

# Localities Embracing and Accepting Diversity (LEAD) program: summary report





# Foreword



For the most part, Victorians are pretty accepting of diversity. The overwhelming majority of us view cultural diversity as a thing to be celebrated and most of us dislike racism in all of its forms. But unfortunately, racism still occurs. Mental illness is among the top three causes of burden of disease and injury in Australia. That's why VicHealth has adopted improving mental health and wellbeing as a strategic focus in our Action Agenda for Health Promotion. We support activity that builds evidence and skills to reduce racism and support cultural diversity.

Local government, as the tier of government closest to the community, is key in preventing racism before it occurs and promoting social cohesion. In 2009, VicHealth established the Localities Embracing and Accepting Diversity (LEAD) pilot program, which developed and tested solutions for reducing race-based discrimination and promoting cultural diversity in two Victorian municipalities – Greater Shepparton and the City of Whittlesea.

The Experiences of Racism Surveys conducted through the LEAD program found that 97% of Victorian Aboriginal respondents and two-thirds of those from culturally and linguistically diverse backgrounds (CALD) had been the target of racism in the past 12 months. The surveys also found that racism was associated with poorer mental health and reduced quality of life for both Aboriginal and CALD Victorians.

I would like to acknowledge the Councils and communities of the City of Whittlesea and Greater Shepparton for taking part in this pioneering four-year program, which has resulted in new evidence and practical tools that other local governments and organisations can use in their existing work to address racism in their communities.

I would also like to acknowledge the range of partners that have contributed time, knowledge and expertise to this program. They are the Victorian Equal Opportunity and Human Rights Commission, the Municipal Association of Victoria, The University of Melbourne, the Australian Government Department of Social Services (DSS), the Lowitja Institute and *beyondblue*.

This report captures the key things we've learnt from the program and provides an overview of the key tools and resources developed through the program.

I encourage successful strategies featured in this report to be adopted in other localities. By working together we can help protect the health of those affected by racism.

A handwritten signature in black ink, which appears to read 'Jerril Rechter'. The signature is fluid and cursive.

**Jerril Rechter**  
VicHealth CEO



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# Terms used in this report

**Aboriginal** – the term used in this report when referring to Victoria’s original inhabitants and custodians. Elsewhere, the terms ‘Indigenous’ or ‘Aboriginal and Torres Strait Islander’ may be used to describe Australia’s first peoples.

**Assimilation** – seeks to address discrimination by eliminating racial and cultural difference and associated inequalities (VicHealth 2007).

**Attitude** – an evaluative judgement (positive or negative) of an object, a person or a social group (Crano & Prislín 2008).

**Culture** – the distinctive patterns of values, beliefs and ways of life of a social group. It is a dynamic concept influenced by environmental, historical, political, geographical, linguistic, spiritual and social factors (UNISA 2004).

**Direct discrimination** – the unfair or unequal treatment of a person or a group, resulting in unequal opportunities. In the case of ethnic and race-based discrimination an example would be an individual not being employed because of their ethnicity/race. This type of discrimination is typically deliberate.

**Ethnicity** – a social construct of group affiliation and identity. An ethnic group is a social group whose members share a sense of common origins; claim a common and distinctive history and destiny; possess one or more dimensions of collective cultural individuality; and feel a sense of unique collective solidarity (Ministry of Economic Development 2003).

**Health/mental health** – a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity (WHO 1948). Mental health is the embodiment of social, emotional and spiritual wellbeing. It provides individuals with the vitality necessary for active living, to achieve goals, and to interact with one another in ways that are respectful and just (VicHealth 2005).

**Interpersonal discrimination** – directly perceived discriminatory interactions between individuals, whether in their institutional roles (e.g. between employer and employee) or as public or private individuals (e.g. between shopkeeper and customer) (Krieger 1999).

**Prejudice** – an unfair negative attitude toward a social group or a member of that group (Dovidio & Gaertner 1999). Prejudice can be overt or subtle and implicit or explicit.

**Race** – a basis for categorising different groups within a society according to a set of characteristics that are socially significant (e.g. religion, dress, accent).

**Race-based discrimination** – racist behaviours and practices resulting in avoidable and unfair inequalities across groups in society (Paradies et al. 2009). This definition encompasses overt forms of racism such as racial violence, open threats

or rejection as well as subtle forms such as race-based bias, exclusion and using racial stereotypes. Race-based discrimination can occur at individual, interpersonal, organisational, community and societal levels.

**Racism** – behaviours, practices, beliefs and prejudices that underlie avoidable and unfair inequalities across groups in society based on race, ethnicity, culture or religion (Paradies et al. 2009). Racism can be:

- internalised – when a person incorporates racist attitudes, beliefs or ideologies into their worldview (e.g. an Indigenous person believing that Indigenous people are naturally less intelligent than non-Indigenous people) (Paradies, Harris & Anderson 2008).
- interpersonal – during interactions between individuals e.g. bullying, harassment, rudeness, being ignored or excluded.
- systemic – when systems, institutions and cultures operate to produce inequalities in the control of, and access to, resources in a society: e.g. a school requires all students wanting to play in its basketball team to wear a uniform of shorts and a sleeveless vest. This means that young women from ethnic backgrounds with dress codes requiring them to cover their arms and legs are excluded from the team (Paradies et al. 2009).

**Religion** – a particular collection of ideas and/or practices that involve issues of personal conviction, conscience or faith that relate to the nature and place of humanity in the universe and/or the relation of humanity to things supernatural, and that encourage or require adherents to observe particular standards or codes of conduct or participate in specific practices having supernatural significance. These ideas or practices are held by an identifiable group who see them as a religion or system of beliefs (HREOC 1998).

**Supporting cultural diversity** – respecting different ways of living and being within an over-arching democratic and human rights framework, and valuing diversity as an asset. Reducing race-based discrimination is an important step in ensuring that cultural diversity is nurtured (VicHealth 2012).

**Systemic discrimination** – sometimes called institutional, organisational, societal or cultural discrimination, occurring when requirements, conditions, practices, policies or processes result in avoidable and unfair inequalities across groups. These seemingly ‘normal’ ways of doing things may directly or indirectly, consciously or unwittingly, promote, sustain or entrench differential advantage for some people and disadvantage for others (Tator 2005). Where direct discrimination is being progressively eliminated, systemic discrimination is more likely to be indirect.

**Vicarious racism** – racism experienced through observation of racism happening to family, friends or others.

# Executive summary

Between 2009 and 2013, VicHealth's Localities Embracing and Accepting Diversity (LEAD) pilot program pioneered a new approach to reducing race-based discrimination and supporting diversity in Australia. The program was supported by the Victorian Equal Opportunity and Human Rights Commission (VEOHRC), the Municipal Association of Victoria (MAV) and The University of Melbourne. Alongside VicHealth, co-funding was provided by the Australian Government Department of Social Services (DSS), the Lowitja Institute and *beyondblue*.

Multiple, evidence-informed strategies were implemented to engage individuals, organisations, workplaces and the broader community in two Victorian municipalities – Greater Shepparton and the City of Whittlesea. Program governance structures and a range of local partnerships were established to support implementation in both localities.

Specific activities conducted over the length of the program included:

- developing new tools and resources to support organisational change
- changing policies, procedures and communication strategies within organisations
- delivering pro-diversity and cultural awareness training programs
- holding events celebrating cultural diversity
- running social marketing campaigns
- changing media reporting practices.

The implementation and outcomes of the LEAD program were evaluated by researchers from The University of Melbourne's School of Population Health. The evaluation used a mixed methods approach to investigate:

- the relationship between anxiety, depression and discrimination within the two communities, using community surveys
- the strengths and limitations of a place-based approach to reducing race-based discrimination and supporting cultural diversity, using process evaluation
- the impact of LEAD in improving knowledge about how to reduce race-based discrimination and support cultural diversity, using impact evaluation.

Community surveys confirmed previous findings that there is a relationship between race-based discrimination and poorer mental health, and they highlighted the role that particular settings, such as public spaces and employment and retail outlets, have in determining the exposure to race-based discrimination. The process evaluation identified several strengths of a place-based approach, and the impact evaluation found evidence of increased pro-diversity attitudes in the councils and workplaces involved in the LEAD program.

Overall, the evaluation demonstrated how local governments can contribute to reducing discrimination and supporting cultural diversity within local communities and organisations.

# Introduction

In 2007, the Victorian Health Promotion Foundation (VicHealth) published data from a survey of 4000 Victorians in the report *More than tolerance: Embracing diversity for health* (VicHealth 2007). The findings showed that while most Victorians supported society being made up of people from different cultures, around 1 in 10 held views that were overtly racist (for example, the notion that some groups are inferior to others or that people from different 'races' should not marry). A substantial minority, around 1 in 3, also held attitudes suggestive of intolerance of ethnic difference (for example, the belief that there are groups that do not fit into Australian society, or resistance to people retaining what makes them culturally distinctive).

Discrimination on the grounds of culture, ethnicity and religion can negatively affect a person's health and wellbeing, particularly their mental health. The experience of discrimination is associated with higher levels of anxiety and depressive symptoms and with substance misuse. Discrimination can restrict access to the resources and systems people need for good health: education; employment; social support; and participation in sports, cultural and civic activities. Furthermore, the personal, familial and economic effects of discrimination on one generation may affect future generations, which can lead to cycles of poverty and disadvantage. Intercultural tensions undermine social cohesion, ultimately affecting us all. Preventing race-based discrimination is therefore an important public health goal.

VicHealth is committed to supporting cultural diversity and reducing race-based discrimination. In 2009, the *VicHealth strategy and business plan 2009–2013* identified that race-based discrimination and supporting diversity was a priority action. The plan included a particular focus on Aboriginal Victorians and settlers from the Middle East, Africa and the Asian and Indian sub-continent.

Over the four years of the plan, several initiatives were implemented to promote respect and tolerance for cultural diversity. The Localities Embracing and Accepting Diversity (LEAD) program was the largest of these initiatives. The program was supported by the Victorian Equal Opportunity and Human Rights Commission (VEOHRC), the Municipal Association of Victoria (MAV) and The University of Melbourne. Alongside VicHealth, co-funding was provided by the Australian Government Department of Social Services (DSS), the Lowitja Institute and *beyondblue*.

The LEAD program used an innovative place-based collective impact approach to intervention. The approach involved implementing strategies in multiple settings within particular localities. Two municipalities were chosen to implement LEAD: Greater Shepparton and the City of Whittlesea.

## The *Building on our strengths* framework

The program was informed by VicHealth's overarching framework for action in this area – *Building on our strengths: A framework to reduce race-based discrimination and support diversity in Victoria* (Paradies et al. 2009) – developed through a partnership between VicHealth, the Onemda VicHealth Koori Health Unit, The McCaughey VicHealth Centre for Community Wellbeing (The University of Melbourne) and VEOHRC.

The *Building on our strengths* framework is based on an ecological model, recognising that the causes of discrimination and intolerance of diversity lie at different levels of the social ecology, as do the solutions. The framework therefore reflects the need for multiple and reinforcing strategies at different social ecology levels. Some of the factors at individual, organisational, community and societal levels that contribute to race-based discrimination and intolerance of diversity are summarised in Table 1.

The framework is primarily focused on addressing the conditions contributing to discrimination (i.e. preventing the problem before it occurs) while recognising the importance and inter-relatedness of efforts to respond to discrimination (e.g. complaints systems) or equipping and empowering those at high risk of exposure to discrimination to deal with its impacts (e.g. efforts to strengthen cultural identity as a protective factor). Although designed to guide anti-discrimination initiatives affecting people from all backgrounds, the framework recognises the need to attend to the different factors influencing discrimination affecting Aboriginal and Torres Strait Islanders and people from migrant and refugee backgrounds when specific interventions are being considered.

Eight themes in the *Building on our strengths* framework underpin and guide action:

- increasing empathy – encouraging people to understand the experience of 'the other'
- raising awareness – supporting people to identify when their beliefs and behaviours are prejudiced or discriminatory
- providing accurate information — by challenging inaccurate beliefs and stereotypes
- recognising incompatible beliefs — by drawing attention to contradictory beliefs (such as the contradiction between race discrimination and the notion of the 'fair go')
- increasing personal accountability — by requiring explanations for certain behaviours (e.g. through staff selection policies)
- breaking down barriers — by increasing contact and understanding between groups

*continued »*

**Table 1: Key factors contributing to race-based discrimination and intolerance of diversity**

Individual	Organisational	Community	Societal
<ul style="list-style-type: none"> <li>• Belief in racial hierarchy and racial separatism.</li> <li>• Belief that some groups do not fit into Australian society.</li> <li>• Fear, anxiety, discomfort, avoidance or intolerance of diversity.</li> <li>• Denial that discrimination occurs or that it is serious.</li> <li>• Negative stereotypes and prejudices.</li> <li>• Failure to recognise own negative attitudes/ behaviours, or belief that they are 'normal'.</li> <li>• Poor conflict resolution skills.</li> <li>• Limited positive inter-group relationships and interaction.</li> </ul>	<ul style="list-style-type: none"> <li>• Organisational cultures that do not recognise discrimination or value diversity.</li> <li>• Organisations that support or have weak sanctions against discrimination.</li> <li>• Policies, practices and procedures that favour the majority group.</li> <li>• Inequitable recruitment, evaluation, training, remuneration, turnover or promotion of staff.</li> <li>• Limited opportunities for positive inter-group interaction.</li> <li>• Leadership that supports, fails to recognise or has weak sanctions against discrimination or does not value diversity.</li> </ul>	<ul style="list-style-type: none"> <li>• Limited relationships and interaction between people from different groups.</li> <li>• Neighbourhood, family and peer cultures that are supportive of, or have weak sanctions against, discrimination.</li> <li>• Resource competition.</li> <li>• Local demography, historical contexts and community identity.</li> <li>• Leadership that supports, fails to recognise or has weak sanctions against discrimination or does not value diversity.</li> </ul>	<ul style="list-style-type: none"> <li>• Institutional, media, cultural and political support for, or weak sanctions against, discrimination.</li> <li>• Limited opportunities for connections between people from different groups.</li> <li>• Lasting effects of colonisation.</li> <li>• Inequitable distribution of material, informational and symbolic resources.</li> <li>• A national identity that excludes certain groups.</li> <li>• Leadership that supports, fails to recognise or has weak sanctions against discrimination or does not value diversity.</li> </ul>

- increasing organisational accountability — for example, through policies and procedures
- promoting positive social norms — by building organisational and community climates within which discrimination is unacceptable and diversity is valued. This is based on the theory that it may be more effective to change behaviours – in the belief that attitudinal change will follow – rather than focusing first on attitudinal change.

## Evidence for a place-based approach

Place-based interventions have become a key strategy to address health inequalities in the World Health Organization’s Health for All initiatives (Chiu & West 2007). Such interventions are an effective way of targeting resources to those most in need. They also provide an opportunity to leverage and build on existing activities, resources and infrastructure, thus optimising program inputs. It is also argued that creating true collaboration between different government sectors and community is only possible at a local level. Accordingly, the solutions and services to address disparities in health and its determinants are often best determined and delivered at that level (Hawe, Ghali & Riley 2005; Lasker, Weiss & Miller 2001).

A place-based approach to supporting diversity and reducing race-based discrimination holds particular promise for a number of reasons:

- There is evidence indicating that the optimal approach to prevention is one that deploys a coordinated program of multiple reinforcing strategies targeted to different levels of influence (individual, organisational, community and societal). Such an approach is more readily implemented on a local scale than on a statewide or national basis.

- There is evidence of a relationship between ‘dose’ or intensity of intervention and the likelihood of positive change (Donovan & Vlasis 2006). In the context of finite resources, sufficient dose or intensity can be more readily achieved within a smaller geographic area than at a state or national level.
- Findings from the *More than tolerance* community attitudes survey conducted in 2006 indicate marked variations in attitudes toward diversity and experiences of discrimination between localities (VicHealth 2007; see also Grady 2006; Inagami et al. 2006). These differences are influenced by a range of demographic and historical factors, suggesting that strategies and approaches may need to be tailored to the characteristics of different local communities.
- There is a clustering of ethnic groups in particular areas (Grady 2006; Inagami et al. 2006), making targeting possible through localised interventions.
- Reducing discrimination involves dealing with highly sensitive issues. There may be greater potential at the local level to carefully plan and monitor activity to avoid negative effects or to deal with them constructively should they occur.

Local governments were selected as the primary implementation partners for LEAD for a number of reasons. They already have a strong track record in supporting diversity and addressing discrimination. They also have the potential to have a sustained influence over a range of settings in which discrimination and intolerance occur and to facilitate a coordinated approach across these settings. Constituting the tier of government closest to constituents, local governments have the potential to understand and respond to local issues and are well placed to engage their communities in initiatives. Place-based initiatives led by local government also offer the potential to trial approaches from the ‘bottom up’. Successful strategies can then be adopted in other localities or at a state or national level.

# The Localities Embracing and Accepting Diversity (LEAD) program

## Aims and objectives

The LEAD program had two main aspects: implementation of a place-based approach to reduce race-based discrimination and support cultural diversity, and evaluation of this approach to inform current and future activity in this area. The program's aims were to:

- promote positive attitudes toward cultural diversity and decrease discriminatory attitudes and behaviours within whole communities
- encourage the implementation of policies and practices that promote diversity and reduce discrimination within local organisations
- create more inclusive local environments with diverse local identities
- support the capacity of local governments and their communities to engender harmony
- build knowledge and evidence for the primary prevention of discrimination and promotion of diversity
- assess the strengths and limitations of place-based pro-diversity/anti-racism initiatives, the coordinating role of local government and the resources required to undertake this role
- use findings from the program to inform future policy, program development and practice in preventing discrimination and supporting diversity.

## Selection of localities

A request for expressions of interest to participate in the LEAD program was disseminated to local governments and local government networks through a range of channels. One rural/regional and one metropolitan council were selected to be the sites of LEAD implementation and the lead agency in their region: Greater Shepparton and the City of Whittlesea. Each had a high proportion of both Aboriginal Victorians and those from CALD backgrounds in comparison to counterpart councils, able to demonstrate readiness to address issues of race-based discrimination and diversity, and presented a coherent plan that was responsive to the program guidelines. They were not chosen because they had high levels of racism in their area.

## Governance structures

Central and local governance structures were put in place to guide implementation. These governance arrangements are depicted in Figure 1.

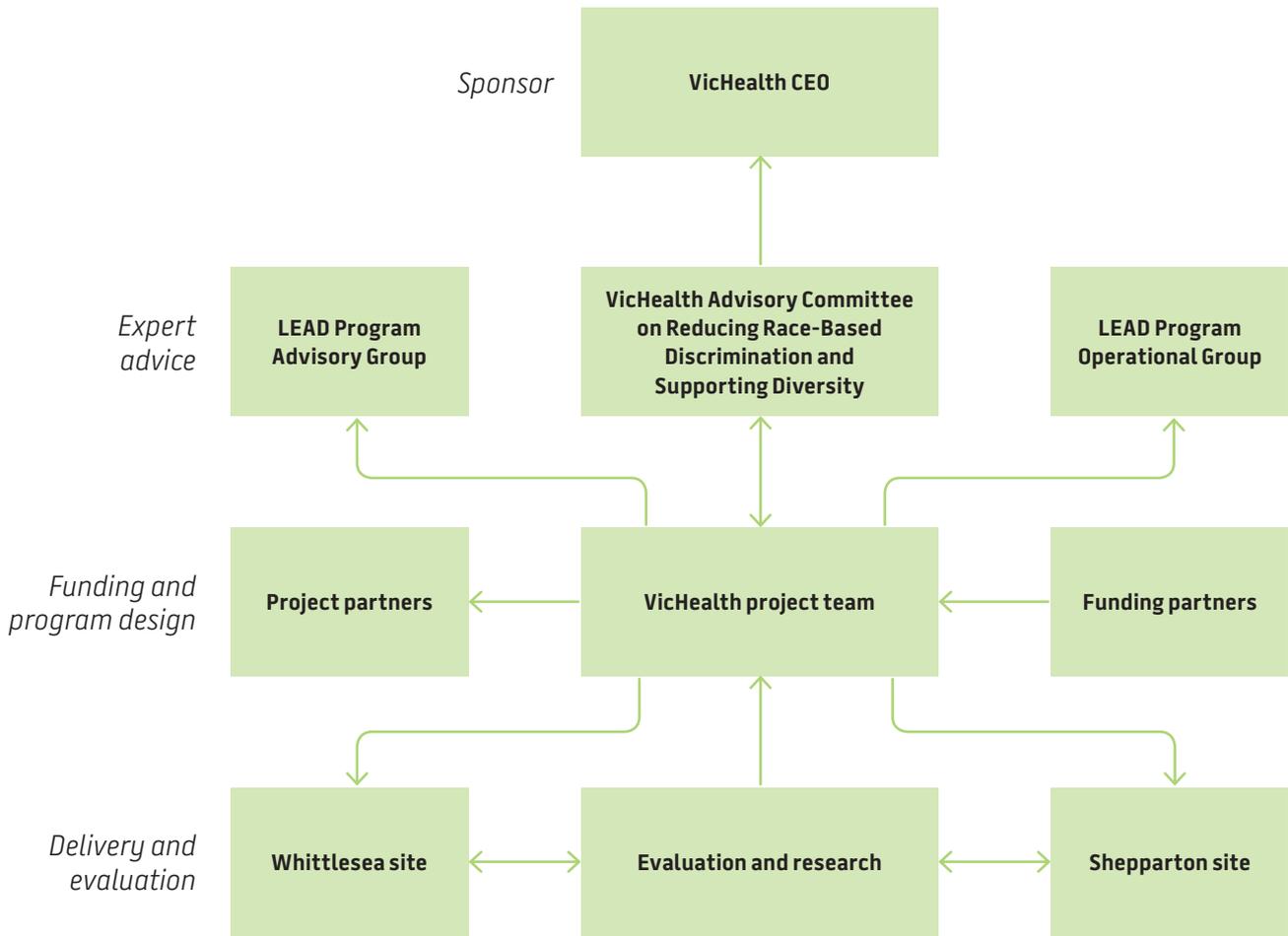
The LEAD program Advisory Group met every six months, and included senior representatives from each of the partner and funding agencies and CEOs from the implementing councils. This group was responsible for guiding the program design.

The LEAD program Operational Group met every three months and included representatives from VicHealth, VEOHRC, MAV, the LEAD evaluation team and the two LEAD councils. It was established to encourage networking and strategic thinking but ended up mainly reporting back on program activities and information exchange between the organisations directly involved in implementation and evaluation of the program.

Each council formed a local external advisory group to bring community input into the program design and to inform communities about LEAD activities. The external advisory group at Greater Shepparton consisted of local councillors and representatives from a range of local organisations including Uniting Care Cutting Edge and the Ethnic Council of Shepparton and District. In the City of Whittlesea the external advisory group included local councillors, and representatives of Victoria Police, Whittlesea Community Connections and African, Vietnamese, Chinese and Arabic-speaking community leaders.

Both councils appointed a program coordinator to develop relationships and coordinate implementation in their municipality. Whittlesea Council established an internal LEAD senior management team and LEAD internal working group. The senior management team comprised the council CEO, two directors and two managers, who met with the LEAD program coordinator every six weeks to keep upper management informed throughout the program. The internal working group consisted of individuals directly involved with implementing LEAD strategies from various council departments.

**Figure 1: Localities Embracing and Accepting Diversity (LEAD) program Governance Model**



## Implementation settings

LEAD had a focus on specific settings, including local government, education, retail, other workplaces and the media within the two local government areas. These were selected on the basis that they were settings where discrimination is known to occur as well as settings where promotion and prevention interventions can be readily introduced (Paradies et al. 2009; Priest et al. 2013; Trenerry, Franklin & Paradies 2012). Arts and sports were also identified as key settings for implementation but were not captured in the evaluation. This is explored further in the LEAD program limitations. Table 2 describes the organisations that participated in the LEAD program in each of these settings for both local government areas (LGAs).

## Key activities

The LEAD program involved the implementation of multiple and reinforcing strategies across these settings. Some strategies were designed to be implemented in both localities and in all settings; others were specifically designed to be implemented in one locality or setting. In all cases, the actions were tailored to each locality and setting to allow the program to be responsive to local contexts. The key strategies implemented were:

- community assessment
- audits of organisational policies, practices and procedures
- policy reform
- pro-diversity and cultural awareness training
- opportunities for work experience and mentoring
- internal organisational communication strategies
- awareness-raising activities
- stronger connections with local media
- *See Beyond Race* social marketing campaign.

**Table 2: Settings for LEAD implementation**

Local government area	Setting	Organisation	Description
Greater Shepparton	Local government	Greater Shepparton City Council	Greater Shepparton City Council employs approximately 800 people and is headed by the CEO, four senior managers and councillors elected by the community. The council provides a range of services and projects, including aged and disability services, health and childrens' services and community strengthening programs.
	Education	3 primary schools* 3 secondary schools	All schools involved in LEAD were publicly funded. Within Greater Shepparton, the schools involved had varying levels of ethnic and racial diversity and socioeconomic standing.
	Retail	Bunnings Shepparton	Bunnings Shepparton is a local branch of a nationwide supplier of home improvement and outdoor living products.
		Brokerhouse	Brokerhouse provides personal and commercial financial services through its offices in Shepparton and Echuca. Brokerhouse employs a team of 11 people.
City of Whittlesea	Council	Whittlesea Council	Whittlesea Council employs approximately 1200 people and is headed by the CEO and councillors elected by the community. The council has a range of responsibilities including provision of youth services, childcare and community strengthening programs.
	Education	2 primary schools* 2 secondary schools	All schools involved in LEAD were publicly funded. Within the City of Whittlesea the schools involved had varying levels of ethnic and racial diversity and socioeconomic standing.  One City of Whittlesea secondary school was only briefly involved with LEAD and is not covered in this report.
	Retail	Coles (Westfield Plenty Valley)	Coles at Westfield Plenty Valley is a local branch of a nationwide supermarket.
		Rebel Sport (Westfield Plenty Valley)	Rebel Sport at Westfield Plenty Valley is a local branch of a nationwide retailer of sporting and leisure equipment.
	Workplace	Mushroom Exchange	Mushroom Exchange is a branch of Costa Exchange. It is Australia's largest producer, packer and marketer of fresh mushrooms, and is the largest food manufacturer in the City of Whittlesea.
	Media	<i>Whittlesea Leader</i>	The Leader Community Newspaper group is part of News Corporation and distributes community newspapers throughout metropolitan Melbourne. The <i>Whittlesea Leader</i> covers local news relevant to the City of Whittlesea.

\* Schools have not been named in this report in order to maintain their confidentiality.

# Evaluation background

## Overview

The LEAD program evaluation sought to describe issues arising from the implementation of the program as well as measure its intermediate impacts (see Appendix 1 for the LEAD program logic). The evaluation aimed to:

- explore the relationship between discrimination, anxiety and depression
- assess the strengths and limitations of a place-based approach to reducing race-based discrimination and supporting cultural diversity, including the leadership role of local government and the resources required to implement this approach
- improve knowledge about how to reduce race-based discrimination and support cultural diversity by assessing and documenting LEAD program processes, outputs and outcomes.

The evaluation team provided input and guidance during implementation and are undertaking knowledge translation to shape future policy, program development and practice to reduce race-based discrimination and support cultural diversity.

## Methodology

The LEAD program evaluation comprised three components – community assessment, process evaluation and impact evaluation – structured around the three aims.

**Community assessment** was designed to explore the relationship between anxiety, depression and discrimination in communities associated with LEAD. This phase was critical to understanding the communities involved in LEAD and informing the development of the program in those communities. It involved:

- examining mainstream community attitudes and experiences of cultural diversity through the Community Attitudes survey
- investigating the patterns and mental health effects of race-based discrimination experienced by affected communities through the Experiences of Racism surveys
- observing the quality and quantity of inter-group contact in key public spaces in the LEAD localities.

The combination of these tools supported a comprehensive overview of how race-based discrimination operated in these areas.

**Process evaluation** assessed the strengths and limitations of a place-based approach to reducing race-based discrimination and supporting cultural diversity, focusing on the quality, reach and process of LEAD activities and strategies. It covered all aspects of program delivery including content, attendance and participant satisfaction. Feedback was sought from key implementers and community representatives in order to identify barriers to and facilitators of program implementation, and to understand why certain aspects of the program were successful or unsuccessful.

**Impact evaluation** was designed to improve knowledge about how to reduce race-based discrimination and support cultural diversity. It examined program outcomes against the intermediate aims outlined in the *Building on our strengths* framework, as well as assessing the effects of particular strategies undertaken through LEAD.

Both the impact and process evaluations adopted a mixed methods approach. Complementary qualitative and quantitative approaches were important in obtaining information from a variety of perspectives regarding organisational contexts, implementation barriers and program sustainability. Quantitative data was collected through community, staff and student surveys, while qualitative methods included student discussion groups, interviews and discussion groups with key informants, the collection of organisational audit data and media analysis. A description of the evaluation tools, how they relate to the evaluation components, and the numbers involved in each aspect are provided in tables 3–5.

Working in collaboration with LEAD partner organisations, the LEAD evaluation team developed a series of new tools to assess the intervention. Development of each tool typically involved reviewing the literature to identify suitable questions or approaches, consultation with LEAD stakeholders, pilot testing in specific locations, refinement based on piloting and feedback, and implementation as part of the evaluation methodology.

**Table 3: Evaluation tools used**

Evaluation tool	Description
<b>Community Attitudes survey</b>	The Community Attitudes survey aimed to understand how community residents felt towards race-based discrimination and cultural diversity in Australia and within their community.
<b>Experiences of Racism surveys</b>	Experiences of Racism surveys aimed to understand the self-reported experiences of Victorian CALD and Aboriginal community members in relation to: <ul style="list-style-type: none"> <li>• interpersonal, systemic and internalised racism</li> <li>• their responses and reactions to their experiences</li> <li>• the association between these experiences and measures of psychological distress.</li> </ul>
<b>Community observation</b>	Observations were made of intra- and inter-group interactions between people of majority and minority backgrounds. Analysis was conducted to determine associations between the type of contact observed, the length of that contact and whether the people interacting were part of a majority or a minority racial or ethnic group.
<b>Workplace diversity and anti-discrimination assessment tool</b>	This is designed to assist organisations review their existing policies, procedures and practices in terms of supporting cultural diversity and addressing race-based discrimination.
<b>School-based audit tool</b>	This is designed to assist schools to review their existing policies, procedures and practices in terms of supporting cultural diversity and addressing race-based discrimination.
<b>Organisational surveys (council, workplaces and education settings)</b>	Surveys examined experiences of discrimination within the workplace, organisational policies and practices relating to cultural diversity and the organisational elements in place to support the implementation of pro-diversity strategies.
<b>Student surveys</b>	Student surveys collected data on: <ul style="list-style-type: none"> <li>• demographics</li> <li>• motivations for fair behaviour towards students from different cultural backgrounds</li> <li>• inter-group attitudes</li> <li>• direct experiences of racism</li> <li>• vicarious experiences of racism</li> <li>• emotional health outcomes (loneliness and sadness).</li> </ul>
<b>Student discussion groups</b>	Discussion groups were held pre-implementation with students to gain insight into the context of students' experiences relating to cultural diversity and racism at school.
<b>Media content analysis</b>	Media data was analysed using a combination of template analysis and discourse analysis (how language was used).
<b>Organisational key informant interviews</b>	Semi-structured interviews were conducted with individuals who had participated in the LEAD implementation to assess the effects of the program within their organisation. Discussion groups and interviews were held with members of LEAD governance structures in each LGA, including internal and external advisory groups.

**Table 4: LEAD tools and evaluation components**

	Community assessment	Process evaluation	Impact evaluation
Community Attitudes survey	✓		
Experiences of Racism surveys	✓		
Community observation	✓		
Workplace diversity and anti-discrimination assessment tool		✓	
School-based audit tool		✓	
Organisational surveys (council, workplaces and education)		✓	✓
Student surveys		✓	✓
Student discussion groups		✓	
Media content analysis		✓	✓
Organisational key informant interviews		✓	✓

**Table 5: Number of participants in aspects of the LEAD evaluation**

	Total participants	Pre-surveys	Post-surveys	Interviews/discussion groups	Audit data
<b>Community settings</b>					
Community Attitudes survey	1236	NA	NA	NA	NA
Aboriginal Experiences of Racism survey	775	NA	NA	NA	NA
CALD Experiences of Racism survey	1139	NA	NA	NA	NA
Victorian Attitudes to Race and Cultural Diversity survey*	632	NA	NA	NA	NA
Community observation	974 (contacts)	NA	NA	NA	NA
Media	224 (articles)	NA	NA	2	NA
<b>Organisational settings</b>					
Greater Shepparton City Council	679	367	312	15	Notes and action plan
Whittlesea Council	812	402	410	21	Notes and action plan
Mushroom Exchange	376	195	181	1	Notes
Bunnings	31	31**	NA	1	NA
Students	476	264	212	87	NA
School staff	673	444	229	13	Notes (8 schools) Action plans (4 schools)

\* Data used for internal planning and not presented in this report.

\*\* Although pre-surveys of staff were collected, no implementation occurred in this setting; this data is therefore not included in analysis.  
NA, not applicable.

# Evaluation findings

## Implementation activities

### Community assessment

A community assessment was conducted at the beginning of program implementation to understand the context within which LEAD would be operating. It involved three components: examining mainstream community attitudes and experiences of cultural diversity, investigating the patterns and mental health impacts of race-based discrimination experienced by affected communities, and observing the quality and quantity of inter-group contact in key public spaces. This phase was critical to understanding the communities involved in LEAD and informing the development of the program in those communities.

In each municipality, data from these surveys was disseminated to council employees to raise their awareness of the existence and effects of race-based discrimination locally. The dissemination process was subsequently used to build support for and awareness of the LEAD program among council staff.

### Community Attitudes survey

The Community Attitudes survey attempted to understand how community residents felt towards race-based discrimination and diversity in Australia and their community. The Community Attitudes survey was conducted with 1236 residents across four LGAs.

### Implementation

The Social Research Centre was contracted to conduct the Community Attitudes survey as a 10-minute computer-assisted telephone interview. Interviewers completed the survey with respondents by telephone using computer-generated prompts. Translations were available in Cantonese, Mandarin, Vietnamese, Italian, Greek, Arabic, Lebanese and Turkish.

The survey was conducted in May 2010 and involved 1236 residents across the City of Whittlesea, Greater Shepparton, one control metropolitan LGA and one control rural LGA<sup>1</sup>. The control communities were selected based on the similarity of their demographics to the LEAD LGAs and their participation in other VicHealth programs.

### Results

The findings from the Community Attitudes survey demonstrate mixed attitudes toward cultural diversity in the surveyed LGAs. Most respondents expressed in-principle support for cultural diversity in Australia, with 78% of respondents agreeing that diversity is an important part of Australian life. However, support for assimilationist and exclusionary attitudes was also present, as 55% of respondents indicated that people from racial, ethnic, cultural and religious minority groups should try to think and act more like other Australians and 58% of

respondents felt that 'there are some racial, ethnic, cultural or religious groups that don't fit into Australian society'. Lack of contact between groups was also apparent, with 39% of respondents reporting 'some form of intercultural contact' between 'never' and several times a month.

### Experiences of Racism surveys

The Experiences of Racism surveys attempted to understand the self-reported experiences of Victorian CALD and Aboriginal community members in relation to interpersonal, systemic and internalised racism, their responses and reactions to their experiences and the association between these experiences and measures of psychological distress.

### Implementation

The surveys were conducted separately with CALD and Aboriginal communities. Consultation was conducted in each LGA to ensure that the relevant Experiences of Racism survey was appropriate and accessible for each community. As a result, the Aboriginal Experiences of Racism survey was varied slightly in each locality, while the CALD Experiences of Racism survey remained consistent across the LGAs. Translations of the CALD Experiences of Racism survey were available in Arabic, Chinese (Traditional), Dari, Swahili, Tongan, Turkish and Vietnamese.

Between five and seven Aboriginal and CALD community workers were recruited to administer the surveys in each LGA, excluding the CALD community in one LGA. In this LGA, service providers and community representatives advised that conducting the survey through a single community event would be more efficient than administration through individual workers' networks. Where community workers were recruited, the recruitment process included a consultation phase with relevant stakeholder groups in each LGA. This process was used to identify the most appropriate way of recruiting community workers and to develop data governance protocols. Community workers were trained in ethical research practices and survey administration by the LEAD evaluation team and supported throughout the data collection period with frequent contact with evaluation team members. Community workers distributed surveys through their personal and professional contacts as well as at local community events and functions. Workers participated in a follow-up session for feedback, debriefing and to discuss issues that had arisen during data collection. Participants received a \$20 supermarket gift voucher after completing the surveys.

In one LGA, members of the CALD communities were invited to complete the survey and have dinner during a community meeting. A further 40 community members were surveyed after the event by LEAD staff, bringing the total number of participants in this community to 300.

<sup>1</sup> Due to a shift away from community-level implementation, a collective decision was made not to implement the surveys after the completion of LEAD.

The processes of consultation and recruitment of community workers took up to six months, and conducting the surveys in the communities took between three and six months. Recruitment of workers who were well connected within the community was important to ensure that workers had access to possible participants. However, finding the right people was difficult, particularly in areas where the community was less engaged with local services. Local service providers and organisations referred appropriate people for the community worker positions and supported the evaluation team by providing advice around research methods, community consultation, developing data governance protocols and solving logistical challenges.

## Results

The Experiences of Racism surveys were conducted in the same four LGAs as the Community Attitudes survey. The findings confirmed the relationship between experiences of racism and poorer mental health. Overall, 1139 people from CALD communities were surveyed with nearly two-thirds reporting that they had experienced racism in the past 12 months. For the 755 Aboriginal Victorians surveyed, 97% had experienced racism in the previous 12 months. The surveys found that people who experienced the most racism also recorded the most severe psychological distress. Two-thirds of Aboriginal Victorians who experienced 12 or more incidents of racism in the past 12 months reported high or very high psychological distress. Similarly, over 40% of CALD Victorians who experienced nine or more incidents of racism in the past 12 months recorded high or very high psychological distress. This data suggests that every incident of racism that is prevented can help reduce the risk of a person developing mental illnesses such as anxiety or depression.

## Community observations

Observations of within- and inter-group contact between people of majority and minority backgrounds were conducted in two public spaces in each LGA. The public spaces to be observed in each LGA were identified as locations of high use by people from both majority and minority cultural backgrounds by local government staff working within the LEAD program. In one LGA, this was the community library and sports centre, while in the second LGA observations were conducted in a community library and a large shopping centre.

## Implementation

In each location the researcher, in consultation with LEAD council staff, identified peak times and places for observation within the setting. One researcher undertook all observations. Four two-hour observation sessions were conducted in each setting across different time periods (morning, afternoon and evening) and days of the week (both weekdays and weekends) over a three-week period.

In the first LGA, the library areas observed were a computer area, children's area, newspaper/magazine section and a television/gaming area, on two mornings and two afternoons for three consecutive Thursdays and a Friday. For the sports centre, two indoor basketball courts and two netball courts were observed on two afternoons, one evening and one morning for three different weekdays (two consecutive Thursdays and one Wednesday).

In the second LGA, library observations were conducted in the newspaper area, children's area and the computer space (divided into two sections due to its size) on two consecutive Saturday mornings and two weekday afternoons (Thursday and Friday). For the shopping centre, two sections of a food court, an outdoor children's playground and an indoor general seating area were observed on three weekday afternoons (two consecutive Thursdays and one Friday), one Thursday evening and one Sunday afternoon.

A map of each section was drawn for every visit and location and the activity of visitors was recorded. Each area was observed for 30 minutes. Date, time, visible racial background as determined by the researcher, age range, type of contact (within, inter-group or none) and quality of contact (friendly/familial or conflict) were recorded every five minutes. Contact rather than individual was the unit of analysis.

## Results

In total, 974 contacts were observed. The data gathered indicates that in public spaces within the two LEAD LGAs, people from visible minority groups tend to have no contact with others or to interact with people from other ethnic/racial groups, while those from the majority group (English-speaking Anglo) tend to interact predominantly with others from their own ethnic/racial group.

This finding suggests that, in public spaces, majority-group members are more likely to interact with other majority-group members than with those from minority groups. More generally, the data suggests minimal presence of community members from minority groups in public spaces.

## Audits of organisational policies, practices and procedures

Participating organisations were asked to audit and review their existing policies, procedures and practices in terms of supporting cultural diversity and addressing race-based discrimination. Two tools were developed as part of LEAD to support this process: the *Workplace diversity and anti-discrimination assessment tool* and the *LEAD School-based audit tool*. These self-assessment tools were designed to generate discussion and reflection, rather than to measure organisational performance. Internal committees were established to undertake the review using the tools as a guide. Through these discussions, organisations gained an overall picture of what they were doing to address race-based discrimination and support diversity and of their organisational strengths. This information was then used to guide development of an action plan to further advance their activity in this area. Appendix 2 summarises the goals, actions and key outcomes arising from the council action plans.

A range of feedback on the tools was gathered from the organisations that used them. It was noted that significant commitment and resources are required to use the tool.

## Policy reform

In both councils, reviews of human resources policies concerning the recruitment and retention of people from diverse backgrounds resulted in changes to disciplinary, grievance and equal opportunity policies; new recruitment processes to allow a wider range of people to apply; and placement of position advertisements in publications with a high proportion of diverse readers.

A number of other policies, procedures and practices were changed at both councils.

Whittlesea Council adopted a Reconciliation Action Plan and an Aboriginal Employment Pathway Strategy and Action Plan, both of which can be found on the Whittlesea Council website.

Greater Shepparton City Council:

- adopted a six-point Aboriginal Protocols policy outlining the council's commitment to acknowledging the Aboriginal community
- updated the council's style guide to enhance communication with the Aboriginal community
- developed an Aboriginal Communications Guide to have specific information accessible to all employees across the organisation when engaging with the local Aboriginal community
- established a faith/prayer/quiet room within council offices and guidelines for its use
- adopted its first Cultural Diversity and Inclusion strategy and associated action plan in March 2012 (with the support of LEAD)
- included policies regarding cultural leave arrangements in its enterprise bargaining agreement
- reviewed other policies regarding work experience and strategies to attract people from diverse backgrounds into the council
- amended its Community Matching Grants scheme to include criteria regarding the accessibility of projects for all people within the community.

## Pro-diversity and cultural awareness training

Pro-diversity training was developed and delivered by VEOHRC specifically for the LEAD program. The full program consisted of three separate sessions of 75 minutes each, delivered over the course of a few weeks. The training introduced participants to the existence, effects and causes of race-based discrimination and focused on the benefits of cultural diversity within an organisation and opportunities for individual and organisational changes to support cultural diversity.

Aboriginal Cultural awareness training was a key part of Whittlesea Council's 2012 Aboriginal Employment Pathway Strategy and Action Plan to build internal cultural competency and skills in attracting, recruiting and retaining Aboriginal staff members. Kangan Institute was contracted to provide Aboriginal-specific cultural awareness training. Previously developed programs were adapted for Whittlesea Council and LEAD program needs in consultation with a steering group comprising council staff, a representative from VicHealth and the evaluation team.

## Opportunities for work experience and mentoring

Within Whittlesea Council, the LEAD program supported and expanded pre-existing programs such as the WorkReady Project, a work placement and training initiative for newly arrived adults from migrant and refugee backgrounds. LEAD in Greater Shepparton supported the Academy for Sport, Health and Education work experience/mentoring program for Aboriginal young people.

## Internal organisational communication strategies

Whittlesea Council created an internal communications strategy to raise awareness and support for LEAD among staff and to facilitate overall organisational culture change. The council promoted involvement and participation in

council-based strategies and disseminated information on progress and results. Numerous communication activities were endorsed by and featured the CEO and other senior members of council. Meetings were held regularly with the LEAD senior management team and internal working group, and communication with Whittlesea Council executives and councillors was sustained via forums, reports, presentations and memos. An introduction to LEAD was also incorporated into the council's face-to-face induction for new staff.

LEAD staff at Greater Shepparton City Council communicated frequently with councillors and council senior management to keep them updated about LEAD progress and activities. LEAD staff at both councils also communicated through regular e-newsletters to internal and external partners and via items in council staff newsletters.

Mushroom Exchange implemented a number of strategies to improve communication within the organisation, particularly focusing on how to better engage staff who had limited English skills. These strategies included increased use of interpreters, engaging directly with smaller groups and ensuring that the environment was comfortable and welcoming when communicating with staff.

## Awareness-raising activities

Each municipality held a number of pro-diversity events. In the City of Whittlesea, Mushroom Exchange held several social events to support staff teams to break down barriers between different ethnic groups within the workplace. Particular teams were supported in organising 'celebrating diversity' events designed to highlight and promote the cultural diversity of the Mushroom Exchange staff. Events included dinner at a Turkish restaurant, belly dancing and lunches supplied during work hours. These lunches focused on cuisines selected by staff members and allowed staff to socialise. Through these events, commonalities between staff members, such as their common work roles, were emphasised.

In Greater Shepparton, approximately 100 students at two primary schools participated in a shared cultural day that included the Human Rights are Aussie Rules workshop, playing traditional Aboriginal and cooperative games and creating Aboriginal-inspired artwork. The workshop interactive sessions promote the four principles of the Victorian Charter of Human Rights and Responsibilities. One primary school conducted a Flowers for Diversity art program, engaging the school council and teachers and supporting students and their families to design wooden flowers representing their ethnic and cultural backgrounds. The flowers are on permanent display at the school.

## Stronger connections with local media

The City of Whittlesea partnered with the *Whittlesea Leader*, a local community newspaper, to increase the coverage of issues relating to cultural diversity in the area and to extend the reach of the *See Beyond Race* campaign. Through this partnership, council staff facilitated connections between *Whittlesea Leader* staff and local community members who participated in *See Beyond Race* to encourage profile pieces on the community members. Staff notified the *Whittlesea Leader* of community news of interest and LEAD activities throughout the partnership.

There were 224 articles published that met the criteria during the study period. Twenty-one of these articles ran in the six months before LEAD (3.5 per month), with 203 over the course of LEAD implementation (4.8 per month). Analysis indicated a general increase in pieces run by the *Whittlesea Leader* over the

course of LEAD in comparison to the six-month period before the LEAD program. During the time that *See Beyond Race* ran in the LEAD LGAs, five *Whittlesea Leader* articles featured the community members participating in the campaign and 38 articles met the criteria for inclusion – 7.6 articles per month on average. Over the reporting period, 11 articles explicitly mentioned either LEAD or *See Beyond Race*, with a number of others referring to different aspects of the program, such as survey findings.

### **See Beyond Race social marketing campaign**

The *See Beyond Race* social marketing campaign was implemented across both municipalities between May and September 2011. The campaign aimed to foster positive attitudes toward cultural diversity. The campaign design, including messaging and selection of appropriate target audiences, was informed by local data from the Community Attitudes and Experiences of Racism surveys. The campaign involved local ‘talent’ from CALD and Aboriginal communities and featured relatable facts about the participants. *See Beyond Race* was deployed on buses, bus stops, stickers, fridge magnets, tabletops in shopping centres and posters throughout the municipalities.

Greater Shepparton City Council added to the *See Beyond Race* marketing campaign activities by developing radio and television advertisements. Materials such as posters, mouse pads and stickers were displayed prominently within the council offices, and flags and signs were placed at recreation reserves across the municipality and at the entrances of Shepparton and Tatura. Whittlesea Council displayed a variety of materials in their offices. At Mushroom Exchange, staff members were encouraged to create pages based on *See Beyond Race* materials using their own characteristics and photos. These pages were collected into a booklet for each harvesting team and were distributed to staff. One secondary school and two primary schools encouraged their students to create posters based on *See Beyond Race* materials using their own characteristics and photos. The posters were then displayed around the schools.

Evaluation conducted by the Social Research Centre (SRC) (Social Research Centre 2011) indicated that the campaign reached 78% of target audiences in Shepparton and 37% in Whittlesea. High recognition of the campaign in Shepparton was attributed to television advertisements, which were not used in Whittlesea. Of target audiences that recognised the campaign, nearly all accurately recalled at least one aspect of the campaign’s message.

Approximately one-third of target audiences who had seen the campaign reported being influenced by it. See page 22 for more information.

### **The LEAD program’s reach**

In total, 3782 people were surveyed, 974 community contacts observed and 224 media articles analysed as part of the LEAD evaluation. The program connected with more than 3000 people at the councils of Greater Shepparton and Whittlesea, Mushroom Exchange, Bunnings Shepparton and in schools (Table 5).

Four secondary schools and four primary schools across Greater Shepparton and the City of Whittlesea completed the LEAD school-based audit tool, with three secondary schools and one primary school completing an action plan.

Approximately 250 staff members across the nine LEAD schools completed the VEOHRC pro-diversity training. One secondary school also ran a tailored version of the LEAD pro-diversity training with 16 student leaders.

Approximately 50 staff members from Greater Shepparton City Council and a small number of people at Brokerhouse and Bunnings completed the training. Greater Shepparton City Council has since made a 90-minute session with elements of LEAD and equal opportunity training and an online component compulsory for all new staff and for continuing employees every two years. Thirty-two staff members had completed this compulsory training at the end of LEAD implementation.

At Whittlesea Council, 50 staff members in customer service and frontline roles completed the full training program and approximately 50 managers, team leaders and coordinators completed the 90-minute session. Also in the City of Whittlesea, a two-hour session was delivered to eight Coles managers and a 90-minute equal opportunity and LEAD pro-diversity training session was delivered to 75 managers and supervisors and 300 harvesting team members at Mushroom Exchange.

Aboriginal cultural awareness training was delivered over two sessions of 3.5 hours each between March and May 2013 at the City of Whittlesea offices. Recruitment for this training targeted leaders, managers, supervisors, human resources staff and employees in contact roles (such as personal assistants to directors and equal opportunity contact officers). Approximately 146 people completed the training.

Approximately 100 students in two Greater Shepparton primary schools participated in the Human Rights are Aussie Rules workshop and one primary school conducted a Flowers for Diversity art program.

## **Impact on reducing race-based discrimination and supporting cultural diversity**

The evaluation found the LEAD place-based approach had a positive impact on individuals, organisations and the community in reducing race-based discrimination and supporting cultural diversity.

### **Individuals**

Overall, there was evidence of increased pro-diversity attitudes in the council and workplace settings, while in education settings staff and student attitudes towards cultural diversity and experiences of racism remained generally stable across the implementation of LEAD.

The evaluation examined the relationship between exposure to particular activities and the impact on individual attitudes. The pro-diversity social marketing, pro-diversity or cultural awareness training, work experience for diverse groups’ human resources policy development, local awareness-raising and pro-diversity policy change strategies all resulted in a decrease in the belief that people from different racial, ethnic, cultural and religious backgrounds don’t get along in the workplace, and in an increase in people preferring to work in a diverse organisation. Most activities indicated an increase in reporting vicarious discrimination and believing that discrimination is a problem in Australia, and a decrease in feeling uncomfortable with having a manager from a different background and in feeling anxiety around people from a different background. A decrease in believing that Australia is weakened by people from various backgrounds sticking to their old ways was associated with four of the six strategies. The findings from this analysis are summarised in Table 6.

**Table 6: Associations between LEAD activities and outcomes from the pre- and post-activity survey results<sup>1</sup>**

	Culture of fairness	Direct discrimination	Vicarious discrimination	Inadequate policies	No clear consequences	Don't get along
Pro-diversity social marketing			↑			↓
Pro-diversity or cultural awareness training			↑			↓
Work experience for diverse groups			↑			↓
Human resources policy development		↑	↑	↓	↓	↓
Local awareness raising			↑			↓
Pro-diversity policy change	↑	↓		↓	↓	↓

	Uncomfortable having a manager	Discrimination is a problem	Prefer a diverse organisation	Australia weakened	Anxiety around people
Pro-diversity social marketing	↓		↑	↓	
Pro-diversity or cultural awareness training	↓	↑	↑	↓	↓
Work experience for diverse groups	↓	↑	↑	↓	↓
Human resources policy development		↑	↑	↓	↓
Local awareness raising	↓	↑	↑		↓
Pro-diversity policy change	↓	↑	↑		↓

<sup>1</sup> An absence of a table entry indicates no change between pre- and post- survey results

## Organisations

It was found that awareness of pro-diversity organisational change increased support for inclusive policies and brought about positive changes in attitudes towards cultural diversity. Effective internal communication around pro-diversity changes is therefore an important strategy to extend awareness and reach of other strategies in the organisation. Implementation was most successful in organisations that had previously demonstrated some level of engagement with issues around cultural diversity and an understanding of the benefits of an inclusive organisational environment.

There was an increase in the levels of vicarious discrimination reported in council staff surveys over the period. This is possibly due to the general increase in awareness of what constitutes

race-based discrimination, and participants being more attuned to covert discrimination in organisational policies and practices. Despite this increase in reporting in the surveys, there were no indications of an increase in the number of formal complaints being lodged.

In Mushroom Exchange, significantly improved employee relations were attributed to the communication strategies established in LEAD. This included increased communication between managers and employees, which averted possible industrial action and allowed disagreements or conflicts to be resolved efficiently. Successful strategies implemented in one branch of Mushroom Exchange were also able to be communicated and transferred to other branches, both through branch-to-branch peripheral networks and through support from head office.

A lack of change in staff and student attitudes and experiences over time in education settings may be due to barriers encountered in implementing the program. These barriers led to strategies that were generally of short duration and limited in scope, such as school cultural days and staff pro-diversity training with little follow-up. The quantitative outcomes are therefore consistent with literature demonstrating that one-off, short interventions are generally insufficient to create meaningful change. Key barriers identified by staff included that schools may need notice of a year or more before implementation begins to enable them to plan and ensure sufficient time and resource allocation. Less intensive programs with longer implementation periods may be more effective in reducing burden on school resources and lessening the effect of staff turnover. In order to reduce time spent in partnership formation, local governments with limited partnerships with schools may also be better placed to support interventions through fostering connections between schools and local programs, services or providers, rather than through direct program implementation as occurred in LEAD.

## Community

Making connections between council and local media was found to improve the media coverage of CALD and Aboriginal communities and of culturally significant events. Connections between local media and communities were also enhanced through LEAD activities.

The *See Beyond Race* evaluation conducted by SRC found that approximately one-third of target audiences who had seen the campaign reported being influenced by it. While there were indications of some objective impacts as measured against pre-campaign benchmarks, the only significant difference in attitudes was a decrease in the proportion of City of Whittlesea respondents who believed there should be fewer immigrants coming to Australia from any country.

An indication of the perceived value of the LEAD program to communities is that both councils have supported ongoing work in this area even after the end of the funded program: the City of Whittlesea committed substantial funding to support the Aboriginal Employment Pathways Strategy and other LEAD strategies, such as the development of a Council-wide Anti-racism strategy, further training, policy reviews and positive communications/media. At Greater Shepparton City Council there was a proposal for the Cultural Development Officer position to be extended from three days to full time.

## Strengths and limitations of a place-based approach

### Governance

There was general agreement among senior management at both sites that the governance structure of LEAD worked well to bring together the strengths of diverse partners to support the program. Having a number of partner organisations involved in the development and design of LEAD also ensured that race-based discrimination would be considered and addressed from a variety of perspectives.

The cooperation of high-level partner organisations that had significant influence in their sectors substantially increased the reach and awareness of LEAD throughout Victoria and Australia. For example, MAV promoted successful LEAD strategies to other Victorian councils, some of which have begun implementation of projects influenced by LEAD.

There was a broad acknowledgement that having a dedicated LEAD program coordinator was essential to keeping the momentum of the program going throughout the implementation process and in liaising across different levels of the organisation.

A LEAD communication protocol was established early in the program to clarify the roles of partner organisations and staff members, processes for communication and resolving complaints or conflicts, ownership of intellectual property, data access and publication processes. The operational and advisory groups were seen by senior managers at both sites as useful in keeping LEAD partner organisations informed of LEAD activities, fostering communication and ensuring that issues could be resolved productively, but there was also some indication that they could have been used more effectively.

At the local level, different levels of engagement and governance were shown to be interconnected in development and implementation of LEAD strategies. While approval from upper management was required to take action within the organisation and provide guidance for a cohesive program, ongoing engagement with individuals conducting the strategies within council was also necessary. This was particularly true when strategies necessitated coordination across different departments.

### Timelines

Given the need to develop general support for the program in the Greater Shepparton and City of Whittlesea communities and in the implementing organisations, and the lengthy processes involved in developing and implementing strategies, a long timeline was necessary for program success. Having (originally three years) four years overall to develop and implement the program allowed for adjustments and changes to processes such as communication between the councils and LEAD partners. Given that changes to organisational culture tend to be slow to manifest, it was important to allocate sufficient time to allow employees to see positive changes happening, which then helped to garner further support for the program.

While having a substantial amount of time to implement LEAD was nominated as a facilitating factor, the time initially planned for the LEAD development phase – six months – was seen as insufficient and subsequently extended to nine months. This extension was necessary because:

- a number of the elements needed to support implementation were not present at the beginning of the program. A review of available training programs and organisational assessment tools indicated that there was a dearth of materials that had been rigorously evaluated and demonstrated to be effective. These materials therefore had to be developed. As a result of LEAD, suitable tools now exist (on the VicHealth website [www.vichealth.vic.gov.au/LEAD](http://www.vichealth.vic.gov.au/LEAD)).
- Developing partnerships with LEAD implementing organisations entailed the establishment by councils of a working relationship with some organisations that had previously had little to no contact with local government, including schools and some workplaces.

## Partnership development

Key informants indicated that they saw building effective partnerships between communities and council as a central measure of success for the program, as well as being important in increasing the impact of LEAD initiatives.

Engaging with organisations around the issue of race-based discrimination was difficult in some cases – either because organisations believed they were already addressing the issue appropriately and therefore were not interested in further implementation, or because addressing race-based discrimination was not perceived as being a key function of the organisation. This difficulty was exacerbated in some organisations where there was high staff turnover and transfer between branches.

School staff spoke positively about the development of their relationship with their local council; however, the majority of schools had previously worked with council in only limited ways, if at all. The time required to build relationships between councils and schools was therefore relatively substantial at the beginning of the program, leaving less time available to work on implementing strategies. Needing to dedicate time to partnership development was particularly problematic: all school staff emphasised that the time and resources schools can offer individual programs are extremely limited due to many competing pressures.

School staff valued the role of council in facilitating the development of other relationships, such as between other local schools or between a school and other local organisations. In particular, several of the staff members indicated that they had discussed their experiences with LEAD at a conference run by one of the councils. Several schools mentioned that they would be interested in learning what other schools in the area were doing to address cultural diversity and were keen to develop those relationships further, possibly with council support.

Implementing LEAD was found to be more challenging where organisational policy was made at the state or national level rather than the local level. In these cases, individual schools or retail branches were constrained in their ability to implement specific strategies, such as amending human resources and recruitment policies or changing other mandated organisational practices.

## The role of local government

The level of support for LEAD expressed within the councils and communities demonstrated that a demand exists for local government to engage with issues of race-based discrimination. External advisory group members expressed an expectation that their local council would be attentive to their needs as a valued part of the community, while council staff indicated that they saw a need for their organisation to reflect community demographics and be a leader in promoting pro-diversity norms. Local government was seen as a natural organisation to be at the forefront of addressing race-based discrimination, due to its ability to serve as a central coordinating point and engage with organisations across the community.

Community members were very supportive of councils taking on the LEAD program and viewed local government as central to anti-racism and pro-diversity efforts in the community. However, there was also acknowledgement that addressing racism was a goal that could only be undertaken with support from a number of sectors, not just local government.

A number of factors were identified that supported and limited the success of implementation. These included:

- Having strong and sustained commitment from the LEAD program coordinator throughout the program was mentioned a number of times as an essential component for the development of a program that was cohesive, engaged the entire organisation and communicated broadly.
- Having the funding for this position was seen as necessary for the level of implementation achieved through LEAD.
- Local government readiness to engage with the issues surrounding race-based discrimination and cultural diversity was also a key consideration. This includes support from the Mayor, Councillors and the CEO.
- Staff changes while the project was being implemented were identified as a factor that delayed program implementation and reduced its effectiveness as well as organisational stability.

# Discussion

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Overall, there was a clear perception that local government is well suited to taking a central role in addressing race-based discrimination. The place-based approach therefore provides a strong platform for transferring effective strategies, both within and between LGAs. Implementation was most successful in organisations that had previously demonstrated some level of engagement with issues around cultural diversity and an understanding of the benefits of an inclusive organisational environment.

In light of these findings the appropriate role of local government should be considered for each implementation setting. Where a council does not have an existing relationship with the relevant organisation, or the needed expertise, it may be better placed to facilitate connections to local service providers, rather than engaging in direct implementation.

The impact evaluation of the LEAD program found a number of positive benefits in the settings and localities that participated in the program. The major results are summarised in Table 7.

Various mechanisms were put in place to support continued implementation of pro-diversity activities after the program ended. These included the commitment by Whittlesea Council of substantial funding to support the Aboriginal Employment Pathways Strategy and other LEAD strategies, and a proposal for the Cultural Development Officer position to be extended from three days to full time in Greater Shepparton City Council.

**Table 7: Summary of key findings for interventions**

Strategy	Settings	Key findings
Audits of organisational policies, practices and procedures	Workplace Education Council	<ul style="list-style-type: none"> <li>The use of audit tools helped organisations understand what was working and what could be improved at baseline.</li> <li>Key informants indicated that the audit process needed to be simplified.</li> </ul>
Pro-diversity and cultural awareness training	Workplace Education Council	<ul style="list-style-type: none"> <li>Training programs received positive feedback from participants.</li> <li>Adaptation of the programs allowed them to be tailored to suit the needs of particular settings and groups of individuals within the organisation.</li> <li>Participants reported intentions to make changes to support cultural diversity within the organisation after the programs.</li> </ul>
Awareness-raising activities (e.g. Human Rights are Aussie Rules workshop and Cultural Day, diversity morning teas, cultural dinners and lunches)	Workplace Education Council	<ul style="list-style-type: none"> <li>Awareness-raising activities were flexible, able to be adapted for the setting and able to be personalised.</li> <li>In some settings, cultural events and activities were useful as part of a larger awareness-raising/pro-diversity strategy.</li> <li>The usefulness of these activities depended on the setting and level of follow-up; social activities were less useful where people were more work-oriented and uninterested in socialising with colleagues (e.g. Mushroom Exchange).</li> </ul>
Policy reform (e.g. human resources policies to improve recruitment and retention of people from diverse backgrounds, policies concerning acknowledging Aboriginal communities)	Workplace Council	<ul style="list-style-type: none"> <li>Policy reform was most successful in organisations that had longer term involvement in pro-diversity interventions.</li> <li>Policy change was associated with longer term change and strong organisational benefits (e.g. lower staff turnover, avoiding industrial action, etc.).</li> <li>Enacting organisational policy change necessitated strong support from management/leadership.</li> <li>There was limited policy change in some organisations (e.g. individual schools, organisational branches) where these conditions were not present.</li> </ul>
Internal organisational communication strategies	Workplace Council	<ul style="list-style-type: none"> <li>Awareness of pro-diversity strategies was associated with increased support for pro-diversity policies and more positive attitudes towards cultural diversity. Internal communication is therefore important in expanding the reach and effectiveness of pro-diversity interventions.</li> </ul>
Stronger connections with local media	Media Community	<ul style="list-style-type: none"> <li>Key informants indicated that increased profile pieces were positively received by the general community.</li> <li>Covering community members for profile pieces helped improve connections between diverse communities and local media organisations.</li> </ul>
Social marketing	Community Workplace Council	<ul style="list-style-type: none"> <li>Approximately one-third of target audiences who saw the campaign reported being influenced.</li> <li>Evidence indicated a decrease in the proportion of City of Whittlesea respondents who believed there should be fewer immigrants.</li> <li>Effects of the campaign may have been diluted due to short duration and limited non-print media.</li> <li>The reach of the campaign was likely extended through activities in LEAD organisations.</li> </ul>

## Key success factors

The evaluation identified a number of drivers of successful engagement and implementation of the LEAD activities in particular settings.

### For local governments:

- Having a dedicated position and the support of senior management was crucial for coordinating strategies across the organisation.
- Having sufficient funding for implementing pro-diversity initiatives following the implementation of LEAD was a primary concern for council key informants. Being able to allocate resources to this work is likely to be a factor in the capacity of local governments to contribute to pro-diversity and anti-racism initiatives.
- Strong internal governance structures contributed to maintaining momentum and senior management support. However, a balance between keeping people involved and providing too much information was needed and took time to develop.
- Organisational stability was important for building momentum and ongoing implementation throughout the program.
- There was strong in-principle support from council and the community for council to lead initiatives to reduce race-based discrimination and support cultural diversity.
- Assessment of council readiness to take on such work should be undertaken before beginning implementation. This could include examining organisational capacity, existing partnerships with local organisations and communities, and level of organisational and management support.
- Multiple reinforcing and interconnected strategies improve effectiveness because they can target different members of an organisation and address multiple factors that impact on resistance to organisational change and negative attitudes towards cultural diversity.
- Even for people who were not directly involved in pro-diversity strategies, awareness of organisational change around these values increased support for such policies and effected positive changes in attitudes towards cultural diversity. This highlights the importance of effective internal communication as a strategy in itself.

### Within retail and other workplaces:

- Implementation was more successful for organisations that had demonstrated experience/interest in pro-diversity intervention and an understanding of business benefits from a pro-diversity work environment.
- Having multiple staff members involved in implementation as well as senior management support may help in maintaining momentum when other issues arise within the organisation.
- Existing organisational structures can be used to improve translation of successful strategies, such as through branch-to-branch networks or head office.
- Working with head office may improve effectiveness if individual branches have limited control over organisational policy.
- High staff turnover in some retail settings may pose a barrier to establishing partnerships and maintaining ongoing implementation.

### Within schools:

- Longer term low-intensity interventions may be more suited to resources available while reinforcing pro-diversity messages over a longer period of time.
- Working directly with the Department of Education and Early Childhood to ensure that appropriate guidelines are in place may be more effective than working with individual schools.
- Council may be better placed to facilitate relationships between local schools and between schools and service providers if prior partnerships and experience in working with schools are not present.

### With respect to the media:

- Communities demonstrated high support for local government working with media due to the perception of negative coverage and representation.
- Facilitation of profile pieces and items regarding culturally significant events helped to improve balance between positive representation and coverage of controversial or negative events.
- Local government may be well placed to improve connections between under-represented communities and local media.

# LEAD program limitations (as a whole)

The genesis of LEAD was a response to recognition of the need to reduce race-based discrimination across entire communities and the need to develop the evidence around the effectiveness of place-based anti-racism intervention. However, as the program developed it became clear that there were significant limitations in the tools available to guide and evaluate anti-racism and pro-diversity strategies, which had been underestimated at the start of the program. The need to develop suitable resources therefore required refinement of the program's aims and timelines. Allocation of LEAD resources to this developmental work meant that the duration of direct intervention was less than initially anticipated. Six months was initially allocated for the development phase, which was subsequently extended to nine months. This demonstrates that this work is a long-term investment.

Furthermore, developing partnerships with the implementing organisations such as some workplaces and schools required the councils to establish working relationships with some organisations that they had up until then had little or no contact with. This engagement phase took up some of the time that had been earmarked for direct intervention.

Arts and sports settings were originally anticipated to be included in LEAD program activities. However, this did not eventuate to the extent that had been initially planned. Greater Shepparton City Council did engage 10 local artists to implement a community arts project, which was successfully completed. The artists were asked to demonstrate their interpretations of our cultural society with the artwork being on display at Greater Shepparton Council offices and transferred to road foils that were installed in the Shepparton Central Business District and small towns within the municipality. Several attempts were made to engage a range of sporting clubs but the response was limited. Shepparton Touch Football Association did undertake some implementation of activities.

Due to a shift away from community-level implementation, a decision was made not to implement the post-implementation surveys (Community Attitudes and Experiences of Racism) after the completion of LEAD. This meant that no community-level outcome data was collected as originally intended.

It is therefore likely that the changes observed in the current LEAD program were potentially more modest than could be expected in future initiatives given that the resources are now available and a greater proportion of time can be spent on implementation.

# Conclusions

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The implementation of LEAD in Greater Shepparton and the City of Whittlesea has demonstrated the feasibility of implementing a place-based initiative to reduce race-based discrimination and support diversity. Implementing a variety of strategies in multiple settings to work with individuals, organisations and the community in a specific locality has been shown to achieve substantial change. It has also highlighted some limitations of such an approach that need to be factored into any future programs, such as the time required to develop partnerships and implement action plans.

The evaluation of LEAD has added to our knowledge about how best to implement strategies to reduce race-based discrimination and support cultural diversity.

Recommendations flowing from the evaluation are that place-based approaches should consider the following:

- working with local government as a central partner
- assessing community experiences of race-based discrimination, including places where race-based discrimination occurs, before implementing interventions so that actions can be targeted appropriately
- assessing the numbers of suitable target organisations in each setting to ascertain the appropriateness of the place-based approach
- employing a program coordinator supported by senior management
- targeting organisations with experience in working with cultural diversity
- phasing implementation in order to harness new resources at each stage of the intervention
- maximising the level of intervention within organisations
- evaluating the results.

Embracing diversity will be the key to Victoria's future social cohesion and prosperity. The LEAD program has shown that multi-faceted place-based strategies that impact on individuals, organisations, communities and society as a whole have the potential to have a positive impact on all Victorians and thus to contribute to Victoria's future.

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# Appendix 1:

## LEAD program evaluation logic

### 1. Aims

- Explore the relationship between anxiety, depression and race-based discrimination
- Assess the strengths and limitations of a place-based approach to reducing race-based discrimination and supporting diversity, including the leadership role of local government and the resources required to implement this approach
- Improve knowledge about how to reduce race-based discrimination and support diversity by assessing and documenting LEAD program processes, outputs and outcomes



### 2. Strategies

- Organisational development activities
- Communication and social marketing
- Policy reform
- Community-strengthening activities

#### Evaluation methods

- Strategy evaluations
- Key informant interviews
- Progress reports
- Newsletters



### 3. Immediate outcomes

#### LEAD delivery:

- Package measures are implemented in accordance with agreed guidelines and timelines
- Monitoring and reporting requirements are met
- Partners and locality stakeholders consider that LEAD is addressing identified needs
- Locality stakeholders consider that the implementation of LEAD strategies is relevant, compatible, simple, flexible and supported

#### Evaluation methods

- Key informant interviews
- Setting surveys
- Strategy evaluations
- Reflection sessions
- Progress reports
- Newsletters

## 4. Intermediate outcomes

### Individuals who:

- recognise prevalence and impact of discrimination
- have accurate knowledge about and are comfortable with people from varied backgrounds
- recognise the benefits of cultural diversity, support multiculturalism and feel pride in a diverse community
- interact with people from varied backgrounds in respectful and just ways.

### Evaluation methods:

- Setting surveys
- Attitudes survey
- Experiences surveys
- Key informant interviews

### Organisations that:

- have policies, practices and procedures that ensure equitable outcomes
- respect and value diversity as a resource
- have strong internal leadership in the reduction of discrimination and support of diversity and model this to other organisations and the wider community
- have strong mechanisms for responding to discrimination when it occurs
- model, promote and facilitate equitable and respectful inter-group relationships and interactions.

### Evaluation methods:

- Audits
- Key informant interviews

### Environments that:

- encourage and facilitate positive contact between groups from varied backgrounds
- are welcoming, safe and supportive for people from varied backgrounds
- recognise the potential for discrimination and have strong mechanisms for reducing and responding to it
- respect and value diversity as a resource and demonstrate pride in a diverse community identity
- have strong leadership in the reduction of discrimination and support of diversity

### Evaluation methods:

- Audits
- Key informant interviews

## 5. Longer-term outcomes

- Increased pro-diversity attitudes
- Reduced discriminatory experiences
- Improved mental health
- Increased participation by diverse groups at an organisational and community level

### Evaluation methods:

- Setting surveys
- Attitudes survey
- Experiences survey
- Key informant interviews

# Appendix 2:

## Summary of goals, actions and key outcomes arising from council action plans

Goal	Council	Actions planned	Outcomes
Strengthen and raise awareness and understanding of council's commitment to cultural diversity and anti-discrimination policies and standards	<b>Whittlesea</b>	<ul style="list-style-type: none"> <li>Review and update internal communications strategies, diversity and anti-discrimination policies</li> <li>Develop a transparent and consistent approach to addressing issues of race-based discrimination</li> </ul>	<ul style="list-style-type: none"> <li>Access to human resources documents improved</li> <li>Communications to support initiatives relating to diversity implemented</li> <li>Disciplinary and grievance policies reviewed and revised</li> <li>Equal Employment Opportunity policy reviewed and revised</li> </ul>
	<b>Greater Shepparton</b>	<ul style="list-style-type: none"> <li>Council mission, vision and values to be strengthened through inclusion of 'I statements' which reflect commitment to diversity</li> <li>Continue to promote positive articles/mention of LEAD and diversity in current staff publications</li> </ul>	<ul style="list-style-type: none"> <li>Diversity statements included in council's strategic mission, vision and values</li> <li>Five editions of the LEAD e-newsletter developed and distributed internally and externally per annum</li> </ul>
Create a platform for stronger acknowledgement of council's commitment to its Aboriginal community (including Traditional Owners) and Aboriginal issues	<b>Whittlesea</b>	<ul style="list-style-type: none"> <li>Develop and support internal policy around acknowledgement of Traditional Owners and Aboriginal people</li> <li>Review, update and promote reconciliation policy</li> </ul>	<ul style="list-style-type: none"> <li>Reconciliation Action Plan adopted in September 2012</li> <li>Council protocol for recognising/acknowledging Traditional Owners promoted</li> <li>Aboriginal cultural awareness training implemented</li> </ul>
	<b>Greater Shepparton</b>	<ul style="list-style-type: none"> <li>Develop an Aboriginal Protocols policy outlining Council's commitment to acknowledging our Aboriginal community</li> <li>Promote Aboriginal community events/posters in communal staff areas and public areas of council</li> <li>Develop guidelines to direct effective communication with Aboriginal communities</li> </ul>	<ul style="list-style-type: none"> <li>Six-point policy developed and adopted</li> <li>Posters displayed in foyer/tea room and at council-owned venues</li> <li>Style guide updated and more examples and scenarios included</li> </ul>
Maintain and improve an inclusive workplace for internal and external customers	<b>Greater Shepparton</b>	<ul style="list-style-type: none"> <li>Investigate opportunities for a faith/prayer room (could be called a quiet room)</li> <li>Develop an operational policy to guide use of faith/prayer/quiet room</li> </ul>	<ul style="list-style-type: none"> <li>Faith/prayer/quiet room established and guidelines for use established</li> </ul>

Goal	Council	Actions planned	Outcomes
Plan for, achieve and support a skilled and diverse workforce that is reflective of and meets the needs of our diverse and growing community	<b>Whittlesea</b>	<ul style="list-style-type: none"> <li>• Develop recommendations regarding a Diversity Plan</li> <li>• Collect and monitor data on workforce composition for comparison with community demographics</li> <li>• Develop and implement an Aboriginal Employment Pathways strategy</li> <li>• Include focus on people from diverse backgrounds in professional development</li> </ul>	<ul style="list-style-type: none"> <li>• Data regarding staff demographics requested from all staff and collected from new staff</li> <li>• Aboriginal Employment Pathways strategy adopted in September 2012</li> <li>• New over-arching objective regarding commitment to having a diverse workforce included in revised Recruitment policy</li> <li>• Applicants' cultural background taken into account in applications for council-supported Diploma of Management. Theme of 'Equity, Diversity and Inclusion' now underpins each unit of competency</li> </ul>
	<b>Greater Shepparton</b>	<ul style="list-style-type: none"> <li>• Investigate the inclusion of cultural leave arrangements in council leave policy, in line with the council's Enterprise Bargaining Agreement</li> <li>• Develop/formalise work experience plan/policy to attract people from diverse backgrounds (e.g. implement the Academy of Sport, Health and Education work experience program as part of plan/policy in partnership with the academy)</li> </ul>	<ul style="list-style-type: none"> <li>• Policies have been reviewed</li> </ul>
Break down potential barriers in current council recruitment processes for job seekers/applicants from diverse backgrounds	<b>Whittlesea</b>	<ul style="list-style-type: none"> <li>• Review alternative recruitment strategies</li> <li>• Implement strategies to enhance promotion of job vacancies to people from diverse backgrounds</li> <li>• Train and educate managers and staff in inclusive recruitment practices</li> </ul>	<ul style="list-style-type: none"> <li>• Review of strategies being undertaken by Human Resources</li> <li>• Job vacancies emailed to service providers working with people from Aboriginal and culturally and linguistically diverse backgrounds</li> <li>• Statement on overseas qualifications reviewed</li> <li>• Changes to Human Resources recruitment policy undertaken and promoted to staff will allow hard-copy applications in addition to online applications; actively encourage people from diverse backgrounds to sit on selection panels, and provide information on overseas accreditation</li> <li>• Aboriginal cultural awareness training implemented</li> </ul>
	<b>Greater Shepparton</b>	<ul style="list-style-type: none"> <li>• Revise recruitment policy to decrease the barriers that limit diverse communities working within council</li> <li>• Train responsible managers around recruitment and selection process and eliminating bias (e.g. LEAD/equal opportunity training)</li> </ul>	<ul style="list-style-type: none"> <li>• Recruitment policy reviewed and updated</li> <li>• Training developed, administered and offered on an ongoing basis</li> </ul>
Build the capacity of staff and develop tools to support them to embrace diversity and reduce/address discrimination in their work roles	<b>Whittlesea</b>	<ul style="list-style-type: none"> <li>• Develop policy regarding multipurpose/retreat rooms</li> <li>• Develop inclusive catering guidelines</li> <li>• Promote culturally significant events/times of the year</li> <li>• Develop guides and support for inclusive language in council documents</li> </ul>	<ul style="list-style-type: none"> <li>• Promotion of culturally significant times of the year through internal staff communications</li> </ul>







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