding focus on internal stakeholders' (staff) capability and commitment required to deliver these objectives.

Further, the lack of clarity around CFCCA's values, purpose and mission has caused confusion internally and risks an absence of staff commitment and motivation. Given that staff are often the most expensive asset in an organisation, CFCCA risks financial inefficiency without a well-developed strategic people management plan. A reconsideration of the Business Plan would also present an opportunity to review the revisioning programme and for CFCCA to provide clarity on its values, purpose and who it represents.

There was a reported lack of communication, an unstructured induction and change in organisational focus, and staff feedback suggested there is confusion around CFCCA's mission, value and purpose, resulting in a lack of understanding of their contribution or sense of achievement.

### 2. Staff Handbook

The Staff Handbook (reviewed by CFCCA's legal advisor before being issued), in the absence of relevant and established policies, does not provide accessible information, in a comprehensible and consistent manner, to ensure that everyone knows exactly what is required and expected of them. The policy documents adhere to equality and employment legislation, but these policies could be further enhanced with appropriate line manager and colleague guidance to ensure they are understood and implemented appropriately. In order to embed policy, it is good practice for guidance and learning to be put in place to support the policy process. This would also support equity, equality and transparency.

### 3. Terms and Conditions (employment contract)

CFCCA's Terms and Conditions reference several organisational policies and procedures that do not exist. Under these circumstances, CFCCA is at an increased risk of legal challenges on the management of its practices or abilities to hold employees to account.

#### 4. Equality and Diversity Action Plan

Although CFCCA states that it is an equal opportunities employer, equality practices appear to be superficial and without detailed understanding and analysis of how this plan could deliver sustainable, positive business outcomes and influence positive organisational culture.

There is insufficient comprehension of what equality/equity, diversity and inclusion mean and the benefits that these bring to the business. The words are referenced frequently, seemingly without knowledge of what they might denote in practice or how they can be embedded in CFCCA's (and its employees') ways of working.

Feedback from both individual staff and artists shows a perception that management has failed to respond adequately to concerns raised regarding lack of diversity. For example, concerns were acknowledged but the response was perceived to be inadequate or insincere. There was also a perception that management discretion in the application of people management processes led to inconsistencies and perceived unfairness and inequalities.

#### 5. HR policies and procedures

Both the Staff Handbook and the Terms and Conditions of Employment reference a series of people management processes despite the non-existence of such/specific policies to explain expectations and management procedures. These are listed in sections 4.3 and 5.5 of the report, but for clarity they are: probation procedure, staff appraisals, learning and development, recruitment and selection, pay and reward.

This presents an unacceptable level of subjectivity in the application of these processes and has created an environment of uncertainty and suspicion, causing stress, anxiety and questions in terms of fairness and management integrity.

#### 6. Lack of Chinese representation

For an organisation whose name, core output and raison d'être is "Chinese", there is overwhelming agreement that the lack of representation of people of Chinese heritage is a priority concern.

##### *Board representation*

At the time of the audit, 42% of Board members were of Chinese heritage, including the Chair, and over the past three years there was a 53% representation of Board members from non-white heritage.

##### *Staff representation*

At the time of the audit, one member of staff identified as being of Chinese heritage. Commencement into their role overlapped with the departure of a team member from a similar background.

##### *Artistic sub-committee representation*

The Artistic sub-committee was regarded as visibly representative of CFCCA's stakeholders (CFCCA stated that representation from Chinese and Black Asian and Minority Ethnic communities has, on average, been approximately 60% over the last three years).

The lack of representation, therefore, in what has been a predominantly "all white" staff team has led to a deficiency in leadership, poor morale/engagement, low cultural competency, and an inability to attract/retain talented staff.

#### 7. Leadership capability

Both at board and senior management level, leadership skills and expertise required to inspire and build a positive work environment needs to be enhanced in addition to maximising its resources. There is a noticeable lack of effective people management and inclusive leadership capability within the organisation, resulting in cultural resistance and fixed mindsets. There is also a high level of staff discontentment with leadership and management decisions and

actions which has, ultimately, created a culture of disharmony and mistrust. Along with the level of remuneration, this has been cited as the main reason for people leaving or wanting to leave the organisation.

The majority of staff, including those with line management responsibilities, reported not knowing or understanding standard people management processes, often deferring these to senior management for a decision. Staff and artists also reported management's resistance to change or to considering their suggestions to take a different approach. They perceived these to be either ignored or dismissed.

### **8. Lack of HR expertise**

Currently, HR responsibility is a 'bolt-on' to another role which it is incompatible with. HR expertise is crucial to developing, reinforcing, embedding and changing the culture of an organisation and should therefore be given greater prominence.

There was a general perception of a lack of internal HR expertise, which was acknowledged by senior management who advised that a forthcoming vacancy provided the opportunity to develop a full-time HR role.

### **9. Pay and reward**

Remuneration is the main reason for team members leaving or wanting to leave the organisation. The overriding belief of those who were interviewed was that salaries are not reflective of the demands of the roles.

Staff members received a 2% pay rise in April 2021 (this information has been made available after the initial writing of this report and Diverse Matters was not informed during the review).

### **10. Role (job description) design**

CFCCA job descriptions are lists of tasks to be undertaken, thereby not providing appropriate opportunity for flexibility, development or growth. It is also a notable omission that the

job descriptions contain no requirements for demonstrable experience, understanding or respect of/for Chinese culture. Neither are there any requirements for candidates to demonstrate competencies that would reveal a passion and commitment for diversity and inclusion.

### **11. Organisational culture**

Feedback from a number of participants who took part in this process stated that CFCCA's culture is one of mistrust and inequalities, driven by the lack of value and respect placed on people within the organisation and the clients it purports to represent.

The number of participants is listed in the full version of this report. The majority expressed the belief that decision-making was inconsistent, unjust and unfair, for example, the rationale behind how staff were allocated to work at weekends. This was reported as a longstanding and ongoing concern. No formal complaints were raised.

### **12. Organisational brand (reputation)**

Both internally (at all levels) and externally, there appear to be more negative perceptions of the organisation than positive. Those who have left (or are looking to leave) are unlikely to express positive views of their work experience. Externally, CFCCA has been on the receiving end of very serious allegations of racism from artists it has worked with. However, complainants (artists and team members interviewed) were either unaware of the Grievance or Whistleblowing procedures, or unwilling to formally raise their complaints.

Without breaching confidentiality of the participants, both staff and artists expressed a perception of racism (institutional and individual) and felt that CFCCA was reluctant to consider racism as a possible problem. Internally, no formal allegations were raised. Conversely, participants were positive about CFCCA's stated ambitions and the dedication and support of individual staff members.

## Summary of recommendations from the audit

### A. CFCCA Business Plan

CFCCA should, in the context of an aligned people strategy and leadership-driven EDI\* business approach, refine, develop and communicate its vision, values and objectives, providing clarity on its signature initiatives.

(\*EDI = equality/equity, diversity and inclusion)

### B. EDI knowledge, education and learning

CFCCA should acquire appropriate expertise to develop a continuous learning and development training programme to embed and mature equality/equity, diversity and inclusion within its ways of working. This should include a mandatory induction training programme, to include equality and diversity.

### C. Equality and Diversity Action Plan

CFCCA should revise its EDI Action Plan to ensure that EDI objectives are embedded in all strategic plans, systems and processes (including change management and engagement), and to incorporate suitable targets for staff and Board member representation from a Chinese background.

### D. Strategic (HR) Workforce Plan – employee lifecycle

CFCCA should review and put in place a full set of end-to-end HR policies and procedures that address the entire lifecycle of employment. These should inform the Terms and Conditions, Staff Handbook and training and development plan. As a priority (in conjunction with Summary Recommendation C) CFCCA should review its recruitment practices.

### E. Leadership capability

CFCCA should define its leadership competencies (including self-awareness and cultural competency); establish a Leadership

Development and Training Programme (which covers anti-racism and unconscious bias); review the staffing structure, which should include a requirement for the Director to have “in-depth knowledge and lived experience of Chinese culture and art”; and refresh the Board to reflect the necessary “diversity, inclusive leadership and commitment to Chinese culture/contemporary art”.

On 9 March 2021 the Board agreed to improve the representation of staff with knowledge and lived experience of Chinese culture and art. They also agreed to further refresh their endeavour to increase the proportion of people with Chinese and other Asian heritage. Note: this information was not made available during the review but by the Chair in June 2021.

### F. Communication and transparency

CFCCA should, in the context of openness, honesty and trust, establish a smooth and effective communication path to ensure timely and appropriate communication between the Board, senior management team and staff teams. CFCCA should also review and utilise the Revisioning Programme in this light. A similar approach should also be taken to engage with external partners and stakeholders, including the development of a procedure to ensure that all complaints are handled fairly, consistently, and wherever possible resolved to the complainant's satisfaction.

### G. Pay and reward

CFCCA should rethink and reposition its overall remuneration/reward strategy to ensure that it is able to attract and retain people with key talents who are committed to the organisation and its goals.

### H. Team structure and job descriptions

CFCCA should review the team structure in order to provide sufficient capacity to fulfil operational demands; consider work/life balance (and pay) for front of house cover; ensure the appropriate

resource is available to deliver expert leadership in areas where this is currently lacking (for example Chinese art/culture, HR, business operations); and review all job descriptions to reflect internal requirements and internal/external values.

### **I. Organisational culture and reputation**

CFCCA should seek to rebuild its culture and reputation by, among other things, redefining and openly articulating its mission and values; investing in and developing the staff team; demonstrating genuine respect for stakeholders; allowing the organisation to be held to account; embracing equality/equity, diversity and inclusion; and promoting psychological safety at work, particularly for an individual isolated by race and suffering the consequences of “onliness” – a term used to describe the “only” staff member with a different identity to their colleagues, for example the only female amongst men, or in this case the only non-white staff member in the team.

### **J. Volunteering**

Volunteers regard their experience at CFCCA to be positive, welcoming and beneficial to their development and progression to their chosen career. They found the experience rewarding, with a helpful and collaborative staff team, and where individuals tried to make the volunteering role a fulfilling one.

## **Conclusion**

The Centre for Chinese Contemporary Art has been delivering a notable service for three and a half decades, with significant points of success during that time. However, it has now reached a point in its journey where its reputation (and principles on which it operates) are in question.

Nevertheless, with determination and leadership CFCCA's current position is redeemable and the findings/recommendations are designed to assist the organisation to move forward to a new position that will allow it to retrieve the flagship position of respect and prestige that it previously held in the sector and with all relevant stakeholders.

This audit was produced for CFCCA by Diverse Matters in April 2021.

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**DIVERSE  
MATTERS**

### About Diverse Matters

Diverse Matters is a diversity and inclusion consultancy that works with organisations from all sectors to embed diversity and inclusion within their practices. We use a tailored approach to ensure that the services required meet the specific needs of the organisation and are fit for purpose as 'one size does not fit all'.

We are happy to support organisations at whatever stage they are in their diversity and inclusion journey.

The Diverse Matters team have several years' experience working within the diversity and inclusion field and in particular within the voluntary and public sector.

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