



15 December 2023

By website: [CALD - Have your say on the Culturally and Linguistically Diverse strategy - PMC \(converlens.com\)](https://www.converlens.com)

DCA submission in response to Consultation Paper: Australian Public Service Culturally and Linguistically Diverse (CALD) Employment Strategy

Dear Commissioner Australian Public Service, Dr Gordon de Brouwer PSM,

Thank you for the opportunity to provide feedback on your Consultation paper: *Australian Public Service Culturally and Linguistically Diverse (CALD) Employment Strategy*.

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We have over 1,300 member organisations, reaching approximately 20% of the Australian labour market.

Comment:

DCA welcomes the opportunity to provide feedback on the *Australian Public Service (APS) Culturally and Linguistically Diverse (CALD) Employment Strategy*. DCA's [research](#) over the last six years has provided much needed evidence about a range of entrenched systemic barriers at work for culturally and racially marginalised people. We have developed a term – CARM – to more accurately describe a cohort under the broader CALD category, that experiences workplace discrimination and racism to a greater degree than other cohorts. One of the key factors identified by our research is the critical importance of centring their voice and experience within the workplace. 'Centring voice' refers to the process of prioritising and acting on what people with lived experiences are telling us.


Below are more specific comments about the *Employment Strategy*.

The importance of language and conceptual clarity:

DCA agrees with the Commission's introductory statement about terminology. Culturally and linguistically diverse, or CALD, is a contested and problematic term. DCA agrees that the term is extremely broad, capturing diverse cultures, ethnicities, languages, birthplaces, national origins, ancestries, race and religions. Taken to the extreme, the entire population of Australia, with the exception of our First Nations peoples, could be classified under this category. However, DCA suggests that this term may be too broad to be useful, particularly in the context of developing policies and strategies aimed at addressing specific challenges for particular groups. The experience of a skilled migrant from the UK is very different to that of a refugee from Iraq.

The term 'Australian born' is also problematic. An Australian born person of Nigerian parents will have a very different experience at work compared to an Australian born person of Swedish parents.

These are just a few examples illustrating the importance of being very explicit in terminology when developing strategies to overcome systemic and structural discrimination and the experience of racism at work. CALD is a useful term to describe cultural diversity when referring to very high level policies or frameworks that may serve as an umbrella for more targeted policies and strategies. But DCA's research, particularly [Racism at Work](#), highlights the importance of talking about race explicitly because the experience of racism and discrimination for culturally and



racially marginalised workers is different, in quality and degree, to that experienced by non racially and culturally marginalised people.

As mentioned in our introductory remarks, DCA's [research and engagement](#) with our members led us to develop the term: culturally and racially marginalised – CARM. This term refers to people who cannot be racialised as white. This group includes people who are Black, Brown, Asian or any other non-white group, who face marginalisation due to their culture or background. We believe that organisations cannot effectively address racism unless they explicitly identify and listen to the voices of those marginalised due to their race and/or culture.

The terms racism and discrimination are not well understood terms and have legal as well as non-legal definitions. These ought to be clearly defined in the *Employment Strategy* to ensure the strategy can be implemented in a meaningful and consistent way.

The Consultation paper's Roadmap shows there has been considerable research and data gathering activities throughout 2023. A number of revealing findings suggest concerns about recruitment, career progression, discrimination and racism, and the workplace response to these experiences. There is potentially a rich source of data here that may be better interrogated to uncover more detailed experiences, particularly the experience of multiply marginalised people eg. racially marginalised women.

The overall goal of the *Strategy* is unclear. Is it aimed at creating a structural change or more focused on initiatives to manage existing challenges? The issue of accountability and responsibility for monitoring and implementation could be made more clear. This is valuable information - if transparent - for all employees but especially those who are CALD/CARM.

Finally, the *Strategy* refers to workplaces inviting employees to 'bring their whole selves' to work. Safe and inclusive workplaces should invite employees to be their authentic selves but may not necessarily invite people to 'bring their whole selves' to work (Acton item 5). There may be strong beliefs held that are not appropriate for people to bring to work. This distinction is particularly important currently with workplaces grappling with the impacts felt locally of world events. The *Strategy* could improve its conceptual clarity in relation to some very complex concepts.

An anti-racism approach:

The APS has an opportunity to be a model employer of culturally and racially diverse people. DCA strongly supports the *Strategy's* aim to improve the cultural and racial literacy of **all** APS employees. DCA also supports the *Strategy* taking a strengths-based approach to this work. A pro-active and informed [anti-racist approach](#) which names and calls out racism and its impacts in the workplace is something that DCA has called for publicly.

The [Racism at Work](#) report provides an evidence-based organisational framework for anti-racism action to help Australian workplaces effectively address racism.

Building cultural and racial literacy at all levels within the APS, including leadership and management, is critical. From attracting applicants, recruitment, development and retention and promotion, cultural and racial literacy, gender literacy and intersectional literacy are foundational. Only then can managers and leaders appreciate the challenges faced and barriers that exist for racially marginalised women for example and what factors prevent them from attaining leadership roles at work.

An intersectional approach:

Racism and discrimination within the workplace are experienced differently by different groups. It is important for the APS to examine the data it has collected to date, and ongoing data collection, on how these are experienced by different groups: First Nations peoples, women, LGBTIQ+, people with disability.



DCA always recommends an intersectional approach when developing and implementing policy and programs. Our definition of intersectionality refers to how some people experience compounded discrimination due to multiple marginalising and interlinked characteristics.¹ An intersectional lens on the lived experience of the diversity of APS employees will add significant value to inform the development of policies and programs to support them in their APS journey.

Essential to the design of good policy is centring the voices of those impacted by the policy. For example, DCA's [research](#) over the last six years has shown that CARM women experience a range of entrenched systemic barriers at work. One of the key factors identified as 'locking' CARM women out of leadership roles for example, is ignoring their voices. Good policy design must consider the lived experience of all women, including those with multiple marginalised identities such as cultural and racial diversity, being Aboriginal or Torres Strait Islander, LGBTIQ+ or having a disability. Given the nature of this lived experience, it is also critical that policy and programs are designed with a trauma informed approach if they are to be sensitive to the particular needs of marginalised and disadvantaged people.

With trauma in mind, it is also recommended that APS leaders and managers keep in mind the cultural load that employees from CALD/CARM backgrounds carry. Expectations of these employees should be monitored closely to ensure their safety and wellbeing as a priority.

For further information on DCA research and resources cited in and/or relevant to this discussion:

Inclusive workplaces:

- [The Case for Inclusion@Work - Diversity Council Australia \(dca.org.au\)](#)

This report is based on the latest findings, yet to be published, from the Inclusion@Work Index and explores key reasons why inclusion at work is beneficial for both people and business.

- [Inclusive Recruitment Tools - Diversity Council Australia \(dca.org.au\)](#)
- [Inclusive Recruitment At Work - Diversity Council Australia \(dca.org.au\)](#)
- [Racism at Work - Diversity Council Australia \(dca.org.au\)](#)

DCA's research with people who experience racism and an expert panel, as well as over 1,500 Australian workers, informs this evidence-based organisational framework for anti-racism action within the workplace.

- [The State of Flex in the Australian Workforce - Diversity Council \(dca.org.au\)](#)

This report highlighted a positive link between flexible work and workplace inclusion. It also showed that stigma around care, gender and flexible work continues and there remains a significant gap between the uptake of flexible working between men and women.

Please feel free to contact myself or Jacqueline Braw, Senior Advocacy and Government Relations Manager, on jacqueline@dca.org.au should you require any further information about this matter.

Yours sincerely



Lisa Annese
Chief Executive Office



ⁱ 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.

