Identifying and Preventing

Systemic Discrimination

at the

Local Level

Policy Brief

October 2020

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Introduction

Background

The Intercultural Cities programme has taken this initiative to assist cities, and organisations in the wider public and private sectors in the cities, to share and learn from the good practice responses to systemic discrimination developed by various cities. This policy brief seeks to support policymakers in cities on the key policy lines and strands of practice in addressing systemic discrimination.

This policy brief is accompanied by a study on systemic discrimination and effective responses that have been developed, and by a database of good practice exemplars from various cities, available on the Intercultural Cities website.

Systemic discrimination

Systemic discrimination occurs where the procedures, routines and organisational culture of any organisation contribute to unequal outcomes for minority groups compared to the general population. Systemic discrimination can be rooted in the way organisations go about their day-to-day business as policymakers, employers, or service providers, and can also feature in automated decision making. It tends not to be a matter of intent or deliberate action. It only becomes visible in the unequal outcomes for particular groups from the policymaking, programme and service delivery, and employment functions of an organisation. Unequal outcomes are thus the markers of systemic discrimination at play.

These unequal outcomes are evident in the situation and experience of groups such as women, visible and ethnic minorities, LGBTI persons, persons with disabilities, lone parents, carers, older persons, young persons, persons with particular religious beliefs, and persons of particular socio-economic status.

Entrenched, inter-generational, and intractable disadvantage for these groups results from systemic discrimination. This disadvantage can be apparent across the full spectrum of employment, income, education, health, housing, culture, policing, public infrastructure, and beyond.

Systemic discrimination undermines the principles of equality, diversity, and interaction that define the intercultural city. Equality means the city reflects equality and non-discrimination in all its work. Diversity means the city recognises diversity as an intrinsic feature of human communities and a source of resilience, vitality and innovation. Interaction means the city enables positive and constructive everyday encounters across this diversity.

Systemic discrimination contradicts the pursuit of equality and non-discrimination across the various functions of the city. Without advancing the goal of equality and non-discrimination, the advantages that flow from diversity are blocked and remain unrealised. The divisions that result from inequality reduce the quality of the interactions possible between groups across this diversity.

Provision of a framework for policy and practice on systemic discrimination

Four interlinked **strands of activity** by the city are necessary to effectively address systemic discrimination. These are:

Gear up: actions to create the conditions for the city to tackle systemic discrimination.

Identify: actions to uncover systemic discrimination and render it visible.

Prevent: actions to develop systemic remedies to a systemic problem.

Shared practice: actions to enable a coherent response to systemic discrimination across the city, the wider public sector, and the private sector.

Four key **principles** that shape these strands of activity are:

- The design and implementation of actions are informed by the groups exposed to systemic discrimination, and their representative organisations.
- Those developing and implementing actions are well informed, with expertise in and understanding of the issue.
- Actions are shaped by substantive ambition for more equal outcomes for groups in their access to resources; recognition for their diversity; influence in decision-making; and relationships of respect, care and solidarity.
- Commitments, reports, recommendations, and findings in relation to systemic discrimination lead on to the city taking practical action.

Strand one: gear up to address systemic discrimination

Setting a standard for addressing the issue

A standard would communicate the ambition of the city in addressing systemic discrimination and establish indicators to track progress on realising this ambition. Further, a standard establishes a vision for the city as a leader and influencer on the issue and sets out the measures of success for its approach to tackling the issue.

Organisational leadership on the issue

Leadership would be designated within the city to give visible commitment and ensure a priority for addressing systemic discrimination. This organisational leadership would involve:

- a political role for a designated member of the City Council;
- allocation of responsibility to a senior manager;
- and a focus on the issue on senior management meeting agendas.

Organisational infrastructure to drive action

An institutional infrastructure would be in place and tasked to address systemic discrimination, enabling long-term sustained action. This institutional infrastructure involves:

- An equality policy for the city, naming systemic discrimination and establishing a commitment to identify and prevent systemic discrimination.
- A cross-organisational committee to act as internal champion on the issue; expert and driver to ensure that staff can and do address the issue of systemic discrimination effectively.
- An action plan on systemic discrimination, establishing goals and initiatives for the city to identify and prevent systemic discrimination.
- Skills training and guidance on systemic discrimination for staff developing and reviewing policies, plans, programmes, and procedures, alongside general awareness training for all staff on the issue.
- Equality and diversity data and information gathered and analysed to enable an evidence-based approach to addressing systemic discrimination.

The Municipality of Turin, Italy, approved a resolution that declared "knowledge, actions, and anti-racist good practice as an intangible common good". The initial goal in this is to develop a Pact of Collaboration for the care, shared management and regeneration of this urban common.

The Pact will identify the priorities to be worked on and the investments to be made in this work. An open call for proposals has been issued to underpin a process of co-creation for the Pact. The Pact will be signed by the entities that agree to collaborate on its implementation. The Pact is a formal act that is set by resolution of the city and commits the parties.

In **Bradford**, **United Kingdom**, a member of the Executive leads on equalities. The Council Management Team, chaired by the Chief Executive, receives reports and recommendations on a quarterly basis from the Council's Cross Departmental Equality Group and periodic workforce reports.

Mexico City, Mexico, has established an internal infrastructure to express and sustain its commitment to equality and non-discrimination.

The Constitution of the City of Mexico includes a Bill of Rights, with specific commitments to address structural inequalities.

The Council to Prevent and Eliminate Discrimination has been established to issue guidelines for public policies on discrimination; prepare policies to prevent and eliminate discrimination; coordinate and monitor the actions of public bodies in addressing discrimination; and provide advice on the right to non-discrimination and process complaints of discrimination.

The Programme to Prevent and Eliminate Discrimination 2019-2020 is organised along three strategic lines of action to promote the incorporation of the equality and non-discrimination approach in the regulatory framework and public management instruments of the city; promote the right to equality and non-discrimination in the communication, education, and information work of the city; and strengthen a culture of equal treatment through awareness of complaint mechanisms, addressing complaints, and preventing discrimination in the private sector.

Strand two: action to identify systemic discrimination

Diagnosing issues of systemic discrimination

- Diagnosis would establish the situation, experience, and specific needs of groups experiencing inequality, to provide an evidence base to assist in eliminating systemic discrimination and improving outcomes for these groups from the city's policies, plans, programmes, and practices.
- Diagnosis involves an expert study or survey of the population and its diversity, the population being the inhabitants of a city, or an area of a city, or the employees of the city. The findings, conclusions and recommendations are published.

Dialogue on issues of systemic discrimination

- Dialogue would engage the city with people who have experienced systemic discrimination in order to learn from and respond to their perspectives.
- Dialogue involves a process to hear the voice of those exposed to systemic discrimination and their representative organisation; analysis of the implications of the knowledge gathered for policy, planning, programme and practice; and reporting on findings and conclusions.

Monitoring discrimination

- Monitoring would track the nature and level of incidents of discrimination in the city, and ensure redress is available to those who experience it.
- Monitoring involves providing access to independent advice and support to those making complaints of discrimination, tracking the complaint brought forward, and analysing and reporting on patterns of complaints and the implications of these.

Barcelona City Council, Spain, publishes an annual report on incidents of discrimination reported in the city. The report is prepared by the Barcelona Discrimination Observatory.

The report identifies who alleged discrimination in terms of their gender, age and legal status; the types of entities against whom discrimination was alleged; the geographical location, by different neighbourhoods, and the context, in the public or private sphere, of these incidents; the grounds for discrimination identified; the specific rights that are alleged to have been infringed; the type of discrimination involved; and the responses made to the complaints.

This published diagnosis of discrimination makes the issue visible so that such behaviours or attitudes do not become normalised. It provides the data necessary for an appropriate focus on the issue in policymaking. It builds trust between civil society organisations and the City Council, and creates space for joint strategy in combating discrimination to be discussed.

The **City of Geneva, Switzerland,** funds and works with the Centre – Écoute contre le Racisme (C-ECR). It is independent of the city. The C-ECR offers a range of free and confidential services to those experiencing discrimination and racism, including listening, counseling, psychosocial support, mediation, and legal assistance.

The C-ECR can provide anonymised statistical information on the issues of racism and discrimination for the city. The C-ECR can, with the permission of the person involved, contact the city, through the Project Manager for Diversity, to seek to resolve issues of discrimination that might arise in the operations of the city. The city, through the Project Manager for Diversity, can refer citizens who have experienced racism to the C-ECR.

In **Montréal, Canada**, the Office de Consultation Publique de Montréal (OCPM) conducted and reported on a consultation on systemic racism and discrimination in the City. The consultation took two years and involved over 7,000 contributions, in person and online. The goal of the process was to draw a portrait of the current state of affairs, to highlight the solutions proposed, and to enlarge perspectives to guide public decision-making.

The report was formally received by the city. The Mayor has publicly recognised systemic racism and discrimination as a problem. The Commission found that combating racism and discrimination had been neglected in favour of a focus on the integration of immigrants. The internal policies and practices of the City and its role in the production and perpetuation of inequalities had not been subject to any previous or ongoing review. The Commission's recommendations emphasise: recognising the problem, measuring the problem, defining goals that lead to concrete actions, and being accountable for these actions.

The Canton (state) of **Neuchâtel, Switzerland**, is conducting an initiative to monitor diversity within the Neuchâtel central administration, in collaboration with the University of Neuchâtel. The first monitoring module, as proposed, will establish the current situation of diversity among public sector employees. It will include questions on whether discrimination has been experienced by the respondent at work or outside of work, and on what grounds. A short report will support the further development of diversity monitoring systems in public administration.

The second monitoring module, as proposed, will involve collection of data on diversity during a recruitment process. This will be based on the results of the first module, and initially piloted over a period of months. A short report will identify any changes that might be required.

Strand three: action to prevent systemic discrimination

Review existing organisational systems

Existing organisational systems of the city for planning, policymaking, programme development, employment and/or services provision would be reviewed in relation to systemic discrimination and any unequal outcomes evident for particular groups.

This review involves:

- an examination of documentation relating to the systems under review;
- gathering and analysing relevant data and information from internal data systems, staff, and groups exposed to systemic discrimination; and
- reporting findings with recommendations.

Implement equality systems in the organisation

Equality systems are those organisational processes that could ensure that an organisation promotes and achieves equality through its functions and operations. These include:

1. Equality impact assessment

Equality impact assessments would be implemented as part of the city's process for developing and reviewing plans, policies, programmes, and procedures, to ensure their capacity to achieve outcomes for groups experiencing inequality is assessed at final draft stage. A similar process of algorithmic impact assessment would be applied to automated decision-making systems.

This assessment involves: gathering data and information on the target population and its

diversity; assessing the likely impact of the plan, policy, programme or procedure at final draft stage on groups exposed to systemic discrimination; and validating the findings with organisations representative of these groups.

2. Equality plans

Equality plans would be developed to address the disadvantage that results from systemic discrimination for groups exposed to this issue that are employed in the city or served in the wider population.

The development of equality plans involves a diagnosis of the situation, experience and specific needs of groups exposed to systemic discrimination; programming responses of positive action and of internal systems change; and setting indicators.

3. Values-led organisation systems

Values-led organisation systems would be established to develop and sustain an organisational culture committed to equality, diversity, and non-discrimination.

Securing this organisational culture involves preparing a statement of the values that motivate the city on equality, diversity and non-discrimination; establishing the practical implications of these values for priorities and processes of the city; and creating organisational systems to engage staff and management with the values.

Develop participative organisational systems

Systems for participation in the work of the city would be established to inform policies, plans, programmes, and procedures with the perspective of groups exposed to systemic discrimination and their representative organisations.

This involves processes of consultation with

groups exposed to systemic discrimination; creation of platforms for the voice of these groups to be articulated in a collective manner; and systems to directly involve these platforms with the city in developing or reviewing policies, plans, programmes, or procedures.

Camden Council, United Kingdom, identified the disproportionate impact of the Covid-19 pandemic and its management on people of Black, Asian and other ethnic backgrounds[1] at an early stage. It noted the complex systems that cause such health inequalities to thrive, encompassing the social, economic, cultural and environmental determinants of health.

A senior level 'Black, Asian and Other Ethnic Inequalities and COVID-19 Working Group' was established. This reviewed evidence across five disproportionality focus areas: health inequalities; residents at risk; children and young people; housing supply and overcrowding; and employment and the labour market. It prepared an action plan, which, while triggered by the pandemic, looks well beyond this focus.

The action plan covers six calls for action so that people from Black, Asian or other ethnic backgrounds: live healthy, independent and happy lives; have the best start to life and the opportunity to develop all their capabilities; access the work that is right for them; secure funding and capacity building for voluntary organisations; and live in a home where they feel safe; and so that Camden's workforce feels safe and supported to do their job.

Dublin City Council (DCC), Ireland, conducted an equality review of its systems for the provision of social housing supports and homelessness services on the ground of racial or ethnic origin.

The equality review included a desk-based review of legislation and national policy and of DCC plans, policies, procedures, service level agreements, information materials, and data sources. Interviews were conducted

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[1] Reference terms specifically used in the UK context

with DCC staff and staff of contracted bodies providing services. Focus group sessions were held with service users from Black and minority ethnic groups.

An Equality Action Plan is being implemented to address the recommendations made. It is planned to repeat the equality review on other grounds.

Kirklees Council, United Kingdom implements an Integrated Impact Assessment as new services, policies or strategies are developed, existing ones changed or in reviews or audits.

This involves an assessment of likely impact on people and on the environment to be considered. This enables an early identification and prevention of any systemic discrimination that might be involved in services, policies and strategies.

The Council has developed guidance and a toolkit for the assessment. The toolkit provides access to a range of relevant data sources. Staff involved in the process must have completed training on its implementation. A draft of the assessment is made available for public comment.

The municipal council in **Botkyrka, Sweden** has developed systems of equality planning to advance the goal of an equal city. The city, in this way, combats systemic discrimination through goal-driven and evidence-based processes and activities. This is a comprehensive approach covering the workplace and service provision and encompassing a range of groups experiencing inequality.

Measures include a focus on achieving a representative workplace where employees reflect the composition of the community; to formulate goals in a manner that ensures the needs and situation of different groups are considered and a contribution to equality is achieved; and to strengthen the competence of staff to contribute to a more equal city.

Galway City Council (GCC), Ireland set out its commitment to equality and human rights in its Equality and Human Rights Values Statement. This underpins a values-led approach to equality and human rights in its planning and internal policymaking.

The statement defines the values that motivate GCC on equality and human rights. It establishes the practical implications of each value for the priorities of GCC and for its operational processes. The values identified are: dignity; accountability; inclusion; participation; social justice; and environmental justice. The Equality and Human Rights Values Statement is to be communicated and engaged in a manner that the values become integral to the organisational culture.

Kirklees Council, United Kingdom has equality related employee networks to play a role in informing decision-making and enabling innovation.

A process of reinvigorate these networks involves: identifying an Executive/senior sponsor for each network with a role descriptor developed for these sponsors; re-establish an annual network operation budget; placing a network coordinator in human resources; and senior level messaging to change the culture of how networks are viewed and valued by line managers.

Strand four: action to spread and share good practice

Local platforms for exchange

Local platforms would take the form of committees, networks, or alliances. They would enable organisations to meet formally to facilitate mutual learning and shared endeavour on the issue of systemic discrimination.

Stakeholder mobilisation in actions

Stakeholder mobilisation would take the form of co-creation of initiatives, joint activities, or securing support for city-led initiatives on tackling systemic discrimination. It would enable involvement of a broader range of organisations with the issue of systemic discrimination, often on the basis of city-led initiatives.

Public visibility for actions

Public visibility would take the form of public communication or targeted messaging to key organisations and sectors. It would enable the city to serve as an exemplar in tackling systemic discrimination.

A local **anti-discrimination infrastructure** can assist a coherent approach to systemic discrimination by driving a standard of non-discrimination across all organisations. **Implementation of national legislation**, that provides for statutory equality duties, can assist a coherent approach to systemic discrimination by driving a standard of equality in the systems implemented by various organisations, with the city serving as an exemplar and providing peer support to others in its implementation.

The Bradford for Everyone integration programme is working with **Bradford Council, United Kingdom**, and Yorkshire Building Society to increase inclusive employment by implementing the Inclusion Maturity Model, designed by Grant Thornton, and the learning from this experience is being shared with the Employers Network of local organisations, which is creating an Employer Toolkit to be shared across the district.

The Pact of Collaboration, addressing anti-racism as an 'urban commons', being developed by the municipality of **Turin, Italy**, used a process of co-creation of the Pact to mobilise stakeholders from various sectors (described in section 4.4 above). This will be further reinforced by a process whereby various stakeholders can sign up to the final Pact which will provide a basis for coordinated effort on anti-racism.

The "Roadmap for an Administration that is Open to Diversity, Egalitarian, and Non-Discriminatory" developed by the Canton (state) of **Neuchâtel, Switzerland**, sets out actions along three axes to value diversity and promote equality (described in section 6.3 above). This first axis establishes the action that will be taken for the state to be an exemplar in matters of equality and non-discrimination. Actions on this axis focus on including its commitment to openness, equality, and non-discrimination, and how this commitment is implemented, in its communication work and tools.