

# Anti-Racism Framework Guidance

OCTOBER 2024



RESEARCH PARTNER



# Acknowledgment

MindTribes acknowledges the Traditional Owners of the lands on which this report was developed and shared. We live and work primarily on the land of the Wurundjeri people of the Kulin Nation. We pay our respects to their Elders, past, present, and emerging, and we honour their rich history, culture, and ongoing connection to this land.

Representing the oldest living culture in the world, First Nations people have been the traditional custodians of this land for more than 65,000 years. Australia is the only Commonwealth country that does not have a signed treaty with its Indigenous peoples. At MindTribes, we are committed to ensuring that every client we partner with has a meaningful and action-based Reconciliation Action Plan (RAP) that reflects genuine engagement and progress toward reconciliation.

We also acknowledge that this report is being created in a context of ongoing colonisation and racism, recognising the resilience and strength of Aboriginal and Torres Strait Islander peoples in the face of enduring trauma and inequities. We are committed to standing in solidarity with their ongoing fight for justice.

We extend our deepest gratitude to all individuals who have shared their lived experiences of racism, contributing their insights, stories, and perspectives to inform this report. Their courage and willingness to engage with us has been invaluable in shaping the understanding and recommendations we present. We honour these contributions and remain committed to amplifying the voices of those affected by racism in our continued efforts toward anti-racism in organisations and workplaces.

We also acknowledge the allies, DEI practitioners, and leaders who have bravely stood alongside us in this journey toward racial equity. Their dedication to challenging entrenched systems of inequality and fostering inclusion has driven real change within their organisations and beyond. Their leadership, advocacy, and partnership with us demonstrated how this work can be done, shining a light on where we need to start on the anti-racism journey as a society.

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# Fair Work Commissioner Oanh Tran



I have the honour – as well as the privilege and good luck – to be one of the first 2 Asian Australians appointed to the Fair Work Commission, Australia’s national workplace relations tribunal. The other is Commissioner Pearl Lim. We, along with our 50-or-so colleagues, resolve workplace disputes, facilitate bargaining for enterprise agreements, review and set minimum wages, conditions and standards. In short, our work affects almost every person who works in Australia.

There is increasing diversity – of many kinds – in our tribunals, courts, councils, houses of Parliament and on company boards. Diverse faces enhance the public’s confidence in institutions.

Representation matters, but it is not enough.

In this report, MindTribes and the University of Melbourne highlight the alarming statistic that as many as two-thirds of non-White employees in Australia experience racism at work. I cannot say it better than Commissioner Lim did during the ceremony that welcomed her to the Commission

“For many of us, what we do for work is an integral part of our identity and the foundational building block for our hopes and dreams in life.”

That so many of us experience racism at work means that our laws – we legislated against racism federally in 1973, and in all states and territories from the early 90s – are not enough. And this experience of exclusion means we lack social cohesion – the foundation for a thriving multicultural society in which all can advance as they desire.

As a society, I believe that we do not have to justify anti-racism. The need is clear. What this report contributes is practical and effective guidance for organisations to develop their own anti-racist framework. The principles are high level, which allows enterprises to tailor them depending on where they are on the anti-racist journey. While all 10 principles are essential, 3 strike me as fundamental: leadership, employee voice and resourcing.

For me, the outstanding contribution of this report is that it reinforces that anti-racism is methodology, which requires reflection and continuous improvement.

It is an honour to be among the first. I never want to be the only.

I genuinely believe in the power of song lyrics. Music gets me through hard times, and I acknowledge that I have fewer than many. My favourite lyric is - *There’s nothing that you’re not worthy of*. So, let’s all use this report to ensure our workplaces do not hold anyone back.

**Oanh Tran**  
**Fair Work Commissioner**

# Foreword



Addressing racism and antiracism in Australian workplaces as an SME firm doing business with big business has been the one of greatest challenges and privileges of our professional and personal lives.

Vick and I came to Australia as skilled migrants almost 22 years ago from South Africa. We were born into racial segregation and saw the transformation of our home country, from apartheid to democracy in 1994 and onwards. We know what legal racial discrimination looks and feels like and we also learnt how to transform communities and workplaces.

We were blessed to be part of that historic change, but left in 2002 with heavy hearts as the criminal violence that was ever present in a nascent democracy, touched our lives too closely – we left for the safety of our soon-to-be-born son and the future of our children.

We started careers and persisted for 10 years, usually one of the only or few People of Colour in teams. We started in lower roles, took longer to get to middle and senior management roles than our Australian and White peers, we studied further, expanded our family - welcoming our two daughters. Some would say the Australian dream – free, physically safe, employed, a comfortable home, healthy children. Yet, racism and racial discrimination was present, sometimes overt in public, more often covert in the workplaces, definitely everywhere in the systems we engaged with – health, education, labour, social. And worse still racism was almost unacknowledged for First Nations people, which troubled us, coming from the Truth and Reconciliation discussions in South Africa. Refugees and asylum seekers locked in detention centres; international students mistreated; our children seen as not Australian – yet there was no discourse on racism. We decided to take a personal risk to start MindTribes in 2012 and while we have often had wobbly moments, as there is low to no allocated investment in workplaces to address racism, as compared to gender equality – we are still here and stand as advocates and allies for employees who are racially and ethnically diverse in all workplaces in Australia alongside, brilliant leaders and sponsors for change who have influenced budgets to bring us in. Your courage has bolstered our courage.

This report is for our collective futures and carries our insights gained across 12 years of, mostly inaugural racism work at clients. We don't do this work, unless there is already continued and committed investment in First Nation's people's experiences of racism – knowing that racism manifests for Indigenous and Non-Indigenous peoples differently and needs nuanced care and responses.

To the reader, see this report as guidance. It begins with Part 1 - definitions and terminology, where we often start with consultations, as we know racial literacy is low. Part 2 carries a background into workplace racism as this is different to racism experienced in other spaces. Part 3 is our prioritised guidance – **10 key considerations and focus areas**, to help you no matter where you and your organisation are on this journey. We hope it helps you get further and make meaningful change. Lastly, we have a section on normalising antiracism – we don't want to be here in another 10 years – convincing leaders that addressing racism in the workplace is the ethical thing to do to create safe workplaces. Finally, to our small but mighty team of MindTribes and students, congratulations on your work on this report, it is a testament to the change makers you are.

**Div & Vick Pillay**

**CEO & Managing Director, MindTribes**

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# About MindTribes

MindTribes is a leading practitioner, researcher and consultant in diversity, equity and inclusion (DEI) in Australia. We exist to create an anti-racist culture that is inclusive of race and cultural diversity.

Founded by Div and Vick Pillay, South African-born migrants to Australia, MindTribes is a purpose-led firm, established out of the lived experience of their own and others of exclusion in workplaces for their age, race, culture and gender. With combined decades of experience and expertise in both people and business, MindTribes offers a unique proposition – behaviourally solving for exclusion, creating an impact on diverse individuals' voice and value that aligns with organisational goals.

In the last 12 years, MindTribes has supported a range of Australian and global organisations to make change, creating a more just and inclusive workplace for people with diverse, intersecting identities. We are experts in intersectionality with a particular focus on race, culture and gender. Our approach is human-centric, outcome-led, focused on equity and equality, across all diversities and co-designed with clients so that change is embedded and sustainable.

In our work, we identify opportunities using targeted data collection (both qualitative and quantitative), analytics and insights, and drive areas of improvement specific to the organisation, leveraging behavioural economics and psychology. Our research with the University of Melbourne and Deakin University, along with our first-hand knowledge derived from our social enterprise Culturally Diverse Women, provides us with a unique knowledge of the barriers and success factors that occur from an intersectional perspective.

Under Div and Vick's leadership, MindTribes has established ourselves as a trusted consulting, advisory and training and development organisation, partnering with large employers in private and public sectors to make notable, positive change. We were panel providers for the Commission of Gender Equality in the Public Sector, are recommended by the Australian Human Rights Commission for lived experience listening and have strategically partnered with Michael Page, The Faculty, Careers in Colour and more to amplify our impacts. We were recognised as TechDiversity Award Finalist, 2019 Westpac Businesses of Tomorrow Winner, 2018; and Telstra Business Award Finalist, 2016, for our business excellence and positive social footprint. MindTribes is also highly regarded for our ongoing commitment to research, innovative thinking and leadership.





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# Glossary

<b>Acronym</b>	<b>Full name</b>
<b>ACT</b>	Australian Capital Territory
<b>ADKAR</b>	Awareness, Desire, Knowledge, Ability, Reinforcement (Change Management Model)
<b>AHRC</b>	Australian Human Rights Commission
<b>ASX</b>	Australian Securities Exchange
<b>BIPOC</b>	Black, Indigenous, and People of Colour
<b>BLM</b>	Black Lives Matter
<b>CALD</b>	Culturally and Linguistically Diverse
<b>CARM</b>	Culturally and Racially Marginalised
<b>CEO</b>	Chief Executive Officer
<b>CGEPS</b>	Commission for Gender Equality in the Public Sector
<b>CPO</b>	Chief People Officer
<b>DCA</b>	Diversity Council Australia
<b>DEI</b>	Diversity, Equity, and Inclusion
<b>EAP</b>	Employee Assistance Program
<b>ESG</b>	Environmental, Social, and Governance
<b>FTE</b>	Full-Time Equivalent
<b>GDP</b>	Gross Domestic Product
<b>HR</b>	Human Resources
<b>IT</b>	Information Technology
<b>LGBTIQA+</b>	Lesbian, Gay, Bisexual, Transgender, Intersex, Queer, Asexual, and others
<b>NSW</b>	New South Wales
<b>NSW PSC</b>	New South Wales Public Service Commission
<b>OHS</b>	Occupational Health and Safety
<b>POC</b>	People of Colour
<b>RDA</b>	Racial Discrimination Act
<b>SMART</b>	Specific, Measurable, Achievable, Relevant, Time-bound (Goal Setting)
<b>VEOHRC</b>	Victorian Equal Opportunity and Human Rights Commission
<b>WGEA</b>	Workplace Gender Equality Agency
<b>WHS</b>	Work Health and Safety



# Executive Summary

## Introduction

### Background

Australia's report card on social cohesion<sup>1</sup> shows us that while Australia is a celebrated multicultural country with 51.5% of the population being first and second generation migrants, our sense of belonging is declining. Some describe this as a maturity issue - that Australia is a 'young migrant' country and lower social cohesion should be expected at this stage in the maturity curve. Alarming, different racial and ethnic communities still experience racism and racial stereotyping on a regular basis in the community and in workplaces. Several recent research highlights that as many as 43-67% of racially diverse employees in Australia experience racism at work,<sup>2,3</sup> aligning with MindTribes' findings that 1 in 3 Women of Colour and 1 in 2 First Nations women feel culturally unsafe at work.<sup>4</sup>

While the legislative framework, including *Racial Discrimination Act 1975*, the *Equal Opportunity Act 2010* (Victoria), and the *Work Health and Safety (WHS) Act 2011*, prohibits direct racial discrimination, these laws alone have not been sufficient to dismantle the underlying structures that perpetuate racism.

### Understanding Systemic Racism

Systemic racism is deeply embedded in organisational structures and employment experiences, systems and processes from "pre-hire to retire" in Australia. This perpetuates inequalities that disproportionately disadvantages First Nations people and racially and ethnically diverse groups. This form of racism manifests through biased recruitment practices that favour certain racial groups, implicit biases in performance evaluations that hinder the career progression of non-White employees, and workplace cultures that subtly enforce conformity to the norms of the dominant racial group. These dynamics are often left unexamined, perpetuating exclusion and inequality within organisations. The nature and context of the experience as recounted by thousands of racially diverse people, is that racial discrimination and racism is covert and subtle, making it harder to call out or formally report. 76% of women of colour shared that their experienced and witnessed racism but would never report it for the fear of not being believed and/or the resultant backlash to careers.<sup>5</sup>

### Why Anti-Racism in Organisations is Important, Now

Despite advancements in diversity, equity, and inclusion (DEI) initiatives over the past decades, deeper issues of racism are often not fully addressed, leaving significant gaps in organisational practices. Overall, MindTribes practitioner work shows that a large proportion of DEI investment focuses solely on gender equality with little to no consideration of intersectionality (despite a significant proportion of the workforce being racially diverse), and low to no continued investment in race and ethnicity efforts. While most organisations have matured their efforts in multiculturalism, from mainly celebrating key community dates, (e.g. Eid and Diwali) to now collecting some data on languages spoken, ancestry, and countries of birth, often, we find the singular focus on multiculturalism has left no room for discussion on racism and race-based discrimination.

In fact, individuals often face internal conflict, like "how can I raise racism experienced when I have just been asked to speak at a Valuing Cultural Diversity event and we have just had an Eid ball". It is important to note that a person can experience both race-based discrimination and an appreciation of their cultural diversity by the same people in the same team. We find that senior leaders look to high engagement

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<sup>1</sup> O'Donnell (2023), *2023 Mapping Social Cohesion Report*, Scanlon Foundation Research Institute, <<https://scanloninstitute.org.au/sites/default/files/2023-11/2023%20Mapping%20Social%20Cohesion%20Report.pdf>>.

<sup>2</sup> Anderson, P., Mapedzahama, V., Kaabel, A. and J. O'Leary (2022). *Racism at Work: How organisations can stand up to and end workplace racism*. Diversity Council Australia. <<https://www.dca.org.au/research/racism-at-work>>

<sup>3</sup> Peucker, M., Vaughan, F., Doley, J., and Clark, T. (2024). *Understanding reporting barriers and support needs for those experiencing racism in Victoria*. Research report. Victoria University: Melbourne

<sup>4</sup> MindTribes & VPS Women of Colour Network (2021), *Diversity and Inclusion in the Victorian Public Sector (VPS) – Women of Colour Network (WoCN)*

<sup>5</sup> CPSU Victoria, MindTribes & The University of Melbourne (2023). *Safer Workplaces for Women of Colour*.

scores and multicultural events as a key indicator of success, while often see race-based discrimination more broadly as bullying or harassment, questioning the veracity of whether it has anything to do with a person's race. This discounting, disbelief or dismissive responses and reactions mean that people's voices are tentative or silenced.

Anti-racism goes beyond the passive act of upholding equality (under persistent structural, systemic racism) or refraining from discriminatory actions. It is a proactive approach that demands ongoing efforts to dismantle both systemic and behavioural inequities present in organisations and society as a whole. At its heart, anti-racism acknowledges that racism is not solely an individual problem but is deeply rooted in societal structures, including the employment systems. This perspective requires a shift from merely avoiding racist behaviour to active anti-racism, which entails deliberate actions to identify, confront, and eradicate racism from organisational practices, systems and culture.



## Current Regulatory & Governance Context

Government bodies are increasingly recognising the urgent need for organisations to go beyond complying with anti-discrimination laws but to actively engaging in dismantling systemic racism: the Australian Human Rights Commission (AHRC) is developing the first National Anti-Racism Framework, the Victorian Government's Anti-Racism Taskforce is crafting a state-wide Anti-Racism Action Plan, the Victorian Equal Opportunity and Human Rights Commission (VEOHRC) recently published a Guideline for organisations to meet minimum standards on proactive duty to eliminate racism, and the New South Wales Public Sector Commission (NSW PSC) also recently published an Anti-Racism Guide on fostering anti-racist workplaces in the NSW public sector. These initiatives represent a significant upcoming shift in Australia's approach to acknowledging and addressing racism.

The broader social and political context, both within Australia—such as the discussions around the Indigenous Voice to Parliament—and globally (including human rights violations and human suffering from conflicts like in Israel and Palestine, Russia and Ukraine, and the civil war in Sudan), further highlight the need for organisations to be prepared to respond to these challenges. This response is essential not only to fulfil legal duties of care but also to meet Environmental, Social, and Governance (ESG) responsibilities amidst an increasingly complex social justice landscape.

## About this report

At MindTribes, we have been engaged by numerous organisations across public and private sectors in recent years to deliver on anti-racism work, reflecting a growing recognition of its importance. It is however to be noted that in all our client work, we have had to advocate and influence with a key senior ally to convince others that this work is critical. Typically, it has involved an initial request about anti-racism, racism and more often cultural diversity. We use this opportunity to extend the discussion to the systems, risks and duty of care. Together with an influential Executive in People and Culture or a business leader sponsoring the work, we influence and advise on the most appropriate starting point to create an impact, and then we partner to sustain the change. We have found that where organisational policies and frameworks are inadequate to address deep-rooted biases and inequalities, they result in a sunk cost of existing investments and efforts.

This report distils our learnings as practitioners, combined with evidence from qualitative and quantitative research, to provide practical, actionable guidance for organisations embarking on or continuing their anti-racism journeys. We build upon existing evidence including AHRC *Leading for Change revisited* report (2018), DCA *Racism at Work* report (2022), Australian Government's *Towards fairness: A multicultural Australia for all* report (2024), Victoria University's *Understanding Reporting Barriers And Support Needs For Those Experiencing Racism In Victoria* (2024), VEOHRC's *Guideline: Race discrimination in the workplace* (2024), *Media Diversity Australia's Racism Handbook* (2024), and more.

Our goal is to offer best practice insights that support the development and implementation of effective Anti-Racism Frameworks, ensuring they are both impactful and sustainable. It is intended to be complementary to the work completed by the government and other bodies, by taking a practitioner lens and widening the scope to a cover all organisations in Australia.

## Summary Guidance

Drawing upon findings from this research, as well as MindTribes' decade-long practitioner experience with Australian organisations, we have identified and ranked by priority ten key considerations that should be taken into account in the development and implementation of Anti-Racism Frameworks. Importantly, these factors are interconnected and interdependent (as shown in Figure 1).

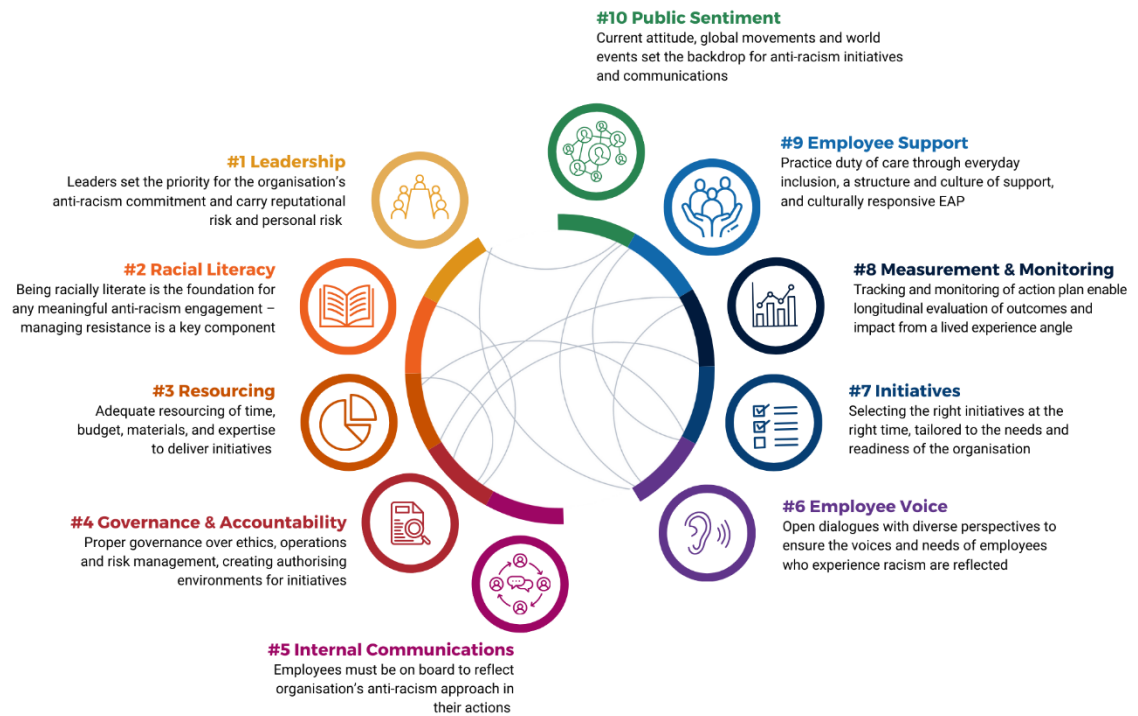


Figure 1. 10 Key Considerations in Anti-Racism Frameworks

Note: The connecting lines indicate key interdependence between factors, but these are not exhaustive.  
Source: MindTribes (2024)

## 1. Leadership – The extent to which leaders are committed to addressing racism

Leadership actions and commitment can make or break an organisation's anti-racism efforts. Leaders have the organisational and positional power to role model, make decisions, set priorities, allocate resources, and set the standard for the rest of the organisation.

We have found that when leaders lack a shared authentic understanding and strong commitment to the anti-racism efforts being implemented, they create inconsistencies between what is preached and what is practiced, leading to further embedding of negative behaviours and processes within the organisation. As senior leaders set the priorities for their leadership cohorts, efforts tend to be sporadic and not sustained – if they speak less about cultural diversity, race and ethnicity, there is a corresponding loss of focus.

However, when leader's actions are measured formally, e.g. in their performance and development plans, we find that there is transparency and accountability across the leadership levels. As this seldom happens, efforts from leaders are often hit or miss – some well-intentioned, determined leaders will follow through and some leaders will not. If the impact of leader action on gender equality is used as a standard for anti-racism action, then we should also have targets, KPI's, transparent reporting on progress, year on year, for anti-racism.

We see a reluctance to follow this path of organisation and leader accountability because leaders often have low racial literacy and a lack of comfort with this agenda.



### MindTribes Example

When the outcome of racism listening sessions was delivered to a CEO and the CPO of a large private sector firm, the CEO's first response was questioning whether this was truly representative of all racially and ethnically diverse people – and potentially it was a smaller problem than portrayed. The CEO was worried about the perceptions of board members, and shareholders and the possibility of the media branding the organisation as racist. He would have preferred to defer any programs or initiatives until a more stable time in the business. This CEO has since moved his position and is now a public ally and advocate. The qualitative data report derived from the listening sessions was crucial in influencing him to act almost immediately.

## 2. Racial Literacy – Understanding and improving the racial literacy of different employee and leader groups

The MindTribes Racial Literacy Framework (page 40) is designed to assess and develop individuals' understanding and skills related to race, racism, and anti-racism within an organisational context. It categorises racial literacy into four different levels, ranging from racially illiterate, basic, intermediate to advanced proficiency.

We recommend organisations mandate basic racial literacy as a minimum standard for all employees, with leaders encouraged to achieve higher levels to act, lead and foster a workplace environment that is anti-racist. Organisations should consider the current racial literacy of its audience in the design of communications and initiatives; while putting in place frameworks to enhance racial literacy of its people and racial maturity of the organisation as a whole.

Without adequately identifying and tackling low racial literacy, organisations risk implementing one-size-fits-all initiatives that may not address the most pressing issues (i.e., attitudes and behaviours from those who are racially illiterate), leading to disengagement or even backlash. In our experience, leaders who are racially illiterate risk causing significant psychological harm as they make decisions with unchecked racial bias and negatively influence the workplace culture. Effective anti-racism frameworks must incorporate racial literacy into employee learning journey and change management initiatives.



### MindTribes Example

An established staff led network put forward their activity and plan for the year ahead to their sponsor [a member of the senior leadership team]. This plan included anti-racism learning for the senior leadership team and initiatives that created spaces to talk about racism. The people and culture lead and the senior sponsor asked the Chair of the network and the executive team to remove any references to race, racism, and anti-racism as they felt that the organisation and leadership team was not ready to receive this kind of information. They would not endorse the plan until this language was removed. They asked the Chair to use 'cultural diversity' and to promote 'multiculturalism' as the core purpose of the network and "not to go too deep" into negative behaviours. The people and culture team shared that they would consider carrying out organisation learning on racism and racial discrimination when the timing was right.

**3. Resourcing** – The extent to which resources, inclusive of time, budget, materials and expertise are allocated for delivery of initiatives within an action plan

Adequate resourcing is fundamental to the success of any anti-racism strategy / action plan. Organisations must ensure that sufficient time, budget, materials, and expertise are allocated to support comprehensive and sustained efforts, rather than basing their anti-racism efforts on employees' voluntary contributions, which are often added on as extra tasks.

Proper resourcing enables thorough planning, execution, and ongoing support, ensuring that anti-racism measures can achieve meaningful and lasting change. Without these resources, initiatives are likely to be superficial and short-lived, failing to address the deep-rooted issues effectively and could backfire.

Currently, based on MindTribes' experience, a large proportion of the effort in anti-racism and cultural diversity efforts is voluntary from staff led networks or employee resource groups. These are people with lived experience of racial discrimination who use their voice to advocate for change, despite their experiences and cultural capability being regularly devalued. Persistent lack of resource support from the organisation risks burdening their people antiracism efforts are intended to support, leading to cultural burnout, further harming those with lived experiences.



### MindTribes Insight

Since the death of George Floyd in 2020, MindTribes has seen a marked increase in the formation and growth of staff led networks/ERGs for People of Colour, Women of Colour and CALD groups. They often see no or low funding [maximum \$5-10K a year]. Of the DEI work focusing on diverse identities [women, race and ethnicity, gender, LGBTIQ+, First Nations and Disability], we note that race and ethnicity work receive the lowest funding, often engaging in a race to the bottom with Disability and First Nations work. This is disheartening, given the workforce representation of 15-30% of CALD people in most private and public sectors. Overall, DEI resourcing is low and often is an added portfolio to an already stretched people and culture leader or allocated to a part time FTE who has no budget or extra resources. Projects often involve small pieces of work contracted piecemeal, with suppliers having to go through long and expensive procurement journeys and business casing, leading to a lack of continuity of funding and connection to the greater strategy.

#### 4. **Governance & Accountability** - The mechanisms by which management and leadership have oversight and responsibility for anti-racism initiatives

Appropriate governance and accountability are essential to ensure that anti-racism initiatives are aligned with the organisation's values, legal requirements, and ethical standards. Proper governance establishes the frameworks and oversight needed to ensure that initiatives are implemented with integrity and transparency.

We have advised clients to think about governance through the lens of Principles [ethics], Process [Structures, Roles, Risk, Operations] and Performance [Accountability, Measures and Evaluation]. Owing to the low maturity and sporadic nature of anti-racism work, we often find that there is no ethical purpose of why it is necessary to do the work; no one is overall responsible or accountable, therefore no one is really managing the risk of doing nothing and operationally there is not a smooth flow of initiatives that aggregate to make structured change.

Governance of the Anti-Racism Framework should be adequately incorporated into existing organisational management systems and processes, such as with clear reporting pathways (linked to point 3). Leadership in an organisation should be personally accountable for the success of these initiatives given the significant role they play (as described in point 1). We recommend incorporating oversight mechanisms and regular reporting processes with clear accountability tied to responsible leaders' performance.



##### **MindTribes insight**

We have found that there is a significant issue with governance more broadly in DEI work. In an organisation, there are often many stakeholders who are not always connected to, or keenly aware of, the key objectives of proactive prevention and responding to early indicators of harm. We often see poor governance over who looks after policies, learning, mental health, reporting and responding to complaints; staff led network support, senior leader capability. This poor governance also extends to reporting – a focus on milestones and activity. Too often organisations, if they report at all, will only report on what was done rather than if the initiative was achieving the desired outcomes.

#### 5. **Internal Communications** – The extent to which the anti-racism action plan can be well understood and followed by employees across the organisation

Clear, consistent and effective internal communication is crucial in creating awareness and fostering a desire for change among employees, aligning with best practice change management. All employees should understand the necessity of the anti-racism action plan and the specific issues it addresses and feel motivated to support and engage with the plan. Regular communications also supports transparency, creating a sense of trust and authenticity in regards to the purpose and intent of the organisation's activities.

The lack of clear definitions and objectives often results in barriers in implementation due to varying perceptions of racism and anti-racism. Without awareness and desire for employees to create change, anti-racism initiatives may also fail to gain traction and achieve meaningful outcomes. Internal communications are dependent on racial literacy (#2) and leadership (#1).



### MindTribes insight

We often find that communications to promote an anti-racist culture is not evident. Communications tend to be activity based or core message based [e.g. Stop Racism] and therefore are not continuous. This lack of continuity does not normalise the language and meaning around racism, racial discrimination and anti-racism. This often results in shock when some race-related messaging eventually comes out. We often hear of the backlash to the initiatives, e.g. “why do we need to talk about racism, as Australia is so multicultural?”, “why is the language referring to people’s skin colour, e.g. People of Colour – who does this refer to and is this not more suited to America?”, “I am from a different cultural background and have never experienced racism in all my years, so I don’t think it is a problem here”. Based on insights from the maturity journey of gender equality, internal communications, event and learning must be regular, bringing people along on a change journey. This ensures that no matter where their attitudes and beliefs start, they understand that the organisation’s values and behaviours are aligned to gender equality (in this case, anti-racism). This approach of mainstreaming the discourse is lacking as there is no regularity of communications with racial discrimination and racism, nor anti-racism.

## 6. Employee Voice – Incorporating employee’s lived and living experiences into the design and execution of anti-racism initiatives

The lived experiences of employees [past experience] and living experiences [current experiences], especially those from marginalised groups, provide essential insights into the realities of racism within the organisation. Anti-racism initiatives must be guided by employee voices that are not only heard but actively incorporated into decision-making.

By creating safe spaces for employees to share their experiences and ensuring that this data is acted upon, organisations can build trust, foster engagement, establish feedback loop for continuous improvements; thus, elevating diverse voices, promoting agency, and ensuring that initiatives are relevant and effective.



### MindTribes insight

We are often concerned that organisations run focus groups and consultations with staff to ask about their experiences of inclusion and respect when considering their racial and ethnic identities; without proper safety and risk protocols, including any duty of care post sharing these experiences. We find that when data is collected and racially and ethnically diverse people willingly share what they would like to see improved, nothing significant is done to see this realised. This creates a backlash of low trust and faith in the organisation and leadership and often doing more harm than good. MindTribes has a well-honed and well-respected process of engaging with people to gather lived and living experience data. We ensure that pre-, during and post-racism listening we manage safety, risk and support of staff – only taking on this work if we are able to share the behavioural insights and recommendations report with the C-suite and board, who can follow-through by acting to improve people’s experiences. We often recommend a regular method and process that includes people’s voices in the design of employee experience surveys, providing more depth to the response data. Importantly, it is worth noting, that listening sessions, focus groups and consultations are data collections at “point in time” – the voice of employees needs to be at the core and consistently present. Staff led networks are often provide good reference group for the continuous employee voice.

## 7. Initiatives – Prioritised actions an organisation takes aligning with the maturity curve and organisational readiness

The correct selection and sequencing of activities, based on change management principles, are critical to the successful implementation and outcomes of an anti-racism action plan. The interventions should be evidence-based, contextual-specific, and fit-for-purpose for the organisation's unique scenarios. The sequencing and timing of activities should also consider the change readiness of people leaders and employees, their knowledge and racial literacy (linked to point #2), and urgency of the issues. The MindTribes Anti-Racism Maturity Curve provides guidance on the recommended phasing of initiatives aligning with the organisation's maturity and readiness to act.

Without strategic selection and sequencing, interventions may be disjointed and ineffective, resulting in inefficiencies and failing to achieve the intended outcomes. Initiatives that are sporadic and not considered strategically or through a change management lens, can sometimes have a deleterious effect, contrary to what was intended.



### MindTribes insight

Often owing to the lack of maturity in the market on racism and anti-racism, we find organisations replicating what their competitors are doing. When we have engaged with clients in early conversations about what they think they need, they often reference other competitors in the sector, and as a result, asking for education and awareness [e.g. a workshop or learning program]. They have not understood the lived experience of people in their own organisations, with little to no understanding of the key issues, barriers, biases, psychosocial risks to then design initiatives that target the problem. Instead, the initiatives tend to be interpersonal-related, broad, with no real change to the lives of people or the systems they operate in. Overall, planning [forecasted initiatives for 12 months] is poor– often it involves reactive initiatives with little interconnectedness and change management.



## 8. **Impact Measurement & Monitoring** – System to measure and monitor the prevalence of racism and the effectiveness of action plan post-implementation

A robust data collection, monitoring, and reporting system is an important enabler for the long-term success of Anti-Racism Frameworks. What we mean by impact measurement is an outcome measure [e.g. reduction or elimination of racism] and what we mean by monitoring is a tracking and evaluation of activities to get to that outcome.

Appropriate indicators of both implementation and outcomes must be identified as part of the Anti-Racism Framework. An effective monitoring and reporting system helps to track the prevalence and experience of racism – longitudinally across employee lifecycle, evaluate the effectiveness of measures, ensuring initiatives stay on track. The measurement and articulation of impacts also enables regular internal communications of progress to employees – building trust by demonstrating the organisation's commitment to addressing racism.

In the absence of monitoring and reporting, initiatives often lack direction and accountability, resulting in a loss of momentum and ultimately undermining their effectiveness. Impact measurement and monitoring is related to governance and leadership accountability (i.e., who is responsible and accountable overall for the progress and outcomes).



### **MindTribes Insight**

What we find is that organisations seldom have either, i.e. no tracking and evaluation of activities and no real impact/outcome measurement. Even if they have some tracking and evaluation it is low level tracking, for example: how many people attended an anti-racism workshop instead of how many people made a commitment to apply the learning to create anti-racism team culture (what we recommend). We also strongly recommend that this is captured in a development plan, that is tied to values or behaviour scores of leaders. In the example, the latter recommended approach ensure movement towards the outcome, the former attendance type data is often meaningless. Specifically for anti-racism work, impact measurement is key as the work required is longitudinal, but is most likely starting as an inaugural piece of work, which means the planning and activity tracking to mobilise change is a long road.

## 9. **Employee Wellbeing Support** – Embed cultural safety in day-to-day operation and management; supported by culturally sensitive and accessible EAP

Employers are responsible in proactively maintaining psychological safety and cultural safety in the workplace. Racism has a devastating impact on racially and ethnically diverse employees.

Cultural safety must be embedded into everyday workplace experiences, Additionally, managers and employees need to be trained to respond sensitively to concerns about racism, ensuring both psychological and cultural safety in the everyday workplace.

Organisations should also ensure that Employee Assistance Programs (EAPs), including mental health and well-being promotion services are culturally sensitive and accessible to address the unique challenges faced by marginalised employees.



### MindTribes Insight

The mental health, well-being and clinical psychology services industry has a historically White lens that stems from the education at Universities and is carried forward with the practical training and the types of organisations that therapists and counsellors join. Those suppliers who are contracted to large organisations are typically not representative of the workforces' demographics and typically, we find, are not investing in culturally responsive capability training. Concepts of self-care from a Western lens, who and how a person is connected to support people [e.g. who is family or kin] is very different when considering First People, migrants, refugees and asylum seeker people [even the second generation]. Often the care is very individual and focussed on self-management whether it is health promotion or incident response, which discounts the collective way that many from culturally diverse backgrounds may look after their mental, emotional and physical health. Mental health and well-being practitioners are often not skilled in responding to racism and racial discrimination. Consequently, when an organisation begins anti-racism work, the lived and living experiences of people are exposed and they are vulnerable, and they might be further harmed by a support service that is not capable of offering culturally responsive care.

#### 10. **Public Sentiment** – The influence of public sentiment on the promotion and perception of anti-racism measures

Public sentiment is generally shaped by the broader social and political context, industry-specific consumer segments, and the social license of the organisation.

To effectively manage public sentiment around anti-racism initiatives, organisations should first focus on internal communications and culture. This means cultivating an inclusive environment from within by engaging employees, fostering open dialogue, and ensuring all internal stakeholders are aligned with the organisation's anti-racism goals. This also ensures that any public expression of the company (marketing, communications, slogans, sponsorships etc), authentically reflects the internal dynamics, and the organisation is not seen as hypocritical or insincere.

While the design and rollout of anti-racism initiatives should be considerate of public sentiment, organisations should manage communications strategically, balancing transparency with sensitivity to current attitudes. Authentic and transparent communications that align with organisational ethics can also avoid appearing disingenuous or reactionary.



### MindTribes Insight

We have seen Australian organisations deliberate over their positions on marriage equality, the Voice referendum, Black Lives Matter movement, climate change pressures etc. They are typically in a balancing act with stakeholders, over the public position they should take and how firm and clear they should be. Usually there is some scenario planning i.e. considerations for the potential negative backlash to the brand's reputation, shareholder value, customer loyalty or loss. Ultimately these positions are taken, more in consideration of commercial, customer, and the competitor lens than primarily ethics and morality. Organisations, commercial considerations need not be at odds with their ethical and moral obligations. Often the "right thing to do" aligns with their customer and employee expectations. Conversely, maintaining the status quo could result in negative brand impacts, poor attraction of talent and consumer backlash.

Table 1. Summary of MindTribes' Anti-Racism Guidance and Framework

<b>#1 Leadership</b>	<b>0 Short term</b>	Active and Visible Leadership Engagement and Accountability
		Commitment to Anti-Racism (Legal and Ethical Responsibilities)
	<b>1 Medium term</b>	Education and Training for Leaders
		Transparent and Open Dialogue
		Commit to Change Management
		Leaders Highlighting Business Benefits to Organisation
<b>2 Long-term</b>	Release Resources for Organisation to Deliver on Anti-Racism Commitment	
	Diverse Hiring, Development and Promotion into Leadership Positions	
<b>#2 Racial Literacy</b>	<b>Starting Point</b>	Assess Racial Literacy Levels
	<b>0 Short term</b>	Set Clear Expectations on Basic Racial Literacy
		Tailor Educational Initiatives to Roles and Levels
		Incorporate Racial Literacy into the Change Management Plan
	<b>1 Medium term</b>	Implement Racial Literacy Education as part of Organisational Practice
	<b>2 Long term – Continuous Focus</b>	Implement Ongoing Monitoring and Reporting of Racial Literacy
<b>3 Continuous Focus</b>	Continuous Improvement of Racial Literacy Framework	
<b>#3 Resourcing</b>	<b>Starting Point – Short term</b>	Conduct a Resourcing Needs Assessment
	<b>0 Short term</b>	Allocate and Provide Consistent Funding
	<b>1 Medium term</b>	Recognition of Anti-Racism Work as part of Workload and Progression
	<b>3 Continuous Focus</b>	Regularly Review and Reallocate Resources
<b>#4 Governance &amp; Accountability</b>	<b>0 Short term</b>	Clear Governance Structures
		Set Measurable Goals, KPIs and Consequences
	<b>1 Medium term – Continuous Focus</b>	Ethical Standards and Transparency
		Policies and Processes Revision to align with Anti-Racism Commitment
		Establish Reporting, Investigation and Resolution Mechanisms for Incidents of Racism
		Regular Review and Adaptation
<b>2 Long-term</b>	External Audits and Independent Reviews	
<b>#5 Internal Communications</b>	<b>0 Short term – Continuous Focus</b>	Develop a Comprehensive Communication Plan
		Tailor Messaging to Different Audiences
		Engage with Racially Diverse Employees / Specialists / ERGs

	1 Medium term – Continuous Focus	Provide Clear and Action-Oriented Guidance
		Utilise Visual and Narrative Formats in Regular Communications
		Cultivate a Safe and Supportive Environment for Dialogue
	2 Long-term	Implement Regular Feedback Mechanisms
#6 Employee Voice	0 Short term	Engage Early and Continuously
		Use Lived-Experience Led Data Collection
		Implement Robust Feedback Mechanisms
		Complaints Handling and Management
	1 Medium term	Create Safe Spaces for Honest Dialogue
		Support Employee Resource Groups (ERGs)
		Adopt Transparent Communication Practices
#7 Initiatives	Starting Point	Conduct a Thorough Assessment of Organisational Readiness
	0 Short term	Strategically Select and Sequence Initiatives
		Adopt an Intersectional Approach
	1 Medium term – Continuous Focus	Customise Training Programs to Organisational Needs
Adopt Transparent Communication Practices		
#8 Measurement & Monitoring	0 Short term	Allocate Adequate IT Resources
		Determine KPIs
	1 Medium term – Continuous Focus	Develop a Comprehensive Measurement Framework
		Implement Anonymous Reporting Systems
		Transparent and Regular Reporting
		Monitor KPIs
2 Long-term	Integrate Feedback Mechanisms	
	Ensure Longitudinal Evaluations	
#9 Employee Support	0 Short term	Create Clear Reporting Procedures and Support
	1 Medium term	Respond Swiftly to Reports using Trauma-Informed Practices
		Integrate Support Services with Anti-Racism Initiatives
	1 Medium – long-term	Enhance Culturally Sensitive EAP Services
	2 Long-term – Continuous Focus	Foster a Proactive Support Culture
3 Continuous Focus	Regularly Audit and Improve Support Systems	
#10 Public Sentiment	0 Short term	Align Initiatives with Organisational Values
		Focus on Internal Culture First
	1 Medium term	Engage with Key Stakeholders

<div style="background-color: #002060; width: 100%; height: 100%; display: flex; align-items: center; justify-content: center;"> <div style="background-color: #800080; width: 50%; height: 50%;"></div> <div style="background-color: #008080; width: 50%; height: 50%; display: flex; align-items: center; justify-content: center; color: white;"> <p><b>2 Long-term – Continuous Focus</b></p> </div> </div>	Align Marketing and Sales Strategy with the Values and Anti-Racism Commitment
	Monitor and Adapt to Public Reactions
	Maintain Transparency and Ethical Standards

Source: MindTribes (2024)





# Introduction

About this report – aims, scope, methodology and structure

# Introduction

This report, a collaboration between MindTribes and the University of Melbourne, aims to identify and evaluate key considerations that will impact the effectiveness of Anti-Racism Frameworks in workplaces.

## About the Authors

MindTribes is a specialist consultancy in diversity, equity, and inclusion (DEI) in Australia, with a particular focus on race, culture, and gender. We leverage human-centric data collection, analytics, insights, behavioural economics, psychology, and change management to support organisations to improve their outcomes.

Together with the University of Melbourne, our academic research partner, we present this report to provide Australian organisations across public and private sector with guidance on key factors to consider when developing an Anti-Racism Framework. We thank the contribution of University of Melbourne students Alex Ciocan, Audrey Angelita Muliawan, Harrison Yap, Shanty Devi Yadinata, and Shion Fujise as co-authors of this report.

## Research question and aims

The central research question for this report is “What considerations will impact the effectiveness of Anti-Racism Frameworks?”

The aims of this report are to:

1. *Examine Key Factors Influencing an Anti-Racism Framework:* Explore how racism manifests within Australian organisations, assess current anti-racism initiatives being implemented, and evaluate the broader legislative, cultural, and organisational contexts.
2. *Evaluate risks and constraints when implementing an Anti-Racism Framework in workplaces:* Identify and analyse the potential challenges that organisations may encounter during the implementation of an Anti-Racism Framework and propose strategies to mitigate these risks.
3. *Prioritise and Provide Practical Guidance on Key Considerations:* Evaluate and rank the importance of each consideration within the Anti-Racism Framework, offering justifications for these priorities. Additionally, provide actionable, practical guidance to help organisations implement these considerations effectively and adaptively, ensuring their anti-racism initiatives are both impactful and sustainable.

## Scope

This report is designed to offer useful, comprehensive guidance on developing and implementing Anti-Racism Frameworks within Australian organisations across both public and private sectors. We aim to address the unique challenges these organisations face, considering the broader legislative landscape and the cultural dynamics specific to Australia.

Anti-racism is an active process of examining and eliminating entrenched racism that is present in the systems, structures and culture in our society and organisations. It requires active engagement starting with recognition of racism and the will to act, beyond the passive position of not exhibiting racist and discriminatory behaviours.

This report focuses on racism experienced by and affecting racially and ethnically diverse people, which makes up approximately 30% of the workforce. While it overlaps with the racism experienced by Aboriginal and Torres Strait Islander people in Australia, the authors recognise that the ongoing harm and racism perpetrated towards First Peoples in Australia originated from the colonisation is unique and distinctive. In Mindtribes’ practitioner work, we work collaboratively with First Nations people and experts in projects where there are intersections with First Nations issues. However, as we are not experts in this area, this report does not provide in-depth guidance into anti-racism in the context of Aboriginal people of Australia – instead, it draws parallels with the need for broader anti-racism initiatives.

While the report aligns with current legislation, it does not offer detailed legal advice, nor does it provide customised solutions tailored to specific organisations. Sector-specific issues and global contexts beyond Australia are not explored in detail. This report maintains a focus on providing broadly applicable, high-level guidance suitable for a wide range of organisations.

## Methodology

A structured methodology was employed to achieve the report's aims of evaluating key considerations, assessing risks, and providing practical guidance for Anti-Racism Frameworks (Figure 2). This approach drew upon a combination of grey research, literature reviews, stakeholder interviews, and MindTribes' practical insights from real-world applications.

The following steps were undertaken to ensure the findings are both comprehensive and actionable:

- **Defining Research Question:** The research question was defined to specifically address the challenges related to developing and implementing anti-racism frameworks. This step was essential in ensuring that the analysis remained focused and relevant.
- **Structured Inquiry via Issue Tree:** An issue tree was developed to systematically break down the primary research question into sub-questions and key areas of focus (Appendix). This approach allowed for a thorough exploration of all relevant dimensions of the topic.
- **Desktop Review:** An extensive review of existing literature, reports, and case studies was conducted to establish a strong theoretical foundation. Best practices and gaps in current approaches were identified through this review, providing context for the research.
- **Stakeholder Consultation:** Primary data was collected through interviews with HR leaders, DEI practitioners, and industry experts. Practical insights into the real-world challenges of implementing anti-racism strategies were gained from these interviews and MindTribes' practitioner work.
- **Data Analysis:** The data gathered from the desktop review and interviews was rigorously analysed to identify key patterns and themes. These insights were used to inform the guidance and recommendations outlined in the report.
- **Developing Findings:** The findings were ranked and prioritised based on their potential impact and feasibility. This step ensured that the recommendations provided are both effective and practical for implementation within organisations.

Figure 2. Methodology summary



Source: MindTribes (2024).

## How to use this report

This report builds on the most recent guidelines and research, including the Victorian Equal Opportunity and Human Rights Commission (VEOHRC) *Guideline: Preventing and Responding to Workplace Racism*,<sup>6</sup> to offer evidence-based guidance for organisations in designing and developing their Anti-Racism Frameworks. Tailored specifically to the needs and context of Australian workplaces and drawing upon MindTribes' practitioner experience with numerous organisations, the report outlines key actionable considerations to ensure that these frameworks are effective in combating racism at both the structural and behavioural levels.

Our guidance aligns with the latest legal standards, including the VEOHRC guideline, the upcoming National Anti-Racism Framework, and Victoria's Anti-Racism Action Plan. This alignment ensures that organisations not only comply with their legal obligations but also adopt best practices that promote meaningful and sustainable change.

## Report Structure

- **Part 1 - Terminology & Definition:** This section of the report clarifies key terms and concepts related to racism and anti-racism, ensuring a shared understanding that forms the basis for the guidance provided in the report.
- **Part 2 - Background:** This section provides context on the historical and systemic factors contributing to racism in Australian workplaces, including an overview of relevant legislation and societal influences. This section helps frame the challenges organisations face in implementing effective anti-racism strategies.
- **Part 3 - Guidance:** This section offers a roadmap for developing and implementing an Anti-Racism Framework, including the use of MindTribes Anti-Racism Maturity Curve to assess your organisation's current standing, change management strategies to support effective implementation, and a risk assessment to anticipate and mitigate potential challenges. This section also outlines the 10 key considerations that are crucial for creating a robust and sustainable Anti-Racism Framework. These include best practices and recommendations designed to address common needs of Australian organisations.
- **Normalising Anti-Racism:** This section concludes the report by discussing the importance of embedding anti-racism into organisational culture. It provides guidance on sustaining efforts over the long term and normalising anti-racism as a key component of workplace practices.

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<sup>6</sup> Victoria Equal Opportunity & Human Rights Commission (VEOHR). (2020). *Guideline: Preventing and responding to workplace sexual harassment – Complying with the Equal Opportunity Act 2010*. <<https://www.humanrights.vic.gov.au/resources/sexual-harassment-guideline/>>.



# Part 1: Terminology & Definition

Clarifying key terms on anti-racism

# Racism vs Racial Discrimination

Racism and racial discrimination are closely related concepts but have distinct meanings, especially within the context of anti-racism.

## Racism

Racism is a broad, systemic issue that encompasses beliefs, behaviours, and institutional practices. It is rooted in the idea that one race is inherently superior to others, leading to prejudice, discrimination, and the perpetuation of social inequalities.

More specifically, the concept of Whiteness, which refers to the social, cultural, and institutional practices that maintain White people's dominance and privilege, and the idea of the racial contract, which describes an implicit social agreement that upholds racial hierarchies by privileging White people while marginalising others, both play a significant role in maintaining systemic racism.<sup>7,8</sup> This systemic aspect of racism means that it can occur even without explicit racial hostility from individuals. It is embedded in the laws, policies, and norms that shape society and its institutions.

Importantly, the concept of reverse racism is often misused, as racism involves a power dynamic where the dominant group benefits from the oppression of others; thus, reverse racism, as it is commonly framed, does not exist.<sup>9</sup>

## Racial Discrimination

Racial discrimination, on the other hand, refers to specific actions or policies that treat individuals or groups differently based on their race, ethnicity, or national origin. It is a more focused concept, often linked to legal frameworks that prohibit such behaviour. Under Australian law, racial discrimination is unlawful and can be addressed through various legislative acts, such as the *Racial Discrimination Act 1975* and the *Equal Opportunity Act 2010* in Victoria.

Racial discrimination can be direct, such as when a person is treated unfairly because of their race, or indirect, where a policy or practice appears neutral but disproportionately affects people of a certain race. While racial discrimination is often a manifestation of racism, not all instances of racism result in legally actionable discrimination.<sup>10</sup>

In practice, addressing racism requires a more comprehensive approach that includes both legal compliance (to prevent racial discrimination) and broader cultural change initiatives (to tackle systemic racism).

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<sup>7</sup> Crenshaw K, Gotanda N, Peller G, et al. (1995). *Critical race theory and critical legal studies: Contestation and coalition*. In: Crenshaw K, Gotanda N, Peller G, et al. (eds). New York: New Press, pp. 63–79.

<sup>8</sup> Mills CW. (1997). *The Racial Contract*. NY: Cornell University Press.

<sup>9</sup> Delgado R & Stefancic J. (2010). *Critical Race Theory: An Introduction*. New York University Press, 2011, Seattle University School of Law Research Paper No. 10-22.

<sup>10</sup> Victoria Equal Opportunity & Human Rights Commission (VEOHR). (2024). *Guideline: Race Discrimination in the Workplace*.

<[https://www.humanrights.vic.gov.au/static/b3a29c6c401b6077ee4f2a4e01664d3a/Resource-Workplace\\_race\\_discrimination-Guideline-EN-Jul\\_2024.pdf](https://www.humanrights.vic.gov.au/static/b3a29c6c401b6077ee4f2a4e01664d3a/Resource-Workplace_race_discrimination-Guideline-EN-Jul_2024.pdf)>.

# Anti-Racism

Anti-racism is more than just a passive commitment to equality or the absence of discriminatory practices.

Anti-racism is an active process that requires sustained efforts to dismantle the systemic and behavioural inequalities that exist within organisations and society at large. At its core, anti-racism recognises that racism is not just an individual issue but is embedded in societal structures, including legal, educational, and employment systems. This understanding necessitates a shift from passive non-racism—where one simply avoids racist behaviour—to active anti-racism, which involves conscious actions to identify, challenge, and eliminate racism in all its forms.<sup>11</sup>

## Addressing Systemic Racism

Systemic racism refers to the institutional policies, practices, and norms that create and perpetuate unequal outcomes for different racial groups. These systemic issues are often deeply embedded in the structures of organisations, making them challenging to identify and address.

Organisations must examine their systems and processes for systemic racism, ensuring that every decision, policy, and practice is viewed through an anti-racist lens. To effectively combat systemic racism, organisations should integrate anti-racism into the core functions and adopt anti-racist practices throughout all aspects of their operations.<sup>12</sup> For many organisations, this starts with understanding where they are at on an anti-racism maturity curve and design a framework that comprehensively examine and tackle racism in a holistic way.<sup>13</sup> These steps are crucial for ensuring that anti-racism becomes an enduring and systemic cultural change rather than a series of isolated initiatives.

## Addressing Behavioural Racism

Behavioural racism manifests in the actions, attitudes, and everyday interactions that perpetuate racial inequalities, often driven by explicit and implicit biases. This form of racism is prevalent in workplace dynamics, where discriminatory behaviours and microaggressions can undermine an organisation's inclusivity efforts.

To address behavioural racism, organisations must foster a culture of zero tolerance to negative behaviours, continuous education and self-reflection.<sup>14,15</sup> Organisations should promote racial literacy and cultural competency as ongoing educational initiatives. Educational programs must be complemented with systems of accountability and support. Clear reporting mechanisms for incidents of racism, resources for learning about anti-racism, and expectations for inclusive behaviour must be established.

## The Role of Leadership in Anti-Racism

Leaders must consistently apply an anti-racist lens to their judgments and decisions, ensuring that anti-racism is deeply embedded in the ways of doing business. This commitment involves not only providing the necessary resources and support but also authentically educating themselves on racism as a serious and complex topic. By leading with intention and accountability, leaders set the tone for the entire organisation, ensuring that anti-racism is not merely a performative effort but a sustained and integral part of how the organisation operates. This requires ongoing learning, reflection, and decisive action to create a genuinely inclusive and equitable environment for all. The importance of leaders' attitude, behaviours and actions reflects its prioritisation as the #1 Consideration among the Guidance.

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<sup>11</sup> Kendi, I. X. (2019). *How to Be an Antiracist*. One World

<sup>12</sup> Winters MF. (2023). *Racial Justice at Work: Practical Solutions for Systemic Change*. Berrett-Koehler Publishers.

<sup>13</sup> Daniels S. (2022). *The Anti-Racist Organization: Dismantling Systemic Racism in the Workplace*. Wiley.

<sup>14</sup> Winters MF. (2023). *Racial Justice at Work: Practical Solutions for Systemic Change*. Berrett-Koehler Publishers.

<sup>15</sup> Sue, D. W. (2010). *Microaggressions in Everyday Life: Race, Gender, and Sexual Orientation*. Wiley.

# People who Experience Racism

The language and terms we use to describe people who experience racism are not static; they evolve as our understanding of race, culture, and identity deepens.

The language used to describe racial diversity, as well as people who experience racism, is a vital tool for shaping understanding, representation, and advocacy within society.

## Race, Ethnicity, and Culture

Understanding the concepts of race, ethnicity, and culture is fundamental to discussions around racism. These terms, though often used interchangeably, have distinct meanings and implications in both social and organisational contexts.

- **Race:** Race is a socially constructed category that groups people based on physical characteristics such as skin color, facial features, and hair texture. While race has no biological basis,<sup>16</sup> it has significant social implications, as it has been used historically and continues to be used as a means of creating and maintaining hierarchies of power and privilege.<sup>17</sup> The concept of race plays a central role in discussions of racism, as it is often the basis for discriminatory practices and systemic inequalities.<sup>18</sup>
- **Ethnicity:** Ethnicity refers to the shared cultural, linguistic, or ancestral heritage of a group of people. Unlike race, which is typically imposed by external social definitions, ethnicity is often claimed by individuals and groups as a marker of identity and belonging. Ethnic groups are often characterised by a shared history, language, religion, and cultural practices.
- **Culture:** Culture encompasses the beliefs, practices, norms, values, and symbols that a group of people share. Culture shapes individuals' worldviews and influences how they interact with others. In the context of diversity, culture plays a critical role in shaping the experiences of individuals within organisations and society at large.<sup>19</sup> It is also important to note that, due to Australia's complex migration history, many individuals identify with multiple cultures. For example, second-generation Vietnamese Australians may strongly identify with both Australian and Vietnamese cultural identities and practices.<sup>20</sup>

In discussions of racism, culture is often used as a substitute for race because it is perceived as a more comfortable or celebratory topic. However, focusing solely on culture can obscure the realities of racism, which requires confronting uncomfortable truths about power, privilege, and systemic inequality, and the lived experiences of racialised individuals.



<sup>16</sup> American Association of Physical Anthropologists. (2019). *AAPA Statement on Race and Racism*. *American Journal of Physical Anthropology*, 169(3), 400-402. <<https://doi.org/10.1002/ajpa.23882>>.

<sup>17</sup> Ore, T. E. (2019). *The Social Construction of Difference and Inequality: Race, Class, Gender, and Sexuality* (7th ed.). Oxford University Press.

<sup>18</sup> Messer R., Gonzalez G. (2021). *Relationship Between Culture and Race*. *Encyclopedia of Evolutionary Psychological Science*. 6538-6540. <[https://doi.org/10.1007/978-3-319-19650-3\\_524](https://doi.org/10.1007/978-3-319-19650-3_524)>.

<sup>19</sup> Guest, K. J. (2017). *Cultural Anthropology: A Toolkit for a Global Age* (2nd ed.). W.W. Norton & Company.

<sup>20</sup> Jupp, J. (2009). *Cultural Diversity in Australia: A Demographic Profile*. Australian National University Press.

## Language and Terminology

In the Australian context, various terms are used to describe collectively people who experience racism. The language chosen can influence both the perception of these groups and the effectiveness of anti-racism messaging. Here are some commonly used terms:

- **Culturally and Linguistically Diverse (CALD):** This term is widely used in government and non-government contexts to describe communities with varied cultural and linguistic backgrounds. While CALD is familiar and widely recognised, it may not fully capture the nuances of racial and cultural identity. The term has been critiqued for its focus on language and culture, often at the expense of addressing race and the specific forms of racism experienced by these groups.
- **Culturally and Racially Marginalised (CARM):** This term, adopted by organisations such as Diversity Council Australia,<sup>21,22</sup> aims to distinguish people who are not White from other culturally diverse groups who may face less discrimination, such as those from Europe or North America. It focuses on the marginalisation experienced by individuals based on their race.
- **(Negatively) Racialised Individuals:** This term refers to people who have been assigned a racial identity, often by societal norms or structures, that leads to their differential treatment based on perceived racial characteristics. The term underscores the process of "racialisation," which is the social, political, and economic categorisation of people based on race, leading to specific forms of disadvantage or privilege.<sup>23</sup> The VEOHRC uses this term to refer to communities and individuals who face ongoing discrimination and exclusion due to their racial identity.<sup>24</sup>
- **People of Colour:** Originating in the United States, the terms "People of Colour" (POC) and "Black, Indigenous, and People of Colour" (BIPOC) have gained prominence through social justice movements. POC is a broad term that encompasses all non-White groups, while BIPOC is used to highlight the distinct experiences of Black and Indigenous communities, acknowledging the unique historical and systemic challenges they face. These terms are increasingly being used in Australian contexts.
- **Racially and Ethnically Diverse:** This term is often used to describe individuals and groups that encompass a wide range of racial and ethnic backgrounds. It aims to recognise both racial and ethnic diversity, acknowledging that individuals may face different challenges based on their racial and ethnic identities. This term is often used to ensure inclusivity and to address the intersections between race and ethnicity in discussions on diversity and inclusion.



### MindTribes Insight

In this report, we use 'racially and ethnically diverse people', 'CALD' and 'People of Colour' interchangeably, recognising that all of the above terms are accepted. MindTribes primarily uses 'racially and ethnically diverse people' as it is inclusive of a wide range of backgrounds and identities, while being an accurate and specific reference to people who experience racism. In our view, the attempt to devise a simple term or language to adequately describe a diverse group of people will always fall short of acknowledging and appreciating the complex nuances. While we strive to educate ourselves and always use the most appropriate language as our knowledge and societal expectations evolves, it is important to us that the focus of doing the work isn't stalled or distracted by the pursuit of a 'perfect' terminology, which in our view, doesn't exist.

<sup>21</sup> Diversity Council Australia. (2021). *Inclusion@Work Index 2021-2022: Mapping the State of Inclusion in the Australian Workforce*. Diversity Council Australia.

<sup>22</sup> Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). (2023). *Culturally and racially marginalised women in leadership A framework for (intersectional) organisational action*, Diversity Council Australia.

<sup>23</sup> Bonilla-Silva, E. (2018). *Racism without Racists: Color-Blind Racism and the Persistence of Racial Inequality in America* (5th ed.). Rowman & Littlefield.

<sup>24</sup> VEOHRC. (2024). *Guide: Racial Literacy in the Workplace*. <[https://www.humanrights.vic.gov.au/static/f21c24274e9640e0bd73dd43ad4d629f/Resource-Workplace\\_race\\_discrimination-Guide-racial\\_literacy-EN-Jul\\_2024.pdf](https://www.humanrights.vic.gov.au/static/f21c24274e9640e0bd73dd43ad4d629f/Resource-Workplace_race_discrimination-Guide-racial_literacy-EN-Jul_2024.pdf)>.

## Exerting and Benefiting from Racism

Racism in Australia is a multifaceted issue. At the core of racism is the exertion of power by certain groups over others, often leading to unequal treatment, access, and opportunities.

- **Whiteness and Privilege:** "Whiteness" refers to the societal norms, structures, and privileges that benefit White people and maintain racial hierarchies. It is a concept used to critically examine how racial advantages are institutionalised and how they shape social relations and power dynamics.<sup>25</sup> "White privilege" is the set of advantages that White people enjoy, consciously and unconsciously, simply by virtue of their race. These privileges are often invisible or unacknowledged to those who benefit from them but are a significant barrier to achieving racial equality.
- **Lateral Violence and Internalised Racism:** Lateral violence is another significant aspect of how racism manifests, particularly within Indigenous communities and other marginalised groups in Australia. Lateral violence refers to the negative behaviours that occur within oppressed communities as a result of internalised oppression and systemic discrimination.<sup>26</sup> Internalised racism occurs when members of marginalised groups unconsciously accept and incorporate the negative stereotypes and beliefs about their own racial or ethnic identity perpetuated by the dominant culture, leading to self-doubt, low self-esteem, and conflict within their communities.<sup>27</sup> Lateral violence is often a response to the stress and trauma of experiencing systemic racism, where people internalise oppressive tactics and redirect them within their own communities.
- **White Supremacy<sup>28</sup> and Systemic Racism:** Systemic racism in Australia is maintained by structures and institutions that prioritise and normalise White cultural values, practices, and beliefs. This systemic bias is evident in various sectors, including the legal system, where Indigenous Australians are disproportionately represented in the criminal justice system, and in education, where students from culturally and racially marginalised backgrounds often face lower expectations and fewer opportunities.<sup>29</sup> These norms are embedded in policies, practices, and cultural narratives that reinforce the status quo and marginalise those who do not conform to the dominant culture.



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<sup>25</sup> Delgado, R., & Stefancic, J. (2017). *Critical Race Theory: An Introduction* (3rd ed.). NYU Press.

<sup>26</sup> Australian Human Rights Commission (2011). *Lateral Violence in Aboriginal and Torres Strait Islander Communities*. Australian Human Rights Commission.

<sup>27</sup> Pyke, K. D. (2010). What is Internalized Racial Oppression and Why Don't We Study It? *Acknowledging Racism's Hidden Injuries*. *Sociological Perspectives*, 53(4), 551-572.

<sup>28</sup> In this context, "White supremacy" refers to structural bias rather than individual radicalisation or extremism.

<sup>29</sup> Hollinsworth, D. (2006). *Racism and Anti-Racism in Australia* (3rd ed.). Allen & Unwin.

# First Nations Australians

Discussions of race and racism are incomplete without acknowledging the unique and critical position of First Nations peoples—the Aboriginal and Torres Strait Islander peoples.

In Australia, the terminology used to describe First Nations peoples is both complex and culturally significant, reflecting the distinct histories, identities, and ongoing struggles of Australia's Indigenous populations.

## Aboriginal and Torres Strait Islander Peoples

"Aboriginal and Torres Strait Islander" is the most commonly used term in Australia to refer to the original inhabitants of the continent and surrounding islands.<sup>30</sup> "Aboriginal" typically refers to the many distinct groups of people who have lived on the Australian mainland and Tasmania for tens of thousands of years, while "Torres Strait Islander" refers to the Indigenous peoples of the Torres Strait Islands, located between the northern tip of Queensland and Papua New Guinea.

Importantly, many Indigenous Australians identify first with their specific language group, nation, or clan, such as the Wurundjeri people or the Yolngu people, before identifying as Aboriginal or Torres Strait Islander. It's best to find out what individuals prefer to be called, rather than making assumptions.<sup>31</sup>

## First Nations

"First Nations" is a term increasingly used in Australia, particularly in political and advocacy contexts, to emphasise the sovereignty and unique cultural identities of Aboriginal and Torres Strait Islander peoples. This term aligns with global Indigenous movements and is intended to reflect the status of these communities as the original and ongoing custodians of the land.

## Indigenous

"Indigenous" is another umbrella term that is widely used in Australia to refer to both Aboriginal and Torres Strait Islander peoples. While it is generally accepted and used in formal contexts, it is always important to respect the preferences of individuals and communities, as some may prefer more specific identifiers.<sup>32</sup>

## Cultural Identity and Rights

The discussion of Aboriginal and Torres Strait Islander peoples within the context of race and cultural diversity must also acknowledge the historical and ongoing impacts of colonisation, including dispossession, forced removal from land, and systemic discrimination. These experiences have significantly shaped the cultural identities of Indigenous Australians and their relationship with the Australian state.

In contemporary Australia, there is a growing recognition of the need for Indigenous sovereignty, cultural safety, and the right to self-determination.<sup>33</sup> This is reflected in movements such as the push for constitutional recognition and the Uluru Statement from the Heart.<sup>34</sup>

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<sup>30</sup> Australian Bureau of Statistics (ABS). (2014). *Indigenous Status Standard*. <<https://www.abs.gov.au/statistics/standards/indigenous-status-standard/latest-release>>.

<sup>31</sup> Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) (2020). *Indigenous Australians: Aboriginal and Torres Strait Islander people*. Accessed 12 July 2024. <<https://aiatsis.gov.au/explore/indigenous-australians-aboriginal-and-torres-strait-islander-people>>.

<sup>32</sup> Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) (2020). *Indigenous Australians: Aboriginal and Torres Strait Islander people*. Accessed 12 July 2024. <<https://aiatsis.gov.au/explore/indigenous-australians-aboriginal-and-torres-strait-islander-people>>.

<sup>33</sup> Australian Human Rights Commission. (2023). *Self-determination and Indigenous peoples*. Voice referendum: Understanding the referendum from a human rights perspective resource kit.

<sup>34</sup> Uluru Statement from the Heart. (2017). <<https://ulurustatement.org/the-statement/view-the-statement/>>.

## Reconciliation Action Plans

A Reconciliation Action Plan (RAP) is a strategic framework developed by organisations in Australia to actively contribute to reconciliation between Aboriginal and Torres Strait Islander peoples and non-Indigenous Australians.<sup>35</sup> Established by Reconciliation Australia in 2006, a RAP outlines specific, measurable actions that organisations commit to taking across three key areas: building respectful relationships, fostering understanding and respect for Aboriginal and Torres Strait Islander cultures, and creating opportunities through employment, training, and business initiatives.

Every organisation in Australia—whether it is a corporation, government agency, non-profit, educational institution, or community group—is encouraged to develop a RAP. It is especially pertinent for organisations with a workforce, customer base, or community engagement that includes Aboriginal and Torres Strait Islander peoples. A RAP helps organisations of all types and sizes to take practical, actionable steps towards reconciliation and positive social change.

### About this Report

In this report, we acknowledge that the experience of racism of First Nations people, which make up of approximately 3% of the workforce, is deep, entrenched, systemic, and ongoing.<sup>36</sup> While this report focuses on racism experienced by the broader racially and ethnically diverse cohort, we recognise that racism experienced by First Nations people is a critical issue in Australia and understand that it requires dedicated attention, especially in the context of Indigenous sovereignty, cultural safety, and the ongoing fight for self-determination. This report does not specifically focus on the unique challenges faced by First Nations communities; instead, it draws parallels with the need for broader anti-racism actions.

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<sup>35</sup> Reconciliation Australia. (n.d.). *Reconciliation Action Plans*. Reconciliation Australia. Retrieved July 2, 2024, <<https://www.reconciliation.org.au/reconciliation-action-plans/>>

<sup>36</sup> Australian Government Jobs and Skills Australia. (2023). *First Nations People Workforce Analysis Report*. <<https://www.jobsandskills.gov.au/publications/first-nations-people-workforce-analysis-report>>

# Intersectionality

Coined by legal scholar Kimberlé Crenshaw in 1989, intersectionality has become a crucial lens through which we examine the complexity of lived experiences and nature of discrimination.<sup>37</sup>

Intersectionality recognises that the causes of disadvantage or discrimination do not exist independently, but intersect and overlap with racism, magnifying the severity and frequency of the impacts.<sup>38</sup>

## The Concept of Intersectionality

Intersectionality explains how people may experience overlapping forms of discrimination or disadvantage based on attributes such as Aboriginality; age; disability; ethnicity; gender identity; race; religion; and sexual orientation.

Every person has multiple, intersectional identities. Some racially diverse individuals are at higher risk of different types of discrimination, such as sexism, class oppression, homophobia, transphobia, ageism, or ableism.<sup>39</sup>

At its core, intersectionality posits that individuals are often disadvantaged by multiple and overlapping sources of oppression. For example, a woman of colour may experience discrimination in ways that differ from those experienced by White women or men of colour due to the combined effects of racism and sexism. These overlapping identities create unique experiences that cannot be fully understood by examining each identity in isolation.

## Intersectionality in the Australian Context

In Australia, intersectionality is increasingly recognised as essential in understanding the diverse experiences of marginalised groups. Australia's complex history of colonisation, migration, and social policy has produced a society where race, gender, and other social categories interact in ways that shape individual and collective experiences of privilege and disadvantage.<sup>40</sup>

For instance, Aboriginal and Torres Strait Islander women often face compounded discrimination due to their race and gender, which intersects with other factors like socioeconomic status and geographical location. Similarly, migrants from CALD backgrounds may face barriers that are unique to their intersecting identities, such as racial and linguistic discrimination, compounded by their immigrant status.

## Intersectionality in Anti-Racism Work

Intersectionality is crucial in the design and implementation of anti-racism frameworks. An intersectional approach acknowledges that people who experience racism may also be affected by other forms of discrimination. Tackling disadvantage in one group may not address discrimination and marginalisation experienced by all other groups equally. This understanding is essential for creating inclusive policies and practices that address the full spectrum of an individual's experience.

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<sup>37</sup> Crenshaw, K. (1989). *Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Anti-Discrimination Doctrine, Feminist Theory and Antiracist Politics*. University of Chicago Legal Forum.

<sup>38</sup> MindTribes. (2022). *Applying Intersectionality*. Commission for Gender Equality in the Public Sector. <<https://www.genderequalitycommission.vic.gov.au/applying-intersectionality>>.

<sup>39</sup> MindTribes. (2022). *Applying Intersectionality*. Commission for Gender Equality in the Public Sector. <<https://www.genderequalitycommission.vic.gov.au/applying-intersectionality>>.

<sup>40</sup> MindTribes. (2022). *Applying Intersectionality*. Commission for Gender Equality in the Public Sector. <<https://www.genderequalitycommission.vic.gov.au/applying-intersectionality>>.

# Racial literacy

Racial literacy is the capacity to identify, understand, and actively challenge racism in all its forms.

This includes knowing where and how racism occurs and being able to identify it, respond to it and prevent it from occurring.<sup>41</sup> Racial literacy helps people to recognise that racism is everywhere in society, encompassing systems, structures of power, individual attitudes and behaviours. It is the foundation to transforming individual behaviours and organisational cultures toward genuine anti-racism.

The existing body of research on racial literacy predominantly focuses on educational and healthcare settings internationally.<sup>42,43</sup> MindTribes has drawn upon and adapted these insights to meet the unique needs of organisations and workplaces in Australia within our work, including this current Guidance.

The *MindTribes Racial Literacy Framework* illustrates the stages of developing racial literacy within an organisation, moving from initial resistance to active leadership and advocacy (Figure 3):

## Level 0: Racially Illiterate – Resistance to Engagement

At this foundational stage, individuals often resist conversations about race and racism, sometimes denying systemic racism or adhering to a 'colourblind' ideology. Racial illiteracy can stem from ignorance or deliberate disengagement, and sometimes, sinister intention of maintaining the status quo. It manifests in three primary ways:

- **Lack of Exposure, Education, or Awareness:** Individuals may lack understanding due to minimal exposure to diverse perspectives, often from living in a monocultural environment. This lack of understanding can make them unaware of the nuances of racial issues or the existence of systemic racism.



<sup>41</sup> VEOHRC. (2024). *Guide: Racial Literacy in the Workplace*. <[https://www.humanrights.vic.gov.au/static/f21c24274e9640e0bd73dd43ad4d629f/Resource-Workplace\\_race\\_discrimination-Guide-racial\\_literacy-EN-Jul\\_2024.pdf](https://www.humanrights.vic.gov.au/static/f21c24274e9640e0bd73dd43ad4d629f/Resource-Workplace_race_discrimination-Guide-racial_literacy-EN-Jul_2024.pdf)>.

<sup>42</sup> Stevenson, H. C. (2014). *Promoting Racial Literacy in Schools: Differences That Make a Difference*. Teachers College Press.

<sup>43</sup> Flynn, J., & Kahn, K. B. (2019). *Cultivating Racial Literacy in Schools: Connecting Theory, Research, and Practice*. Teachers College Record.

- **Narrow Privileged Experiences:** Some individuals acknowledge that racism exists but believe it has largely been resolved, often due to their narrow, privileged experiences. This belief can apply to anyone, including People of Colour, who may not recognise the broader systemic nature of racism beyond their personal experiences.
- **Willful Blindness:** This form of racial illiteracy involves a deliberate choice not to engage with race or racism, driven by discomfort, resistance to change, or an unwillingness to confront personal biases or privileges, partially due to the selfish desire to maintain inequitable status quo.

Overcoming this resistance is crucial as it forms the starting point for any meaningful change. Without addressing resistance, organisations risk reinforcing the status quo and failing to engage employees in their anti-racism efforts.<sup>44</sup>

A combination of approaches is required to address all three types of racial illiteracy effectively: for individuals lacking exposure or awareness, organisations should focus on education and engagement that broaden perspectives and highlight diverse lived experiences. Addressing narrow privileged experiences or willful blindness requires a more strategic approach. To challenge the belief that racism is resolved, organisations should use lived experience data and real-world examples that are drawn from people in the organisation to illustrate the urgency of the issues. For those who are willfully disengaged, leadership should model openness and vulnerability, establish safe spaces for dialogue, and enforce policies mandating engagement in anti-racism efforts to ensure commitment to change.

### Level 1: Basic – Awareness and Understanding

At the Basic level, the focus is on building a foundational understanding of race, racism, privilege, and bias. Individuals begin to recognise systemic inequities and reflect on their own racial identities and biases. This stage is essential for laying the groundwork for deeper engagement and learning.<sup>45</sup>

Developing awareness and understanding helps to create a common language and framework for discussing race within the organisation. This enhances communication, reduces instances of microaggressions, and fosters a more inclusive environment.

At this stage, organisations should invest in foundational training and education that introduces core concepts of racial literacy. We recommend organisations mandate basic level for all employees – and incorporate the learning in induction, onboarding and development in the employee cycle, ensuring that the organisation achieves a minimum basic racial maturity. This should be linked to accountability mechanisms and KPIs [self-assessed and demonstrated behaviours] (see Figure 3 on Criteria).

### Level 2: Intermediate – Skill Development and Application

At the Intermediate level, the emphasis shifts to building practical skills for navigating racial dynamics and promoting inclusive behaviours. This stage is critical because it moves beyond awareness to action, equipping individuals with the tools needed to manage racial dynamics that commonly arise in the day-to-day business operation and workplace situations effectively.

Developing these skills leads to cross-cultural understanding and respect, conflict resolution, and bias reduction in decision-making, which improves collaboration, workplace psychological safety, and efficiency. Employees become more adept at recognising and addressing biases.

Organisations should provide specific training programs that enhance these skills, such as respectful behaviours training and inclusive leadership courses. They should also create opportunities for practical application rooted in lived experience of racism appropriately collected from the organisations. Accountability should be established and reinforced through feedback, performance development

<sup>44</sup> DiAngelo, R. (2018). *White Fragility: Why It's So Hard for White People to Talk About Racism*. Beacon Press.

<sup>45</sup> Sue, D. W., Capodilupo, C. M., & Torino, G. C. (2007). *Racial Microaggressions in Everyday Life: Implications for Clinical Practice*. *American Psychologist*, 62(4), 271-286.

metrics, and data measurement. We recommend setting Intermediate as a minimum requirements for all people leaders – as part of leadership development and promotion criteria.

### Level 3: Advanced – Action and Advocacy

At the Advanced level, individuals take on leadership roles in advocating for systemic change and promoting racial equity. This stage is vital for sustaining long-term anti-racism efforts.

Empowering leaders and advocates enhances the organisation’s capacity to drive systemic change, fosters a culture of accountability, and builds a reputation for social responsibility and equity. This can improve employee trust, attract diverse talent, and strengthen stakeholder relationships.

We found that successful Executive sponsors, P&C leaders and ERG chairs often reach this stage to unlock their knowledge, ability and influence to become change agents. Peer to peer learning and influence are effective in building the advanced proficiency – as this stage requires actions beyond awareness and individual knowledge. Often when people act as a group, they can drive progress forward for an organisation more effectively than a single champion – the sum of the individuals is indeed bigger than its parts.

### Measurements and Monitoring

To measure the progress and improvements in racial literacy, organisations should establish robust feedback mechanisms and evaluation methods. Implement regular surveys, focus groups, anonymous feedback, and complaints channels to gauge employee experiences and perceptions at each stage. Encourage open dialogue and reflection to identify barriers and opportunities for improvement.

Use quantitative and qualitative data to measure progress, such as tracking participation rates in anti-racism programs, assessing changes in employee engagement scores, and monitoring retention and promotion rates among diverse groups. Establish clear KPIs linked to anti-racism goals to evaluate the impact and effectiveness of initiatives.

Racial literacy is a key, foundational consideration in establishing an effective anti-racism framework. See Consideration #2 – Racial Literacy for actionable guidance.



Figure 3:



# MindTribes Racial Literacy Framework



## RESISTANCE TO ENGAGEMENT

### Level 0: Racially Illiterate

**Description:**

Denial or avoidance of conversations about race, e.g. insistence on "colourblindness". Sees these topics as unnecessary, divisive, or uncomfortable. Resistant to change.

**Metrics for Self-Assessment:**

- Do I avoid discussions on race, or do I dismiss them as unimportant?
- How often do I perceive conversations about racism as unnecessary or overly sensitive?
- Do I hold a belief that racism is not a significant issue in my context?

**Organisational Response:**

- Awareness campaigns, inclusive internal communications, safe spaces for dialogue
- Leadership to model vulnerability and openness, making it clear that engagement in racial literacy is expected and supported
- Policies and training programs that explicitly address bias and racial dynamics

**Criteria to Move to Level 1:**

- Openness to Listening: Show willingness to listen to others' perspectives and experiences regarding race.
- Curiosity about Racial Dynamics: Begin asking questions or seeking basic information about race and racism.
- Initial Self-Awareness: Acknowledge the existence of different racial experiences, even if not fully understood.

## FOUNDATIONAL AWARENESS

### Level 1: Basic

**Description:**

Beginning to recognise racial dynamics, biases, and the existence of systemic racism. Basic understanding of race-related concepts, initial self-reflection, and improved confidence in discussing race.

**Metrics for Self-Assessment:**

- Can I define key terms like racism, privilege, bias, and microaggressions?
- Have I reflected on my own racial identity and how it shapes my perspectives?
- Do I recognise overt forms of racism, but struggle with understanding subtle or systemic forms?

**Organisational Response:**

- Foundational training and education that introduces core concepts of racial literacy
- Workshops, reading groups, and curated learning materials that enhance awareness
- Share data on workforce diversity and racial equity to ground discussions in concrete reality

**Criteria to Move to Level 2:**

- Basic Knowledge Acquired: Demonstrate understanding of fundamental concepts related to race and racism.
- Willingness to Self-Reflect: Engage in self-reflection exercises to identify personal biases.
- Readiness to Practice: Show readiness to apply initial knowledge in discussions or real-life scenarios.

## SKILL DEVELOPMENT

### Level 2: Intermediate

**Description:**

Applying practical skills in real-life racial interactions, such as conducting culturally safe conversations around race and racism, identifying when racism occurs, and responding to racism appropriately.

**Metrics for Self-Assessment:**

- Can I effectively communicate about race-related issues without defensiveness?
- Have I used empathy to understand and validate others' experiences of racism?
- Am I able to identify and manage my emotional responses (e.g., discomfort, anxiety) during racial conversations?

**Organisational Response:**

- Capability training programs that enhance these skills, such as respectful behaviours training, inclusive leadership courses, and conflict resolution workshops
- Practical application rooted in lived experience of racism appropriately collected from the organisations
- Accountability set up through feedback, performance development metrics, and data measurement

**Criteria to Move to Level 3:**

- Effective Skill Use: Demonstrate practical use of skills like assertive communication and emotional regulation in race-related situations.
- Empathy and Cultural Humility: Show the ability to empathise and actively listen to diverse perspectives.
- Consistent Engagement: Regularly engage in discussions or actions related to racial equity with confidence and respect.

## LEADERSHIP AND ADVOCACY

### Level 3: Advanced

**Description:**

Taking proactive steps to lead change and advocate for racial equity at systemic levels. Leading difficult conversations, challenging inequities, mentoring others, influencing policy or practices.

**Metrics for Self-Assessment:**

- Am I actively advocating for racial equity in my organisation or community?
- Have I led or facilitated discussions about race and racism, guiding others through their learning journey?
- Do I have a track record of influencing policies or practices that promote racial justice?

**Organisational Response:**

- Support and empower employees to become change agents
- Forming anti-racism taskforce, appointing a senior sponsor, activating ERGs, and setting up platforms for advocacy
- Implement inclusive policies, hold leaders accountable for DEI outcomes, and integrate racial equity goals into the overall strategic vision and performance metrics

**Criteria to Maintain Level 3:**

- Ongoing Advocacy: Continue to lead initiatives, advocate for systemic change, and mentor others in racial literacy.
- Sustained Action: Demonstrate a sustained commitment to racial equity through consistent actions and leadership.
- Feedback and Growth: Seek feedback on advocacy efforts and continuously refine approaches to be more inclusive and effective.



# Part 2: Background

Contextualising workplace racism in Australia

# Workplace Racism in Australia

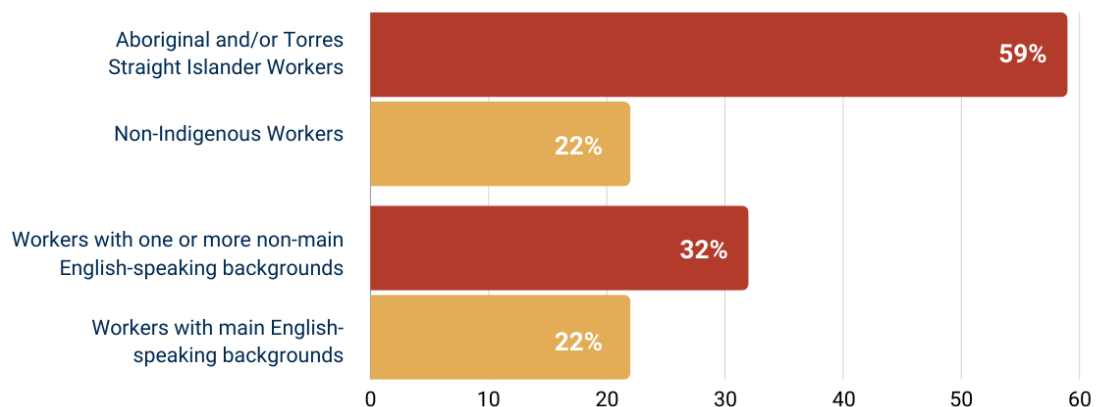
Recent studies found that up to two-thirds of non-White Australian employees commonly experience racism at work.<sup>46,47</sup>

In Australia, racism is widespread across sectors. It is present and evident in many places where people work; including corporate,<sup>48</sup> media,<sup>49</sup> sports,<sup>50</sup> education,<sup>51</sup> healthcare,<sup>52</sup> public services,<sup>53</sup> and more. An increasing number of reviews and reports in recent years have shone a light on the nature, extent and impact of racism in many workplaces, in no small part due to the bravery of employees who spoke out.

At MindTribes, we have worked with organisations across a wide range of sector industries. We found that racism causes significant personal and organisational harm. Indeed, workplace racism poses significant risks to employee well-being and productivity, as well as organisational integrity. Evidence showed that it can cause extensive psychological and emotional distress to employees,<sup>54</sup> lower workplace productivity, increased mental injury claims, and even litigation.

With its origin dating back to the era of European colonisation and as recent as the White Australia policy in the 1960s, racism remains to be ongoing and deeply entrenched in many modern Australian workplaces today, as illustrated in Figure 4.<sup>55</sup>

Figure 4. Reported levels of discrimination and harassment for marginalised workers in 2023



Source: Diversity Council Australia (2024)<sup>56</sup>

<sup>46</sup> Anderson, P., Mapedzahama, V., Kaabel, A. and J. O'Leary (2022). *Racism at Work: How organisations can stand up to and end workplace racism*. Diversity Council Australia. <<https://www.dca.org.au/research/racism-at-work>>

<sup>47</sup> Peucker, M., Vaughan, F., Doley, J., and Clark, T. (2024). *Understanding reporting barriers and support needs for those experiencing racism in Victoria*. Research report. Victoria University: Melbourne

<sup>48</sup> Anderson, P., Mapedzahama, V., Kaabel, A. and J. O'Leary (2022). *Racism at Work: How organisations can stand up to and end workplace racism*. Diversity Council Australia. <<https://www.dca.org.au/research/racism-at-work>>

<sup>49</sup> Terri Janke and Company Pty Ltd. (2024). *Listen Loudly, Act Strongly: Independent Review into ABC Systems and Processes in Support of Staff who Experience Racism*. Commissioned by the Australian Broadcasting Corporation.

<sup>50</sup> Sport Integrity Australia. (2024). *Racism in sport*. Sport Integrity Australia. Accessed 18 August 2024. <<https://www.sportintegrity.gov.au/news/integrity-blog/2024-03/racism-sport>>

<sup>51</sup> Ethnic Communities Council of Queensland. (2024). *Racism within Australian schools: A report on the experiences of CALD students*.

<sup>52</sup> Australian Government Office for the National Rural Health Commissioner. (2022). *Impacts of racism on the health and wellbeing of Indigenous Australians: Position statement*.

<sup>53</sup> CPSU Victoria, MindTribes & The University of Melbourne. (2023). *Safer Workplaces for Women of Colour*. MindTribes.

<sup>54</sup> Priest NC, Paradies YC, Gunthorpe W, Cairney SJ, Sayers SM. (2011). *Racism as a determinant of social and emotional wellbeing for Aboriginal Australian youth*. Medical Journal of Australia [Internet]. Accessed May 22, 2024. 1;194(10):546–50. <<https://onlinelibrary.wiley.com/doi/abs/10.5694/j.1326-5377.2011.tb03099.x>>

<sup>55</sup> Wesley CH. (1972). *Racism In History*. 35(3):52–3. <<https://www.proquest.com/scholarly-journals/racism-history/docview/1296808399/se-2?accountid=12372>>

<sup>56</sup> Diversity Council Australia. *Inclusion @ Work Index* [Internet]. (2024). Accessed May 24, 2024. <[https://www.dca.org.au/wp-content/uploads/2024/03/DCA\\_Inclusion@Work\\_Index\\_2023-2024\\_Synopsis.pdf](https://www.dca.org.au/wp-content/uploads/2024/03/DCA_Inclusion@Work_Index_2023-2024_Synopsis.pdf)>

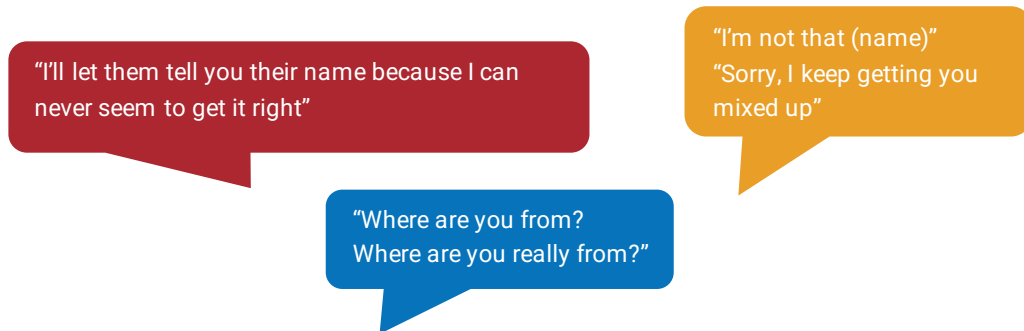
## Categorising Workplace Racism

Racism can manifest in various forms, and individuals may not always be aware of the entirety of its presence and impact. In regard to workplace racism, the issue can be broadly categorised into two types: Behavioural and Structural racism.

**Behavioural racism** is embedded in the actions and attitudes of individuals.<sup>57</sup> This form of racism can be both overt and covert. Overt behavioural racism can be demonstrated through racial slurs, vilification, and negative stereotyping.

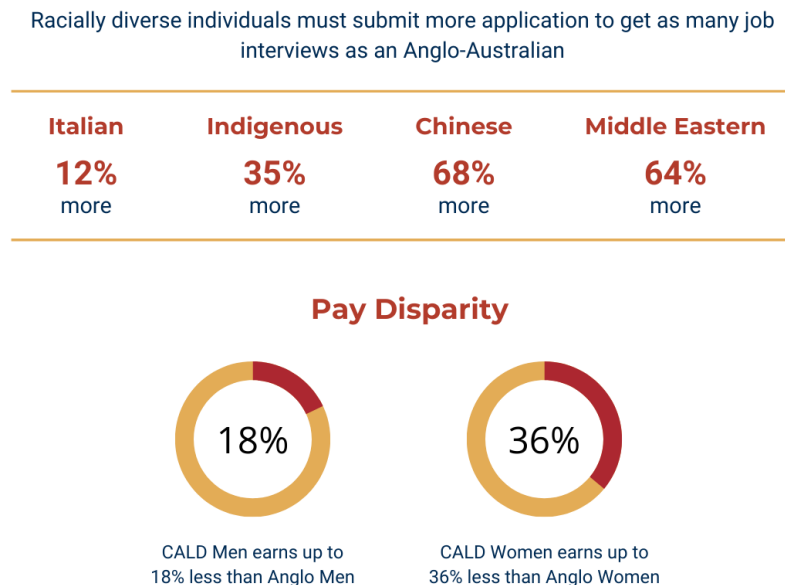
In most workplaces, behavioural racism is more covert (Figure 5). They manifest through ways such as microaggressions and social exclusion etc. that similarly cause tangible psychological harm, but are less likely to be called out and acted upon because of its nature of being less noticeable.

Figure 5: Examples of Behavioural Racism



**Structural racism** is ingrained in the structures and systems of organisations, perpetuating racial inequality to marginalised groups or individuals.<sup>57</sup> This form of racism is often more covert and less observable. It can be expressed through discriminatory hiring practices, biased performance review, unequal progression opportunities, pay disparity, social norms and status etc. Systemic racism (a component of structural racism) focuses on how specific policies and practices embedded within organisations can result in the exclusion or promotion of certain racial groups (Figure 6).<sup>57</sup>

Figure 6: Examples of Structural Racism



Source: Booth (2022)<sup>58</sup> & Lam (2023)<sup>59</sup>

<sup>57</sup> Alberta Civil Liberties Research Centre [Internet]. (2024). *Forms of racism*. Accessed May 25, 2024. <<https://www.aclrc.com/forms-of-racism>>.

<sup>58</sup> Booth AL, Leigh A & Varganova E. (2011). *Does Ethnic Discrimination Vary Across Minority Groups? Evidence from a Field Experiment*. Blackwell Publishing Ltd and the Department of Economics, University of Oxford. 2011. <<https://andrewleigh.org/pdf/AuditDiscrimination.pdf>>

<sup>59</sup> Lam J. *Non-Anglo pay gap revealed*. The Australian. April 7, 2023. Accessed April 30, 2024. <<https://www.theaustralian.com.au/business/the-deal-magazine/ethnic-pay-gap-workers-from-the-middle-east-africa-asia-face-discrimination/news-story/8c3ab6dd01790bd957e1f141d07e5595>>.

## Why Address Racism?

In the contemporary Australian context, addressing racism is not merely a moral imperative. It is also a critical business imperative in creating a more inclusive, safe, and productive work environment. Elias and Paradies in 2016 estimated that Australia loses more than approximately \$37 billion per year as a result of racial discrimination.<sup>60</sup> 3% of annual GDP has been lost due to dismissal of productivity and talent.

Evidence showed that organisations face the following negative impacts if racism remains unaddressed:

- High Turnover Rates - Employees who experience personal racism from colleagues are 2.7 times more likely to consider quitting in the following year.<sup>61</sup>
- Absenteeism - Among employees affected by racism, 70% took discrimination-related time off,<sup>22</sup> resulting to high absenteeism and lower productivity levels.
- Psychological Distress - Racism is significantly associated with increasing anxiety, depression, suicide risk and endorsing poor overall mental health.<sup>62</sup>
- Profitability - Nearly 30% of companies with less diversity in their workforce are more likely to underperform financially.<sup>63</sup>
- Costly Recruitment - 70% of job seekers considers potential employer's commitment to DEI practices. Hiring will therefore be more time consuming.<sup>63</sup>
- Consumer Rejection - When making purchasing decisions, 40% of consumers consider a brand's stance on racial injustice.<sup>64</sup> This may lead to a loss of market share and possibly contribute to poor profitability.



<sup>60</sup> Elias A., Paradies Y. (2016). *Estimating the mental health costs of racial discrimination*. BMC Public Health 16, 1205.

<sup>61</sup> Wiley C. (2020). *The impact of cultural safety and exposure to racism on job satisfaction, career progression and turnover intentions of Aboriginal staff* [Internet]. Accessed May 25, 2024. <<https://nahc.com.au/6653>>

<sup>62</sup> Priest NC, Paradies YC, Gunthorpe W, Cairney SJ, Sayers SM. (2011). *Racism as a determinant of social and emotional wellbeing for Aboriginal Australian youth*. Medical Journal of Australia [Internet]. Accessed May 22, 2024. 1;194(10):546–50. <<https://onlinelibrary.wiley.com/doi/abs/10.5694/j.1326-5377.2011.tb03099.x>>

<sup>63</sup> Bagalini A. (2020). *5 ways racism is bad for business – and what we can do about it* [Internet]. World Economic Forum. Accessed 22 May, 2024. <<https://www.weforum.org/agenda/2020/07/racism-bad-for-business-equality-diversity/>>

<sup>64</sup> WARC. (2020). *How consumers are responding to brands' anti-racism stance* [Internet]. Accessed May 25, 2024. <<http://www.warc.com/newsandopinion/news/how-consumers-are-responding-to-brands-anti-racism-stance/en-gb/43909>>

# Organisations' Response to Racism

Amidst DEI initiatives and social movements, workplace organisations are in need of more focused and robust anti-racism responses.

## Risks of Not Implementing Anti-Racism Response

On an organisational level, the absence of a clear Anti-Racism Framework can lead to a toxic workplace culture where discrimination and bias are allowed to persist unchecked. This environment not only diminishes employee morale and productivity but also results in higher turnover rates, as employees—particularly those from marginalised backgrounds—may feel unsafe or unsupported. Moreover, a workplace that tolerates or fails to address racism will struggle to foster the kind of inclusive culture necessary for innovation and collaboration, putting the organisation at a competitive disadvantage.

From a reputational standpoint, organisations that do not take proactive measures to address racism may face public backlash, particularly in an era where social justice issues are highly visible and subject to public scrutiny. This can lead to significant damage to the organisation's brand, eroding consumer trust and loyalty. Negative public perception may result in boycotts, loss of market position, and strained relationships with key stakeholders, including investors and partners. The financial implications are also substantial, with potential costs including crisis management, legal fees, and lost revenue due to decreased customer and employee engagement.

For executives and leaders, the risks of not prioritising anti-racism efforts extend beyond organisational consequences. Leaders who fail to address racism may face personal accountability for their inaction, particularly in jurisdictions with strict legal requirements. For instance, under the *Equal Opportunity Act 2010 (Vic)*, there is a positive duty on employers to eliminate discrimination proactively. Executives who do not meet these obligations could be held personally liable for breaches, resulting in fines, legal action, and damage to their professional reputations. Furthermore, leaders perceived as indifferent or complicit in the face of racism may lose the trust and respect of their teams, undermining their authority and effectiveness.



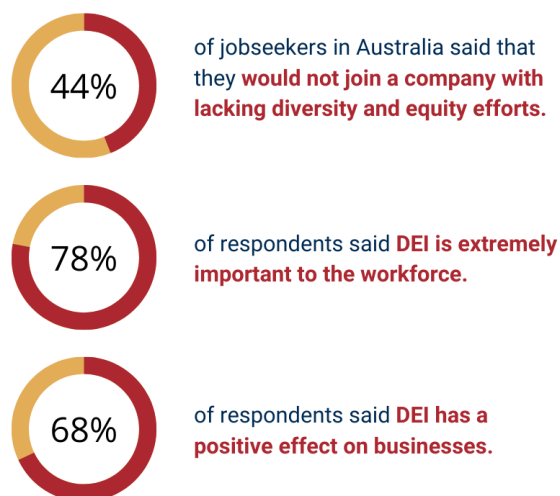
## Progress in Anti-Racism

Recent years have seen progress in some areas that relate to anti-racism in the workplace. Some of the key advancements through organisational efforts, social movements, and/or legislative changes include:

- **DEI Initiatives:** Organisations have increasingly implemented DEI programs such as training, policy reforms, and strategies to increase representation of marginalised groups, focusing on fostering inclusive cultures (Figure 7). However, many DEI initiatives have been criticised for lacking depth, specificity and measurable outcomes. They often present an appearance of multiculturalism without acknowledging and effectively tackling the root causes of racism. For meaningful progress, DEI initiatives must show a strong commitment to combating racism with measurable outcomes and accountability mechanisms.
- **Gender Equity Initiatives:** Progress in gender equality has improved representation and parity in the workplace but often lacks intersectionality. Many initiatives fail to address the unique challenges faced by Women of Colour, highlighting the need for approaches that consider multiple dimensions of identity and discrimination. The Workplace Gender Equality Agency (WGEA) in Australia has been pivotal in promoting gender equality, yet its frameworks often do not fully encompass the intersecting issues of race and gender, necessitating more comprehensive strategies.
- **Black Lives Matter (BLM) Movement:** The BLM movement out of the U.S. has rippled through the Pacific Ocean, spotlighting systemic racism and prompting organisations to implement more robust anti-racism actions. However, there exist critiques that some businesses focused mainly on performative actions rather than making substantial changes in policies and behaviours that promote racial justice.
- **Aboriginal Reconciliation:** In Australia, addressing Indigenous rights and reconciliation is crucial for broader anti-racism efforts. Strategies like Reconciliation Action Plans (RAPs) acknowledge past injustices and promote inclusion of Aboriginal and Torres Strait Islander peoples, supporting broader anti-racism initiatives by addressing unique experiences of discrimination. However, the 2023 Voice Referendum, which failed to pass the proposed establishment of a permanent Indigenous advisory body to Parliament, has reinforced feelings of exclusion, hurt and marginalisation among the Aboriginal and Torres Strait Islander communities.

While progress has been made on these fronts, anti-racism efforts have not been sufficiently focused and lack maturity. The initiatives often fall short in addressing systemic racism comprehensively and require more robust, outcome-oriented approaches to create lasting and meaningful change.

Figure 7: Statistics on perspectives on DEI



Source: Tilo (2024)<sup>65</sup>

<sup>65</sup> Tilo D. (2023) *Australia emerges as leader for DEI efforts: report* [Internet]. Accessed May 25, 2024. <<https://www.hcamag.com/au/specialisation/diversity-inclusion/australia-emerges-as-leader-for-dei-efforts-report/442702>>

# Legislative Frameworks

Anti-racism in the workplace is governed by a combination of federal and state/territory laws.

## Legislative Requirements in Australia

In Australia, different jurisdictions provide protections against racial discrimination and impose obligations on employers to create safe and inclusive work environments. Key legislative requirements include:

- **Racial Discrimination Act 1975 (RDA)** - This federal legislation makes it unlawful to discriminate against someone on the basis of race, colour, descent, or national or ethnic origin. It covers various areas including employment. The RDA also addresses issues of racial hatred and vilification. However, the RDA does not impose a positive duty on employers to actively eliminate racial discrimination, a gap that has been highlighted as an area in need of reform. The Act primarily relies on individuals lodging complaints after incidents of discrimination have occurred.
- **Fair Work Act 2009** - This Act makes it unlawful for employers to discriminate against employees and prospective employees on the basis of race, colour, or national or ethnic origin during recruitment, employment, and dismissal. Employees who believe they have been discriminated against based on these protected attributes can seek redress through the Fair Work Commission. However, like the RDA, the Fair Work Act primarily addresses discrimination reactively, rather than imposing a proactive duty on employers to prevent it.
- **Equal Opportunity Act 2010 (Victoria)** - The Victorian Equal Opportunity Act is particularly notable for its inclusion of a positive duty for organisations to eliminate discrimination, harassment, and victimisation proactively. This means that employers in Victoria are required to take reasonable and proportionate steps to prevent discrimination from occurring in the workplace. The Act mandates that organisations address systemic issues and create policies and practices that promote equality, going beyond merely responding to complaints.
- **Work Health and Safety (WHS) Act 2011**: This Act requires employers to provide a safe work environment, which includes addressing psychological risks such as racism and harassment. Under the WHS Act, employers have a duty of care to ensure that workplaces are free from risks to health and safety, including those arising from discriminatory practices or environments that foster racism.
- **State and Territory Anti-Discrimination Laws** - Various states and territories have their own anti-discrimination laws that complement the RDA and Fair Work Act. For example, both the ACT and Queensland recently amended its Discrimination Act to introduce a positive duty for organisations,<sup>66</sup> similar to Victoria's legislation. These laws often include specific provisions that require organisations to make reasonable adjustments to accommodate individuals' needs based on protected attributes, including race.

To comply with these legislative requirements and foster a truly inclusive workplace, organisations should ensure they are familiar with the specific obligations under both federal and state laws and implement proactive measures to prevent racial discrimination, including regular training, policy reviews, and creating safe reporting mechanisms.

Organisations should also go beyond compliance by adopting best practices such as those outlined in the Victorian Equal Opportunity and Human Rights Commission Guidelines and New South Wales (NSW) Public Sector Anti-Racism Guide, which encourages organisations to be proactive rather than reactive in addressing racial discrimination.

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<sup>66</sup> ACT Human Rights Commission (2024). *ACT Discrimination Act Positive Duty*. <<https://hrc.act.gov.au/discrimination/act-discrimination-act-positive-duty>>

## Victorian Equal Opportunity and Human Rights Commission Guidelines

The Victorian Equal Opportunity and Human Rights Commission (VEOHRC) published its guideline on *Preventing and Responding to Workplace Racism* in August 2024, providing a critical framework for addressing race discrimination in the workplace.

The VEOHRC guideline outlined clear expectations towards organisations of all sizes to meet their legal obligations under the *Equal Opportunity Act 2010 (Vic)* and implement effective anti-racism strategies. It emphasised the importance of proactive measures, known as the positive duty, which requires organisations to actively prevent race discrimination rather than merely responding to incidents.

The guidelines outline five minimum standards for compliance:

1. **Racial Literacy:** Understanding and addressing the various forms of racism.
2. **Policies and Procedures:** Establishing clear anti-racism policies.
3. **Organisational Culture:** Promoting a culture of respect and inclusivity.
4. **Reporting and Response:** Implementing effective mechanisms for reporting and addressing racism.
5. **Continuous Improvement:** Regularly updating policies and practices to maintain effectiveness.



## NSW Public Sector Anti-Racism Guide

The NSW Public Sector Commission also published an Anti-Racism Guide in August 2024 outlining practical guidance for public sector organisations in fostering anti-racist workplaces. Tailored specifically for the public sector, the guide emphasises proactive measures that go beyond mere compliance, aligning with the *Work Health and Safety Act 2011 (NSW)* and the *Work Health and Safety Regulations 2017 (NSW)*. It outlines strategies for embedding anti-racism into organisational culture, including leadership accountability, continuous improvement, and the creation of safe spaces for dialogue. This guide complements both national and state frameworks, ensuring public sector bodies in NSW meet their legal obligations while fostering an anti-racist organisation.

## About this Report

While the VEOHRC and NSW PSC reports are more focused on compliance and broad guidelines, this current guidance focuses on the 'how' as a transformative tool for organisations to embed anti-racism into their core operations.

We envision this guidance to serve as both a practical guide and a thought leadership piece, helping to shape the conversation on racism in Australian workplaces.

This guidance addresses the VEOHRC minimum standards for preventing and responding to workplace racism, with specific guidance detailed in the following considerations:

- **Racial Literacy:** This aligns with *Consideration #2: Racial Literacy* where we emphasise the importance of building a deep understanding of racism, ensuring that all employees, especially leaders, are equipped with the knowledge to recognize and address racism effectively within the organisation.
- **Policies and Procedures:** This aligns with *Consideration #4: Governance & Accountability* ensuring that organisations establish clear and accountable policies and procedures for anti-racism.
- **Organisational Culture:** This aligns with *Normalising Anti-Racism* where we stress the importance of embedding anti-racism into the organisational culture. This involves fostering an environment where respect, inclusion, and open discussions about racism are normalised. This is also linked to *Consideration #1 Leadership* and touches more broadly across all considerations.
- **Reporting and Response:** This aligns with *Consideration #9: Employee Support* focusing on creating effective, culturally sensitive support systems, which include clear channels for reporting and responding to racism.
- **Continuous Improvement:** This aligns with *Consideration #8: Measurement & Monitoring* by advocating for the regular review and improvement of anti-racism efforts, ensuring they remain effective and responsive to the evolving needs of the organisation. This is also highlighted in the 'Continuous Focus' stage of the change roadmap.



# Part 3: Guidance

# Building an Anti-Racism Framework

An Anti-Racism Framework is essential for any organisation serious about tackling racism in a comprehensive and sustained way.

Unlike isolated initiatives, which may address specific incidents or aspects of racism, a framework provides a structured, strategic approach that ensures all elements of the organisation are aligned with the goal of acknowledging and addressing racism. This systematic approach is crucial because racism is not just an individual issue but a systemic one, embedded in organisational practices, policies, and cultures.

## Why a Framework is Required

- **Consistency and Accountability:** A framework ensures that anti-racism efforts are consistent across the organisation, preventing the piecemeal or fragmented approach that often results in sunk costs. It creates a roadmap for action, where progress can be measured, and accountability is clear.
- **Sustainable Change:** Racism is a deeply entrenched issue that cannot be effectively addressed without a holistic view. A framework supports long-term, sustainable change by embedding anti-racist practices into the organisation's core values and operations.
- **Comprehensive Approach:** A well-designed framework considers all aspects of the organisation—leadership, culture, policies, practices, and behaviours. It ensures that every facet of the organisation is examined and aligned with anti-racist principles, rather than just focusing on superficial changes that eventually can erode trust.

## MindTribes Anti-Racism Maturity Curve

The MindTribes Anti-Racism Maturity Curve is a useful tool for understanding where your organisation stands in its anti-racism journey and what steps are needed to advance. MindTribes Anti-Racism Maturity Curve (Figure 8), adapted from our report for the Commission for Gender Equality in the Public Sector (CGEPS),<sup>67</sup> provides a helpful reference. The levels of maturity are defined as follows:

- **Level 0 – Preparatory Stage:** Organisations at this stage are laying the groundwork for their anti-racism strategy, focusing on foundational assessments and building initial awareness.
- **Level 1 – Foundational Stage:** This stage is about compliance. Organisations are focused on meeting basic legal requirements and setting up initial policies and structures.
- **Level 2 – Promotional Stage:** At this level, organisations begin to set targets, promote anti-racism initiatives, and encourage participation across the organisation.
- **Level 3 – Advocacy Stage:** Organisations actively advocate for anti-racism, with leaders driving the agenda. This stage involves the execution of targeted actions and fostering a culture of inclusion.
- **Level 4 – Normalising Behaviours:** Anti-racism becomes a norm within the organisation. Inclusive practices are embedded in everyday operations, and there is a strong focus on creating a culture of belonging.
- **Level 5 – Continuous Improvement and Sustainability:** The final stage is about sustaining progress. Organisations at this level continuously evaluate and refine their anti-racism efforts, ensuring long-term commitment and adaptation to evolving challenges.

By understanding and utilising the MindTribes Anti-Racism Maturity Curve, organisations can take deliberate steps to advance their anti-racism efforts and tailor the Anti-Racism Framework to be both achievable and impactful. Moving through these levels ensures that anti-racism is not just a temporary focus but a lasting part of the organisation's identity.

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<sup>67</sup> MindTribes & Victorian Multicultural Commission. (2022). *Summary Report: How defined entities can achieve gender equality for Culturally Diverse Women in the Victorian Public Sector*. Research funded by CGEPS. <<https://mindtribes.circle.so/c/resourcehub/read-how-defined-entities-can-achieve-gender-equality-for-culturally-diverse-women-in-the-victorian-public-sector>>

## Getting Started with an Anti-Racism Framework

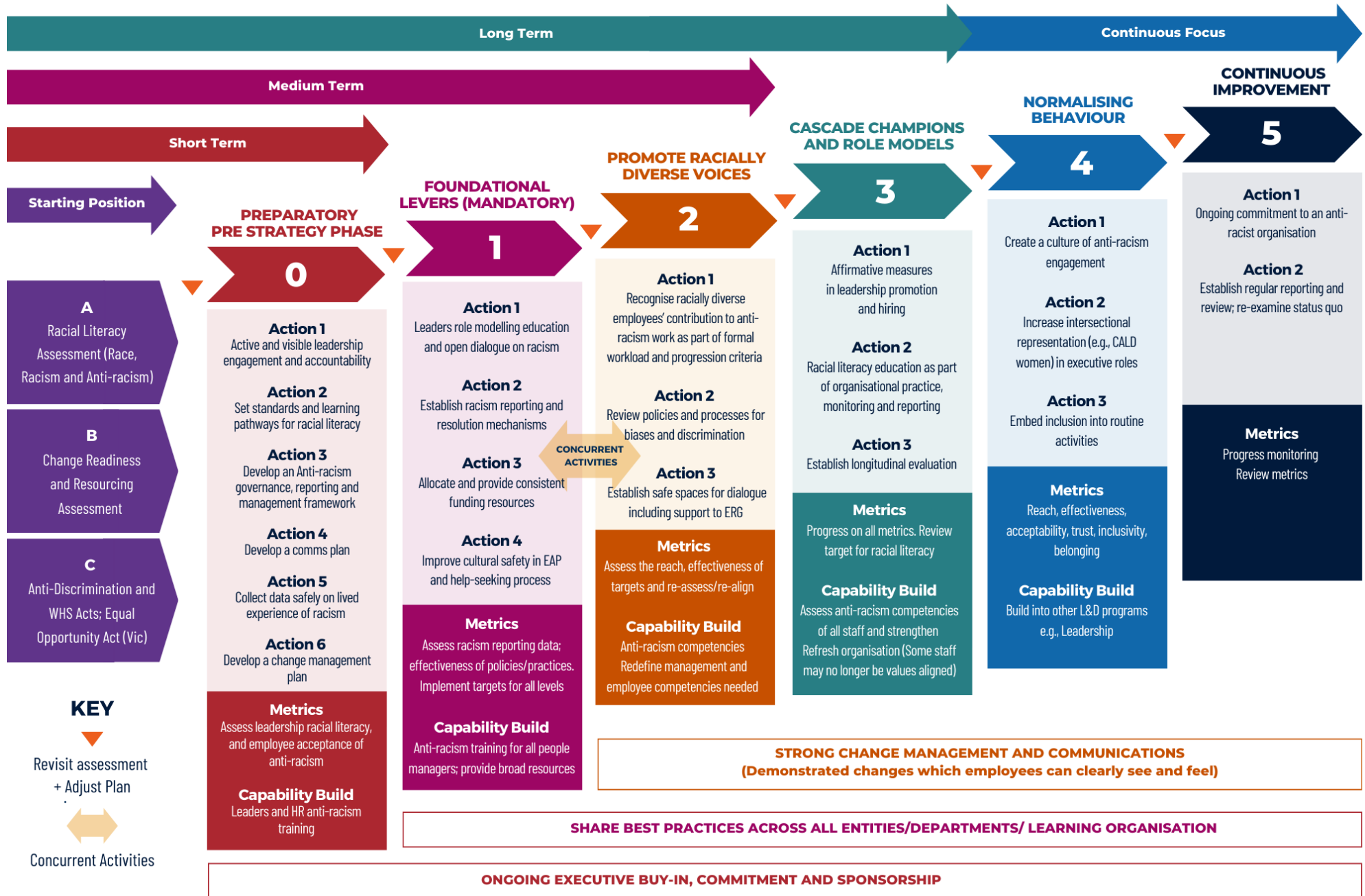
- **Assessment and Understanding:** Begin by assessing the current state of your organisation including racial literacy, change readiness and resourcing assessment. Collect data safely on lived experience of racism to understand the existing challenges, biases, and areas where racism may be present. This step often involves gathering data, conducting surveys, and holding conversations with employees, particularly those from culturally and racially marginalised groups.
- **Leadership Commitment:** Ensure that leadership is fully committed to the anti-racism journey and understand personal and organisational responsibilities towards legislative and ethical obligations. Leaders must not only endorse the framework but also actively participate in its development and implementation. Their commitment is vital for driving change and setting the tone across the organisation.
- **Developing the Framework:** The Framework should include the 10 considerations described in the following chapters. It should set standards for racial literacy and actions for all employees, ensuring consistency and transparency. The Framework must also include a governance, reporting and management framework, underpinned by clear goals and objectives.
- **Implementation and Integration:** Develop and roll out a change management plan and an internal communications plan. The Framework should integrate these plans into existing organisational processes and systems. This might include revising HR policies, introducing new training programs, and establishing mechanisms for ongoing feedback and improvement.

A real constraint lies in whether the business is ready to listen or not.

DEI practitioner in a private sector company



Figure 8: MindTribes Organisational Anti-Racism Maturity Curve



Source: MindTribes (2024).

# Putting Anti-Racism into Practice

The need for a thoughtful, proactive approach that pre-empts resistance and strategically embeds anti-racism initiatives, ensuring widespread support and lasting cultural change.

## Change Management

Implementing anti-racism initiatives requires a tailored change management approach that is human-centric, focusing on both individual behaviours and systemic barriers.

The ADKAR framework<sup>68</sup> –Awareness, Desire, Knowledge, Ability, and Reinforcement–provides a structured process for guiding anti-racism efforts in organisations:

- **Awareness:** Building awareness involves more than just identifying issues; it requires deep, often uncomfortable conversations about racism, privilege, and power. This step should include targeted data collection that captures the experiences of marginalised groups, creating a clear and evidence-based understanding of the specific racism-related challenges within the organisation.
- **Desire:** Fostering a desire to support anti-racism efforts is critical, especially given that these initiatives often challenge deeply held beliefs and behaviours. Leaders and employees must be motivated not only by organisational goals but also by a genuine commitment to justice and equity. Clear communication of the strategic intent and moral imperative of anti-racism is essential.
- **Knowledge:** Providing knowledge involves more than just training; it requires equipping people with the skills and understanding needed to confront and dismantle racism in their daily work. This includes practical tools for recognising and addressing biases, as well as creating safe spaces for ongoing learning and dialogue.
- **Ability:** Ensuring the ability to implement anti-racism actions involves creating an environment that supports and reinforces these efforts. This is likely to require significant structural changes to remove barriers and build systems that are supported by accountability measures. Leaders must actively role model anti-racist behaviours and ensure that the organisational culture supports these values.
- **Reinforcement:** Sustaining anti-racism change demands ongoing commitment and vigilance. Reinforcement should include continuous monitoring, regular feedback, and the adaptation of strategies as needed. Celebrating early wins and communicating progress is crucial for maintaining momentum and building trust within the organisation.

When implementing the ADKAR framework, leadership and stakeholder engagement are crucial, with leaders playing a key role in embedding anti-racism into the organisation's core values and operations. Continuous improvement and outcome measurement are also necessary to maintain momentum and ensure that the initiatives lead to lasting, impactful change.

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<sup>68</sup> Prosci. (n.d). *The Prosci ADKAR Model*. [Internet]. Viewed 1 August 2024. <<https://www.prosci.com/methodology/adkar>>

## Managing Resistance in Anti-Racism Efforts

Resistance to anti-racism initiatives is common. In most cases, a spectrum of initial reactions can be expected from people within an organisation, ranging from strong support to active opposition. Understanding the likely responses from different groups is key to addressing resistance effectively.<sup>69</sup>

For those who are resistant, concerns often stem from perceived threats to status or fears of reverse discrimination, indicating a low racial literacy (or racial illiteracy; see *MindTribes Racial Literacy Framework* in Figure 3). Addressing these concerns requires a comprehensive approach that includes education, dialogue, and active engagement to build racial literacy. Additionally, it is important to communicate the organisation's commitment to anti-racism and expected standard of behaviours of its employees.

For the ambivalent majority, fostering open dialogue and creating "brave spaces" rather than just "safe spaces" is crucial. These spaces encourage honest, non-judgmental conversations about race, helping to shift perspectives and reduce resistance.<sup>70</sup> Supportive individuals can be engaged as allies and champions within the organisation, helping to diffuse resistance and build broader buy-in.<sup>71</sup>

**Lots of diversity fatigue and pushback where privileged groups believe that they might be missing out on the path that was predestined for them.**

DEI expert



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<sup>69</sup> Edwards, D. (2023). *Responding to Resistance around DEI*. Board. <<https://board.org/dei/resources/responding-to-resistance-around-dei/>>

<sup>70</sup> Racial Equity. (n.d). *Respond to internal resistance to racial justice lens.* <<https://racialequity.org/2020/04/respond-to-internal-resistance-to-racial-justice-lens/>>

<sup>71</sup> Keister, A. (2024). *The 10 Most Common Objections to DEI and How to Respond*. The Diversity Movement. <<https://thediversitymovement.com/10-most-common-objections-dei-how-to-respond>>

## Assessing and Mitigating Risks

Just like potential resistance to change, organisations should anticipate and manage other risks to implementation to ensure successful outcomes. These risks often arise because anti-racism efforts challenge deeply ingrained beliefs and structures within an organisation. Below are key risks associated with implementing anti-racism initiatives, along with common strategies to mitigate them:

BARRIER	RISK	MITIGATION
<b>Implementation Challenges</b>	Organisations with low racial maturity or limited resources may struggle to implement comprehensive anti-racism initiatives effectively. The complexity of these initiatives might lead to partial or ineffective execution.	<ul style="list-style-type: none"> <li>• Leverage the <i>MindTribes Anti-Racism Maturity Curve</i> (Figure 8) to phase their implementation plans, aligning actions with their current maturity level and resources</li> <li>• Structured, gradual build-up of capacity, ensuring that even those with limited resources can progress meaningfully</li> </ul>
<b>Perceived Complexity</b>	Anti-racism initiatives can appear overwhelming due to their multi-faceted nature, particularly for organisations with limited experience in anti-racism work. This complexity may result in confusion or paralysis, hindering effective action.	<ul style="list-style-type: none"> <li>• Simplify the approach by focusing on clear, actionable steps using the ADKAR framework</li> <li>• Engage an external specialist consultant with practitioner experience to prioritise key initiatives and provide guidance on how to phase implementation effectively</li> </ul>
<b>Superficial Adoption</b>  <i>[see Considerations #1 - Leadership and #4 - Governance &amp; Accountability]</i>	There is a risk that organisations may superficially adopt anti-racism initiatives, focusing on compliance rather than genuine change. This could result in initiatives that are performative and fail to create meaningful impact.	<ul style="list-style-type: none"> <li>• Emphasise the need for authentic commitment from leadership</li> <li>• Set up accountability measures and regular reporting, ensuring that anti-racism efforts are deeply integrated into the organisation's culture, rather than being treated as checkbox exercises</li> </ul>
<b>Resource Allocation</b>  <i>[see Consideration #3 - Resources]</i>	Anti-racism initiatives require adequate resourcing, but some organisations may face challenges in allocating sufficient funds or resources. This can lead to incomplete or unsustainable efforts.	<ul style="list-style-type: none"> <li>• Anti-racism is seen as a priority and resources are allocated strategically to support the long-term success</li> <li>• Thorough resource planning, including securing necessary funding and support, from the outset</li> </ul>
<b>Potential Backlash</b>  <i>[see Considerations #5 - Internal Communications and #10 - Public Sentiment]</i>	Anti-racism initiatives can provoke backlash, particularly in organisations with significant internal divisions or conservative stakeholders. This backlash can undermine the initiatives and erode support.	<ul style="list-style-type: none"> <li>• Foster open dialogue and proactively address concerns, making space for all voices while reinforcing the strategic and moral imperatives of anti-racism</li> <li>• If the backlash is expected to be significant or destructive, leverage influential leaders to deliver a strong message and engage different stakeholder groups prior to and during implementation</li> <li>• Build strong relationships and trust across the organisation is key</li> </ul>

# Consideration #1: Leadership

Leadership is the cornerstone of successful anti-racism efforts, driving accountability, fostering inclusivity, and ensuring sustainable change within organisations.

## Introduction

Overwhelmingly in our research and practice, we found that leadership is the number one factor in determining whether an organisation's anti-racism efforts are likely to succeed.

Leaders set the tone for organisational values, priorities and behaviours. Their commitment to anti-racism is crucial for lifting the strategy off the paper and turning them into real actions. When leaders prioritise anti-racism, they create an enabling and authorising environment for the organisation to allocate necessary resources, implement clear policies, and ensure accountability at all levels. In other words, leaders define the organisation's anti-racism culture.

When leaders actively engage in anti-racism work, they set the standards for other people managers and employees to model the behaviours and attitudes necessary for creating a workplace that is ready to commence its anti-racist journey. Evidence shows that such transformational and adaptive leadership not only promotes organisational values but also leads to positive business outcomes, such as increased innovation (less groupthink), reduced psychological harm, lower turnover rates, and higher profitability. Indeed, organisations with accountable leadership saw an 81% higher level of trust among employees.<sup>72</sup>

**We're quite a hierarchical structure, so we need a lot of support from seniors to do this work.**

DEI practitioner in a public sector organisation

Conversely, a lack of leadership commitment can undermine anti-racism efforts, allowing biases and discriminatory behaviours to persist and grow. Leadership that is not genuinely invested in anti-racism can often lead to superficial or performative actions rather than substantive changes. The inconsistency between stated values and actual practices can erode trust among employees, when they observe negative behaviours from their leaders.

Therefore, it is imperative that leaders not only endorse anti-racism policies but also be visibly and actively involved in their implementation and ongoing assessment. Anti-racism must be recognised as a core competency for leaders, with integration into their daily responsibilities and performance evaluations. This active involvement ensures that anti-racism initiatives are not only effective and sustainable but also ingrained in the organisational culture.

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<sup>72</sup> Institute for Corporate Productivity (I4CP). (2024). *The ripple effect: unveiling the consequences of not holding leaders accountable* [Internet]. Accessed May 25, 2024. <<https://www.i4cp.com/press-news/the-ripple-effect-unveiling-the-consequences-of-not-holding-leaders-accountable>>

## Common Issues

1. **Lack of Awareness and Understanding of Racism as an Issue:** Leaders in most Australian organisations remain to be overwhelmingly from Anglo backgrounds and do not have lived experience of racism.<sup>73</sup> This is compounded by a lack of data collection on racism within their organisations and, often, low racial literacy among leaders. [See Consideration #2 – Racial Literacy]
2. **Lack of Recognition that Anti-Racism is a Moral Obligation and Business Imperative:** Racism harms employee morale, productivity, and overall organisational performance. The *OHS Act* across various Australian jurisdictions requires employers to provide a safe and healthy work environment, which includes protecting employees from risks to their health and safety, such as those caused by discrimination and racism. In Victoria, the *Equal Opportunity Act 2010* mandates a positive duty on organisations to actively prevent discrimination, including racism.
3. **Lack of True Commitment and Accountability:** Some leaders superficially endorse anti-racism policies without genuine commitment. This lack of involvement and inadequate resourcing keeps anti-racism efforts siloed and ineffective. Meaningful change requires active leadership and proper integration into business practices. [See Consideration #4 – Governance & Accountability]
4. **Resistance to Change:** Resistance to anti-racism initiatives is a significant barrier. Existing leaders who benefit from status quo may also personally be disincentivised to create change out of unjustified fear. This resistance stalls progress and creates a hostile environment for advocates of change. [See Consideration #2 – Racial Literacy]
5. **Shortfall in Diverse Leadership:** The lack of representation for marginalised groups results in tokenistic efforts that fail to ensure long-term impact. Currently, only one in ten ASX leaders originates from non-Anglo or non-Northern European backgrounds, and Indigenous representation makes up only 0.7 per cent of senior leadership positions in Australia's largest firms.<sup>74</sup> This results in a negative cycle hindering effective anti-racism actions and perpetuating inequality.

Requires slow, step-by-step convincing to get them to change their way of thinking.

DEI expert on senior leaders in an organisation

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<sup>73</sup> Soutphommasane T, Whitwell G, Jordan K & Ivanov P. (2018). *Leading for Change A blueprint for cultural diversity and inclusive leadership revisited*. Australian Human Rights Commission.

<sup>74</sup> Spillett M. (2024) *Anti-racist systems leadership to address systemic racism* [Internet]. Accessed 18 May, 2024. <[https://www.researchinpractice.org.uk/media/sooflams/anti-racist-practice-strategic-briefing-joint\\_web.pdf](https://www.researchinpractice.org.uk/media/sooflams/anti-racist-practice-strategic-briefing-joint_web.pdf)>

## Guidance on What Organisations Should Do

0 Short term	Active and Visible Leadership Engagement and Accountability	Ensure senior leaders are actively involved in anti-racism efforts. Set clear goals, allocate resources, and lead by example. Implement accountability measures and regularly monitor progress. Leaders should participate actively and visibly demonstrate their commitment, both verbally and through actions.
	Commitment to Anti-Racism (Legal and Ethical Responsibilities)	Senior leaders individually and as a group to commit to fulfilling legal and ethical obligations of anti-racism under the Equal Opportunity Act and the imperative to promote equality. The commitment should be transparent and measurable. [See Consideration #4 – Governance & Accountability]
1 Medium term	Education and Training for Leaders	Implement programs to equip leaders with the knowledge and skills necessary to lead inclusively and address racism effectively. Include organisational context, clear frameworks and requirements, and practical strategies for identifying and addressing racism. [See Consideration #2 – Racial Literacy]
	Transparent and Open Dialogue	Foster an open and inclusive dialogue about racism and antiracism efforts among leaders. Address concerns and misconceptions head-on, providing a safe space for leaders to express their views and ask questions. Set the foundation for transparent communications with employees. [See Consideration #5 – Internal Communications]
	Commit to Change Management	Leaders to commit to employing change management strategies to support a whole-of-organisation approach in adopting proactive anti-racism initiatives. This includes clear communication, training, and continuous support to help them adapt to new practices and policies.
	Highlighting Business Benefits to Organisation	Communicate the positive impact of anti-racism initiatives to the rest of the organisation, showing leadership priorities. Evidence shows that diverse and inclusive workplaces lead to increased innovation, higher employee satisfaction, and better financial performance.
2 Long-term	Diverse Hiring, Development and Promotion into Leadership Positions	Implement strategies to increase diversity within the leadership ranks. This includes setting diversity targets, using diverse hiring panels, and implementing bias-free recruitment processes. Provide mentorship, training, and support to help high-potential diverse talent progress. Senior leaders should be actively involved in these programs to ensure they are effective and aligned with organisational goals.

# Consideration #2: Racial Literacy

Racial Literacy is the foundation for genuine anti-racism, equipping people with knowledge, skills, and support to become change agents.

## Introduction

Racial literacy is closely linked to one's ability and willingness to act and drive anti-racism. The level of racial literacy varies among people in any organisation, and assessing how different groups of employees and leaders fall within this spectrum is a crucial first step. The MindTribes Racial Literacy Framework is a tool designed to assess current levels and guide development towards higher racial literacy.

In any organisation, there will likely be a small proportion of those who are racially illiterate (Level 0). These are individuals who dismiss or invalidate others' experiences of racism, often adopting a "colour-blind" approach or rejecting the idea of systemic racism altogether. As a result, they compromise the cultural safety of a workplace, where racially and ethnically diverse employees may feel pressured to mask their discomfort at casual racism or tolerate race-based inequities. The risk of racial illiteracy is particularly acute when these individuals hold positions of power over those who experience racism, potentially leading to discriminatory practices in recruitment, promotion, or daily interactions, creating a hostile work environment. This poses a significant hazard to psychological safety and breaches the employer's positive duty to maintain a safe workplace.

MindTribes recommends organisations to mandate basic racial literacy (Level 1) as a minimum standard for all employees. This can be achieved through mandatory training on foundational racial literacy, integrated into induction programs and refreshed periodically. Additionally, organisational policies should actively discourage behaviours demonstrating racial illiteracy, such as dismissing reports of racism or microaggressions. This approach not only mitigates risks but also establishes a foundation for genuine anti-racism work.

**The hardest thing with racism is that no one wants to think they are racist and no one wants to acknowledge that it is a big problem.**

DEI practitioner in a private sector organisation

Intermediate (Level 2) and advanced (Level 3) racial literacy involve skill development and application—reactively and proactively, respectively. All managers and leaders should aim for at least an intermediate level, as this equips them to lead discussions about racism and respond effectively to incidents. Given that approximately 30% of the workforce comprises racially and ethnically diverse employees, with many experiencing racism, an intermediate level of racial literacy is critical for those in leadership roles.

At the advanced level, individuals should demonstrate proactive behaviours, such as identifying systemic barriers, advocating for change, and challenging entrenched racism within organisational structures and society at large. Senior leaders and members of any anti-racism task force should either reach this level or have access to specialists who can support them. While the goal is for all employees to progress towards advanced literacy, the reality of turnover and attrition means this must be a continuous effort.

Neglecting to integrate racial literacy into the anti-racism framework can lead to significant resistance to these initiatives. Without adequate support, leaders with low racial literacy may struggle to champion anti-racism efforts effectively, resulting in inconsistent messaging and a lack of credibility.

Racial literacy equips individuals to understand and challenge existing power structures in the workplace.<sup>75</sup> It enables individuals to recognise the subtle ways in which racism operates, encouraging them to actively challenge bias and discrimination.

People do struggle with actually acknowledging the difference between race, ethnicity, culture, etc. I think they're much more comfortable with the idea of culture.

DEI practitioner in a public sector organisation

## Common issues

1. **Resistance to Racial Literacy Learning and Change:** Employees and leaders may resist developing their racial literacy, especially if discussions about race are perceived as uncomfortable or irrelevant to their work. This resistance can stem from defensiveness, fear of being labelled as racist, or a belief that racism is not a significant issue.
2. **Lack of Awareness of Personal Biases:** Many individuals are unaware of their own implicit biases and how these biases influence their behaviour and decision-making. This lack of self-awareness can undermine anti-racism efforts by perpetuating discriminatory practices, even unintentionally. Unaddressed biases contribute to the persistence of systemic racism within the organisation.
3. **Inadequate Training and Education:** Many organisations offer insufficient or poorly designed training on race and racism. Such training may be one-off, superficial, or fail to address the complexities of racial issues, leaving employees with an incomplete or misguided understanding. Inadequate training leads to superficial engagement with anti-racism initiatives, where employees may go through the motions without truly understanding or committing to the framework's goals.
4. **Failure to Tailor Initiatives to Varying Levels of Racial Literacy:** Anti-racism initiatives are often designed with a one-size-fits-all approach, overlooking the diverse levels of racial literacy among employees. This can result in initiatives that are either too advanced for some or too basic for others. When initiatives do not meet employees where they are in their understanding, they are less effective, leading to disengagement, frustration, or a lack of meaningful impact.

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<sup>75</sup> Bargallie D., Fernando N., Lentin A., (2024). *Breaking the racial silence: putting racial literacy to work in Australia*. Ethic and Racial Studies. Routledge Taylor & Francis Group. < <https://doi.org/10.1080/01419870.2023.2206470>>

5. **Lack of Continuous Learning Opportunities:** Racial literacy is not a one-time achievement but requires ongoing learning and reflection. However, many organisations fail to provide continuous opportunities for employees to deepen their understanding of race and racism. Without ongoing education, employees may revert to old habits and biases.
6. **Insufficient Use of Compliance as a Tool:** Organisations often neglected to use compliance as a supplementary tool to educational and cultural change. It can be a useful driver and incentive for the initial engagement, with organisations setting and communicating racial literacy as a priority.

There's a lot of resistance to understanding the nuance of race because it makes people uncomfortable. They tend to conflate race with culture or religion.

DEI practitioner in a public sector organisation



## Guidance on What Organisations Should Do

<b>Starting Point</b>	<b>Assess Racial Literacy Levels</b>	Evaluate the current level of racial literacy among different employee groups and leaders. Consider a mixed-methods approach to gather data on current levels of racial literacy, such as using surveys to collect quantitative data on knowledge and attitudes, and providing qualitative insights into the nuances of individuals' racial literacy and their unique challenges.
<b>0 Short Term</b>	<b>Tailor Educational Initiatives</b>	Design customised educational programs that cater to varying levels of racial literacy among employees and leaders. Offer basic awareness training for those with lower levels of understanding and advanced sessions for individuals with higher racial literacy. Ensure these programs include both theoretical content and practical applications.
	<b>Incorporate Racial Literacy into the Change Management Plan</b>	Integrate racial literacy development into broader change management strategies, recognising that this is a gradual process requiring continuous growth, alongside structural changes. Use human-centric approaches, encourage collaborative learning that distributes the work of racial literacy education more equitably.
<b>1 Medium term</b>	<b>Implement Racial Literacy Education as part of Organisational Practice</b>	Embed racial literacy into standard organisational practices, including induction programs (ensure all employees reach the basic level), ongoing learning and development initiatives, leadership development programs etc. Foster an environment where continuous reflection and application of racial literacy are encouraged, helping employees integrate their learning into their daily work.
<b>2 Long term – Continuous Focus</b>	<b>Ongoing Monitoring and Reporting of Racial Literacy</b>	Regularly evaluate the effectiveness of racial literacy initiatives and adapt them as needed based on employee feedback and performance data. Provide confidential channels for employees to share experiences and suggestions, helping identify areas for improvement. Track progress over time to measure the success of these initiatives and ensure they remain relevant and effective. [See Consideration #8 – Measurement & Monitoring]
<b>3 Continuous Focus</b>	<b>Continuous Improvement of Organisational Racial Literacy Framework</b>	Regularly refine the racial literacy framework based on the organisation's evolving maturity and needs. As the organisation progresses, adapt the framework to address more complex issues, incorporate advanced content, and respond to employee feedback, ensuring it remains effective, relevant, and aligned with growth objectives.

# Consideration #3: Resourcing

Adequate resourcing ensures anti-racism initiatives are backed by the necessary tools, time, and talent to drive real, tangible change, avoiding sunk costs.

## Introduction

Despite the recognition of the importance of addressing racism within organisations, the allocation of resources—whether in terms of budget, personnel, or time—frequently falls short. This lack of prioritisation can critically undermine the effectiveness of even the most well-intentioned strategies and condemn anti-racist efforts to failure from the outset.

In some organisations, there is an expectation of voluntary efforts of employees, particularly those from racially diverse groups who are most affected by racism. These employees are frequently expected to lead or contribute to anti-racism work without adequate compensation, recognition, or support. In MindTribes' experience, this not only places an unfair burden on them but also perpetuates systemic inequities by exploiting their lived experiences. Such reliance on unpaid or under-resourced initiatives often leads to burnout and disengagement.

**Anything that diverts resources from the bottom line (profit and loss) requires a strong case to prove its importance.**

DEI practitioner in a private sector organisation

Under-resourcing sends a stark message about the organisation's true commitment, or the lack thereof, to anti-racism. When initiatives are not fully supported with the necessary resources, they can be perceived as symbolic gestures rather than genuine efforts to create change. This perception can erode trust among employees, especially those from marginalised groups, and may even exacerbate the very issues the initiatives aim to address.

For anti-racism to be genuinely embedded within an organisation, resourcing must be seen as an investment in the organisation's future. This requires thoughtful planning, dedicated roles, and continuous evaluation. Without consistent resourcing, anti-racism initiatives are likely to be short-lived, leaving systemic issues unresolved.

## Common Issues

### **1. Inadequate Allocation of Resources (time, budget, and expertise) to anti-racism initiatives.**

Organisations often underestimate the resources required, leading to efforts that are underfunded and unable to meet their objectives. A survey by Edelman showed that 57 per cent of employees believe leadership is holding up DEI progress due to under-resourcing and under-prioritisation.<sup>76</sup> This not only hampers the effectiveness of these initiatives but also signals a lack of true commitment from leadership.

**2. Lack of Specific Focus on Anti-Racism:** Incidents of racism are often grouped under general bullying/harassment or DEI, which can obscure the specific focus and importance of anti-racism. We propose that incidents of racism should be reported directly to executives to ensure stronger accountability and that anti-racism efforts have dedicated resources, rather than competing with other DEI initiatives. .

**3. Lack of Expertise:** Another significant issue is the lack of specialised expertise within the organisation to drive anti-racism initiatives effectively. Often, these responsibilities are placed on HR or diversity teams that are already overextended and may lack the specific knowledge required to tackle systemic racism comprehensively. Without the right expertise, initiatives may be poorly designed and fail to address the root causes of racial inequality.

**4. Failure to Align Resources with Strategic Goals:** Even when resources are allocated, they are often not aligned with the organisation's broader strategic goals. This misalignment can result in initiatives that are disconnected from the overall mission of the organisation, making it difficult to sustain momentum and achieve meaningful outcomes. For anti-racism initiatives to be successful, they must be integrated into the core strategic objectives of the organisation. [See Consideration #7 – Initiatives]



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<sup>76</sup> Edelman R. (2023). *Employees are Disconnected from their Employees on Racial Justice*. < <https://www.edelman.com/trust/2023/trust-barometer/special-report-business-racial-justice/executives-disconnected-employees>>.

## Guidance on What Organisations Should Do

<p><b>Starting Point</b></p>	<p><b>Conduct a Resourcing Needs Assessment</b></p>	<p>Begin by conducting a thorough needs assessment to identify the specific resources—such as budget, staff, materials, and expertise—required for your anti-racism initiatives. This assessment should consider both immediate and long-term needs to ensure sustainability. Make sure to include input from those who are directly affected by racism, as their insights are crucial for accurately identifying what is needed.</p>
<p><b>1 Medium term</b></p>	<p><b>Allocate and Provide Consistent Funding</b></p>	<p>Ensure that anti-racism initiatives receive consistent funding by integrating them into the organisational budget and strategic planning processes. This involves not just initial investments but also committing to ongoing financial support to sustain these efforts. Allocate funds for training, external expertise, resources, and employee support programs, guaranteeing that anti-racism work is prioritised and resourced adequately over time.</p>
	<p><b>Recognition of Anti-Racism Work as part of Workload and Progression</b></p>	<p>Acknowledge that racially diverse employees often carry the extra burden of driving anti-racism efforts. To avoid over-reliance on their lived experiences and emotional labour, organisations should formally recognise these contributions as part of employees' workloads. This recognition should include recognising this as part of their formal workload, offering professional development opportunities, or incorporating their contributions into performance evaluations and career advancement criteria.</p>
<p><b>3 Continuous Focus</b></p>	<p><b>Regularly Review and Reallocate Resources</b></p>	<p>Implement a process for regularly reviewing the allocation of resources to anti-racism initiatives. This includes assessing whether the current distribution of resources is effective and making adjustments as necessary to respond to changing needs or priorities. Regular reviews can help prevent resource wastage and ensure that initiatives remain aligned with organisational goals. [See Consideration #8 – Measurement &amp; Monitoring]</p>



# Consideration #4: Governance & Accountability

Governance & Accountability provide the framework that turns anti-racism commitments into lasting institutional change.

## Introduction

Governance is often overlooked in Anti-Racism Frameworks. Yet, it plays a critical role in ensuring that these initiatives are continuous, effectively implemented and sustained over time.

Governance of anti-racism efforts involves structures, policies, and processes that guide, monitor, and enforce the organisation's commitment to eradicating racism. It supports accountability, ensuring that those in leadership positions are responsible for the outcomes of these initiatives and are held to ethical standards. Such governance structures can come in a variety of forms, such as anti-racism taskforce,<sup>77</sup> committees and sponsors. It is crucial for the governance to be led by Executive Leadership where they are personally responsible. Accountability is the mechanism through which organisations can measure their progress and make necessary adjustments.

Robust governance ensures compliance with legal standards, including anti-discrimination laws, thereby safeguarding the organisation against legal risks. In today's business landscape, where the public and employees alike are increasingly demanding transparency and ethical conduct, strong governance and accountability are no longer optional—they are essential.

Neglecting governance and accountability in anti-racism efforts can lead to significant risks, including the perpetuation of unethical practices, ineffective initiatives, and even personal risks for senior leaders and executives. Failure to comply with legislative requirements can also result in legal repercussions, reputational damage, and financial losses.

Proper governance frameworks, ethical standards, and transparent practices are vital for driving meaningful change. When leadership fails to establish clear governance structures, anti-racism efforts may lack direction, oversight, and follow-through, leading to initiatives that are disconnected from the organisation's broader strategy.



**Building it into big pieces of strategic work gives ongoing anchor, otherwise it tends to be piecemeal funding... Making it sustainable is the challenge.**

HR leader in a public sector organisation

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<sup>77</sup> Dobbin F., Kalev A. (2015). *Why Firms Need Diversity Managers and Task Forces*.  
<[https://scholar.harvard.edu/files/dobbin/files/why\\_firms\\_need\\_diversity\\_managers\\_and\\_taskforces.pdf](https://scholar.harvard.edu/files/dobbin/files/why_firms_need_diversity_managers_and_taskforces.pdf)>.

## Common issues

1. **Lack of Clear Accountability:** Without clearly defined roles and leadership commitment, anti-racism initiatives often become fragmented and inconsistently applied. This lack of clarity leads to perceptions of superficiality and undermines the effectiveness of these efforts.
2. **Inadequate Oversight:** Weak governance structures result in poor monitoring and tracking of anti-racism initiatives, allowing systemic issues to persist unchecked. Inadequate oversight also increases the risk of failing to meet legislative compliance, which can have serious legal and financial consequences.
3. **Tokenism in Representation:** Including diverse voices without giving them real influence results in tokenistic representation that fails to address the root causes of racism. This leads to frustration and disengagement among marginalised groups.
4. **Insufficient Risk Management:** Failing to identify and manage risks associated with anti-racism initiatives leaves organisations vulnerable to challenges that can undermine these efforts. This oversight can result in reputational harm and lost trust among employees and stakeholders.
5. **Ethical Compromises:** Balancing anti-racism efforts with other business priorities can lead to ethical compromises, where anti-racism is deprioritised. This creates perceptions of hypocrisy and performative activism, eroding trust and credibility. Ethical compromises can also lead to violations of legal standards, further complicating the organisation's compliance efforts and increasing the risk of legal action.

Our HR areas don't carry any data around racism; they measure it (in broad terms) like discrimination or bullying.

DEI practitioner in a public sector organisation



## Guidance on What Organisations Should Do

0 Short term	Clear Governance Structures	Establish clear governance structures that include dedicated committees or roles responsible for overseeing anti-racism initiatives, involving senior leaders. Ensure these structures have the authority to make decisions and allocate resources effectively. Incorporate compliance checks within these structures.
	Set Measurable Goals, KPIs and Consequences	Define specific, measurable goals for anti-racism initiatives and tie them to Key Performance Indicators (KPIs) that are regularly tracked and reported. Include measures of compliance with legal standards and ethical guidelines. Ensure that leaders are held accountable for meeting these targets, and establish clear consequences for failing to meet them to reinforce the organisation's commitment to anti-racism.
1 Medium term – Continuous Focus	Ethical Standards and Transparency	Uphold the highest ethical standards in all anti-racism efforts. Transparency in decision-making and reporting is crucial to build trust and credibility with employees and stakeholders. This involves clear communication about the goals, progress, and challenges of anti-racism initiatives, ensuring that everyone in the organisation is aware of the ongoing commitment to these efforts.
	Establish Reporting, Investigation and Resolution Mechanisms for Incidents of Racism	Create clear mechanisms for reporting, investigating, and resolving incidents of racism, with escalation protocols that align with the nature and severity of the incident. Consider escalating severe cases to the CEO or board level to ensure they are handled with the appropriate level of seriousness. Tailor these mechanisms to reflect the organisation's risk appetite.
2 Long-term	Policies and Process Review to align with Anti-Racism Commitment	Review and revise existing policies and processes to ensure they align with the organisation's anti-racism commitment. This includes assessing policies and practices associated with the entire employee process including recruitment, performance management, and disciplinary procedures to identify and address any systemic biases.
	External Audits and Independent Reviews	Consider conducting external audits or independent reviews of anti-racism efforts. These provide an objective assessment and offer valuable recommendations for strengthening governance and accountability.

# Consideration #5: Internal Communications

Clarity of internal communications is the extent to which the anti-racism plan can be well understood and followed by employees across the organisation.

## Introduction

A well-thought-out communications plan equips the organisation with a structured approach to delivering clear, consistent, and effective messages necessary to garner employee support and influence the intended behavioural change to adopt an organisation-wide anti-racist approach.

In our research and practice, we found that the communications plan needs to be highly tailored to the needs of the organisation, in both the messaging and language, as well as the timing and ways of its distribution. Firstly, the communications must reflect accurately the experience of racially diverse employees. Organisations need to base their messaging authentically on real experiences of racism within their workplace and be ready to acknowledge the existence of racism and their commitment to addressing it – starting from the leadership (see Consideration #1 - Leadership).

Secondly, the crafting of the messaging, including tone, structure and language, and the information flow should consider the racial literacy and likely response from different employee segments (see Consideration #2 – Racial Literacy). For example, in an organisation where the large majority of employees has at least a basic level of racial literacy, educational storytelling and call to action can drive empathy and motivation to act. In contrast, in organisations where a significant group of racially illiterate people is likely to dismiss the issue of racism, use a balanced approach of firmly presenting the evidence of racism, incentivise positive engagement with anti-racism education as professional development, and escalate consequences of repeated disruptive behaviours as psychosocial hazards in the workplace.

Finally, the internal communications plan should be regularly reviewed and updated to incorporate new information (e.g., feedback from audience), be agile, and track its effectiveness in progressing towards the intent of driving anti-racism attitude, behaviours, and culture.

Aligning with the ADKAR change model,<sup>78</sup> communications with employees should articulate the urgency of the need for change and the vision for desired outcomes. It also highlights the importance of using both rational evidence and emotive reasoning to reach the 'head' and 'heart' of employees.

Ineffective employee communication can undermine anti-racism efforts. Without clear, consistent messaging and a genuine commitment to change, employees may become disengaged, resistant, or indifferent. Appropriate and timely internal communication is crucial to ensure all employees understand the importance and benefits of anti-racism efforts, feel supported in the change, and are motivated to commit to real behavioural change.

A successful employee communications strategy, therefore, is not only about disseminating information but also about fostering an inclusive dialogue, understanding diverse perspectives, and driving meaningful and sustained change within the organisation.

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<sup>78</sup> Prosci. (n.d). *The Prosci ADKAR Model*. [Internet]. Viewed 1 August 2024. <<https://www.prosci.com/methodology/adkar>>.

## Common Issues

1. **Failure to Tailor to Racial Literacy of Audience:** Discussions about racism can evoke strong emotions such as fear, anger, and defensiveness amongst those with low racial literacy. It is important to consider the likely response while maintaining cultural safety of those with lived experience of racism.
2. **Unclear Identification of Workplace Racism:** Communications related to racism sometimes are too general and lack specific examples of how it manifests in the environment. This makes it difficult for employees to identify behavioural and systemic incidents of racism, especially covert racism. As a result they might dismiss racism as an issue that is relevant to their workplace.
3. **Lack of Clear and Consistent Messaging:** Inconsistent or unclear communication can confuse employees about the goals and processes of the anti-racism framework. Mixed messages from different parts of the organisation (e.g., from different leaders) can undermine efforts and reduce the credibility of the initiative. Establishing a unified communication strategy is crucial to ensure all messages are clear, consistent, and aligned with the organisation's values and goals.
4. **Insufficient Emphasis on the Importance of Change:** Employees may not understand why anti-racism efforts are necessary or how they benefit the organisation. This can lead to apathy or active resistance. Clearly communicating the urgency and importance of anti-racism efforts, ideally from the leadership, as well as firm expectations on the organisation's part, is essential to motivate employees and drive engagement.
5. **Lack of Long-Term Planning and Commitment:** Treating anti-racism efforts as a one-time initiative rather than an ongoing commitment can lead to short-lived changes and eventual regression. Embedding anti-racism into the organisational culture through continuous communication, training, and reinforcement helps sustain momentum and ensure long-term commitment to these initiatives.

Poor communication can result in inconsistent messaging across the organisation.

DEI practitioner in a private sector company



## Guidance on What Organisations Should Do

0 Short term – Continuous Focus	Develop a Comprehensive Communication Plan	Align communication efforts with leadership messaging to ensure visible, active involvement in anti-racism messaging. Start with a strong commitment from leadership to set the tone and convey the seriousness of anti-racism initiatives. Ensure the plan includes clear messaging on goals, progress, and responsibilities to maintain transparency and build trust across the organisation.
	Tailor Messaging to Different Audiences	Customise communications to match varying levels of racial literacy among employees, anticipating diverse responses and fostering engagement. For employees who tend to avoid discussions about racism, focus on the consequences of inaction and provide clear, actionable steps. For those who are more proactive, acknowledge their efforts and highlight the positive impact of their actions on the workplace environment.
	Engage with Racially Diverse Employees / Specialists / ERGs	Consult appropriately and regularly with racially diverse employees and Employee Resource Groups (ERGs) to gather insights and feedback. Conduct listening sessions led by culturally diverse facilitators to capture lived experiences and ensure communications are relevant. Provide platforms for employees to express their feelings and support them through culturally sensitive counselling and peer support groups.
1 Medium term – Continuous Focus	Provide Clear and Action-Oriented Guidance	Enhance employee engagement through clear and concise communication. Provide straightforward guidance on how employees can participate in measures against workplace racism to reduce ambiguity and ensure all employees can easily follow the plan. Use simple and contextual examples through workshops, tailored to the nature of the job, to help employees understand the importance of anti-racism and their role within the action plan. [See Consideration #7 Initiatives].
	Nudge Behaviours in Regular Communications	Integrate anti-racism perspectives into all organisational communications, not just those specific to anti-racism initiatives. Use this approach to subtly encourage positive cultural and behavioural changes.
	Cultivate a Safe and Supportive Environment for Dialogue	Foster a culture where individuals feel safe to discuss experiences of racism without fear of judgment. Prioritise emotional safety, focusing on growth and learning rather than blame, and provide access to culturally sensitive support resources.
2 Long-term	Implement Regular Feedback Mechanisms	Establish feedback loops using surveys, suggestion boxes, and open forums to stay agile and responsive to employee concerns. Encourage open discussions to build trust and facilitate continuous improvement in anti-racism efforts. [See Consideration #6 – Employee Voice].

Having members share real stories and experiences are key to change hearts and mind that written stats and rules.

DEI practitioner in a private sector company

# Consideration #6: Employee Voice

Employee Voice amplifies the lived experiences of racism among employees, guiding anti-racism strategies that resonate with the needs.

## Introduction

Workplace racism is about what employees experience day-to-day and as they navigate through organisational processes. For anti-racism initiatives to be truly effective, they must be guided by employee voices that are not only heard but actively incorporated into decision-making. The lived experiences of racially and ethnically diverse employees provide essential insights into the realities of racism within the organisation.

However, many organisations fall short in genuinely integrating employee voice into their Anti-Racism Frameworks. Often, these voices are sidelined, leading to initiatives that miss the mark and fail to resonate with those most affected. This disconnect not only weakens the impact of anti-racism efforts but also risks perpetuating a culture where their concerns and experiences are overlooked or dismissed.

The lack of proper channels for employee feedback further exacerbates this. Employee voice should not be treated as an afterthought – engaging employees meaningfully requires a commitment to ongoing dialogue, where feedback is welcomed and also acted upon in a transparent and accountable manner.

To ensure that anti-racism initiatives are more than just performative actions, organisations must create and maintain safe spaces where employees can share their experiences openly, without fear of retribution. Such spaces should be upheld by all employees and especially people leaders, as well as ERGs.

When organisations prioritise employee voice, they demonstrate a commitment to understanding and addressing the realities of workplace racism. This commitment is not a one-time effort but an ongoing process of listening, learning, and evolving based on the lived experiences of employees.

ERG is utilised for understanding of the employee experience... through storytelling.

DEI practitioner in a public sector organisation

## Common issues

**1. Insufficient Consideration of Employee Voice During Framework Development:** Many organisations fail to adequately consult employees with lived experiences of racism during the development of anti-racism frameworks, which may then lead to initiatives that may be perceived as out of touch or ineffective.

**2. Over-reliance on Surveys with Limited Depth:** While the People Matter Surveys are a common method for gathering employee engagement data, they often lack the depth needed to capture the nuanced experiences of racism. This can lead to a superficial understanding of the issues and ineffective responses.

**3. Lack of Safe and Inclusive Feedback Channels:** Many organisations do not provide safe, anonymous, and accessible channels for employees to voice concerns related to racism. This can lead to underreporting of issues, as employees may fear retaliation or doubt that their concerns will be taken seriously.

**4. Tokenism in Employee Engagement:** In some cases, organisations may seek input from racially diverse employees in a way that feels tokenistic, without genuinely considering or acting on their input. This can lead to frustration and disengagement among employees who feel their voices are not truly valued.

**5. Failure to Act on Feedback:** Even when organisations collect employee feedback, they often fail to act on it effectively. This inaction can lead to disillusionment and a lack of trust in leadership, as employees see little change resulting from their input.

## Managing disclosures (or reporting) of racism... process needs to be culturally safe.

DEI practitioner working for a large employer



## Guidance on What Organisations Should Do

0 Short term	<b>Engage Early and Continuously</b>	Incorporate employee voices from the start of developing an anti-racism framework, prioritising racially diverse employees with lived experience of racism. Establish ongoing feedback loops to ensure their insights shape the development, implementation, and monitoring of initiatives.
	<b>Use Lived-Experience Led Data Collection</b>	Integrate lived-experience-led data collection methods, such as listening sessions, focus groups, and anonymous surveys, to gather qualitative data on the impact of racism within the workplace. This data should be analysed with a focus on intersectionality, recognising that individuals may face multiple forms of discrimination.
	<b>Implement Robust Feedback Mechanisms</b>	Regularly seek feedback from employees on the impact and progress of the initiatives. This can be achieved through periodic surveys, town halls, and suggestion boxes. Importantly, the feedback gathered should be acted upon promptly, with clear communication to employees on how their input is shaping the initiatives. [See Consideration #5 Internal Communications]
	<b>Complaints Handling and Management</b>	Establish clear procedures for reporting and managing complaints of racism, aligning with governance and accountability frameworks (see Consideration #4 – Governance & Accountability). Offer multiple reporting channels (e.g., anonymous, direct), define escalation paths, and ensure timely investigations with trauma-informed support. Regularly review and update these procedures to maintain effectiveness and trust.
1 Medium term	<b>Create Safe Spaces for Honest Dialogue</b>	Foster psychological safety by ensuring employees and people managers have a minimum of basic to intermediate level of racial literacy to conduct conversations and dialogue around racism. Engage external specialist facilitators if needed to deliver sessions, allowing employees to share their experiences of racism without fear of retaliation.
	<b>Support Employee Resource Groups (ERGs)</b>	ERGs such as People of Colour network, CALD network and Women of Colour network can serve as a critical platform for amplifying employee voice. These groups should be empowered with the resources, autonomy, and direct access to leadership needed to influence organisational policies and practices. ERGs can also play a vital role in peer support, education, and advocacy within the organisation.
	<b>Adopt Transparent Communication Practices</b>	Maintain trust by openly sharing how employee voices shape anti-racism initiatives, providing regular updates on progress and any adjustments made based on feedback.

# Consideration #7: Initiatives

Initiatives are the strategic actions that drive measurable outcomes in anti-racism – in workplace environment and systems.

## Introduction

Many organisations invest resources in general DEI initiatives that are not targeted to delivering on anti-racism and fail to achieve their intended goals. There is also often a lack of strategic alignment and execution. When it comes to anti-racism efforts, what you do, when you do it, and how you implement it matters greatly.

The correct selection and sequencing of activities are critical to the successful implementation and outcomes of an Anti-Racism Framework. The initiatives should be evidence-based, context-specific, and fit-for-purpose for the organisation's unique scenarios. Aligning with change management principles, the sequencing and timing of activities should also consider the change readiness of people leaders and employees, their knowledge and racial literacy, and the urgency of the issues.

In MindTribes' experience, we found that organisations frequently seek to deliver a single anti-racism initiative, often around awareness or education only, without clear objectives or alignment with a broader strategy. Without strategic selection and sequencing, interventions may be disjointed and ineffective, resulting in inefficiencies and failing to achieve the intended outcome. For example, without continuous learning plan or the scaffolding for people to apply their new knowledge, the awareness and education trainings are sunk costs.

Furthermore, it should be noted that a one-size-fits-all approach to anti-racism initiatives is inherently flawed. The socio-cultural contexts that shape and underpin organisational values and practices can vary significantly. Consequently, the challenges faced, and the appropriate interventions will differ. A nuanced understanding of these contextual variations is essential to develop effective and culturally relevant anti-racism strategies.<sup>79</sup> We recommend basing the initiatives design on the MindTribes Anti-Racism Maturity Curve (page 40).

We don't have key initiatives... we have an inclusivity strategy that looks at workplace inclusivity as a whole, but it doesn't actually have any targets or key strategies around cultural diversity.

DEI practitioner in a public sector organisation

<sup>79</sup> Ozbilgin M., Erbil C., (2024). *Global Perspective on Diversity and Inclusion*. Oxford University Press. < DOI:10.1093/obo/9780199846740-0224 >

## Common Issues

1. **Inadequate Assessment of Organisational Readiness:** Many organisations fail to conduct thorough assessments of their current state regarding racial equity and racism before designing their initiatives. This lack of foundational analysis means that initiatives are often launched without a clear understanding of the specific challenges, needs, and levels of racial literacy within the organisation. As a result, initiatives may be misaligned, lacking both direction and effectiveness, and fail to resonate with employees. [See Consideration #2 – Racial Literacy]
2. **Lack of Specific Objectives:** Anti-racism initiatives frequently begin without well-defined objectives that align with the organisation's broader strategic goals. This leads to efforts that are misaligned with the organisation's overall mission and values, resulting in initiatives that seem disconnected, unfocused, and ultimately ineffective. Without clear objectives, it becomes difficult to measure success or ensure that the initiatives are making a meaningful impact. [See Consideration #1 – Leadership]
3. **Poor Selection and Sequencing:** The correct selection and sequencing of activities are critical to the success of anti-racism initiatives. However, many organisations struggle with strategic planning, leading to the implementation of disjointed or poorly timed interventions. Without careful consideration of how each activity builds on the previous one and contributes to the overall strategy, initiatives can become fragmented and fail to achieve their intended outcomes, wasting resources and eroding trust.
4. **Generic and Ineffective Training Programs:** Off-the-shelf anti-racism programs (or unconscious bias training or diversity and inclusion training) are often too generic and lack the necessary depth and relevance to be truly effective. These programs may not address the specific needs, challenges, or cultural context of the organisation, leading to low engagement from participants.
5. **Lack of Intersectional Approach:** Anti-racism initiatives frequently fail to adopt an intersectional approach, neglecting to consider the overlapping and intersecting forms of discrimination that individuals may face based on their race, gender, sexuality, disability, and other identities. This oversight can result in initiatives that do not fully address the complexities of discrimination, leaving certain groups without the support they need and perpetuating existing inequalities.
6. **Failure to Address Systemic Bias:** Structural barriers and systemic biases within organisational processes and culture are often not adequately addressed by common initiatives. These include rigid hierarchies, exclusionary practices, and a lack of transparency in career progression, all of which can impede the progress of culturally diverse employees. Without tackling these deep-rooted issues, anti-racism initiatives are unlikely to achieve sustainable change, and may even reinforce the status quo.

Analysis of common reasons why initiatives fail is further described in Table 2.

There's great things happening in particular pockets, but there's no consistency in terms of as an organisation.

DEI practitioner

Table 2. Common Reasons Why Initiatives Fail

INCORRECT OR POORLY MANAGED INITIATIVES	WHY IT FAILS		CONSEQUENCES OF FAILURE
	Structural	Behavioural	
<b>Implementing one-size-fit-all initiatives without conducting racial literacy assessment or needs assessment of the organisation</b>	Lack of systemic change to address inequities that are present in the organisation	Reinforcing existing disparities and even creating new ones, unintentionally harming marginalised communities	High attrition of minority groups.  Damaged company reputation, difficulty attracting diverse talent and acquiring the employees' belonging in long-term
<b>Focus on one aspect of people's identity without consideration of intersectionality (e.g., racially diverse without intersectional approach for Women of Colour / People of Colour with disability etc)</b>	Policies/practices that perpetuate exclusion of groups with more than one marginalised identity  Tokenistic with a focus on numbers	Prioritising visibility over substantive change	Lack of energy to expand efforts  Increases disgruntlement and feeling of being ignored - replaces one problem for another
<b>Relying solely on Employee Resource Groups &amp; Committees (i.e. diverse minority support groups) without a systemic lens or involvement of Anglo leaders</b>	Relying on ERGs as a substitute for organisational accountability and action  Funding is tokenistic and piecemeal	Burdening marginalised groups with solving systemic issues	Tokenistic funding, performative allyship, employee cynicism, false sense of progress for senior management
<b>Applying homogeneous approach in initiatives that assume all individuals within a diverse group have the same experiences with racism and require the same solutions</b>	Policies/practices exaggerate the power structures that disregarding voices have been supported and heard	Individuals may feel invalidated and become disengaged	The experiences of individuals have not been taken and considered, lacking support for individual and inclusivity within the same diverse group
<b>Delivering programs that are not specifically anti-racism focused – as part of the 'anti-racism plan', such as general Diversity and Inclusion Training, focus on Awareness training / Unconscious bias training</b>	Lack of focus on racial literacy and what it needs to dismantle systemic racism	Employees assuming attending the training alone solves deep-rooted issues, ignoring the need for action	Sunk costs that don't lead to outcomes, and create an illusion of positive progress when they are not effective

## Guidance on What Organisations Should Do

<b>Starting Point</b>	<b>Conduct a Thorough Assessment of Organisational Readiness</b>	Before designing anti-racism initiatives, conduct a comprehensive anti-racism audit, employee surveys, and focus groups to assess the current state of racial equity within the organisation. This will ensure that initiatives are tailored to address specific challenges and are aligned with the organisation's readiness for change. [See Consideration #8 – Measurement & Monitoring]
<b>0 Short term</b>	<b>Strategically Select and Sequence Initiatives</b>	Plan the selection and sequencing of initiatives carefully to ensure they build on each other and drive cumulative progress, based on the ADKAR change management plan and organisational maturity phases. Avoid random, one-off interventions and instead design a cohesive, step-by-step approach that maximises impact.
	<b>Adopt an Intersectional Approach</b>	Ensure that all initiatives consider the intersectional nature of discrimination, addressing the overlapping and intersecting forms of bias that may affect employees differently based on their identities. This approach ensures that no group is overlooked and that all employees receive the support they need.
<b>1 Medium term – Continuous Focus</b>	<b>Customise Initiatives and Training Programs to Organisational Needs</b>	Develop or select training programs that are tailored to the specific needs and context of the organisation. Incorporate diverse perspectives and practical applications that resonate with employees and address the unique challenges of the workplace. See Table 2 for common reasons why anti-racism initiatives fail.

Employees here prefer having direct instruction on what to do and how to operate.

DEI practitioner in a private sector company



# Consideration #8: Measurement & Monitoring

Measurement & Monitoring track the progress of anti-racism efforts, ensuring they remain effective, responsive, and results-driven.

## Introduction

In business, what gets measured gets improved. However, what you measure – and how – matters. A measurement and monitoring process should be integral to the Anti-Racism Framework.

Our primary research revealed a consistent challenge: obtaining accurate data on workplace racism. Marginalised employees often do not report racism due to fear of career repercussions and the perceived lack of trust in the organisation to appropriately handle and acknowledge these reports. As a result, companies may underestimate the severity of racism within their organisations, leading to inadequate resource allocation and poorly designed interventions that do not meet the specific needs and experiences of racially diverse employees.

Outcome measurement should focus on both qualitative and quantitative assessments of racial discrimination. Lived experience listening sessions, facilitated by experienced external consultants, are crucial for collecting authentic qualitative data. This approach is rooted in the principles of intersectionality and involves deeply engaging with the personal stories of individuals from diverse identity groups. By listening to these narratives, we can gain profound insights into employees' experiences of exclusion, discrimination, and racism.

Longitudinal evaluations and continuous monitoring are key for sustained cultural and behavioural change. Systematic collection and analysis of data over time assess the effectiveness of interventions, identify emerging issues, and understand the long-term impact of racism – as well as that of anti-racism efforts.

**An effective measurement and monitoring system is especially important when implementing anti racism initiatives within the workplace as the implementation of anti-racism efforts have been majorly under supported in the past.**

DEI practitioner in a private sector company

## Common Issues

1. **Underreporting of Racism:** Marginalised employees often do not report instances of racism due to fear of retaliation, lack of trust in the reporting system, or cultural norms that discourage confrontation. This underreporting skews the data, making it appear as though racism is less prevalent than it actually is, which in turn leads to insufficient resource allocation and inadequate interventions.
2. **Lack of Qualitative Insights:** Quantitative data alone cannot capture the full extent of employees' experiences with racism. Organisations often fail to incorporate qualitative methods such as lived experience listening sessions, which provide deeper insights into the personal and emotional impacts of racism. Without these insights, policies and interventions may not address the real needs of employees.
3. **Lack of Integration and Coordination:** Even when data is collected, it is often not integrated with other DEI efforts or across various organisational departments. This lack of coordination can result in fragmented strategies that fail to address the systemic nature of racism effectively. Without a cohesive approach, efforts to combat racism can be disjointed and less impactful.
4. **Failure to Act on Findings:** Collecting and analysing data is only the first step. Organisations often fail to act on the findings, either due to a lack of commitment, resources, or understanding of how to implement changes. This can lead to continued discrimination and a perception among employees that the organisation is not genuinely committed to anti-racism. [See Consideration #7 – Initiatives]



Calls for data-driven approaches to demonstrate links between our work and organisational-level goals.

DEI practitioner in a private sector company

## Guidance on What Organisations Should Do

0 Short term	Allocate Adequate Resources to Monitoring (e.g., IT)	Invest in the necessary resources, including time, budget, and expertise, to establish measurement and monitoring systems such as the IT system required. [See Consideration #3 – Resources]
	Determine KPIs	Define specific KPIs to measure the success of anti-racism initiatives, such as the number of reported incidents of racism, number of incidents resolved (and the outcomes), employee satisfaction scores, number of policies and practices revised, and diversity metrics across all levels of the organisation. Ensure these KPIs are linked to broader organisational goals and regularly reviewed.
1 Medium term – Continuous Focus	Develop a Comprehensive Measurement Framework	Create a framework that includes both quantitative and qualitative methods to capture a holistic view of racism within the organisation. Ensure this framework is integrated with broader DEI efforts to address racism comprehensively from individual to systemic levels.
	Implement Anonymous Reporting Systems	Encourage reporting of racial discrimination, prejudices, microaggressions, and other discriminatory behaviours through anonymous systems. This can help build a speak-up culture and reduce fears of retaliation.
	Transparent and regular reporting	Foster a culture of transparency around the measurement and monitoring of racism. Regularly communicate findings and actions taken to address issues, building trust and accountability within the organisation.
	Monitor KPIs	Track metrics such as employee turnover, productivity, and qualitative measures like the quality of ideas from teams. Regular monitoring of these KPIs can provide insights into the effectiveness of anti-racism initiatives.
2 Long-term	Integrate Feedback Mechanisms	Ensure data collected via feedback mechanisms (See Consideration #6 Employee Voice) is appropriately considered and integrated into monitoring system, enabling the organisation to stay agile and responsive while fostering a culture of continuous improvement.
	Ensure Longitudinal Evaluations	Implement longitudinal evaluations to track specific outcomes over long periods. This approach helps in understanding how perceptions of racism evolve over time and assessing the long-term impact of anti-racism interventions.

# Consideration #9: Employee Support

Employee Support is critical in building a workplace where every employee feels safe, valued, and empowered to contribute.

## Introduction

Without robust support systems, organisations risk not only the well-being of their employees but also the integrity of their anti-racism commitments. Effective employee support begins with understanding employers' responsibilities in proactively maintaining psychological safety and cultural safety in the workplace, and acknowledging the devastating impact that racism, both behavioural and systemic, have on racially and ethnically diverse employees.

This has both an interpersonal competence lens and an institutional / environmental lens. The former refers to how capable are managers and employees of offering a culturally sensitive and safe response when a Person of Colour raises their experience of a microaggression. The latter refers to whether culturally safe mental health support services are in place, as well as whether cultural safety is embedded into everyday workplace experiences.

The lack of support that gets provided to staff is really concerning, particularly working in the organisation where the content can be quite difficult.

DEI practitioner in a public sector organisation

Employee Assistance Programs (EAPs) and all mental health and well-being services must be culturally competent and equipped to address the unique challenges of racism. EAP is a reactive, need-based, on-demand service. Many organisations also offer mental health and well-being programs designed to promote healthy living or lifestyles. However, the ways they are delivered can sometimes be culturally inappropriate.

Inadequate support not only jeopardises employee trust but also threatens employees safety and wellbeing within the workplace. The long-term harm caused by racism, if left unaddressed, can lead to severe mental health issues, diminished employee engagement, and higher turnover rates. Evidence showed that this leads to increased absenteeism and lower productivity.<sup>80</sup>

For anti-racism initiatives to succeed, employee support must be integrated into the framework from the outset, with continuous attention to the evolving needs of the workforce. Appropriate employee support also ensures that organisations comply with legal obligations under acts like the *Racial Discrimination Act 1975* and the *Work Health and Safety (WHS) Act 2011*.

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<sup>80</sup> Berdahl, J. L., & Moore, C. (2006). Workplace harassment: Double jeopardy for minority women. *Journal of Applied Psychology*, 91(2), 426–436. <[https://www.researchgate.net/publication/7228194\\_Workplace\\_harassment\\_Double\\_jeopardy\\_for\\_minority\\_women](https://www.researchgate.net/publication/7228194_Workplace_harassment_Double_jeopardy_for_minority_women)>

## Common issues

1. **Lack of Responsibility and Accountability:** There is often a lack of responsibility taken by the organisation and people leaders in maintaining a psychologically and culturally safe workplace free from racism. This includes insufficient policy framework in place and training for managers on how to recognise and address racism – in addition to merely not perpetrating harm in their roles.
2. **Lack of Culturally and Racially Sensitive Support/EAP:** Standard EAPs and other support services often lack the cultural competency needed to address the specific needs of employees facing racial trauma. Without appropriate care, employees may not receive the necessary support to recover from the psychological impacts of racism, or sometimes even be retraumatized due to their experiences being invalidated.
3. **Perceived Ineffectiveness of Reporting Channels:** Employees may perceive existing reporting channels as ineffective or unsafe, especially if past complaints have not been handled well. Handling complaints of racism requires a trauma-informed approach, yet many HR teams and managers are not adequately trained in this area. This perception can discourage employees from reporting incidents of racism, leading to underreporting and unresolved issues.
4. **Exclusionary Practices in Organisational Events:** Employees from racially and culturally diverse backgrounds have also reported feeling excluded from organisational events due to the lack of inclusive options, such as food that meets their cultural or dietary needs, or activities that consider their traumatic past experiences. Additionally, workplace activities that fail to acknowledge or respect cultural connections—such as neglecting the significance of land for First Nations people—can further perpetuate systemic racism.
5. **Cultural Inappropriateness of Organisational Programs:** Wellness programs that only reflect Western dietary options and stress management techniques can alienate employees from diverse backgrounds. Such programs often fail to consider the collective nature of self-care in many non-Western cultures and overlooking the unique stressors faced by People of Colour, such as concerns about family members in conflict zones or different kinship structures. Offering yoga or Ayurvedic practices led and profited by Anglo businesses inappropriately can also be offensive to some employees.



I think the EAP stuff is really important. The lack of culturally responsive EAPs or even having cultural supervision is really important.

DEI practitioner

## Guidance on What Organisations Should Do

<p><b>0</b> Short term</p>	<p><b>Create Clear Reporting Procedures and Support</b></p>	<p>Establishing clear, accessible, and safe reporting procedures is foundational for building trust and accountability within the organisation. Employees need to know how to report incidents of racism safely and anonymously if needed. Multiple reporting options, such as online forms, dedicated hotlines, and in-person reporting to HR or designated diversity officers, ensure that everyone can access the support they need.</p>
<p><b>1</b> Medium term</p>	<p><b>Respond Swiftly to Reports using Trauma-Informed Practices</b></p>	<p>Equipping HR teams and managers with trauma-informed training is essential for handling reports of racism with the sensitivity they require. This training should ensure that complaints are managed without causing further harm, acknowledging the emotional and psychological impacts of racism. Furthermore, organisations must establish protocols that guarantee a swift response to any report of racism, ideally within 24-48 hours.</p>
<p><b>1</b> Medium – long-term</p>	<p><b>Enhance Culturally Sensitive EAP Services</b></p>	<p>Partner with EAP providers to ensure that counsellors are specifically trained in cultural competency. Regularly audit the EAP services to assess their cultural competency and appropriateness, ensuring they meet the needs of diverse employees. Include professionals who have experience working with diverse communities, and offer resources in multiple languages if necessary.</p>
<p><b>2</b> Long-term – Continuous Focus</p>	<p><b>Foster a Proactive Support Culture</b></p>	<p>Creating a proactive support culture within the organisation is essential for sustaining anti-racism efforts. This involves encouraging managers to regularly check in on their teams, especially after significant anti-racism training sessions, and fostering an environment where allyship and peer support networks can thrive.</p>
<p><b>3</b> Continuous Focus</p>	<p><b>Regularly Audit and Improve Support Systems</b></p>	<p>Conduct regular audits of support mechanisms, such as Employee Assistance Programs (EAPs), reporting procedures, and employee feedback, to ensure they remain effective and culturally competent. Annual reviews help identify gaps and refine services to meet evolving workforce needs.</p>



# Consideration #10: Public Sentiment

Public Sentiment shapes the perception and reception of anti-racism efforts, influencing organisational reputation and impact.

## Introduction

In Australia, the public sentiment towards anti-racism can be complex and, at times, polarised. The significant racial and cultural diversity in Australia, marked by around 50% of people who are born overseas or has a parent who is born overseas, and the approximate 30% of people who are from racially and ethnically diverse backgrounds, means that there is a wide diversity of lived experiences and perspectives when it comes to the topic of racism. This is further complicated by the varied racial literacy – where people are sometimes not equipped with the understanding and language to articulate the experience or witnessing of racism.

This diversity brings both opportunities and challenges for organisations committed to anti-racism. Organisations must navigate this complex environment with courage and clarity, recognising that a genuine commitment towards anti-racism is required to resonate and validate the experience of those who face systemic racism in the community. This coincides with a growing recognition of the need for reconciliation and the importance of addressing historical injustices.

**Leadership teams are always cautious about how active the organisation is politically around topics like anti-racism, not willing to put their neck out and be brave if it's at the expense of losing consumers.**

HR practitioner in a private sector company

However, initiatives aimed at promoting racial equity can face scrutiny and backlash from sections of the community with low racial literacy or resistance to change, particularly when they intersect with politically charged issues. Organisations must therefore be prepared to manage a range of reactions and choose how they want to position themselves. The way in which a company engages with the public, communicates its values, and implements its initiatives can determine whether it is seen as a leader in social responsibility or dismissed as engaging in performative activism.

In particular, misalignment between organisational actions and public expectations can affect trust, credibility, and overall impact. Out of touch or insincere actions or messaging that relate to racism can harm brand image and customer loyalty. Internally, it erodes employee trust, lowers morale, and increases turnover, as employees feel their concerns and values are disregarded.

To be seen as genuine leaders in social responsibility, organisations need to reflect the experiences of marginalised groups and demonstrate a bold commitment to anti-racism, while strategically managing public sentiment. Proactive and effective management of public sentiment allows organisations to lead on social issues, build stronger brands, and secure a competitive advantage.

## Common issues

**1. Reactive Rather Than Proactive Approach:** Many organisations adopt a reactive stance in managing public sentiment, often waiting to respond to negative feedback or crises instead of proactively shaping the narrative. This can result in hasty decisions, poorly crafted responses, and missed opportunities to positively influence public opinion.

**2. Inconsistent Messaging and Communication Strategies:** Poorly executed communication strategies can lead to mixed messages and confusion, further complicating public perception. Inconsistencies between an organisation's stated values and its actions can create confusion and mistrust among the public.

**3. Misjudging the Public's Capacity for Change:** Some organisations misjudge the public's readiness to accept and support anti-racism initiatives, either overestimating the potential for backlash or underestimating public support. This misjudgment can lead to initiatives that are poorly received or fail to resonate with the target audience.

**4. Failure to Engage Stakeholders:** Organisations may neglect to engage key stakeholders—such as community leaders, advocacy groups, or employees—in the development and implementation of anti-racism initiatives. This oversight can lead to initiatives that do not adequately reflect the needs or concerns of the community, resulting in poor reception and lack of support.

**5. Failure to Address Industry-Specific Concerns:** Public sentiment can vary significantly across different industries. Organisations often fail to tailor their anti-racism initiatives to the specific expectations and norms of their sector, leading to public backlash when these initiatives are perceived as irrelevant or inappropriate.

We face public backlash from the public when taking a stance and be told to stay in our lane.

DEI practitioner in a private sector company



## Guidance on What Organisations Should Do

0 Short term	Align Initiatives with Organisational Values	Anti-racism initiatives should be closely aligned with the organisation's core values and mission. This alignment ensures that the initiatives are seen as a natural extension of the organisation's purpose, rather than as superficial or opportunistic efforts. When initiatives are deeply rooted in the organisation's values, they are more likely to be perceived as genuine and credible by the public. [See Consideration #1 – Leadership]
	Focus on Internal Culture First	Before making public statements or launching external campaigns, ensure that the internal culture reflects the anti-racism values being promoted. Authenticity is key; employees should feel that the organisation is genuinely committed to anti-racism, which will naturally translate into more credible and effective external communications. [See Consideration #5 – Internal Communications]
1 Medium term	Engage with Key Stakeholders	Actively involve community leaders, advocacy groups, customers, and employees in the development of anti-racism initiatives. Engaging these stakeholders early in the process ensures that the initiatives are well-informed, culturally sensitive, and reflective of the needs and concerns of the community. This approach also helps build a coalition of support, which can be crucial in managing public sentiment.
	Develop a Comprehensive Communication Strategy	Organisations should create a clear and consistent communication strategy that aligns with their anti-racism objectives. This strategy should articulate the organisation's commitment to anti-racism in a way that is authentic and transparent. Ensure that messaging is consistent across all channels and that it reflects the organisation's values and actions. Clear communication can help mitigate the risk of mixed messages that may confuse or alienate the public.
2 Long-term – Continuous Focus	Monitor and Adapt to Public Reactions	Establish continuous monitoring of public sentiment within their industry and broader community. Organisations should track reactions across social media, news outlets, and within their own industry. Being responsive to public feedback and adapting initiatives as needed can prevent minor issues from escalating into major crises. As part of risk assessment, organisations should anticipate potential backlash and develop a plan to address it. Flexibility in approach allows organisations to refine their strategies in real-time, ensuring that they remain aligned with both internal and external expectations.
	Maintain Transparency and Ethical Standards	Transparency is key in managing public sentiment. Organisations should be open about their goals, progress, and the challenges they face in their anti-racism efforts. Maintaining high ethical standards throughout the process will help build and maintain public trust. Regular updates and honest communication about both successes and setbacks demonstrate a commitment to genuine change. [See Consideration #4 – Governance & Accountability]

# Normalising Anti-Racism

Normalising anti-racism within organisations requires a fundamental shift of attitudes, policies, practices, and workplace culture.

This shift requires embedding anti-racist principles into every aspect of the organisation, from its culture and operations to its systems and daily practices. It is about transforming anti-racism from a concept into a lived reality for all employees, making it an inherent part of the organisation's existence.

## Integrating Anti-Racism into Organisational Culture

Anti-racism must become a core organisational value that directs and is considered in every decision, behaviour, and interaction. Integrating anti-racism into an organisation's culture involves changes at all levels: visible parts like policies and procedures, stated values that openly champion anti-racism, and, most importantly, the invisible, deep-rooted mindsets and beliefs that shape behaviours.<sup>81</sup> The key is to address the surface-level changes while ensuring deeper cultural transformation, which takes time but is essential for sustained progress in creating an anti-racist organisation.

## Leadership Accountability

Anti-racism must be integral to how leaders operate and make decisions every day. True leadership accountability means that every judgment, action, and policy decision is made through the lens of anti-racism. Leaders must embody anti-racist principles in their day-to-day roles, setting clear expectations for their teams, and ensuring that the organisation's structures and systems that they are custodians of are free from racial biases. This commitment should be reflected in the decisions they make, the behaviours they model, and the culture they cultivate within the organisation. Leaders should drive systemic change and create an environment where equity and inclusion are the norm, not the exception.

## Embedding Anti-Racism into Policies and Practices

For anti-racism to be truly embedded in an organisation, it must be integrated into all policies and practices. This involves a critical examination of existing systems to identify and eliminate any that perpetuate racial inequalities. Revise policies or replace with new policies that actively promote racial equity is essential, as is the need to measure their effectiveness through clear metrics and accountability mechanisms.



**Tone at the top is clear – racial discrimination is not tolerated. Reality and practices are different to the zero-tolerance policy.**

Staff

## Ongoing Education and Training

Continuous education is crucial for embedding anti-racism into the organisation. Training must go beyond surface-level diversity topics to explore the complexities of systemic racism, privilege, and how these dynamics manifest in the workplace. This education needs to be mandated as part of induction and onboarding processes, ensuring that all new employees begin with a foundational understanding of anti-racism. Additionally, higher level racial literacy (intermediate and advanced) should be integrated into

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<sup>81</sup> Schein, E. H. (1985). *Organizational Culture and Leadership*. Jossey-Bass.

professional development (PD) and leadership competency frameworks, with refresher courses provided regularly. This approach ensures that anti-racism remains a priority throughout an employee's career and aligns with the organisation's racial maturity, equipping all employees with the tools to evolve behaviours and systems as the organisation evolves.

## Sustained Commitment to Anti-Racism

Organisations must continuously assess their progress, not only celebrating successes but also confronting and addressing the systemic challenges that arise. The 10 considerations presented in this report are critical for sustained anti-racism efforts. They ensure that organisations stay aligned with societal shifts and remain at the forefront of equity efforts.

As the Overton Window<sup>82</sup> shifts in response to changes in anti-racism public discourse and activism, organisations must adapt their approach to ensure their Framework remains relevant and impactful. Businesses and public sector organisations should also not underestimate their roles in driving societal progress forward.

## The Broader Context and Future Outlook

In today's world, anti-racism is both a moral imperative and a strategic necessity for organisations that wish to remain relevant and competitive. The issues surrounding race and equity are deeply intertwined with the biggest issues our society faces today, and they influence everything from consumer expectations to employee engagement and public trust. Ignoring these realities isn't just shortsighted; it's a risk that no forward-thinking organisation can afford to take.

As the dialogue around race intensifies globally—whether through national conversations like the Indigenous Voice to Parliament or broader international movements—organisations must recognise that these aren't external distractions. They are signals of the profound shifts in societal values that directly impact the business landscape. Companies that proactively address racism within their structures and cultures position themselves as leaders in a world increasingly demanding fairness, equity and inclusion.

Anti-racism isn't an add-on or a compliance checkbox—it's the foundation for building resilient, innovative, and adaptive businesses. Those who fail to integrate anti-racist practices into their core operations risk falling behind, not just ethically, but operationally. In a world where equity is becoming a baseline expectation, the organisations that will thrive are those that have embedded anti-racism into every facet of their identity, ensuring they are not only compliant but also culturally attuned and strategically prepared for the challenges ahead.

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<sup>82</sup> Lehman, J. (2010). *The Overton Window of Political Possibilities*. Mackinac Center for Public Policy.

The Overton Window refers to the range of ideas and policies that are considered acceptable or mainstream within public discourse at a given time. It shifts over time as public opinion and activism evolve, and ideas that were once seen as radical or unacceptable can move into the window as they gain broader societal acceptance.

# Appendix: Methodology

An issue tree was developed to map out the different aspects of the central research question which is “*What considerations will impact the effectiveness of Anti-Racism Frameworks*”. This step allows all possible causes and sub-issues to be explored and analysed systemically.

The issue tree below shows a breakdown of key factors such as workplace racism, the risks and benefits of anti-racism initiatives, and the various considerations that impact the successful implementation of these frameworks.

Figure 9. Issue Tree (1 of 2)

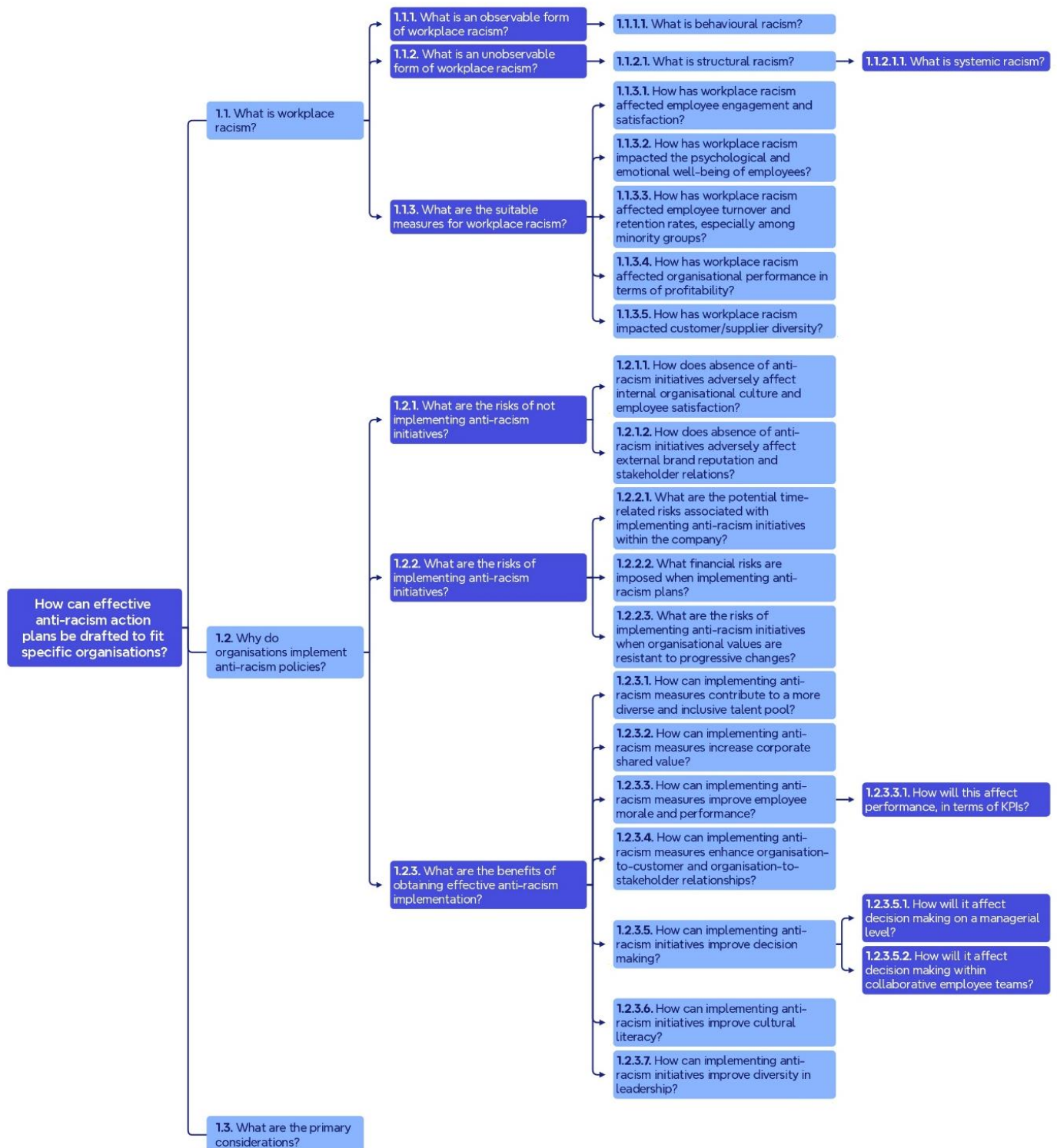
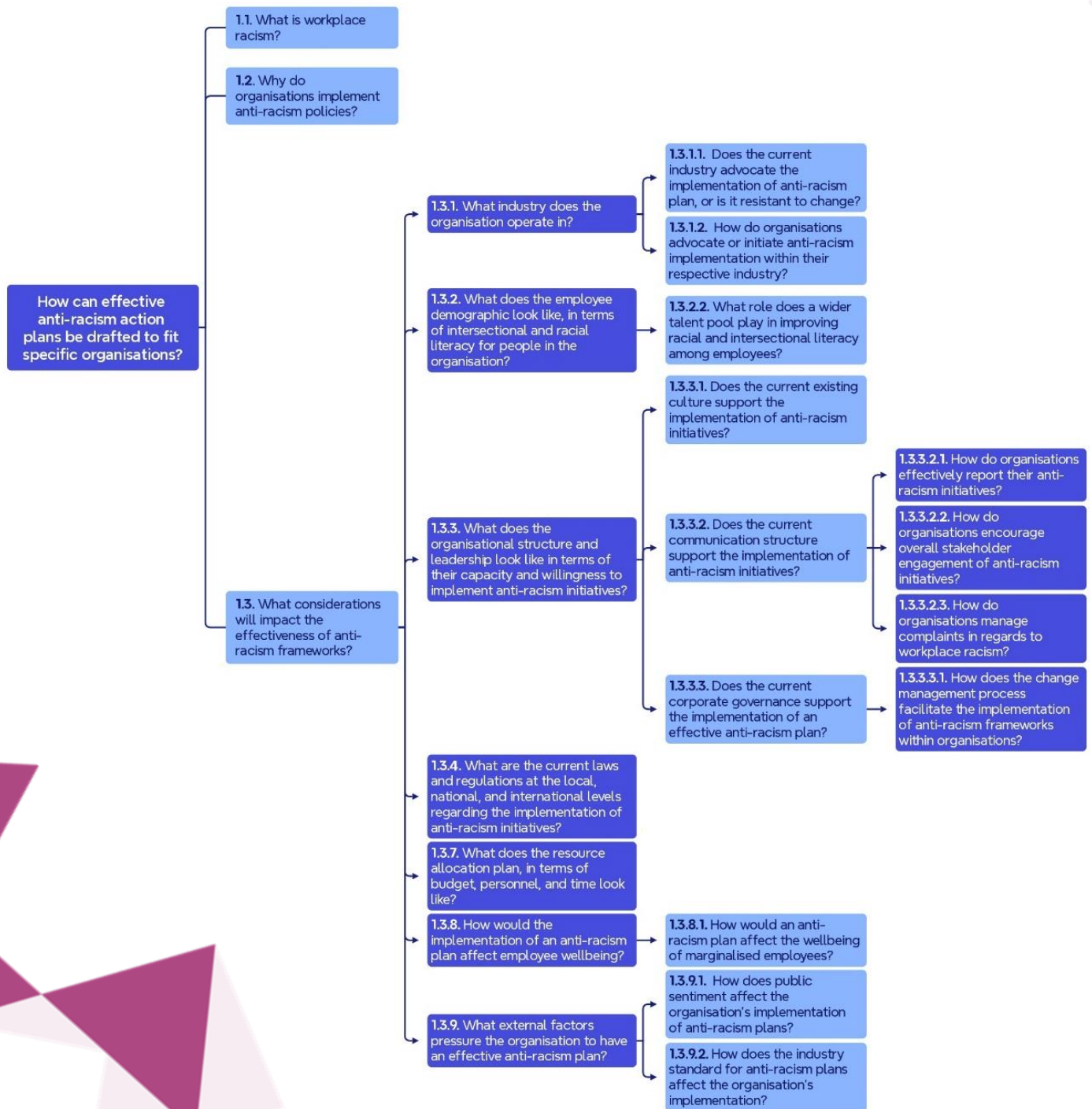


Figure 9. Issue Tree (2 of 2)





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