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We need to refocus
around equality.

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"We did the study and the data
showed there is systemic
discrimination."

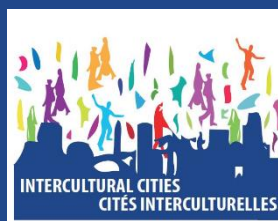
Systemic
Discrimination



Identifying and Preventing Systemic Discrimination at the Local Level

Policy Study

October 2020



COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

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Council of Europe©

Council of Europe, October 2020



We are creating an
internal
infrastructure to
tackle systemic
discrimination.

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1. Intercultural Cities initiative

1.1. Intercultural Cities and the issue of discrimination

The intercultural city is defined by three key principles: equality; diversity; and interaction¹.

Equality involves a commitment from the city to ensure equality and non-discrimination are reflected in all its functions and relationships.

Diversity involves a recognition by the city of diversity as an intrinsic feature of communities and a source of resilience, vitality and innovation for the city.

Interaction involves the city in creating the conditions for positive and constructive everyday encounters across this diversity, the type of interactions that are characteristic of intercultural integration.

The intercultural city “assures every effort is made to ensure non-discrimination in all of its policies, programmes and activities”². Anti-discrimination is thus a key strand of action for the intercultural city, which acts to eliminate discrimination at both the individual and institutional or systemic level. This strand of action for the city involves initiatives to prevent discrimination and protect those who experience it, through:

- reviewing municipal rules and regulations to identify mechanisms that may discriminate against minority groups;
- providing dedicated advice and support to those experiencing discrimination; and
- conducting anti-discrimination campaigns.

This approach needs to be pursued by the city, the wider public sector, and the private sector in the greater city environs. Each actor ideally takes action within their own organisation, while at the same time seeking the same standard from partners, vendors and other organisations alike, thus enabling a holistic approach to eliminating discrimination.

The importance of implementing institutional change in addressing discrimination is emphasised in identifying that an intercultural city “actively combats prejudice and discrimination and ensures equal opportunities for all by adapting its governance structures, institutions and services to the needs of a diverse population”³, an approach which is relevant across all public and private sector organisations.

These principles and ambitions motivate the Intercultural Cities programme to focus its attention on the challenge to address systemic discrimination, which is defined in section two below.

Systemic discrimination directly undermines the capacity of the intercultural city to give effect to the principle of equality. Where one principle is compromised all three principles for the intercultural city are diminished. Without equality, the advantages that flow from diversity are blocked. Division reduces the quality of interactions across this diversity, ultimately hindering the capacity of the cities to realise the potential of the intercultural integration model and its positive impacts, including better relationships and increased openness.⁴

An anti-discrimination strand of action, inevitably, requires a focus on systemic discrimination. If the focus of the city is limited to the more visible and immediately contentious individual level of discrimination, it will not be able to capture and address the less visible but destructive institutional level of discrimination.

¹ [The Intercultural City Step by Step: A practical guide for applying the urban model for intercultural integration](#), updated Bathily A. & edited and coordinated D’Alessandro A., Intercultural Cities, Council of Europe, 2019.

² Ibid.

³ Ibid.

⁴ [Final Report Evaluation of the Intercultural Cities Programme](#), Council of Europe, 2015.

The Intercultural Cities programme has, therefore, developed an initiative to assist the intercultural cities to share and learn from the good practices developed by various cities on the issue of systemic discrimination, and to provide them with a further resource base from which to engage effectively with this issue. This initiative takes a broad multi-ground perspective on systemic discrimination, encompassing the full range of groups exposed to this issue.

This study is one element of this initiative. It is accompanied by a policy brief to support policymakers with key policy lines and strands of practice required to address systemic discrimination. The good practices gathered from the cities, for this study, have been prepared as resources materials and made available through a specific thematic page and database on the Intercultural Cities website.

1.2. Study methodology

This study aims to provide a resource for cities, the wider public sector as well as the private sector, to better:

- understand systemic discrimination;
- create the conditions to address systemic discrimination; and
- take practical steps to identify and prevent systemic discrimination and to share this good practice across all sectors.

The first step in preparing this study was to identify good practices in addressing systemic discrimination in cities. Cities involved in the intercultural cities programme were contacted and briefed on the initiative. A survey was undertaken to enable cities to engage by indicating good practices for further discussion and documentation in this study. Twelve cities responded through the survey, and a further seven cities responded directly to the initial contact.

The development of this study further involved desk-based review of relevant literature; review of the intercultural cities good practice database; and follow-up with individual cities to discuss and document good practices they had identified.



2. Systemic discrimination

2.1. Defining systemic discrimination

Systemic discrimination comes under a range of titles in the literature including “structural discrimination”; “institutional discrimination”; and “systematic discrimination”. It is not specifically defined in international or European legislation.

The *UN Committee on Social, Economic and Cultural Rights* notes unchallenged, pervasive, and persistent discrimination that is often found “entrenched in social behaviour and organisation”⁵. It has defined what it refers to as “systemic discrimination” as the “legal rules, policies, practices or predominant cultural attitudes in either the public or private sector which create relative disadvantages for some groups, and privileges for other groups”.

It has recommended that state parties take “a comprehensive approach with a range of laws, policies and programmes, including temporary special measures” to tackle this issue. It emphasises the need for incentives to encourage public and private actors to change their attitudes and behaviour; public leadership and programmes to raise awareness about systemic discrimination; and devoting greater resources to traditionally neglected groups given the relative disadvantages that accrue due to systemic discrimination⁶.

The *Council of Europe* has identified that “structural discrimination” is based on the way society is organised and institutions are structured. This structural discrimination operates “through norms, routines, patterns of attitudes and behaviour that create obstacles in achieving real equality or equal opportunities”⁷.

The Council of Europe notes that the “challenge of structural discrimination is to make it visible, as we often grow up with it being self-evident and unquestioned”⁸. Where systems disadvantage certain groups of people and structural discrimination has been made visible, it identifies that steps need to be taken to address the patterns of behaviour and the ways in which institutions operate that generate such disadvantage.

The *European Commission against Racism and Intolerance (ECRI)* of the Council of Europe, in its work in relation to equality bodies, has defined what it refers to as “structural discrimination” as, the “rules, norms, routines, patterns of attitudes and behaviour in institutions and other societal structures that, consciously or unconsciously, present obstacles to groups or individuals in accessing the same rights and opportunities as others and that contribute to less favourable outcomes for them than for the majority of the population”⁹.

ECRI emphasises the challenges in effectively addressing structural discrimination given that those involved are often not aware that their actions have a discriminatory effect; the issue of structural discrimination affects large numbers of people; and individuals find it difficult to challenge it due to the institutional power they must confront. For an effective response to the issue, ECRI points to the importance of regular dialogue with groups exposed to discrimination in order to identify structural

⁵ [UN Committee on Economic, Social, and Cultural Rights, General Comment No.20](#), Non-discrimination in economic, social, and cultural rights, Identifying and Preventing Systemic Discrimination at the Local Level E/C.12/GC/20, 2009.

⁶ Ibid.

⁷ [Compass, Manual for Human Rights Education with Young People](#), Council of Europe, 2015.

⁸ Ibid.

⁹ [ECRI General Policy Recommendations No. 2: Equality Bodies to Combat Racism and Intolerance at National Level](#), adopted on 7 December 2017.

discrimination and establish how this might be addressed, and of targeting positive action at those who experience structural discrimination¹⁰.

The *European Union* has defined indirect discrimination in its equal treatment Directives. Systemic discrimination is not, however, named or defined in this legislation. The Directive on the ground of racial or ethnic origin, for example, establishes that “indirect discrimination shall be taken to occur where an apparently neutral provision, criterion or practice would put persons of a racial or ethnic origin at a particular disadvantage compared with other persons, unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary”¹¹.

The *European Commission*, through its networks, has identified that the concept of indirect discrimination, with its focus on effect or impact, can serve as a tool to make systemic discrimination visible and to challenge it. However, the law in this area is complex and it has been difficult to pursue a substantive body of casework on this. It has been emphasised that the prohibition of indirect discrimination needs to be backed up with further legislative and non-legislative action to raise awareness of indirect discrimination and to tackle the structural problems that are exposed through any findings of indirect discrimination¹².

This body of work can be applied in defining systemic discrimination for the purpose of this initiative.

Systemic discrimination involves the procedures, routines and organisational culture of any organisation that, often without intent, contribute to less favourable outcomes for minority groups than for the majority of the population, from the organisation’s policies, programmes, employment, and services.

2.2. Impact of systemic discrimination

Systemic discrimination tends not to be a matter of intent or deliberate action. It is rooted in the way organisations go about their day-to-day business as policymakers, employers, or service providers. It is a product, usually inadvertent, of the systems, structures, and cultures organisations have developed for and deploy in their work. This would also include systems of automated decision making, using artificial intelligence (AI) technologies and algorithms.

The impact of systemic discrimination is most easily seen in the outcomes for particular groups through the policymaking, programme design, service delivery and employment functions of an organisation. Unequal outcomes are the markers of systemic discrimination being at issue. Such unequal outcomes can be the experience of 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. These unequal outcomes can be compounded for the individuals at the intersections of these various groups.

Systemic discrimination can operate across the full spectrum of employment, income, education, health, housing, culture, policing, public infrastructure, and beyond. Entrenched, inter-generational, and intractable disadvantage for these groups, across all these areas, result from systemic discrimination.

¹⁰ Ibid.

¹¹ [Council Directive 2000/43/EC](#) of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin.

¹² Tobler C., [Limits and potential of the concept of indirect discrimination](#), European network of legal experts in the non-discrimination field & European Commission, Directorate-General for Employment, Social Affairs and Equal Opportunities Unit G.2, 2008.

3. Responding to systemic discrimination

3.1. Enablers, barriers, and transmitters for action

Four key **enablers** for an organisation to effectively address systemic discrimination are evident in the work of the cities that have been examined for this study:

- Awareness of the potential presence of systemic discrimination in the organisation and beyond, as well as leadership in putting systemic discrimination on the agenda and seeking solutions.
- An active and empowered civil society in the city, organised within the communities that are exposed to inequality and systemic discrimination.
- The definition, engagement, and discussion in an organisation, of values, such as dignity, inclusion, and social justice, to shape an organisational culture which motivates a commitment to equality, diversity and non-discrimination.
- Organisational processes to prevent, detect, and remedy all forms of discrimination and to advance equality for groups exposed to systemic discrimination, alongside staff capacity to apply these effectively.

Three key **barriers** that can limit the quality of an organisation's response to systemic discrimination are identified:

- The invisibility of the processes involved in systemic discrimination, the absence of evident intent, and the difficulty in directly linking the resulting situations of disadvantage to specific systems within the organisation.
- Lack of knowledge about and understanding of the complex nature and widespread implications of systemic discrimination.
- Fear or defensiveness in an organisation that preclude acknowledgement of systemic discrimination as an actual or potential problem.

Two key **transmitters** that can enable an organisation to influence a wider range of organisations across various sectors to respond to systemic discrimination:

- Communication strategies that integrate a focus on systemic discrimination and effective responses, and that establish the city as an exemplar on the issue.
- Engagement structures that build partnerships between organisations and sectors, serve shared endeavour on systemic discrimination, and that establish the city as a leader on the issue.

3.2. Framework for action

Systemic discrimination cannot be tackled on a once-off basis, it requires sustained attention from and initiative by organisations. Four interlinked strands of activity, evident in the practice of the cities, are necessary to effectively address systemic discrimination:

Gear up: This strand of activity is about creating the conditions within an organisation to tackle systemic discrimination. It involves securing leadership and creating drivers for action, as well as setting standards in relation to the issue within the organisation.

Identify: This strand of activity is about uncovering and rendering systemic discrimination visible. It involves gathering evidence, engaging in dialogue with those affected by the issue, and monitoring incidents and patterns of discrimination.

Prevent: This strand of activity is about developing systemic remedies to what is a systemic problem. It involves redesigning the systems that create disadvantage, and implementing new systems required to advance equality.

Shared Practice: This strand of activity is about enabling a coherent response to systemic discrimination across all sectors. It involves the city, the wider public sector, and the private sector engaging together with a view to achieving such a coherence of response.

4. Gear up to
address
systemic
discrimination

4.1. Definition of this strand of activity

Gear up

This strand of activity is about creating the conditions within an organisation to tackle systemic discrimination. It involves securing leadership and creating drivers for action, as well as setting standards in relation to the issue within the organisation.

Systemic discrimination is a complex, enduring, and damaging phenomenon. It requires sustained effort to address it effectively, undo its consequences, and ensure it does not recur or take new forms. This requires establishing a long-term responsibility and structures within an organisation to address the issue. Three types of action found in the cities to establish the institutional developments required, comprise this 'gear up' strand of activity:

- organisational leadership on systemic discrimination;
- organisational infrastructure to drive action; and
- setting a standard for addressing the issue.

Guidance is provided on each of these actions below. While this guidance is based on examples of good practice from the cities, it is designed to be relevant and applicable to all organisations in the wider public sector and across the private sector. The purpose and scale of an organisation could influence the choice of actions to prioritise, as well as the inclusion of any adaptation in the methodology.

4.2. Organisational leadership on the issue

The **purpose** of establishing leadership within the organisation for addressing systemic discrimination is to ensure that the issue is afforded priority within the organisation, and to establish a visible commitment to addressing it.

This organisational leadership on systemic discrimination could **involve** three core elements:

Political role: A member of the City Council designated to take the lead on issues of equality and non-discrimination, including systemic discrimination, to establish a political imperative and offer political encouragement and oversight on progress made.

Senior manager role: A senior manager allocated to take the lead on the issue of systemic discrimination, ensure an effective approach is being pursued within the organisation on the issue, and keep senior management informed of steps taken and progress made.

Senior management agenda: Senior management meetings include a regular agenda item on systemic discrimination, the steps being taken on this issue, and the achievements realised in this regard.

Three key **principles** that shape the necessary leadership within the organisation are:

- Leadership is well informed, reflecting expertise in and understanding of systemic discrimination.
- Leadership is committed, offering a role model for management personnel and staff in the organisation.
- Leadership is diverse, reflecting the composition of the wider society and capturing diversity advantage at this key level.



Good practices: leadership

In **Bradford, United Kingdom**, the Council's Executive designates one member to be responsible for equalities. The Corporate Management Team, made up of the Chief Executive and the senior director team, receive reports and recommendations on a quarterly basis from the Council's Cross Departmental Equality Group.

In **Montréal, Canada**, a member of the Executive Committee has been designated as the elected official in charge of the dossier of racism and discrimination. A Commissioner Against Racism and Discrimination is to be recruited to serve as part of the team of the General Manager of the City.

4.3. Organisational infrastructure to drive action

The **purpose** of establishing an institutional infrastructure afforded the central role in addressing systemic discrimination, is to ensure and enable long-term sustained action by the organisation on the issue.

Cities are already familiar with the need for such an institutional infrastructure to drive their commitments as an intercultural city. Many cities already have an institutional infrastructure in place with regard to the principles of equality, diversity and interaction, or elements of such an infrastructure. This infrastructure can serve to also address systemic discrimination and, in many instances, this responsibility has already been taken on.

This institutional infrastructure within an organisation to address systemic discrimination could **involve** four core elements:

Equality policy: An organisational equality policy to establish and detail the commitment of the organisation to equality, diversity, and non-discrimination across a range of grounds, for policy beneficiaries, service-users, and staff.

- This policy would name and define systemic discrimination as a concern for the organisation, and as an issue that the organisation is committed to preventing, identifying and eliminating, as well as to take a wider leadership on it beyond the organisation.
- It would establish where leadership and responsibility lie to ensure the commitment to address systemic discrimination is made real in the policies, plans, procedures, and practices of the organisation.
- It would establish procedures for: making complaints where this commitment has not been achieved; addressing any such complaints including those of systemic discrimination; and ensuring no victimisation for those making a complaint.

Driver for action: A cross-organisational committee convened to take overall responsibility for ensuring systemic discrimination is effectively addressed in the organisation. Its mandate could be complimentary to a focus on other broader commitments made in the equality policy.

- This committee would serve as the internal champion and expert on the issue, as well as the driver to ensure that those responsible can and do address the issue of systemic discrimination in the ongoing work of the organisation.
- It would pursue a long-term planned approach to addressing systemic discrimination, within the wider commitment to equality and non-discrimination.

Action plan: An action plan on systemic discrimination to be developed by the cross-organisational working group. This could be as part of a wider action plan on equality, diversity, and non-discrimination.

- This plan would establish the processes and steps that the organisation would take to prevent, identify, and, as necessary, eliminate systemic discrimination, and the goals it seeks to achieve in this regard over a set period of time.

- Implementation of the plan would be driven, monitored, evaluated, and reported on by the cross-organisational working group.

Capacity building: A programme of training to be provided for management and staff.

- Skills training and guidance for staff responsible for developing and reviewing policies, plans, programmes, and procedures, to develop their expertise in the identification and prevention of systemic discrimination.
- Awareness training for all staff that includes a focus on systemic discrimination, to build a shared understanding of the issue, and to stimulate a pro-equality organisational culture.

Equality and diversity data: An evidence-based approach to addressing systemic discrimination would be enabled by reinforcing gathering and analysis of equality and diversity data on policy beneficiaries, staff and service-users.

- This would include quantitative and qualitative data, given that quantitative equality and diversity data is underdeveloped.

Two key **principles** that shape the establishment of this institutional infrastructure are:

- The institutional infrastructure is informed by those groups who are exposed to systemic discrimination, and their representative organisations.
- Senior management are represented and active within the institutional infrastructure.



Good practice: an equality infrastructure in Mexico City, Mexico

Concept

Mexico City has established an internal infrastructure to express and sustain its commitment to equality and non-discrimination. This encompasses a Constitution for the City of Mexico published in 2017, a Council to Prevent and Eliminate Discrimination established in 2011, and a biennial Programme to Prevent and Eliminate Discrimination. This infrastructure covers a wide range of groups.

Foundation

This infrastructure is rooted in international and national human rights instruments. It is driven by the Law to Prevent and Eliminate Discrimination of Mexico City. This includes duties on public bodies to be proactive in preventing and eliminating discrimination and promoting equality.

Progress

The Constitution of the City of Mexico includes a Bill of Rights, with specific commitments to address structural inequalities. As a 'city of solidarity', authorities are to take measures to progressively eradicate structural inequalities. As an 'inclusive city', attention is to be given to the full exercise of their rights by people who, due to structural inequality, face discrimination, exclusion, mistreatment, abuse, violence and obstacles to fulfilling their rights. It commits to a system of indicators for the rights set out, that allow goals to be set in the annual budget of the city, and an evaluation of their achievement.

The functions of the Council to Prevent and Eliminate Discrimination include 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. It is responsible for the Programme to Prevent and Eliminate Discrimination. It is composed of members of the public administration and the Consultative Assembly, with a range of public bodies attending. A Consultative Body advises the Council, with members drawn from relevant social, private, NGO, and academic sectors.

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.

Good practice: anti-discrimination institutional infrastructure in Barcelona, Spain

Concept

Barcelona City Council has an institutional infrastructure to combat all forms of discrimination, including systemic discrimination, in place for over two decades. This involves internal structures that enable the city to identify and address systemic and other forms of discrimination; build staff capacity on the issue; create platforms for the participation of people experiencing inequality and their associations in policy-making; and give public visibility to the issue of discrimination and the city's commitment to address it.

The institutional infrastructure includes Barcelona Municipal Immigration Council, established in 1997; Office for Non-Discrimination, established in 1998 and renewed in 2017; and Barcelona Discrimination Observatory, established in 2018.

Foundation

A Government Measure: Office for Non-Discrimination of the City Council in 2017 reinforced and reprioritised the office and its work, with further responsibilities and intervention mechanisms. This measure was published in response to a study on municipal mechanisms for safeguarding human rights, commissioned by the Department of Citizen Rights and Diversity Services.

Progress

Barcelona Municipal Immigration Council is a consultative participatory body comprised of municipal political groups, migrant associations, and observers. It works to four themes of full citizenship; interculturality; promoting and supporting associations; and internal functioning. The full citizenship theme has objectives to combat institutional racism, and to promote participation of its member associations in platforms for defining public policies, including municipal policies.

The Office for Non-Discrimination, a municipal service, works to provide a municipal space for combating discrimination, including support to municipal services on the issue; raise public awareness of and counter discrimination, including support to civil society organisations working on the issue; and develop responses to incidents of discrimination, including providing assistance, including psychological support and legal advice, to people who experience discrimination, and establishing disciplinary mechanisms within the city council for discrimination.

The Barcelona Discrimination Observatory publishes an annual report on incidents of discrimination that occurred in the city, the actions and strategies to address them, and future challenges. This a joint initiative of the Office for Non-Discrimination and the Human Rights Resource Centre of the city, and the Board of Organisations for Assistance to Victims of Discrimination, involving over 18 entities (described in section 5.2 below).

Good practice: anti-racism cockpit in Turin, Italy

Concept

It can be difficult to secure consistent and coherent action on the issue of systemic discrimination in a large organisation such as the City of Turin. Different departments can pursue their own intercultural policies without reference to each other, or knowledge about what others was doing.

It is necessary to open up permanent spaces for exchange of knowledge, sharing of good practices, and coordination of actions. Such a space, in the form of an Intercultural Working Group in this instance, serves to raise the quality of intercultural action, including a focus on systemic discrimination, and provide a particular form of training, training by doing.

Foundation

This initiative is rooted in the 'Guidelines for the Coordination of the Intercultural Policies of the City of Turin' adopted in 2018. The guidelines provide a framework for action by the public administration to increase participation of all citizens, eliminate all forms of racist discrimination, and strengthen a sense of community.

The guidelines set out three lines of action for an Office for the Coordination of Intercultural Policies. The first line of action is focused on the work of the public administration. It is concerned with inter-sectoral dialogue and coordination within the public administration, between responsible departments and between the Councillors. The second line of action refers to networking by the public administration for co-planning, governance and evaluation. The third line of action refers to work on visibility and training, including strengthening of civil society.

Progress

An Intercultural Working Group, with members drawn from across the various municipal services, was formed. It meets on a monthly basis and is coordinated by the chief of staff of the Deputy Mayor for Human Rights and Youth Policies. This started informally with a small group and has been enlarged to include ten members. Members have some form of equality brief within their service area. Care is taken in this process of growth to keep the working group rooted in its motivation for and understanding of intercultural action. Not all core functions are covered as of yet.

The initial focus is to exchange information, practices, and contacts between the different departments involved. Connections have been established between departments on intercultural issues and responses to these issues. Individual members have taken on responsibilities in acting to challenge racism and built their expertise in doing so. A foundation for self-evaluation of intercultural policies in the different services has been created. Links have been established with the development and implementation of a Pact of Collaboration with its focus on anti-racism (described in section 4.4 below).

Good practice: gathering and analysing equality data in Kirklees, United Kingdom

In Kirklees, consolidated data sets and information are made available to relevant staff responsible for assessing the impact of policy and programme proposals on groups experiencing inequality and on the environment. These include community profiles and feedback (including population data and health and wellbeing reports), surveys and consultations; service user data; workforce data; and community surveys (with equality analysis).

4.4. Setting a standard for addressing the issue

The **purpose** of establishing a standard in relation to addressing systemic discrimination is to ensure a significant and shared level of ambition in the approach of the organisation to the issue, establish measures of success that can be tracked, and offer transparency to the commitment and endeavour on this issue.

Standard setting in relation to systemic discrimination could **involve** two key elements:

Vision: A vision for the organisation, its commitment, standing, and goals, could be defined and detailed as being:

- a leader on equality, diversity and non-discrimination, including systemic discrimination;
- an influencer for equality, diversity and non-discrimination, including systemic discrimination; and
- planned and systematic in its internal approach to equality, diversity and non-discrimination, including systemic discrimination.

Measures of success: Indicators of success would be developed, and tracked over time, that encompass developments in:

- institutional infrastructure to address systemic discrimination and its functioning;
- organisational systems to identify and prevent systemic discrimination, and to advance equality and recognise diversity and their implementation; and
- outcomes from policies, plans, programmes, and practices for groups experiencing inequality, and their improvement.

Three key **principles** that shape this standard and its development are:

- The standard espouses an ambition for equality that is substantive in seeking more equal outcomes for groups, that would include enhanced access to resources; participation and

influence in decision-making; recognition and status for their diversity; and experience of relationships of respect, care and solidarity.

- The standard is informed by those groups who are exposed to systemic discrimination and their representative organisations.
- The standard is publicly disseminated to allow for discussion and feedback on the standard and its realisation in ongoing practice.

Good practice: anti-racism as an urban common in Turin, Italy

Concept

The concept of “the commons” draws from the English legal term for common land and traditionally refers to shared resources held in common. The commons tend to be understood as material resources that communities manage for collective and individual benefit but can refer to both material and immaterial resources.

On March 17, 2020, the Municipality of Turin approved a resolution that declared “knowledge, actions, and anti-racist good practice as an intangible common good”. With this, the city has begun a journey with potential to prevent all forms of racism, including systemic discrimination.

Foundation

This initiative is based on the ‘Regulation on Urban Commons’ approved by the City Council on 11 January 2016, as revised in 2019 to include for immaterial commons. This establishes forms of cooperation between citizens and the local authority for the care, shared management, and regeneration of urban commons.

It defines urban commons as those tangible, intangible and digital goods, that citizens and the administration recognise as contributing to “the exercise of the fundamental rights of the person, individual and collective well-being, and the interest of future generations”.

Progress

The initial goal for the journey is to develop a Pact of Collaboration for the care, shared management and regeneration of this urban common. This is preceded by a public consultation to get ideas and proposals for inclusion in the Pact. An open call for proposals has been issued to underpin a process of co-creation for the Pact.

This open call identifies the purpose of the Pact as being to “consolidate, enhance, promote and extend” the urban commons of knowledge, actions, and anti-racist good practice. It will provide a basis to coordinate the efforts of the municipality and the signatories to the Pact, on the issue of anti-racism. It will identify the priorities to be worked on and the investments to be made in this work.

The details of the Pact and the mutual commitments involved are yet to be defined. Sixty entities have sought to be involved in the Pact to-date, including associations, trade unions, museums/institutions, networks, informal committees, and individual. Once completed the Pact will be signed by those entities that agree to work together on its implementation in a form of co-management of the issue.

The Pact is a formal act that commits the parties and cannot be neglected. As it is set by resolution of the city, it can only be rescinded by a further resolution.



5. Action to
identify
systemic
discrimination

5.1. Definition of this strand of activity

Identify

This strand of activity is about uncovering and rendering systemic discrimination visible. It involves gathering evidence, engaging in dialogue with those exposed to the issue, and monitoring incidents and patterns of discrimination.

Systemic discrimination by its nature is a largely invisible phenomenon. It only becomes visible in unequal outcomes, as well as in disadvantaged situations and experiences of particular groups in the city. There are three types of action found in the cities to render systemic discrimination visible under the 'identify' strand of activity:

- diagnosing issues of systemic discrimination;
- dialogue on issues of systemic discrimination; and
- monitoring discrimination.

Guidance is provided on each of these actions below. While this guidance is based on examples of good practice from the cities, it is designed to be relevant and applicable to all organisations in the wider public sector and across the private sector. The purpose and scale of an organisation could influence the choice of actions to prioritise, as well as any adaptation in the methodology itself.

5.2. Diagnosing issues of systemic discrimination

The **purpose** of the diagnosis is to establish an evidence-based overview of the situation, experience, and specific needs of groups experiencing inequality, in order to identify systemic discrimination, and improve the outcomes achieved for these groups from the organisation's policies, plans, programmes, and practices.

Diagnosis could **involve** two key elements:

Study/survey: An expert study or survey of the population and its diversity could be conducted or commissioned.

- The population could be the inhabitants of a city or an area of a city, or it could be the employees of an organisation.
- The study/survey questions would explore:
 - the situation of each of the specific groups exposed to systemic discrimination, in relation to the particular functional area of the organisation being examined, such as employment, income, housing, education, or health:
 - *What disadvantages are evident in their situation?*
 - *How does their situation compare with the wider population?*
 - the experience of each of the specific groups exposed to systemic discrimination in engaging with the wider society:
 - *What is their status and standing within the wider population?*
 - *What is the quality of their relationships with key public and private sector organisations?*
 - the manner in which each of the specific groups exposed to systemic discrimination give expression to their identity:
 - *What particular needs are evident for each of the groups?*
 - *To what extent are these particular needs being addressed?*

Publication: The findings, conclusions and recommendations of the study or survey would be published.

Three key **principles** that shape this process of diagnosis are:

- The diagnosis is informed by the groups who are exposed to systemic discrimination and their representative organisations.
- The diagnosis takes an intersectional perspective to ensure that there is a focus on the diversity of people within these groups.
- Action is taken based on the report to address any:
 - recommendations on the institutional systems found to be generating differential outcomes for specific groups; and
 - recommendations on better addressing the situation, experience and needs of groups found to be disadvantaged.

Good practice: diversity monitor in the Canton of Neuchâtel, Switzerland

Concept

The Canton (state) of Neuchâtel is pioneering an initiative to monitor diversity within the Neuchâtel central administration. This is being done in collaboration with the University of Neuchâtel.

A first monitoring module will involve a census of around 4,000 staff being undertaken, to photograph the diversity, visible and invisible, of staff within the administration, including the municipality of Neuchâtel (with its 1,200 employees). Based on this, a second monitoring module will assess whether and how under-representation takes place through the recruitment processes.

Foundation

This initiative is rooted in the “Roadmap for an Administration that is Open to Diversity, Egalitarian, and Non-Discriminatory” approved by the Canton (state) of Neuchâtel in May 2018.

Progress

The first monitoring module, as proposed, will establish the current situation of diversity among public sector employees. It will take a broad perspective on diversity, including age, nationality and national origin, gender (including non-binary forms), language, and childcare responsibilities, dependents and work-life balance issues. It will include questions on whether discrimination has been experienced by the respondent at work or outside of work, and on what ground.

A short report is to be prepared, presenting and analysing the data, while protecting the confidentiality of all individuals. It will further support the development of diversity monitoring systems in the 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. It will use a separate diversity form where candidates self-identify their specific characteristics, that correspond with those addressed in the first module. The diversity form protects anonymity and is not made available to the human resources department.

A short report sets out the overall results and suggests any changes that might be required. This will analyse the data from a diversity perspective in terms of groups not reached by the recruitment process, that is groups not represented among the applicants; and the recruitment procedure itself, where groups are not represented among successful candidates.

Good practice: annual discrimination report in Barcelona, Spain

Concept

Barcelona City Council publishes an annual report on incidents of discrimination reported in the city. This covers diverse grounds of discrimination including racial or ethnic origin; sexual orientation; disability; language; gender; socio-economic status; health; religion; ideology; and age.

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 neighbourhood, and the context, in the public or private sphere, of these incidents of discrimination; 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 adequate and appropriate focus on the issue in policy making. It builds trust between civil society organisations and the City Council and creates space for joint strategy in combating discrimination to be discussed.

Foundation

The Barcelona Discrimination Observatory, established in 2018, has published this annual report since 2018. The observatory is a joint initiative of the Office for Non-Discrimination, and the Human Rights Resource Centre of the city council and of the Board of Organisations for Assistance to Victims of Discrimination, comprising over 18 civil society organisations that assist people alleging discrimination.

Progress

The methodology for the 2019 annual report included:

- analysis of data from the discrimination case load of nine civil society organisations and of the Office for Non-Discrimination; and
- focus groups to explore the issues arising from the data, including issues of under-reporting and intersectionality.

95% of the cases reported involved direct discrimination, and the analysis of under-reporting is largely focused on this type of discrimination.

Systemic discrimination is increasingly coming onto the agenda. It has been adopted as its core topic for 2020 by the Barcelona Municipal Immigration Council, a consultative body for the city comprised of municipal political groups and migrant associations. It is expected this will lead to greater attention to this phenomenon in future years.

The report concludes by identifying the main challenges for 2020, with recommendations to be addressed by various public bodies and by the members of the Board of Organisations for Assistance to Victims of Discrimination.



5.3. Dialogue on issues of systemic discrimination

The **purpose** of dialogue is to engage with and learn from people and groups who have experienced systemic discrimination in order to apply and respond to the knowledge and understanding they share.

Dialogue could **involve** three key elements

Process: An accessible process is developed and implemented to enable the voice of those exposed to systemic discrimination and their representative organisation to be heard on the issues they face.

- This could be the voice of these groups in the workplace or in the community that are exposed to systemic discrimination.
- This could be an ongoing or a time-limited process.

Analysis: The knowledge gathered from the process of dialogue would be analysed with a view to establishing the policy, planning, programme, and practice implications.

Report: The findings and conclusions of the dialogue process and the conclusions drawn from these would be publicly reported.

Four key **principles** that shape this dialogue process are:

- The design of the dialogue process is informed by the groups who are exposed to systemic discrimination and their representative organisations.
- The dialogue process includes an intersectional perspective to ensure the diversity of voices within these groups are heard.
- Feedback is provided to those who participated in the dialogue process to check that there has been an accurate recording and understanding of the knowledge gathered.
- Action is taken to address the findings of and conclusions from the dialogue process.

Good practice: public hearings in Montréal, Canada

Concept

The Office de Consultation Publique de Montréal (OCPM) published a report in June 2020 on a consultation regarding systemic racism and discrimination in the City. The consultation took two years and involved more than 7,000 contributions, both in person and online. The goal of the process was not to verify alleged facts, but rather 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 Commission conducting the consultation identified systemic racism and discrimination as the interaction between decisions, attitudes and institutional practices that are tinged with bias and that have prejudicial effects, intended or not, on racialised and Indigenous persons.

Foundation

The Commission was convened on foot of a citizens' initiative as provided for under the Montréal Charter of Rights and Responsibilities.

In July 27, 2018, a group of individuals and organisations submitted a petition containing some 22,000 signatures requesting a public consultation on systemic racism and discrimination. One month later, the Executive Committee of the City of Montréal adopted a resolution mandating the OCPM to organise the consultation. The Commission noted that the consultation would not have taken place without this citizens' initiative.

Progress

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 report has been formally received by the city. The Mayor has publicly recognised systemic racism and discrimination as a problem. Initial actions have been concerned to strengthen a City institutional infrastructure to combat systemic discrimination. The post of Commissioner to Counter Racism and Discrimination is being created as part of the city manager's team. A member of the Executive Committee has been designated as the elected official for this dossier. Further actions recommended include to amend the Montréal Charter of Rights and Responsibilities to reference systemic and intersectional discrimination; produce three yearly comparative and differentiated populational data; improve treatment of discrimination complaints; and provided training to staff on the issues, including mandatory training for management personnel.

More specific recommendations are made in relation to issues affecting indigenous people and to tackle racism and systemic discrimination in employment by the city; policing; cultural development policies and services of the city; urban planning and land use; housing; and democratic participation and accountability.

Good practice: staff listening circles in Kirklees, United Kingdom

Concept

Kirklees Council has identified and pursued the potential in Listening Circles to contribute to addressing systemic discrimination. Listening Circles are to provide time and a safe space for staff to say what they are thinking and feeling around the theme of 'race', racism and inequalities following the structural issues highlighted by Covid-19, and the murder of George Floyd in the USA and resultant global protests.

Listening Circles are a restorative practice that helps to engender mutual understanding and support among people in stressful times. They are aimed at creating community and sharing humanity. Listening Circles involve listening, learning, and leadership.

The Council has emphasised that the Listening Circles are one part of a broader strategy on these issues. Talking is not to replace action, but to inform action. At the end of each Listening Circle participants are invited to provide any feedback or reflections that they would specifically like to make to the Council.

Foundation

The initiative has been developed in the context of publication of a report on the disparities in the risk and outcomes of covid-19 by Public Health England. It responds both to the findings on Black, Asian, and minority ethnic (BAME)¹³ communities being disproportionately affected by Covid-19, and to the issues being raised by the Black Lives Matter movement.

These developments have put a spotlight on the issue of systemic discrimination and have prompted focused reflection on the role that systemic racism plays in inequalities experienced by BAME people.

¹³ Reference terms specifically used in the UK context

Progress

The Council's BAME network sought to understand the needs of BAME staff and their experiences at such a challenging time and identified the need for a space to share experiences and be heard. A working group was convened by the Council to consider how staff might be supported to explore the issues of race, racism and inequalities. The project plan for the Listening Circles was developed and has recently been approved.

Four Listening Circles are to be facilitated initially. They will be co-facilitated by staff members, by one BAME staff member and one non-BAME staff member. Given the potential for such events to be emotional or even angry, facilitators are to be offered support both before and after the event.

The Listening Circles are to be open all staff, and to management personnel. The first Listening Circle is to be confined to staff without line management responsibilities. The Listening Circles will open with a video to give context for the initiative and set the scene for discussions. Learning resources on the issues have been compiled and will be made available to all staff.

Good practice: community research circles in Botkyrka, Sweden

Concept

A research circle is a methodology to enable in-depth, participative, and longer-term examination of an issue. It was piloted in Botkyrka to examine issues of racism and discrimination, in 2013.

A research circle brings together a set grouping of residents, from various groups and areas, assisted by a researcher. The process involves:

- A series of discussions being facilitated on the issue in question, to formulate recommendations for the municipality.
- Recommendations then being presented to key decision-makers.

Officials examining how they can respond to the recommendations, and then providing feedback on this to the research circle.

Foundation

This initiative was piloted as part of a transnational project to strengthen local strategies and actions combating racism and xenophobia: 'ECAR - European Cities Against Racism – Responsibilities of Cities in Counteracting Racism Sustainably'. The project took place over two years, to pilot new initiatives to support implementation of the Ten Point Plan of Action to support the fight against racism and discrimination, of ECAR.

Progress

The focus for the research circles in Botkyrka was the interface between the participants' everyday life and the municipality. The participants on the research circle placed particular emphasis on systemic discrimination in their discussions.

The process began with a Search Conference to which residents in the municipality were invited by open invitation. This event identified three areas for investigation:

- the role of schools in the reproduction of and fight against racism and discrimination;
- the role of the municipality in the reproduction of and fight against racism and discrimination; and
- the role of civil society in the reproduction of and fight against racism and discrimination.

Three research circles of about ten people, of various ethnicities, were formed by people at the event. Two further research circles were formed by directly contacting local associations - one organising residents of African origin, and the other organising residents of Muslim faith. In total, twenty research circle meetings were held over seven months.

The participating researchers established recurrent problem areas across the research circles, and proposals and recommendations were drafted in the research circles as to how the municipality could improve its work against discrimination and racism. The recommendations were presented to decision-makers in the municipality. They were considered and processed by officials. Feedback was provided to those who had participated in the research circles on the steps already being taken and those to be developed in response to the recommendations by the municipality.

5.4. Monitoring discrimination

The **purpose** of monitoring is to track and establish the nature and level of incidents of discrimination in the city, and to ensure that redress is available to those who have experienced discrimination, including systemic discrimination.

Monitoring could **involve** three key elements:

Advise and support: Access to independent advice and support would be enabled and provided for those who bring forward allegations of discrimination.

- Complainants should also have access to a process for hearing of complaints with appropriate remedies and redress where discrimination is found to have occurred.

Tracking: Complaints of discrimination brought forward would be recorded and tracked over time.

Analysis and report: The patterns of the complaints of discrimination recorded and the implications of these patterns would be analysed and made available to duty bearers and the wider public.

Two key **principles** that shape this monitoring are:

- The city provides support for the independent provision of advice and support to those exposed to discrimination.
- The city has a process to learn from patterns of complaints that are brought forward, in particular those complaints that relate directly to the city.

Good practice: supporting non-discrimination in Geneva, Switzerland

Concept

The City of Geneva funds and works with the Centre – Écoute contre le Racisme (C-ECR), which defends, advises and assists people affected by racism. The C-ECR is completely independent of the City of Geneva.

The C-ECR can provide support to those who might experience discrimination from the services of the City. It can provide anonymised statistical information on the issues of racism and discrimination for the city.

Foundation

This initiative is rooted in the Municipal Policy of the City of Geneva on Diversity. This includes the commitment to be:

“A non-discriminating city: the City of Geneva militates actively against popular misconceptions, stereotypes and discrimination of any kind. To this end, it promotes public initiatives and supports the efforts of third-party institutions and associations”.

It draws from Article 261bis of the Swiss Criminal Code, which addresses discrimination on the grounds of racial or ethnic origin and religious affiliation in terms that include public incitement of hatred or discrimination, propagation of a demeaning or denigrating ideology, undermining of dignity, and refusal of a benefit intended for public use. Sanctions include a custodial sentence of up to three years or a monetary penalty.

Progress

The C-ECR is able to use the funding provided by the City of Geneva at its own discretion. It offers a range of free and confidential services to those experiencing discrimination, including listening, counseling, psychosocial support, mediation, and legal assistance. It has assisted people confronted by racism to be able to deal with this experience and supported them to make complaints to the police. It has conducted public information campaigns to enable people in the city to be aware of the supports it has available to people.

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

Good practice: supporting anti-discrimination bureaux in Botkyrka, Sweden

Concept

Local Anti-Discrimination Bureaux assist people who experience discrimination. They are independent non-governmental organisations that explain their rights to people, assist them to make a complaint, or refer them to the necessary institution.

In Botkyrka, the municipal council stands out for the relationship it has developed with the Anti-Discrimination Bureau in its area. This relationship includes provision of significant annual funding.

Foundation

The Discrimination Act prohibits direct and indirect discrimination, inadequate accessibility for people with disabilities, harassment and sexual harassment, and instruction to discriminate, on the grounds of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age. It has a broad scope including the fields of employment, education, employment services, health and social care, social insurance and benefits, and the provision of goods, services and housing. The Equality Ombudsman is established at a national level to oversee compliance with the Act.

Progress

The Anti-Discrimination Bureau, Stockholm Syd, is a non-profit organization run by SIOS, the Cooperation Body for Ethnic Organisations in Sweden. It is funded by the Swedish Agency for Youth and Civil Society and Botkyrka municipality. Stockholm Syd works to combat discrimination and promote human rights, provide free counselling, support and information for individuals who feel they have been discriminated against, conduct investigations into cases, mediating between the parties, and preparing referrals to the Equality Ombudsman.

This Anti-Discrimination Bureau is an important resource for:

- those who experience discrimination, in empowering them by enabling them to take action to change their situation and experience; and
- the work of Botkyrka municipality, in enabling issues of discrimination in the area to be tracked and understood; raising incidents of discrimination with city as necessary; and contributing to the developmental work of the municipality on this issue.

6. Action to
prevent
systemic
discrimination

6.1. Definition of this strand of activity

Prevent

This strand of activity is about developing systemic remedies to what is a systemic problem. It involves redesigning the systems that create disadvantage, and implementing new systems required to advance equality.

Systemic discrimination involves organisational procedures, routines and organisational culture. Institutional change is required to prevent and eliminate such discrimination. Institutional systems and organisational cultures need to evolve to better reflect and respond to the diversity of the population served and the staff employed. Three types of action found in the cities to advance such institutional change comprise this 'prevent' strand of activity:

- review existing organisational systems;
- implement equality systems in the organisation: equality impact assessments; equality plans; and values-led organisational systems; and
- develop participative organisational systems.

Guidance is provided on each of these actions below. While this guidance is based on examples of good practice from the cities, it is designed to be relevant and applicable to all organisations in the wider public sector and across the private sector. The purpose and scale of an organisation could influence the choice of actions to prioritise, as well as the inclusion of any adaptation in the methodology.

6.2. Review existing organisational systems

The **purpose** of reviewing existing organisational systems is to establish the presence or otherwise of systemic discrimination, by examining the policies, procedures and practice involved in the organisation's planning, policymaking, programme development, employment, and/or service provision.

A review of existing systems, whether for planning, policymaking, programme development, employment, or service provision, **involves** three key elements:

Documentary review: Organisational documents would be reviewed, including national level legislation and policy of relevance; organisational plans, policies, procedures, and standards of relevance; and the organisational equality and non-discrimination infrastructure.

Data and information review: Key organisational sources of data and information would be engaged with and explored, including:

- analysis of data gathered by the organisation on the presence of and outcomes for the diversity of the organisation's policy beneficiaries, employees, or service-users;
- interviews with key staff on the experience and practice of implementing organisational systems;
- staff survey to capture the dominant perceptions of equality, diversity, and non-discrimination in the organisation; and
- interviews with people from groups experiencing inequality and their representative organisations on their experiences of organisational systems and practices.

Report and recommend: A report would be prepared with recommendations on steps to address any systemic discrimination found.

- Developments in systems for planning, policymaking, programme development, employment or service provision would be identified, that could better serve to advance equality, respond to diversity, and prevent discrimination.

Three key **principles** that shape this review of existing organisational systems are:

- The review is informed by those groups who are exposed to systemic discrimination and their representative organisations.
- Feedback is provided to those who participated in the review to check there has been accurate recording and understanding of the knowledge gathered.
- Action is taken to address the recommendations made.

Good practice: planning and provision in Camden, United Kingdom

Concept

Camden Council has a track record in seeking to address systemic discrimination and structural inequalities. This is not a new issue for the Council, but Covid-19 has both highlighted and exacerbated it. The Black Lives Matter movement is credited with amplifying energies in the Council on the issue. This is important as fatigue can all too easily set in where an issue is so long-standing and difficult to change.

There was an early recognition of the disproportionate impact of the pandemic and of the steps required for its management on people of Black, Asian and other ethnic backgrounds¹⁴. The Council had been alerted by trusted leaders and anchors in the community prior to national data becoming available. It was aware of 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. Evidence of lived experience and structural inequalities was gathered from residents and partner organisations and analysed. Midpoint findings were published in July 2020 to ensure transparency. 'Building Equal Foundations: Tackling the disproportionate impact of COVID-19 on Black, Asian and other ethnic communities in Camden' was published in August 2020, with a detailed Action Plan for its implementation.

Foundation

The initiative is rooted in the Camden 2025 Vision with its ambition to create a place that works for everyone, and where everybody has a voice. While it is linked to the Covid-19 pandemic, the initiative looks beyond this trigger, to establish calls for action that address and seek to improve the situation and experience of Black, Asian and other ethnic groups into the future, both in living with Covid-19 and post-pandemic.

Progress

The working group reviewed evidence across five focus areas of health inequalities; residents at risk; children and young people; housing supply and overcrowding; and employment and the labour market. These topics revealed how COVID-19 had starkly exposed the cost of accepting high levels of health and social inequality and the need to co-design services and solutions alongside the communities, rather than just deliver them. The online remote nature of the evidence gathered was credited with allowing the Council to hear new and different voices, in particular young people.

¹⁴ Reference terms specifically used in the UK context

The final 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.

Good practice: service provision review and action plan in Dublin, Ireland

Concept

In 2018, Dublin City Council (DCC) conducted an equality review of its provision of social housing supports and homelessness services on the ground of racial or ethnic origin. It then developed an Equality Action Plan in 2019 to implement the recommendations made as part of the review.

An equality review involves an examination of policy, plans, procedures, and practices in an organisation. It does this to assess the extent to which discrimination and harassment are prevented, diversity is acknowledged and accommodated, and equality is promoted and achieved in the work and operations of an organisation. Recommendations are made on foot of the review to support the preparation of an equality action plan to improve the performance of an organisation in these areas.

Foundation

This initiative is rooted in the equal treatment legislation that governs service provision. The Equal Status Acts 2000-2015 prohibit discrimination, sexual harassment, and harassment in the provision of goods and services, accommodation, education and in registered clubs. It covers the nine grounds of gender, civil status, family status, sexual orientation, disability, age, 'race', religion, and membership of the Traveller community.

The initiative drew from the Irish Human Rights Equality and Human Rights Act 2014 that requires public bodies to have regard, in all their functions, to the need to eliminate discrimination, promote equality, and protect human rights of staff, service-users, and policy beneficiaries.

Progress

The equality review focused on one ground, racial or ethnic origin, and on one area of service provision, social housing supports and homeless services. It started with a desk-based review of relevant legislation and national policy and of relevant DCC plans, policies, procedures, service level agreements, information materials, and data sources. It involved interviews with staff members of DCC and of contracted bodies involved in the provision of services. It included focus group sessions with service users covered by the ground of racial or ethnic origin.

Some recommendations were directed at the government department responsible for national policy in this area. An Equality Action Plan was developed and is being implemented, to address the recommendations to the specific DCC departments responsible for social housing supports and homeless services, and those to DCC overall, on strengthening its equality and human rights infrastructure. It is planned to repeat the equality review to cover all the grounds under the Equal Status Acts.

Good practice: inclusive employer in Bradford, United Kingdom

Concept

Bradford Council has over 8,000 employees and seeks to be an inclusive employer. It is working with Grant Thornton, a private sector company, to apply the Inclusion Maturity Model, a tool developed and successfully implemented by that same organisation, to establish the current standing of Bradford

Council as an employer. The tool covers all the protected characteristics under the equal treatment legislation.

The Inclusion Maturity Model assesses an organisation on five factors: talent attraction; talent development; strategic development; culture; and external impact. The tool establishes where an organisation stands on the following scale:

- Emergent: The organisation is setting out on its inclusion journey and is doing what it needs to from a regulatory and legal perspective to enable inclusion for colleagues.
- Characteristic focussed: The organisation recognises that it needs to provide tailored support to under-represented groups to 'level the playing field.'
- Inclusive: The organisation is breaking down barriers to inclusion for all of its colleagues to enable psychological safety and to help them bring their whole selves to work.
- Systemic: The organisation is reflecting their inclusion culture on every touchpoint with stakeholders, suppliers and clients, leading their sector in inclusive practices.

Foundation

This initiative is rooted in Bradford Council's Equality Objectives 2016-2020. One objective is that the Council is well run, fit for business and is fair and inclusive in its approach. This includes a focus on workforce diversity and an ambition for the workforce to more closely represent the communities served, at all levels.

Progress

The initiative is being implemented by Grant Thornton and Bradford Council in a district-based approach, with another organisation applying the model for comparative purposes, Yorkshire Building Society, and links made to the Employers Network established by the Council.

A desktop review of processes, practices and procedures against the Inclusion Maturity Model has been completed in Bradford Council. A staff survey to collect staff information and to get feedback on staff perceptions of the inclusion culture in the organisation has been conducted. An 'As-is' report on the findings from this work, with recommendations, has been prepared and is under consideration by Bradford Council.

An Equality, Diversity and Inclusion Strategy is to be prepared, based on this report, with a steering group being convened for this purpose.

6.3. Implement equality systems in the organisation

6.3.1. Introduction

Equality systems involve those processes within an organisation with a capacity to ensure that it promotes and achieves equality through all its functions and operations. Systemic discrimination is prevented by systems that are designed to secure equal outcomes for groups experiencing inequality.

Equality systems could **involve** three core elements:

- equality impact assessment of plans, policies, programmes and procedures at final draft stage;
- equality plans; and
- values-led organisation systems.

6.3.2. Equality impact assessment

The **purpose** of an equality impact assessment is to ensure that an organisation's process for developing and reviewing plans, policies, programmes, and procedures includes a formal assessment, at final draft stage, of their capacity to advance equality and achieve equal outcomes for groups experiencing inequality.

The equality impact assessment **involves** four key steps:

Scoping

- The plan, policy, programme or procedure would be scoped for:
 - the nature and purpose of the plan, policy, programme, or procedure would be defined.
 - the diversity of the target population for the plan, policy, programme, or procedure would be established.

Evidence

- The data and information available on the target population and its diversity, relevant to the nature and purpose of the plan, policy, programme or procedure, would be gathered and analysed.
- The relevant elements of the situation, experience, and specific needs, arising from their identity, of groups experiencing inequality would be established and considered.

Impact assessment

- The potential or likely impact of the plan, policy, programme, or procedure on groups experiencing inequality would be assessed at final draft stage.
- It would be established whether the plan, policy, programme or procedure is designed in a manner to achieve equal outcomes, recognise and take account of diversity, and be free from all forms of discrimination.
- Organisations representing groups experiencing inequality would be engaged with to check and validate this assessment.
- The assessment would be made public to allow for feedback.

Decision-making

- The plan, policy, programme or procedure would be finalised on the basis of the assessment, addressing any issues identified.

Specific tools have been developed to review existing and proposed systems involving automated decision making. An algorithmic impact assessment can be conducted to flag any risks in relation to such as fairness, justice, due process, and disparate impact prior to implementation. This resembles an equality impact assessment in purpose and approach.

Two key **principles** that shape the implementation of an equality impact assessment are:

- Decision-making on the plan, policy, programme or procedure is informed by equality data and information, with no room for assumptions about or stereotypes of groups that experience inequality.
- The implementation of an equality impact assessment is informed by those groups who are exposed to systemic discrimination and their representative organisations.

Good practice: gender and intersectional analysis (ADS+) in Montreal, Canada

Concept

Gender and Intersectional Analysis (ADS+) has been developed and is deployed as a process to guide and organise decision making in relation to the programmes and projects of the city. It is founded on gender differences but takes an intersectional approach in addressing differences of social class, disability, age, ethnicity, sexual orientation, and gender identity.

The ADS+ serves to prevent systemic discrimination and ensure an inclusion of the vulnerable groups. It ensures that the specific needs of a diverse population are understood and addressed in the development and implementation of initiatives. It enables more accessible, safer and more inclusive programmes and projects.

Foundation

The ADS+ process is rooted in the Montréal Charter of Rights and Responsibilities and its commitment to values of human dignity, tolerance, peace, inclusion and equality. It reflects the Montréal Declaration for Cultural Diversity and Inclusion with its commitment to structure municipal actions using an inclusive approach.

Progress

The ADS+ started as a pilot project in 2018 involving two boroughs and five administrative services. Awareness-raising tools were prepared to motivate staff. An implementation guide, a checklist and a deployment package were made available to assist staff. This is accompanied by a one-day training session for professionals, managers and elected officials to strengthen capacity to implement these. Mentoring and practical support is made available to staff using the tool.

There are four phases to the ADS+ process:

- Identify: gathering and analysing relevant data, preparing a situational diagnosis for the programme or project, consultation with the groups covered and determining the relevant issues specific to these groups.
- Formulate: design of the programme or project based on the needs of the groups covered, consultation with those groups, and ensuring a focus on this diversity and its requirements in all project elements: objectives, inputs, outputs, and indicators.
- Implement: the programme or project is implemented in a way that addresses ADS+ issues in all activities, and capacity building on ADS+ for relevant stakeholders, if needed.
- Monitor: tracking progress indicators, using inclusive evaluation methods, applying quantitative and/or qualitative ADS+ data to document progress, and making changes to better address ADS+ requirements if needed.

Good practice: integrated impact assessment in Kirklees, United Kingdom

Concept

Kirklees Council has developed an Integrated Impact Assessment process that is implemented when new services, policies or strategies are being developed or existing ones being changed or when reviews or audits are being conducted in the organisation. The Integrated Impact Assessment allows for an assessment of likely impact on people and on the environment to be considered in the development of services, policies, and strategies. This enables an early identification and prevention of any systemic discrimination that might be involved in these.

The equality element of the impact assessment encompasses the grounds of age; disability; gender reassignment; marriage or civil partnership (employment only); pregnancy and maternity; 'race'; religion or belief; sex; sexual orientation; unpaid carers; and people on low income or experiencing poverty.

The Integrated Impact Assessment allows a focus on the interactions between environmental and social policy to be recognised and addressed. It allows consideration of the distribution of environmental quality among groups; the groups driving environmental quality; and the equity of environment policy.

Foundation

This initiative is rooted in and goes beyond obligations under the Equality Act 2010 and its provision for the Public Sector Equality Duty to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations. It reflects the commitment in Kirklees Council's

'Inclusion and Diversity Strategy and Action Plan 2017-2021' that all key decisions made by the Council are supported by an Equality Impact Assessment.

Progress

The Council has developed guidance and a toolkit to support implementation of the Integrated Impact Assessment process. Staff involved in the process must have completed training on its implementation. Mandatory corporate Equality and Diversity training is provided.

The process is designed to have influence on and be integrated all the way through the development of a plan, service or strategy. It is evidence-based, and the toolkit provides access to a range of relevant data sources. It is participative with a draft of the assessment being made available for public comment. It looks beyond equality of opportunity to emphasis an ambition for equality of outcomes for groups.

6.3.3. Equality plans

The **purpose** of equality plans is to respond to the disadvantage that results from systemic discrimination, for particular groups in employment in the organisation or in the wider population of the city. This can involve initiatives of positive action and targeting resources at the disadvantaged groups to achieve new outcomes, and/or of systems change in the organisation to improve the outcomes for these groups.

The development of equality plans **involves** three key elements

Diagnosis: The current situation, experience, and specific needs of groups exposed to systemic discrimination in employment or within the wider population would be established.

Interventions: Actions to improve this situation and experience and meet these needs, through positive action and targeted resources or through internal systems change, would be identified and programmed.

Measures of success: Indicators for the plan would be established and deployed to monitor progress made.

Three key **principles** that shape the approach to an equality plan are:

- The development of the plan is informed by those groups exposed to systemic discrimination and their representative organisations.
- Diversity is recognised and the practical implications of how groups chose to live out their identity is taken into account, with resultant needs addressed.
- The plan is implemented, monitored, and evaluated, with adaptations made where the progress expected is not being achieved.

Good practice: equality planning in Botkyrka, Sweden

Concept

The municipal council in Botkyrka has developed specific systems to advance the goal of an equal Botkyrka and give expression to its values of citizen-focus, diversity as an asset, staff competence, flexibility and adaptability of organisation, and commitment to realising citizen's entitlements.

The city 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.

Foundation

This approach is rooted in the 'Strategy for Equality in Botkyrka', which sets out the long-term ambitions of the municipality for a more equal Botkyrka.

It is based on the Discrimination Act, as amended in 2017, which provides for a duty on employers to take a goal-oriented approach to advance equality on the grounds of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation and age. Employers are required to draw up a plan for equality at work and take active measures for equality based on an investigation of the current situation in the organisation.

This approach builds on a subsequent analysis by the city, which led the municipal council to expand this approach to include its externally-focused operations under this requirement, alongside the required focus on employment.

Progress

Equality in the workplace is pursued through active measures in four development areas, to achieve a representative workplace where employees reflect the composition of the community; a work environment that is free from discrimination and respectful of difference; a knowledge base among employees in relation to equality, diversity and non-discrimination and the management of such issues; and an internal structure and procedures for goal setting, planning, development and follow-up for equality. This approach follows guidelines published in 2017.

Equality in external operations is based on five strands of action, to survey and analyse current situation and development, map and analyse differences between groups and the opportunities and influence of different groups; formulate goals, ensuring the needs and situation of different groups are considered and a contribution to equality is achieved; monitor goals and results across the different groups; assess the consequences for equality, checking how decisions at different levels affect different groups; and strengthen the competence of staff to contribute to a more equal city. This approach follows guidelines published in 2017.

Good practice: diversity roadmap in the Canton of Neuchâtel, Switzerland

Concept

The Canton (state) of Neuchâtel approved a “Roadmap for an Administration that is Open to Diversity, Egalitarian, and Non-Discriminatory” in May 2018.

The roadmap sets out actions along three axes to value diversity and promote equality, addressing the state as an exemplar in matters of equality and non-discrimination; the state as a service provider; and the state as employer. It seeks to achieve systemic change and sustain a pro-equality culture across all departments.

The roadmap is a flexible instrument that can be adapted to the realities of different departments. It emphasises that valuing diversity is not only achieved by the absence of discrimination but also requires proactive measures. It is based on quantitative and qualitative data gathering and analysis.

It is explicitly concerned with both individual level discrimination and systemic discrimination. It takes a multi-ground approach encompassing gender, nationality, cultural or ethnic affiliation, socio-economic status, language, age, or disability.

Foundation

This roadmap is rooted in the federal Constitution and the Constitution of Neuchâtel, federal equal treatment legislation, the Neuchâtel Law on Integration and Multicultural Cohesion, and the Cantonal Integration Programme, which include prevention of discrimination as an area for action.

Progress

The state as exemplar involves objectives to clearly communicate commitment; apply the principle of equal rights in all actions; and inform society of diversity advantage.

The state as service provider involves objectives to develop tools to support the management of diversity; ensure services are accessible to all service-users; and support staff awareness and understanding of diversity and non-discrimination.

The state as employer involves objectives to increase visibility of under-represented groups; ensure recruitment processes are non-discriminatory and accommodate diversity; secure staff awareness of the needs and contributions that flow from diversity, and of services that support those experiencing discrimination.

The roadmap addresses responsibilities for implementation and human and financial resources required. The Service for Multicultural Cohesion has a role to prevent and combat discrimination, provide staff training on diversity, and support diversity awareness initiatives. It makes a key contribution in driving the roadmap.

Good practice: conscious inclusion in Camden, United Kingdom

Concept

Camden Council has adopted a process of 'Conscious Inclusion' to ensure all staff 'can be their best self at work'. The approach taken involves a focus on leadership, staff, and systems in the Council. A Conscious Inclusion Statement was published with specific commitments to action in relation to all three of these factors.

Camden Council, through this initiative, states an ambition for: all staff being able to be their best self at work; staff composition reflecting the diversity of Camden; understanding, challenging, and evolving from the biases that everyone holds; valuing and celebrating difference; using differences to assist in better decisions; sharing responsibility for calling out anything that is not right; everyone coming to work with the determination to resolve and learn from the things that are not right; and not tolerating any form of discrimination, victimisation, harassment or bullying.

Foundation

The initiative is rooted in the Camden 2025 Vision and the Our Camden Plan 2018-2022, and its commitment to Camden Council being a great place to work and an inclusive organisation that encourages diversity in all respects.

Progress

Action on leadership is concerned to:

- develop capacity to deliver systemic change and improvement;
- provide sponsorship of Black, Asian and minority ethnic (BAME), LGBT+, and disabled staff in middle management to progress; and
- offer mentoring to build the representation of these groups at senior management level.

Action on staff is concerned to:

- support every people manager to play their role in conscious inclusion;
- adopt the Time to Change Employer Pledge to support workplace mental health; and
- benchmark the Council against the Stonewall index for workplace LGBT+ equality.

Action on systems is concerned to:

- develop understanding of the different ways people think, function and mentally process information to improve support for people to flourish;
- improve recruitment systems in particular in relation to people with disabilities;
- enable staff with carer responsibilities to return to work and do so without disadvantage;
- demonstrate employment practices are among the best in London through the Mayor's Good Work Charter accreditation; and

- act as strategic influencer for good practice by local businesses.

6.3.4. Values-led organisation systems

The **purpose** of values-led organisation systems is to develop and sustain an organisational culture that is committed to achieving full equality in practice for all groups and to recognising diversity, leaving no room for any form of discrimination.

Values-led organisation systems **involve** three key elements:

Values statement: An explicit statement of the values espoused by the organisation that motivate a commitment to equality, diversity and non-discrimination would be developed to identify and define a small number of core values such as dignity, inclusion, and social justice.

Values in practice: A shared understanding of the practical implications of these values for priorities, procedures, and practices within the organisation would be established in order to track a consistent and coherent expression of these values in the work of the organisation.

Engaging values: Organisational systems and initiatives would be developed and deployed to engage these values on a sustained basis among staff and management personnel across the organisation.

Two key **principles** that enable values-led organisation systems are:

- Shared understanding and sense of ownership among staff and management personnel of the core values established for the organisation.
- Sustained role-modelling of the values in action by management personnel in the organisation.

Good practice: shared values in Bradford, United Kingdom

Concept

Values were identified as key by Bradford Council given how they underpin and motivate behaviours. They are central to the culture of organisations and to how people in the community think about behaviours and make decisions and choices.

Dialogue organised within local communities established a strong consensus that a set of shared values is pivotal to building stronger communities. An initiative was developed to identify the shared values that could shape what individuals, groups and organisations do and how they might work together to address key issues.

Foundation

The initiative is rooted in the 'Stronger Communities Together Strategy for Bradford District 2018-2023. This is based on four pillars: Getting On, with a focus on employment and addressing economic participation and poverty; Getting Along, with a focus on education and addressing interaction in a context of educational and residential segregation; Getting Involved with a focus on social mixing and addressing community leadership and opportunities to participate in community and civic life; and Feeling Safe, with a focus on perceptions of the other and addressing crime and the fear of crime, with an emphasis on hate crime.

Progress

A values statement was co-created through workshops with Bradford for Everyone Ambassadors, a grouping of community representatives formed as part of the Stronger Communities Together strategy; community engagement activities; a public online consultation; and pop-up consultation events. These were organised over a twelve-month period and engaged over 1,400 people. Feedback was gathered from partner organisations in health, police, fire services, housing, voluntary sector organisations and education. The district's elected representatives were consulted.

The values statement is now being finalised, based on values of We Respect; We Care; We Share; and We Protect. The framework for behaviour change that shapes this initiative involves co-creation; education; raising awareness; promoting positive experiences; reminding and encouraging; and ongoing evaluation.

Future plans include to communicate and celebrate the values to a point where they become a social norm; host an online pledge counter to gather support for the values statement; and provide organisations signing up to the values statement with tools to promote a positive culture in-line with these values.

The shared values will strengthen Bradford Council's work, including in the Council's future five-year plan; the city of culture bid by the council; reshaping life after Covid-19; and responding to the Black Lives Matter movement.

Good practice: systems for a values-led approach in Galway, Ireland

Concept

Galway City Council (GCC) is progressing a values-led, planned and systematic approach to equality and human rights. This is based on establishing motivating values and systems to engage these across the organisation. It involves developing an internal infrastructure to drive its implementation of a statutory duty on public bodies to have regard to the need to eliminate discrimination, promote equality, and protect human rights.

Values shape organisational culture and motivate a concern for equality and human rights. A values-led planned and systematic approach by an organisation to equality and human rights seeks to sustain a focus on equality and human rights that is integral to its strategic planning cycle and driven by its organisational culture. It enables the organisation to move beyond merely implementing a set of discrete actions on specific equality and human rights issues.

Foundation

The initiative is rooted in the Irish Human Rights Equality and Human Rights Act 2014 which makes provision for the statutory duty on public bodies. This requires public bodies to:

- make an evidence-based assessment of the equality and human rights issues relevant to all their functions;
- take steps to ensure these issues are addressed as they prepare workplans and internal policies; and
- report on the progress made in addressing these issues.

The duty covers people in poverty and social exclusion as well as those covered by the grounds under equal treatment legislation gender (including trans people); civil status; family status (including lone parents and carers; age; disability; sexual orientation; race; religion; and membership of the Traveller community.

Progress

Galway City Council set out its commitment to equality and human rights in its Corporate Plan. It appointed a senior official to take responsibility for its planned and systematic approach. It provided training on the statutory duty to senior officials from each of its departments.

An Equality and Human Rights Values Statement has been developed to underpin a values-led approach to equality and human rights in its planning and internal policy making. This identifies and defines the values that motivate GCC in its concern for equality and human rights, and it establishes the practical implications of each of these values for the priorities and for the processes of GCC. The values identified are dignity; accountability; inclusion; participation; social justice; and environmental justice.

An action plan has been prepared to roll out training and implementation of the statutory duty across all departments. A network of champions, drawn from each department will be convened to promote and support implementation of the statutory duty. The Equality and Human Rights Values Statement will be communicated and engaged in a manner that the values become integral to the organisational culture.

6.4. Develop participative organisational systems

The **purpose** of establishing and implementing systems for participation in the work of an organisation, is to ensure that the development and review of policies, plans, programmes, and procedures by an organisation are informed and shaped by the voice and perspective of groups exposed to systemic discrimination and their representative organisations.

Participation by these groups **involves** three key elements:

Consultation processes: Processes of public or staff consultation would be implemented that engage effectively with groups exposed to systemic discrimination, that are organised in a manner to:

- take account of potential barriers and ensure accessibility;
- track participation to ensure the diversity within each group is engaged; and
- take steps to address any gaps that become evident.

Platform creation and support: Support would be provided to create and sustain platforms for the voice of groups exposed to systemic discrimination to be articulated in a collective manner, including through:

- employee networks; and/or
- civil society organisations.

Engagement systems: Systems to directly involve these platforms with the organisation would be implemented at key moments, when the organisation is developing or reviewing policies, plans, programmes, or procedures.

Three key **principles** that shape participation in the work of an organisation are:

- The systems for this participation are informed by those groups who are exposed to systemic discrimination and their representative organisations.
- Feedback is provided to those who participate in a particular process to check that there has been an accurate recording and understanding of the knowledge gathered.
- Action is taken to address the conclusions agreed on from the process.

Good practice: reinvigorating employee networks in Kirklees, United Kingdom

Concept

Kirklees Council identifies that equality related employee networks play an important role in informing decision-making and enabling innovation. In doing so, they contribute to addressing systemic discrimination. The Council has networks of Black, Asian, and minority ethnic (BAME) staff¹⁵; young staff; staff who are carers; staff with disabilities; and LGBT+ staff.

There are challenges in sustaining staff engagement in and leadership of networks in a busy organisation, ensuring line manager support for staff to engage in the networks, and adequately resourcing the work and ambitions of the networks.

¹⁵ Reference terms specifically used in the UK context

Foundation

This initiative is rooted in Kirklees Council's 'Inclusion and Diversity Strategy and Action Plan 2017-2021'. One outcome identified for the strategy is that the approach of the Council to Inclusion and Diversity is informed by feedback from staff and citizens. One measure of performance identified for this was that 'employee networks are contributing to organisational priorities and change'. The Year Two Action Plan committed to reinvigorating the employee networks.

Progress

The process of reinvigorating equality related employee networks has established the role of these networks as being to:

- Engage: take actions to reach colleagues and communities to help everyone understand the opportunity of difference.
- Embed: scrutinise Council policies and decisions to ensure inclusion is wired into the thinking so it becomes an everyday reality.
- Empower: signpost and support colleagues to ensure they are able to be the best they can be, feel valued and can add value.
- Equip: help people to learn about and celebrate differences and how they can make the council stronger.
- Evaluate: support the creation of workplaces where people feel safe to be themselves and to share information and use the information to develop strategies and action to address inequalities.
- Evolve: help to measure impact and how the Council has made a difference and ensured inclusion is an everyday reality in the Council.

The Council is now strengthening these networks by 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.



7. Action to
share and
spread good
practice

7.1. Definition of this strand of activity

Shared practice

This strand of activity is about enabling a coherent response to systemic discrimination across all sectors. It involves the city, the wider public sector, and the private sector engaging together with a view to achieving such a coherence of response.

Systemic discrimination is an issue across the public sector and the private sector within the greater city environs. There is an imperative to develop shared purpose, advance established good practice, and enable peer support in meeting this challenge. The city has a particular contribution to make in building this coherence across the various sectors and organisations, but this is a shared responsibility. Five types of action found in the cities to engage other organisations across all sectors comprise this 'shared practice' strand of activity:

- local platforms for exchange;
- stakeholder mobilisation in actions;
- public visibility for action;
- anti-discrimination infrastructure; and
- implementation of national legislation.

Guidance is provided on each of these actions below. While this guidance is based on examples of good practice from the cities, it is designed to be relevant and applicable to all organisations in the wider public sector and across the private sector. The purpose and scale of an organisation could influence their approach to the shared responsibility of a coherent response to systemic discrimination.

7.2. Local platforms for exchange

The **purpose** of establishing local platforms for shared practice is to bring relevant organisations together in a formal engagement that enables mutual learning and shared endeavour on the issue of systemic discrimination. Local platforms could **involve** committees, networks, or alliances focused on the issue of systemic discrimination or on a wider agenda that includes this issue. A key **principle** that shapes local platforms is that of partnership between the organisations involved, based on shared commitment.

Good practice: local platforms for exchange

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 (described in section 6.2 above) 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.

Galway City Council, Ireland, in seeking to progress a values-led and planned and systematic approach to equality and human rights (described in section 6.3 above), is engaging with other public bodies to form a Collaborative Forum. This will provide peer support and stimulus for public bodies taking a similar approach, and allow an exchange of information, experience, and learning between the public bodies involved.

7.3. Stakeholder mobilisation in actions

The **purpose** of engaging in stakeholder mobilisation for shared practice is to involve relevant organisations in initiatives to tackle systemic discrimination that are being led by the city. Stakeholder mobilisation could **involve** co-creation of initiatives, joint activities, or securing support for city-led

initiatives on tackling systemic discrimination. A key **principle** that shapes stakeholder mobilisation is the pursuit of shared endeavour, based on shared values.

Good practice: stakeholder mobilisation in actions

The Bradford District Shared Values, developed by the Bradford for Everyone integration programme who are working Bradford Council, United Kingdom, to strengthen its future work on unifying citizens and encouraging those who work in the district to foster positive relationships between communities (described in section 6.3 above), will provide for a sign up to the shared values by a wider range of stakeholders, including partner organisations, local businesses and community groups, with a view to more broadly promoting a positive culture in line with the values.

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.

7.4. Public visibility for actions

The **purpose** of public visibility for shared practice is to generate debate across different organisations and sectors on systemic discrimination and to establish the city as an exemplar in tackling this issue. Public visibility could **involve** different forms of public communication or targeted messaging to key organisations and sectors. A key **principle** that shapes public visibility is clear messaging through appropriate channels for the target audiences.

Good practice: public visibility for actions

The Barcelona Discrimination Observatory, which forms part of the Barcelona City Council, in Spain, institutional infrastructure to combat all forms of discrimination, publishes an annual report on incidents of discrimination that occurred in the city, the actions and strategies to address them, and future challenges (described in section 5.2 above). This gives a public visibility to the issue.

The “Roadmap for an Administration that is Open to Diversity, Egalitarian, and Non-Discriminatory” developed by the Canton (state) of Neuchâtel, in 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.

7.5. Anti-discrimination infrastructure

The **purpose** of anti-discrimination infrastructure for shared practice is to ensure a standard of non-discrimination is met across organisations in all sectors in the city, including in relation to systemic discrimination. The anti-discrimination infrastructure could **involve** making supports available to enable those who have experienced discrimination from any organisation to bring forward a complaint and have it satisfactorily resolved. A key **principle** that shapes this anti-discrimination infrastructure is an expertise in responding to the legal and personal support needs of those subjected to discrimination.

Good practice: anti-discrimination infrastructure

In Botkyrka, Sweden, the municipal council provides annual funding to the Local Anti-Discrimination Bureau. This organisation assists people who experience discrimination across all sectors by, explaining their rights to people, assisting them to make a complaint, or referring them to the necessary institution.

The City of Geneva, Switzerland, funds and works with the Centre – Écoute contre le Racisme (C-ECR), which defends, advises and assists people affected by racism. The C-ECR can provide support to those who might experience discrimination from different sectors in the City.

7.6. Implementation of national legislation

The **purpose** of implementation national legislation for shared practice is to ensure that, where a standard of equality is established for the systems of organisations, across the different sectors in the city, the city can give leadership in serving as an exemplar in its implementation, provide peer support for its implementation, and generate awareness of the value in implementing such provisions. National legislation, for this purpose, could **involve** equal treatment legislation that imposes duties on public and private sector organisations to be proactive, planned, and systematic in advancing equal outcomes for groups exposed to systemic discrimination or that requires the implementation of specific equality systems. A key **principle** that shapes such national legislation is ensuring support for implementation of the statutory duties involved and enforcement for lack of compliance.

Good practice: implementation of national legislation

In Ireland, the Irish Human Rights Equality and Human Rights Act 2014 requires all public bodies to make an evidence-based assessment of the equality and human rights issues relevant to all their functions; take steps to ensure these issues are addressed as they prepare strategies, workplans and internal policies; and report on the progress made in addressing these issues.

In Mexico, the Law to Prevent and Eliminate Discrimination of Mexico City includes duties on public bodies to be proactive in preventing and eliminating discrimination and promoting equality.

In Sweden, the Discrimination Act, as amended in 2017, provides for a duty on employers to take a goal-oriented approach to advance equality on the grounds of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation and age. Employers, across the public and private sectors in a city, are required to draw up a plan for equality at work and take active measures for equality based on an investigation of the current situation in the organisation.

In the United Kingdom, the Equality Act 2010 requires all public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations. This creates a situation whereby all public bodies in a city are required to conduct an equality impact assessment on draft policies.





Diversity has become a key feature of societies today and is particularly tangible in urban centres. While people of diverse national, ethnic, linguistic and faith backgrounds have immensely contributed to post-war prosperity, inequalities related to origin, culture and skin colour persist, and anxiety about pluralism, identity and shared values is often politically instrumentalised. The challenge of fostering equity and cohesion in culturally diverse societies has become more acute. Cities are uniquely placed to imagine and test responses to this challenge.

The Council of Europe and its partner cities have developed and validated an intercultural approach to integration and inclusion which enables cities to reap the benefits and minimise the risks related to human mobility and cultural diversity. A decade after the start of this work, there is growing evidence that diversity, when recognised and managed as a resource, produces positive outcomes in terms of creativity, wellbeing and economic development.

The Intercultural Cities Programme (ICC) invites cities in Europe and beyond to explore and apply policies that harness diversity for personal and societal development.

The Council of Europe is the continent's leading human rights organisation. It comprises 47 member states, 27 of which are members of the European Union. All Council of Europe member states have signed up to the European Convention on Human Rights, a treaty designed to protect human rights, democracy and the rule of law. The European Court of Human Rights oversees the implementation of the Convention in the member states.

