



## Diversity Council Australia Ltd

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By email: [multiculturalaffairs@homeaffairs.gov.au](mailto:multiculturalaffairs@homeaffairs.gov.au)

## Multicultural Framework Review – Terms of Reference (Draft)

Dear Immigration, Citizenship and Multicultural Affairs, the Hon Andrew Giles MP

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We have over 1,200 member organisations, reaching more than 20% of the Australian labour market.

The review of the Multicultural Framework is of great interest to DCA and our members, and we welcome the opportunity to comment on the draft Terms of Reference shared on the Department of Home Affairs website.

Our feedback relates to the language used in the draft, the composition of the review panel and role of lived expertise in this process, and the commitment to addressing systemic barriers that limit participation for people from “multicultural communities”.

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### Language: ‘CALD’ and ‘multicultural’

Australia has shown longstanding reluctance to focus on race,<sup>1</sup> preferring to use terms like ethnicity and culture,<sup>2</sup> evident in the use of terms such as non-English-speaking background (NESB), culturally and linguistically diverse (CALD), ‘multicultural’ and ‘harmony’. As discussed in DCA’s *Racism at Work*<sup>3</sup> guide, Australia’s reluctance to focus on race means we often struggle to talk in an informed, thoughtful, and transformative way about race, and to identify and respond to racism.

Our research<sup>4</sup> tells us that language such as ‘culturally and linguistically diverse’ (CALD) and ‘multicultural’ are no longer useful terms to describe the experiences of people who experience cultural and racial marginalisation in Australia.

In our recent work, *Culturally and racially marginalised (CARM) women in leadership*, we have deliberately shifted away from these terms, offering the alternative language of ‘culturally and racially marginalised’ (CARM) in recognition of the significance of race and racism in people’s lives, and encourage the Department to consider language that more accurately reflects the present-day experiences of the communities impacted by the Framework and related policy.

**DCA recommends that the Terms of Reference and Framework be updated to include language that more accurately reflects the experiences of culturally and racially marginalised people.**

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## **Review panel and reference group**

We were pleased to see that the Department plans to consult extensively with communities throughout the review process. In our recent research reports<sup>5</sup> DCA strongly advocated for the voice of lived experience and centring marginalised voices at all levels; acknowledging that culturally and racially marginalised people are uniquely qualified to speak about topics that affect them.

The draft Terms of Reference notes that a panel of “three eminent Australians” and a reference group that “includes representation from people with lived experience in or supporting multicultural communities”, along with other stakeholders.

DCA has long held the view that lived and subject matter expertise are not mutually exclusive. To that end, we would hope to see three appointees to the review panel with lived experience, and these perspectives centred in the reference group and further consultations.

**DCA recommends that lived experience is prioritised in the composition of the panel and reference groups.**

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## **Addressing systemic barriers**

The consideration of addressing systemic barriers was excellent to see in the draft Terms of Reference, as systemic obstacles are a focal point of DCA research.<sup>6</sup>

It is important for Australia to recognise the centrality of race and racial discrimination in the power systems of this country, given our colonial history. Racism is upheld through this systemic power, and structural change can only occur through a deepened and critical understanding of institutional policies, procedures, and practices that directly or indirectly discriminate, exclude, or disadvantage people from racially marginalised groups.

Our research identifies a number of systemic barriers that allows racism to persist in Australia. Notably, this includes a lack of racial literacy within institutions, ignoring the expertise of those with lived experience of racism, Australia’s silence on the current state of racism, silencing discussions of racism in favour of multiculturalism rhetoric, and a failure to call out racism when it occurs.<sup>7</sup>

**DCA recommends that racism be specifically addressed in the Terms of Reference as a systemic barrier in preventing culturally and racially diverse people from participating safely in Australian society.**

We have included (in confidence) copies of our recent research, *Racism at Work* and *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action* for your reference alongside this submission (reports not to be published).

Please feel free to contact myself or Cathy Brown, Director of Communications and Advocacy, on 0424 578 698 or [advocacy@dca.org.au](mailto:advocacy@dca.org.au), you require any further information about this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'L. Annese', with a long horizontal flourish extending to the right.

**Lisa Annese**  
**Chief Executive Office**

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<sup>1</sup> Diversity Council Australia (Anderson, P., Mapedzahama, V., Kaabel, A. and O'Leary, J.) *Racism at Work: How Organisations Can Stand Up To and End Workplace Racism*, Sydney, Diversity Council Australia, 2022.

<sup>2</sup> P Mousaferiadis, "Beyond CALD: what lies behind the labels." Diversity Atlas, 13 July 2020, <https://www.diversityatlas.io/beyondcald-2/>.

<sup>3</sup> Diversity Council Australia (Anderson, P., Mapedzahama, V., Kaabel, A. and O'Leary, J.) *Racism at Work: How Organisations Can Stand Up To and End Workplace Racism*, Sydney, Diversity Council Australia, 2022.

<sup>4</sup> Diversity Council Australia (Anderson, P., Mapedzahama, V., Kaabel, A. and O'Leary, J.) *Racism at Work: How Organisations Can Stand Up To and End Workplace Racism*, Sydney, Diversity Council Australia, 2022; Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action*, Diversity Council Australia, 2023.

<sup>5</sup> Diversity Council Australia (Anderson, P., Mapedzahama, V., Kaabel, A. and O'Leary, J.) *Racism at Work: How Organisations Can Stand Up To and End Workplace Racism*, Sydney, Diversity Council Australia, 2022.

<sup>6</sup> Diversity Council Australia (Anderson, P., Mapedzahama, V., Kaabel, A. and O'Leary, J.) *Racism at Work: How Organisations Can Stand Up To and End Workplace Racism*, Sydney, Diversity Council Australia, 2022; Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action*, Diversity Council Australia, 2023.

<sup>7</sup> Diversity Council Australia (Anderson, P., Mapedzahama, V., Kaabel, A. and O'Leary, J.) *Racism at Work: How Organisations Can Stand Up To and End Workplace Racism*, Sydney, Diversity Council Australia, 2022.

