

Anti-Racism and Cultural Safety Procedure

Section 1 - Governing Policy

(1) These Procedures are governed by the ACU Anti-Racism and Cultural Safety Policy.

Section 2 - Scope and Application

(2) These procedures set out how ACU implements the [Anti-Racism and Cultural Safety Policy](#), including the responsibilities, processes, and support required to prevent, identify, respond to, and eliminate racism, including antisemitism, Islamophobia, and racism against Aboriginal and Torres Strait Islander people at ACU. It ensures that members of the university community experience a culturally safe, inclusive, and respectful environment. In alignment with the principle of Catholic Social Teaching that every human being is equal in the sight of God, discrimination on the basis of nationality, race, or religion is incompatible with ACU's Mission and is unacceptable. Such discrimination undermines the common good, weakens the fabric of society and fosters insecurity and intolerance.

(3) These Procedures are to be read in conjunction with related policies, procedures, guidelines and local protocols.

Section 3 - Roles and Responsibilities

(4) Responsibility for preventing and responding to racism and promoting cultural safety operates through the following pathway:

- a. All staff and students: model expected behaviour and report concerns;
- b. Local leaders: respond to concerns raised within their areas;
- c. Specialist teams: provide advice and support as required;
- d. Senior Leaders: oversee serious or systemic matters referred for their attention; and
- e. Insights from reported concerns and systemic matters inform improvements to prevention, training and cultural safety across the University.

For detailed reporting and response workflows, please refer to the [Anti-Racism and Cultural Safety Procedures Process Flowchart](#).

(5) Roles and responsibilities clarify accountabilities for preventing, identifying, reporting and responding to racism, including antisemitism, Islamophobia and racism against Aboriginal and Torres Strait Island people. It distinguishes whole-of-university leadership, local implementation, specialist support, digital and physical response functions, and the shared responsibilities of staff and students.

Strategic leadership and governance

(6) Senior executive, faculty and directorate leaders set expectations, oversee compliance, address systemic risks, and champion culturally safe and inclusive environments.

Local implementation and response

(7) Faculty, school, directorate and campus leaders are responsible for receiving reports, supporting affected people, acting promptly within their remit, and escalating serious or unresolved matters.

Teaching, research and student experience

(8) Academic, teaching, supervision, placement and research leaders ensure learning, teaching and research environments are culturally safe, inclusive and responsive to concerns.

Specialist support and advice

(9) Safeguarding and Student Safety, People and Capability, Indigenous Higher Education Units, the First Peoples Directorate, Information Technology, Marketing and External Relations, Properties and Facilities, and the Office of General Counsel provide targeted support across student safety, staff conduct, cultural advice, digital platforms, public communications, physical campus response, legal risk and procedural fairness.

Shared responsibility of staff and students

(10) Staff and students are expected to complete required training, model respectful and inclusive behaviour, report incidents through designated channels, and contribute to safe working, learning and community environments.

Section 4 - Procedures

Education and Training

(11) Staff and students are required to complete the University's anti-racism and cultural safety training, including specific content on antisemitism and Islamophobia.

(12) The content, delivery methods, and completion rates for training will be monitored and reported at least bi-annually to the Vice Chancellor's Management Committee. Training content will be reviewed periodically and updated to reflect current best practice, any changing legal requirements, and the experiences of affected communities.

Reporting and Responding to Incidents

How to report

(13) Incidents or concerns about racism, including antisemitism and Islamophobia, can be reported by students, staff, contractors and members of the public via:

- a. By students - [Appeals, complaints and feedback](#);
- b. By staff - [ACU staff complaints](#);
- c. By members of the public - [Complaints and feedback](#);
- d. Directly to supervisors, or relevant university units – [ACU Staff Complaints](#); or
- e. Relevant University units (e.g., Safeguarding and Student Safety; People and Culture; Indigenous Higher Education Units/First Peoples Directorate; Student conduct/complaints channels).

(14) The [Critical Incident Management Policy](#) and [Critical Incident Management Procedure](#) will ensure triage and case

coordination. Where a report is received locally (e.g., by a supervisor), it must be referred and recorded through the CIM.

(15) If there is immediate risk to safety or threats of violence, staff and students should contact the police on 000 and/or campus security without delay.

(16) The contact details for campus security are as follows:

- a. Call 1300 729 452 or 8888 (from an internal ACU phone).
- b. Download the Safezone app to contact the National Security Centre directly.

(17) Anonymous reports will be accepted and recorded; however, the University may be limited in its ability to investigate where insufficient information is provided.

Acknowledgement, confidentiality and procedural fairness

(18) All complaint reports will be acknowledged in accordance with [Student and Public Complaints Policy](#) and [Staff Complaints Management Policy](#), treated with sensitivity, confidentially, and handled in accordance with the principles of procedural fairness.

(19) The University will ensure that reports are recorded securely, accessed only by authorised personnel, and managed in systems that comply with privacy and records management requirements. Access will be role-based and auditable (including access logs), with information limited to the extent required to manage the matter and meet obligations.

Interim measures and safety planning

(20) Appropriate interim measures must be carefully considered and put in place to protect the safety and wellbeing of those affected while a matter is being addressed (e.g., changes to class groupings, supervision, placement, or work arrangements).

Outcomes, restorative options and communications

(21) Outcomes and interventions (e.g., education, restorative processes, changes to arrangements, or disciplinary action) will be communicated to relevant parties to the extent possible with reference to privacy and confidentiality requirements.

(22) Restorative approaches will only be used where appropriate and safe and will be voluntary for the person affected.

Local response procedures and anti-retaliation

(23) Leaders and supervisors at all levels must establish and maintain local procedures to respond to reports and incidents of racism, antisemitism, and Islamophobia including guidance on:

- a. Immediate response in learning spaces, meetings, workplaces, events and placements;
- b. When and how to escalate matters; or
- c. When restorative approaches are appropriate and how they are to be conducted.

(24) Retaliation or victimisation against any person who raises a concern, makes a complaint, or participates in a process under this Procedure is prohibited and may be treated as possible misconduct or serious misconduct.

Support and Accommodation

(25) Individuals affected by racism, antisemitism or Islamophobia will be offered timely access to confidential and culturally safe support services. Depending on whether the matter involves a student or staff member, this may include referral to Safeguarding and Student Safety, counselling and wellbeing services, Campus Ministry services, Aboriginal and Torres Strait Islander support services, Indigenous Higher Education Units and/or the First Peoples Directorate, student advocacy services, People and Capability advisors, campus security, and external specialist support services where appropriate.

(26) Reasonable accommodations or adjustments (e.g., changes to study or work arrangements, supervision, assessment deadlines, timetabling, placement location, or seating) will be provided where necessary to ensure safety and wellbeing following the [WHS Communications and Consultation Procedure](#)

Record Keeping and Reporting

(27) All records relating to reports, incidents, investigations and outcomes will be managed in accordance with the [Records and Archive Management Policy](#) and relevant privacy legislation.

(28) Records will be kept in a secure system accessible only to authorised personnel and will be restricted to information necessary for managing the matter and fulfilling reporting obligations. Role-based access controls, audit logs, and retention/disposal requirements will be applied.

Section 5 - Definitions and Terms

Term	Definition
Aboriginal and Torres Strait Islander people	Aboriginal and Torres Strait Islander people are the first inhabitants of Australia. An Australian Aboriginal and/or Torres Strait Islander person is one who: 1. is of Aboriginal and/or Torres Strait Islander descent; 2. identifies as an Australian Aboriginal and/or Torres Strait Islander person; and 3. is accepted as such by the community in which they live or has lived. Aboriginal and Torres Strait Islander peoples are comprised, as a group, of diverse nations, each with their own language and traditions.
Anti-racism	Anti-racism refers to beliefs, actions and policies that actively work against racism in all its forms by: 1. challenging racial prejudice of individuals as well as embedded and sometimes subtle societal attitudes around race; 2. addressing historic and contemporary power imbalances between groups; 3. promoting respect for all members of society; and 4. developing non-discriminatory policies, practices, and procedures that support the inclusion of all groups.
Antisemitism	As defined by Universities Australia, "Antisemitism is discrimination, prejudice, harassment, exclusion, vilification, intimidation or violence that impedes Jews' ability to participate as equals in educational, political, religious, cultural, economic or social life. It can manifest in a range of ways including negative, dehumanising, or stereotypical narratives about Jews. Further, it includes hate speech, epithets, caricatures, stereotypes, tropes, Holocaust denial, and antisemitic symbols. Targeting Jews based on their Jewish identities alone is discriminatory and antisemitic. "Criticism of the policies and practices of the Israeli government or state is not in and of itself antisemitic. However, criticism of Israel can be antisemitic when it is grounded in harmful tropes, stereotypes or assumptions and when it calls for the elimination of the State of Israel or all Jews or when it holds Jewish individuals or communities responsible for Israel's actions. It can be antisemitic to make assumptions about what Jewish individuals think based only on the fact that they are Jewish. "All peoples, including Jews, have the right to self-determination. For most, but not all Jewish Australians, Zionism is a core part of their Jewish identity. Substituting the word "Zionist" for "Jew" does not eliminate the possibility of speech being antisemitic."
Authorised Officer	Authorised Officer is the person to whom incidents can be reported (See Section 12 – Schedule 1 of the Managing Student Misconduct Procedure).

Term	Definition
Cultural safety	Cultural safety refers to environments and behaviours that are spiritually, socially and emotionally safe and free from judgement or critical comparison. Cultural safety is essential for flourishing, particularly for those from minority or marginalised cultural and religious groups. By contrast, a culturally unsafe environment or practice disempowers or diminishes the cultural identity and well-being of an individual or group.
Discrimination	Discrimination is the disadvantaging and / or less favourable treatment of an individual or group based on their personal characteristics such as race, colour, sex, sexual orientation, age, gender identity, gender expression, intersex status, marital or relationship status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction, social origin, disability or physical or mental disability. Discrimination can be both direct and indirect. Direct discrimination involves treating, or proposing to treat, someone differently to others in the same or similar situations. Indirect discrimination occurs where a rule, requirement or condition is imposed on everyone equally but has an unfair or adverse impact on individuals and groups which share certain personal attributes. Indirect discrimination is identified where: 1. individuals with certain attributes have difficulty complying with the condition; 2. a higher proportion of individuals without the same attributes are able to comply with the condition; and 3. the condition, or consequence of failing to meet the condition, is not reasonable.
Islamophobia	The United Nations defines Islamophobia as "A fear, prejudice and hatred of Muslims or non-Muslim individuals that leads to provocation, hostility and intolerance by means of threatening, harassment, abuse, incitement and intimidation of Muslims and non-Muslims, both in the online and offline world. Motivated by institutional, ideological, political and religious hostility that transcends into structural and cultural racism which targets the symbols and markers of a being a Muslim."
Privilege	Privilege is the advantage or favour granted to some but not to others. Racism results in one group having more access to privilege than other groups.
Race	The Anti-Discrimination Act 1977 (NSW) defines race as colour, nationality, descent and ethnic, ethno-religious or national origin. The word 'race' is used in this Policy and Procedure to reflect relevant State and Commonwealth legislation. Race can be understood as not only background but also family, culture, history, beliefs, a sense of place and belonging with others who share those same or similar things.

Term	Definition
Types of Racism	Interpersonal Racism Interpersonal racism involves specific acts of racist behaviour by individuals or groups. These acts can include any language or action which are: 1. Racist in nature; and 2. Offensive, degrading, intimidating or embarrassing. Interpersonal racism is not always directed at a specific person; similarly the individual or a member of the targeted group does not need to be present for an act of racism to occur. Racial Hatred and Vilification Racial hatred and racial vilification are public acts of racism that are deemed unlawful within Commonwealth and State, including those that incite hatred, contempt, or ridicule based on race, such as antisemitic or Islamophobic vilification. Offensive behaviour based on racial hatred is referred to in the Racial Discrimination Act 1975 (Cth) as public acts that are reasonably likely, in all the circumstances, to offend, insult, humiliate or intimidate another person or group of people because of their race, colour or national or ethnic origin. These acts include communicating words, sounds, images or writing to the public, in a public place, or in the sight or hearing of people who are in a public place. Racial vilification is referred to in the Anti-Discrimination Act 1977 (NSW) as public acts that incite hatred towards, serious contempt for, or severe ridicule of, a person or group of persons on the ground of the race of the person or members of the group. A public act that threatens or incites violence towards an individual or a group of people on the basis of race may be a criminal offence and will be referred to the Police. Micro aggressions Micro aggressions are casual expressions of racism that occur in everyday contexts and interactions, which may include subtle or indirect antisemitic or Islamophobic comments or behaviours. They can be verbal, behavioural, or environmental, such as the naming of buildings exclusively after white people or displaying statues of historical figures such as colonisers, slave owners and racists. Micro aggressions are generally indirect and may be so subtle that they are not visible to everyone, particularly to those with no lived experience of discrimination or racism, however they have a cumulative effect on individuals. Micro aggressions typically take three forms: 1. Micro assaults generally refer to behaviour that is deliberately discriminatory however offense may be unintentional or dismissed e.g. telling racist jokes; 2. Micro insults involve racist comments, offhand remarks and behaviours e.g. compliments that have a discriminatory undertone or convey racist assumptions, perpetuation of stereotypes about racial or cultural groups, not acknowledging individuals based on colour or religion, appropriation of terms and culture; or 3. Micro invalidations are generally unintentional comments and behaviours that exclude, undermine, or deny racialised experiences e.g. claims of oversensitivity, denial of one's own racism and privilege, looking for the targeted group to absolve or make you feel better, denying the experience and impact of historic or ongoing events such as the Holocaust or colonisation. Institutional Racism Institutional racism refers to the way that institutions and organisations discriminate directly or indirectly, intentionally or unintentionally, through their structures and the policies and practices that inform their operations. This results in the reproduction and maintenance of privilege and power dynamics. The omission or exclusion of relevant knowledges and ceremonial commitments, responsibilities and customary obligations is also a form of institutional racism. Systemic Racism Systemic racism is often so entrenched in our societies that it is perceived as normal. It refers to the way that the cultural norms, laws, ideologies, policies and practices of a particular society result in inequitable treatment, opportunities and outcomes based on race. Lateral Violence Lateral violence occurs within disadvantaged, oppressed and marginalised groups as a result of complex historical, cultural, and social factors. It involves the displacement of anger and violence towards other members of the group rather than towards the systems and societies that oppress them. Behaviours include but are not limited to: 1. gossiping, backstabbing and bullying; 2. aggression, intimidation and open conflict; 3. social exclusion and isolation; 4. publicly challenging, undermining or otherwise censoring identity and lived experience; and 5. undermining cultural capital and reputation for example, through public claims of cultural inappropriateness. Lateral violence can be perpetrated by an individual or a group. While it is generally internalised within a group, other individuals can be complicit in the behaviour. Identity and cultural censorship in particular can involve the vicarious recruitment of individuals who are not from the in-group. This can happen directly, through the perpetuation of claims, or indirectly, through the creation of culturally unsafe and unmoderated spaces where these occur or the absence of active bystanders.

Term	Definition
Staff	All people employed by the University including conjoint appointments, whether on continuing, permanent, fixed term, casual (>3 months) or cadet or traineeship basis.
Students	A person whose application to enrol in a course of study or unit of the University has been accepted by the University and whose enrolment has not been withdrawn. For the purpose of this Policy, it includes a student of another university or other education provider who is granted temporary or ongoing rights of access to a campus or site of the University for study purposes.
Victimisation	Victimisation refers to any unfavourable treatment of an individual or group who are directly or indirectly associated with a discrimination, bullying or harassment complaint.

Section 6 - Review

(29) In line with the University's [Policy Development and Review Policy](#), this procedure will be reviewed in line with the governing policy and is scheduled for review every five years or more frequently if appropriate.

Section 7 - Revisions made to this Procedure

Date	Major, Minor or Editorial Revision	Description of Revision(s)

Status and Details

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Responsible Executive	Tania Broadley Deputy Vice-Chancellor (Education)
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