



All Together Now's submission to the
Human Rights Commission
in relation to proposed national anti-racism framework

February 2022

1. Introduction

1.1. All Together Now – a nationally-focussed racial equity organisation – welcomes the opportunity to provide this submission to the Human Rights Commission regarding the proposed national anti-racism framework. This submission highlights some of the gaps and limitations within the proposed framework.

2. Insufficient funding to implement framework

2.1. All Together Now believes that the proposed framework will need adequate funding and resources in to order to be implemented and effectively executed. Without adequate funding and resources some of the proposed outcomes within the framework will be impossible to achieve.

2.2. To provide a ‘best case’ example, Canada’s anti-racism strategy contains specific funding commitments. For example: CA\$3.3 million towards a national racism awareness campaign and CA\$5 million towards fighting hate crime and online disinformation. Canada has allocated CA\$45 million to implementing its anti-racism strategy. The current proposed framework lacks clear and specific funding commitments.

2.3. Australia has already witnessed a lack of funding for the Australian Human Rights Commission to implement the previous anti-racism strategy. For example, the ‘Racism – It stops with Me’ campaign has had no dedicated funding since 2017. Future public information and education campaigns must be adequately funded and resourced on an ongoing basis. All Together Now recommends the proposed framework to include specific funding commitments. This is necessary for effective implementation of the framework.

3. The need for clearer definitions

3.1. All Together Now notes that throughout the framework there is occasional mention of systemic/institutional/structural racism. Whilst we commend this as a starting point we believe there is a need for stronger emphasis on this throughout the framework in general. The historical roots of racism need to be clearly and strongly articulated. An understanding of the systemic/institutional aspects of racism needs to be at the foundation of the framework’s understanding of racism.

3.2 Further to the above All Together Now believes that there is an imperative need to mention the impacts of colonisation and ongoing colonial logics alongside the understanding of racism as being primarily institutional/systemic. The continued impact of colonialism today – particularly on First Nations people – needs to be addressed within this framework. Without specific mention of this, the framework falls short in its understanding, description and scope of racism.

3.3 All Together Now believes that the framework requires a clear definition of racism, colonialism, institutional racism, and systemic racism. We note that there is no glossary/terminology section within the framework. Including a definition of these terms at a minimum will ensure that all stakeholders have a clear understanding of what is being discussed and proposed.

3.4 All Together Now notes that the framework uses the term equality/racial equality. All Together Now would prefer that the framework sought racial equity. This would ensure that the structural barriers that persist for people who experience racism are taken away, enabling racial justice to be achieved.

3.5 Once again, we would like to cite Canada's anti-racism strategy which has a stronger emphasis on systemic/institutional racism than that which is currently being proposed by the Australian Human Rights Commission. For example, the Canadian example specifically mentions colonialism, its effects and some potential remedies. It also contains a terminology section with definitions of important terms. All Together Now believes that Australia's proposed anti-racism framework should mirror this.

4. Insufficient accountability procedures and measurable targets

4.1 All Together Now believes that while the current framework strives towards many admirable goals there needs to be accountability for each strategic goal to ensure institutions and other stakeholders take their commitments under the framework seriously. Without accountability measures specified, it will be impossible to ensure genuine and effective

commitment to the goals outlined in the framework. This may lead to a situation where stakeholders engage in tokenism and optics rather than making wholehearted commitments.

4.2. All Together Now maintains that many of the proposed national outcomes, key actions and strategies need to be more detailed and specific. Without such detail it will be impossible to measure the proposed outcomes.

4.3. It is All Together Now's position that there is a need for further detail on how each national outcome will be measured. A useful example for reference is Australia's National Plan to Reduce Violence against Women and their Children. This National Plan specifically outlines how the success of each national outcome will be measured. This not only helps set clear targets but also helps ensure accountability.

4.4. All Together now believes that the outcomes within the framework should be publicly reported against each year by the Race Discrimination team at the Commission.

5. Submission on guiding principles

5.1. All Together Now commends many of the admirable guiding principles set out in the framework; however, it also believes there are two key points that need to be included.

5.2. An anti-racism framework set out in a country founded on colonialism, such as Australia, must begin with an acknowledgment of First Nations Peoples' ongoing sovereignty and that this land was never ceded. The ability of First Nations Peoples to care for the land uninterrupted since time immemorial is a testament to the success of their ongoing custodianship. This must be strongly articulated.

5.3. While the guiding principles take the time to briefly mention the various forms of racism including systemic/institutional racism All Together Now strongly believes that the importance of systemic/institutional racism needs to be emphasised more. Whilst the framework takes the time to distinguish between various forms of racism we believe that the systemic/institutional nature of racism needs to be at the core of the framework's understanding of racism. A mere mention alongside other forms of racism does not suffice.

6. National Outcome 1

6.1. All Together Now welcomes the establishment of a national data framework that will be used to identify the extent of racism in Australia, as well as incidences of racist extremism. We note however that the proposed approach to collecting data will likely account for more obvious or blatant incidences of racism and racial discrimination and risks failing to capture other forms of racism that may be more subtle or systemic. All Together Now agrees that there is a strong need to truly understand the prevalence and nature of systemic racism. However for this to occur the Commission must consider existing data sets that may reflect deeper trends around systemic barriers. For example: data that maps Indigeneity and cultural background against incarceration rates, deaths in custody, health outcomes, and education outcomes are important to examine because this data highlights forms of institutionalised and systemic racism that are currently only discussed in informal, qualitative terms. Where there is a gap in available data it is recommended that such data be collected, and done so accurately.

6.2. Further to examining/collecting other data sets it is important that checks and balances are in place to keep such data safe and secure. It is imperative that no opportunities are created for the data to be weaponised by organisations, groups or individuals that seek to undermine Australia's multiculturalism. Data should be used only to guide policy in an effective manner and should seek to address systemic gaps. For this reason, All Together Now recommends that the Commission reports broadly on this data but not release it for public consumption.

6.3. All Together Now believes that there needs to be a distinction made between the terms "racism" and "racial discrimination" in the framework, noting that the Racial Discrimination Act only covers the latter. All Together now believes that this framework should be broader than the Racial Discrimination Act and include all forms of racism.

7. Submission on National Outcome 2

7.1. All Together Now believes that all jurisdictions need to commit to this framework in order for it to be effectively implemented.

7.2. All Together Now believes that specific legal frameworks be further developed to tackle particular areas and take action on certain issues. For example, a stronger and more comprehensive legal framework is required to address police accountability and deaths in custody. More than 500 First Nations deaths in custody have occurred since the Royal Commission into Aboriginal Deaths in Custody took place more than 30 years ago. Governments across all levels have failed to take appropriate action in this area. Of the 339 recommendations made by the Commission many are still to be implemented. Further recommendations from other reports and inquiries have also failed to be actioned (e.g. Australian Law Reform Commission's Pathways to Justice Inquiry, the Don Dale Royal Commission and a number of coronial investigations). There is a history of neglecting previous recommendations. Implementing these recommendations would go a long way to strengthening existing legal frameworks.

7.2. A specific legal framework also needs to be further developed to combat far-right extremism. We need a framework that is able to take direct and swift action on particular symbols, groups and platforms. Currently very few far-right groups have been proscribed and continue to operate in Australia with impunity. There is also a need to create stronger and specific policies around online hate linked to the growth in far-right extremism. Once again it is worth noting the Canadian example which includes a specific section dedicated to tackling online hate as well as CA \$5 Million in funding for this issue alone.

7.3. At this point the framework only talks about racial discrimination and racial hatred. These account for the most obvious examples of racism however this fails to account for more subtle forms of racism and systemic racism. As mentioned above the framework needs to be broader in its understanding of the various forms of racism.

8. Submission on National Outcome 3

8.1. All Together Now agrees that it is imperative that all levels of Australian federal, state and local governments commit to eradicating racism and racial discrimination through their actions. However, in its current form All Together Now believes this national outcome needs to be more specific with clear objectives and goals for each level of government. Without more

specific and clearly articulated goals and strategies for each level of government it will be difficult to ensure commitment and accountability.

9. Submission on National Outcome 4

9.1. All Together Now believes that there is a need for a broad-based community understanding of racism and racial discrimination as well as how to counter it. It believes a national anti-racism campaign would be beneficial however would require funding and resources as well as close consultation with communities impacted by racism. Public education initiatives on racism should be led by First Nations people and people of colour to ensure that their voices are centred and that people are also able to benefit economically from doing this type of work. Canada's anti-racism strategy will invest CA \$3.3 million into a national racism awareness campaign. Any national anti-racism campaign that aims to raise awareness and understanding must focus on all forms of racism. Particularly it must educate Australians on institutional forms of racism. Bystanders and allies need a strong understanding of institutional racism and how it can be addressed.

9.2. We believe that some sections of the media need to be held accountable for their role in helping perpetuate racism and embolden racists. For far too long some news outlets within the Australian media have been able to escape accountability for their role in furthering racism. We strongly recommend strategies to counter this. All Together Now's reports from its Media Monitoring project have highlighted the ongoing prevalence of racism in the Australian media today.¹ There is a clear need to engage with communities impacted by racism in the Australian media to come up with solutions. Some recommendations to come out of All Together Now's Media Monitoring project are:

- Journalists need to consider more closely the effect of their work;
- All news organisations need to cultivate and maintain an anti-racist culture within their workplaces;

¹ All Together Now. (2021). *Politely Racist: A case study on readers' comments in Australian mainstream newspapers*. https://alltogethernow.org.au/wp-content/uploads/2021/12/Politely-Racist_Media-Report-2021.pdf; All Together Now. (2021). *When inclusion means exclusion: social commentary and Indigenous agency*. <https://alltogethernow.org.au/wp-content/uploads/2021/12/When-inclusion-means-exclusion-report-2021.pdf>.

- Mainstream media organisations need to increase cultural diversity across all parts of their operations;
- The Federal Government and the media industry need to invest in media literacy education for audiences;
- All sectors of society need to invest in opportunities for independent journalism and the Federal Government needs to continue financial support for public journalism.

What is currently being proposed is far too vague and immeasurable at this stage. Clearly articulated goals and targets need to be identified before engaging media stakeholders.

10. Submission on National Outcome 5

10.1. All Together Now agrees that all sectors of society need to commit to countering and preventing racism and that there is a need to form community partnerships. However for this to be effective there needs to be genuine accountability and measurement of their commitment. It must be taken seriously and we propose a model that could perhaps operate in a similar vein to the way Reconciliation Action Plans (RAP) currently operate, whereby an institution makes public commitments that are verified by a third party (in this case, Reconciliation Australia) and then reported against publicly. This will help ensure that organisations will take their commitment seriously given that outcomes will be reported publicly.

10.2. More detailed and clearer guidelines on how different sectors can action this outcome are important. Key actions and strategies cannot be vague and need to have more detailed proposals, guidelines or suggestions. For example, employers who hire people to do the above-mentioned work should hire First Nations people and/or people of colour to lead this work.

10.3. All Together Now believes that specific strategies will need to be developed for different sectors. Racism and particularly systemic racism manifest differently in particular areas of society e.g. the justice system. Tailored approaches will be required to address the various forms and manifestations of racism across different sectors. There cannot be a one size fits all approach. Each sector has its own challenges and barriers.

11. Submission on National Outcome 6

11.1. All Together Now believes that there is a genuine need for all sectors of society to commit to ensuring that communities vulnerable to racism and racial discrimination are adequately represented and have effective participation in all areas of public life. Many of the current key actions and strategies are sufficient; however once more we believe there is a need for more clearly articulated and specific guidelines and strategies.

12. Submission on National Outcome 7

12.1. There is a need for Australian governments to adopt targeted and measured approaches to address racial inequality. However, how this will actually happen is not clear. There is a need for more detail into how this will take place and be implemented. The key strategies and actions outlined are a useful starting point but more detail is required.

12.2 As already mentioned any data collected and used must be kept safe. There is an imperative need to ensure that data will not be misused. It should only be used to guide policy that genuinely seeks to address any gaps that come to light from the data.

13. Submission on National Outcome 8

13.1. Whilst All Together Now agrees with national outcome 8 and the broad idea that measures addressing racism need to compliment measures to increase social cohesion and foster multiculturalism, it is important to stress that this should not be used to distract from or undermine the genuine grievances from particular communities. Social cohesion is important but not with the objective or effect of ignoring or hiding away genuine concerns and grievances from particular communities and groups.

13.2. All Together Now would like to provide two examples to illustrate the point made under 13.1.: Australia Day (currently a day to simultaneously celebrate being an Australian and to commemorate invasion, genocide and survival for First Nations people); and Harmony Day (which in Australia is a day to celebrate multiculturalism but is known elsewhere in the world as the United Nations International Day for the Elimination of Racial Discrimination). As they currently stand, these days are increasingly divisive for Australia, and will continue to be until

the underlying issues of colonialism and racism are addressed rather than ignored, erased or re-packaged in the name of a particular take on ‘social cohesion’ and ‘multiculturalism’.

14. Submission details

This submission was prepared by All Together Now and submitted on 3 February 2022.

All Together Now is a racial equity organisation that seeks to educate Australians about racism. We do this by imagining and delivering innovative and evidence based projects that promote racial equity. We are community driven, we utilise partnered approaches and our work is intersectional. For more information please see our website at <https://alltogethernow.org.au>.

As All Together Now’s office is currently unattended due to COVID-19, please contact us by email in the first instance:

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All Together Now was established in 2010 and is registered with the ACNC.

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