



LOCAL GOVERNMENT
**MULTICULTURAL
NETWORK**

National Anti-Racism Framework Submission by the NSW Local Government Multicultural Network

Executive Summary

The NSW Local Government Multicultural Network (LGMN) welcomes the opportunity to provide feedback and comments to the timely National Anti-Racism Framework. The LGMN is committed to the long-term journey the nation will be undertaking in addressing the complex issues around racism. Within our comments and recommendations we focus on ensuring the onus on building anti-racism pathways is not placed on the shoulders of people who are impacted by racism. We are also keen to support cultural and psychological safety mechanisms to be embedded throughout this process. We encourage the nation to listen, learn and to be led by First Nations people; their stories and experiences must be front and centre in the co-design and evaluation of this Framework. We are placing trust that accountability and transparency will be demonstrated at all stages throughout the process; and the LGMN will be working to champion the national outcomes identified by providing reputable expertise, connections to our diverse communities and our unwavering commitment to justice, truth telling, diversity and inclusion as part of our national identity.

Introduction

The NSW Local Government Multicultural Network (LGMN) commend the Australian Human Rights Commission (AHRC) on its leadership to develop a National Anti-Racism Framework and we welcome the opportunity to participate in the sector consultation process and provide a written submission detailing feedback on the National Anti-Racism Framework Concept Paper.

The LGMN consists of Council workers from across NSW, who either directly or tangentially support multicultural communities within their Local Government Area. The LGMN comes together to share information and best practises for working with multicultural communities, as well as to collaborate on cross-Council projects, deliver capacity building training, coordinate advocacy, and consult with State and Federal Government Agencies.

In response to the growing number of Covid-19 related instances of racism and the global Black Lives Matters movement, the LGMN established the New South Wales Anti-Racism

Working Group in June 2020. The membership of the working group comprises staff from Local Councils and Government and Non-Government Organisations (NGOs). In December 2020, the working group conducted [a Current Strategies in NSW research report](#) to investigate the best practice for anti-racism initiatives in Local Government areas in New South Wales.

What Principles should guide the Framework?

Comments on the draft principles in current Concept Paper

It is reassuring that the draft principles in the Concept Paper align with Australia's human rights obligations: the International Convention for the Elimination of All Forms of Racial Discrimination and is guided by the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Nevertheless, the Framework must strengthen its acknowledgement about how the past and current systems undermine Australia's commitment to our human rights obligations and articulate its commitment to adopting a truth telling approach about Australia's history that recognises, understands, and accepts the wrongs of the past and the impact of these wrongs on First Peoples, as outlined by the Uluru Statement from the Heart.

Education about the country's history, truth-telling

It is absolutely imperative that anti-racism change comes from positions of power. Racial literacy must already exist in these positions before organisational changes can be implemented and societal change can occur. This also needs to be combined with facing one's own white privilege and internalised racism. When those in positions of authority and those who have the power to create change within an institution or society have racial literacy, as mentioned by Croom (2016), it is much more effective when implementing change. Gillborn (2006) argues that 'racism be placed at the centre of analyses and that scholarly work be engaged in the process of rejecting and deconstructing the current patterns of exclusion and oppression.'

During the NSW Anti-racism Working Group discussion, it has also been highlighted that there needs to be a focus in the school curriculum to educate the broader community about the country's racist history such as the genocide of First Nations people, the stolen generations, the White Australia Policy; and to stop glorifying the country's colonial history. There needs to be systemic support and frameworks to implement specific training that tackles topics related to racism such as microaggressions, systemic racism, being an ally, accomplices, and co-conspirators. There also needs to be increased awareness of the health and social impacts of racism and the development of strategies for prevention.

A person centred approach encompassing intersectionality, acknowledging experiences of Black, Indigenous and People of Colour who are impacted by racism

It is great to see many organisations with increased awareness of racism and more investment in anti-racism training, diversity and inclusion strategies. However, many of these initiatives involve people with no lived experience, who have decision making powers, that are leading work for and on behalf of First Nations People, Black and People of Colour. Many of the anti-racism initiatives are without input from people impacted by racism. Their lived experiences, voices and expertise are not being centred and amplified during these processes, for example:

- Contracting non-People of Colour to conduct anti-racism workshops and or leadership programs/workshops for First Nations People, Black and People of Colour
- Non-First Nations people creating and contributing to organisational Reconciliation Action Plans
- Non-People of Colour leading work on behalf of People of Colour with outcomes directly impacting them
- Dismissing, and not taking seriously, racism and discrimination complaints by People of Colour within the organisation

It is this thinking and action that perpetuates the cycle of suppression through the removal of voices, and people exercising their privilege and, therefore, the reinforcement of a dominant racist system. This is what systemic discrimination, racism, and oppression looks like in a modern corporate organisation.

In addition, while we advocate for the centring of the voices of people who experience racism, it does not mean that First Nations People, Black and People of Colour should carry the burden of educating people about racism in our day-to-day work and doing additional diversity and inclusion work. Anti-racism is everyone's responsibility, and it is important to encourage the community to self-educate and do the anti-racism work that is necessary. More effort and support needs to be allocated to encourage the wider community to become anti-racism allies, accomplices and co-conspirators to effect personal and systemic change.

We support the NARF Concept Paper's emphasis on the importance of intersectionality as a principle and we recommend the AHRC uses the intersectionality lens to identify the increased vulnerabilities associated with intersectional disadvantage in guiding anti-racism priorities and support. Due to the complex nature of people who experience racism, we recommend the AHRC promotes a Person Centred and Strength-Based Approach when addressing racism in the community and institutions.

Measuring the impact /effectiveness of the Framework

The NSW Anti-Racism Working Group conducted a survey to identify the current anti-racism strategies in NSW and over 31 organisations participated in the survey in 2021. It identified

that many Local Councils have developed and implemented many social cohesion related initiatives to celebrate cultural diversity and perhaps, on occasion, anti-racism training and forums. However, there needs to be an increased focus on the evaluation of the effectiveness and impact of these initiatives on the community, particularly communities who are subject to racism.

There are opportunities for the AHRC to partner with education institutions to develop an evaluation framework for the National Anti-Racism Strategy measures so we can evaluate the effectiveness and impact of the strategy. It would also help to build the capacity of key stakeholders to implement evidence based, rather than ad hoc, activities to influence effective changes.

Reconceptualisation of racism from individual actions to systemic issues

Many Councils are supporters of Harmony Day celebrations and initiatives to celebrate cultural diversity. There is no doubt that promoting harmony and inclusion is important, but it cannot be the broom we use to sweep Australia's ongoing and deeply ingrained racism under the rug instead of working towards acknowledging past injustices and promoting change. We must first acknowledge 21 March as the 'The International Day for the Elimination of Racial Discrimination' to highlight the continuing harm of racism and re-affirm our commitment to eliminate it.

With that, the next step needs to be to re-conceptualise racism from thinking about individual acts (e.g., unconscious bias) to structural actions (anti-racist policies), from the intent to not be racist (rhetoric) to leading on anti-racist impact (asking for anti-racist outcomes). From a focus on the perpetrators of racism (let's do some internal training) to a focus on the wellbeing of those who experience it (the outcomes that have meaning for those communities most excluded).

Co-design approach

In order to create a successful National Anti-Racism Framework, it is essential to work together with community members and stakeholders to design the Framework.

This will allow for issues and solutions to be explored collaboratively, and for AHRC to connect with community members and stakeholders in a meaningful way. It will also ensure that the Framework takes into consideration community needs, as well as any constraints. Finally, a co-design approach will allow the Framework elements to be open to community input.

A co-design approach will not only challenge the imbalance of power held by individuals who make important decisions about others, by restoring broken relationships between these parties, it will also build capability using inclusive convening to share knowledge and power.

As a result, the National Anti-Racism Framework will be fit for purpose, with an increased level of community buy-in, consensus, ownership, and leadership and accountability. In

addition, the Framework will be viewed as a community-led project which will foster the best engagement outcomes from the community.

The project lead team will need to be mindful to create conditions that allow for a safe, respectful and productive collaboration to ensure the best project delivery possible.

Anti-racism education; everyone's business

Racism matters to all of us. This is not an issue that should only matter or be dealt with by people who have been marginalised. To create a lasting and positive shift about racism, we must focus on education strategies and work toward building capacity to counteract racial bias.

We must raise our voices and engage in meaningful conversations about racism, to ensure no one feels harmed either mentally or physically by racist comments or acts. All citizens and stakeholders must be equipped with tools to support these sometimes-difficult conversations and so that the message and imagery remains consistent across Australia. Allowing the masses to effectively speak with one, common language to break down any racist barriers.

Most importantly, to disrupt the cycle of racism, the Framework should support the education of our next generation; the ones starting their school education. As we are starting to see First Nations People themes being introduced as early as the kinder years, anti-racism messages and celebration of diversity should become part of the everyday curriculum in all classes from preschool to year 12. Equally, workplaces should be supported by the Framework to ensure that employers and employees feel secure in naming racist behaviours in the workplace and are able to and have the capacity to propose educational solutions to break the cycle.

Accountability and transparency

To be successful in designing the National Anti-Racism Framework, it is important to remember that accountability and transparency should be demonstrated at all stages throughout the process.

By engaging in co-designing workshops and by stating the project's intent, the project lead will effectively create a two-way communication with citizens and stakeholders who will feel valued and respected but also empowered to ask questions and demand results and outcomes.

We recommend the AHRC to state their project schedule and key milestones for all to see and create a clear line of communication with the public and their key stakeholders. We ask that the project leads are held accountable for their actions, including any oversights or omissions, and that in the interest of transparency, any wins and setbacks during the process are shared with everyone.

Accountability and trust will make sure that community members and stakeholders trust the process and will also reinforce that the Framework exclusively works towards reducing racism bias in the community through a fair and transparent process.

We encourage AHRC to communicate key milestones and lessons learnt and demonstrate a commitment to involve the wider community to develop a mechanism to measure short to long term outcomes and impacts.

Outcomes and strategies to create real systemic change

The National Anti-Racism Framework outcomes in the Concept Paper are a great starting point in addressing complex issues and the history around racism in Australia. We have noted, however, that the current draft places much of the onus of change on those who experience racism. We recommend that the outcomes focus on actions that will impact real change within an Australian context. This section provides suggestions to strengthen the outcomes.

Summary of Recommendations

- First Nations voices, stories and experiences must be front and centre in the design and evaluation of this Framework
- There are duplications in some of the outcomes and others do not address the true and systemic nature of racism and its impacts
- Much of the responsibility to make changes is placed on the people with lived experience of racism
- Governments, the private sector and the broader community must understand and accept the concept of whiteness / privilege. This is the only way the true nature and history of racism in Australia will be understood
- The language used in the Framework must empower and accurately reflect the systemic nature of racism; the language used comes from a deficient point of view
- There is a lack of attention on the education system/curriculum and its responsibility and capacity to educate students on the true nature and history of racism and how to become an anti-racist person and community

Recommendations in relation to the current Draft National Outcomes

National Outcome 1 *The nature, prevalence, and incidence of racism in Australia is understood*

A national data framework will help ensure consistency; however, the Concept Paper needs to clarify on what the framework will cover, clearly outlining institutions / key stakeholders

and organisations that it will be involving. We urge AHRC to provide more clarity in the next iteration of the Framework.

We welcome the racial equality audits considering the proportion of the Australian Public Service workforce, which are largely from English-Speaking Background, has remained almost unchanged for the past decade (APS 2021).

National Outcome 2 *Australia has an effective legal framework to protect people from racial discrimination and racial hatred.*

Our current legal framework has had limited capacity to address systemic and institutional discrimination despite provisions to prevent racial discrimination. We recommend implementing auditing mechanisms that identify structural racism and create systems that counteract such oppression and control.

National Outcome 3 *All Australian Governments commit to eradicating racism and racial discrimination through their actions.*

We are supportive of the key action that ‘All Australian Governments adopt strategies to increase diversity in leadership and across public services’. Noting that currently there is no Australian Public Service (APS) wide employment strategy on cultural diversity. The lack of prioritisation in the APS is evident from the removal of language other than English and country of birth questions from the 2020 APS Census when no other demographic questions were removed, and no substitute questions were inserted.

We strongly recommend the Framework reflect and include all three tiers of government.

National Outcome 4 *There is broad based community understanding of racism and racial discrimination, and how to counter it.*

The Racism.It Stops with me, Remove Hate from the Debate and other anti-racism/anti-discrimination campaigns have had limited success in creating greater understanding of the nature of racism and how to become an anti-racist. We recommend the AHRC develop an open evaluation to understand the true reach and impact of these campaigns and such reports be made publicly available annually.

We suggest that the AHRC support ‘Racism Not Welcome’ as a successful community-led anti-racism campaign that has gained momentum across Australia.

Strategies number 2 and 3 in this outcome will require adequate funding for their success. We strongly recommend a wide source of funding across all sectors be pooled together to reinforce the notion that this is a whole-of-community issue and we all need to be part of the solution. We suggest that Local Councils are supported financially and strategically to deliver this work at the local level.

Over the past two years, media outlets and social media have both have played a role in encouraging racism and racial discrimination. Those who hold the power of the messages in

the media must be held responsible and accountable for fostering one sided or limited narratives. A comprehensive education campaign is needed for both media outlets and the community to foster community cohesion and a deeper understanding of the impacts of racism on the individual, businesses and community.

We recommend that AHRC work with All Together Now to support and enhance the work they are doing to monitor media reporting: [All Together Now: Media Reporting Framework](#)

National Outcome 5 *All sectors of society commit to countering and preventing racism, and community partnerships are formed.*

Outcomes 5, 6 and 8 can be merged into one outcome. The merged outcome could be:

All sectors of society commit to becoming anti-racist

Key actions and strategies for the merged outcome can include:

- First Nations people must lead the national anti-racism strategy design and evaluation as well as any state or local strategies
- People from culturally and linguistically diverse communities must have a central role in the design and prioritisation of actions.
- The National Anti-Racism Strategy provides resources and guidance for all sectors on how to counter and prevent racism and also for local community partnerships to be formed to create anti-racist communities, together (using the Racism Not Welcome model)
- National Anti-Racism Strategy develops measures to address racism, racial discrimination and racial inequality that includes holding organisations, governments and individuals accountable for their actions as well as to mandate governments at all levels to develop measures and strategies to strengthen equity and social justice.

National Outcome 6 *All sectors of society commit to ensuring communities vulnerable to racism and racial discrimination are adequately represented and have effective participation in all areas of public life.*

It is evident that the current draft places the onus on First Nations people and People of Colour to address and counter racism and discrimination. We strongly advise that the Framework/Strategy emphasise an understanding of systemic racism and white privilege and how the system upholds the power and cultural dominance of the white privileged.

National Outcome 7

All Australian Governments commit to addressing racial inequality and adopt targeted and appropriate measures to address it

Outcome 7 can be merged with Outcome 3

The new Outcome can be:

Australian Government at all levels and the private sector commit to adopting targeted and appropriate measures to address the systemic nature of racism and become accountable to the people

Key actions and strategies can include:

- Data collection across all national frameworks is disaggregated by ethnicity to identify where there are unequal outcomes based on ethnic background or race
- Governments and the private sector uphold anti-racism practises within their own workplaces
- Intersectionality must be woven and embedded in all policies and strategies
- The Department of Education to commit to truth telling by embedding true history of colonisation, First Nations peoples' histories, stories and experiences as well as anti-racism education in curriculum from preschool age
- All workplaces to improve reporting mechanisms and processes for racism and discrimination, in a way that reduces harm and trauma around cultural and psychological safety to the person/people who experience it

National Outcome 8

Measures to address racism, racial discrimination and racial inequality complement measures to strengthen multiculturalism, social inclusion, and Indigenous reconciliation.

See notes in outcome 5

Further recommendations for inclusion in the Framework:

- Intersectionality has been mentioned but not in a way that demonstrates how it will overlay all outcomes. We request that there is a deeper reflection regarding our collective understanding of intersectionality and the compounding of oppressions that people experience when exposed to racism. i.e., a woman who is from a non-English speaking background and queer will face more barriers and discrimination than a male from a non-English speaking background
- Reconciliation Australia and a Reconciliation Action Plan are a good starting point for an organisation's journey toward greater understanding around accountability and actions but it is not the only step, organisations must commit to being anti-racist
- The AHRC must explore further who has been excluded from the Framework. We suggest the AHRC consider who is not represented including those who are neurodiverse, people with disabilities and the intersectionality of these which can lead to marginalisation and exclusion from the anti-racism journey
- Data and technology must be inclusive in participation and reflective of the national journey. The current ways to communicate and display data and knowledge is not

accessible to all. The AHRC must consider how to make the data accessible and inclusive for those who experience racism.

How can we embed evaluation and accountability measures within the Framework?

We fully support the AHRC's efforts in embedding evaluation and accountability within the National Anti-Racism Framework so it can achieve its full potential. Indeed, it is well known that many organisations take a stand against racism without committing to any specific actions. Performative allyship is not only hypocritical and ineffective, it perpetuates workplace environments where staff do not feel safe to speak up.

We acknowledge the limited powers and resources of the Commission in promoting the adoption and implementation of the Framework. As a result, the NSW Anti-Racism Working Group has identified a short list of actionable evaluation and accountability approaches that can be easily implemented after the launch of the National Anti-Racism Framework.

1. Advisory Committees solely focused on evaluation and accountability

Previous attempts from the AHRC have had limited engagement and minimal co-design with people who have lived experience of racism. The classic 'draft - consult - release - hope for the best' consultation approach has proven to have had little positive impacts on the ground. Not only this but this approach does not include sufficient accessible pathways to capture intersectionality and break down barriers in participation. Most importantly this current approach relies too heavily on the goodwill of organisational leaders. We have seen how easily leaders shelve good plans or justify bad practice in the interest of higher priorities. The treatment of residents from South West Sydney during the Delta outbreak, compared to the delayed response of the outbreak in the Eastern Suburbs, was, in that respect, discriminatory, and highlighted the prejudice that people from diverse backgrounds are exposed to.

We would like to see the AHRC guided by new State-based Evaluation Advisory Committees and add its voice in support of impacted communities when discriminatory measures impact the livelihoods of vulnerable groups.

We believe there is a high risk of implementation failure with the National Anti-Racism Framework if the AHRC doesn't maintain ongoing relationships with communities and grassroots organisations. As a result, we urge the AHRC to establish new State-based Evaluation Advisory Committees to provide advice on evaluation and accountability for the Framework. Members of the new committees should be appointed following a transparent and wide recruitment process through platforms recognised by diverse communities and include members with lived experience of racism. To follow best practice, Advisory Committee members should also be remunerated for their contribution.

2. Guidance on workforce diversity reporting

Without genuine public workforce diversity reports, organisations will continue to hide behind pledges and actionless statements. We, therefore, strongly recommend that the AHRC mandates any organisations supporting the National Anti-Racism Framework and its anti-racism campaigns to publicly report on their workforce diversity metrics as part of their annual reports, including the AHRC itself. Whilst data reporting is not perfect, it is an inexpensive approach to ensure organisations are accountable. Diversity Council Australia already articulates key principles to guide organisations. We recommend the AHRC promote them as part of the Framework.

Gender workforce reporting obligations under the Workplace Gender Equality Act 2012 have made Boards and Executive teams of large organisations more aware of the need to change their practises. We, therefore, advise the AHRC to advocate for similar measures to be taken for workforce diversity more broadly, with breakdowns across all management levels.

3. External and internal review mechanisms on inclusion policies and practises

We welcome the update of the AHRC's Workplace Cultural Diversity Tool to allow self-assessment of organisations. However, to promote transparency and accountability, we recommend the AHRC co-design models/mechanisms to review policies and practises in collaboration with key stakeholders such as [Democracy in Colour](#), [Hue](#), [Colour in Conversations](#), [Our Race](#), [ACON](#), [Welcoming Cities](#) and [Reconciliation Australia](#). These credible organisations have demonstrated their expertise in assessing organisations' needs and supporting them with progressing with tangible diversity & inclusion initiatives.

The co-designed and co-delivered external review mechanisms would not only instil trust in the Workplace Diversity Tool but also help develop a shared language, build on the current ecosystem of anti-racism champions, foster an intersectional agenda, and create a closer relationship between the AHRC and the diversity and inclusion sector more broadly.

Organisations with successful assessments should be recognised and their stories shared on a regular basis to disseminate best practice.

4. Establish a best practice framework in anti-racism training

Currently few organisations commit funding to anti-racism and cross-cultural competency training. Worse, when training is delivered, it often does not genuinely acknowledge what racism is and its impact. One recent example is PriceWaterhouseCoopers continuing to display its diversity and inclusion consulting offering after its HR team hosted an online trivia event where one HR executive dressed up as a bat from Wuhan while another mocked the Chinese accent.

AHRC should require organisations to establish guidelines for anti-racism and cross-cultural competency training, including:

- Clear training outcomes linked to the National Anti-Racism Framework
- Evidence-based training practises, including co-facilitation with a person with lived experience as a minimum
- Follow-up actions arising from the training (anti-racism is an action verb)
- Commitment to relationship-building to strengthen continuous organisational learning
- A list of organisations (large and small) that provide good anti-racism training and practice what they preach.

Existing best practice stories of anti-racism, social inclusion, social cohesion, and diversity and inclusion initiatives

We have identified the following examples of policy, procedures, initiatives and evaluation framework for the AHRC's reference.

Policy, procedures and funding priorities

<https://www.vic.gov.au/family-violence-reform-rolling-action-plan-2020-2023/reform-principles/intersectionality>

<https://www.vic.gov.au/everybody-matters-inclusion-and-equity-statement>

<https://www.whittlesea.vic.gov.au/media/1493/anti-racism-strategy-graphic-designed.pdf>

<https://www.vic.gov.au/anti-racism-taskforce>

<https://www.ontario.ca/page/ontario-public-service-anti-racism-policy-progress-report-april-2020-july-2021#section-2>

Projects and initiatives

<https://zerobarriers.net.au/>

<https://www.humanlibraryaus.org>

<https://www.antiracismkit.com.au/#anchor2>

<https://www.narragunnawali.org.au/rap/actions/30/take-action-against-racism>

Practice

<https://www.museumnext.com/article/what-does-it-mean-to-decolonize-a-museum/>

https://www.abc.net.au/news/2020-05-14/art-tour-guide-galleries-museums-racism-colonialism-exclusion/12241850?utm_campaign=abc_news_web&utm_content=link&utm_medium=content_shared&utm_source=abc_news_web

<https://www.abc.net.au/education/collections/the-school-that-tried-to-end-racism/>

<https://www.contemporaryartsociety.org/about/anti-racism-policy/>

Evaluation, monitoring and accountability

<https://alltogethernow.org.au/our-work/media-monitoring/>

<https://www.dca.org.au/research/project/counting-culture>

<https://www.genderequalityAHRC.vic.gov.au/about-gender-equality-act-2020>

<https://www.genderequalityAHRC.vic.gov.au/gender-impact-assessments>

<https://www.vic.gov.au/gender-equality-baseline-report/intersectionality-gender-inequality>

<https://www.acon.org.au/lgbti-health/workplace-inclusion>

<https://www.reconciliation.org.au/reconciliation-action-plans/>

<https://www.wgea.gov.au/what-we-do/compliance-reporting/competitor-analysis-benchmark-reports>

https://myan.org.au/wp-content/uploads/2020/11/nysf-applying-good-practice-capabilities_self-assessment-guide_fa.pdf

Closing Comments

The NSW Local Government Multicultural Network, through the extensive work that its NSW Anti-racism Working Group has taken on over the last 20 months in unpacking anti-racism, recommends the AHRC re-engages with the NSW Anti-racism Working Group prior to finalising the framework to strengthen our relationship and maximise on opportunities within our anti-racism work. Our network is committed to upholding our part in this journey, adopting communal language, shared understanding and alliances to make our National Anti-Racism story a reality.