

GUIDE

Developing a workplace race discrimination prevention plan

How to write a prevention plan

Prevention plan template

A prevention plan sets out the approach for preventing workplace race discrimination within an organisation. It identifies relevant drivers and risks of workplace race discrimination, and sets out the appropriate response measures.

Race discrimination is defined under the *Equal Opportunity Act 2010* (Vic). It includes when someone is treated unfavourably because of their skin colour, descent or ancestry, nationality, ethnic background, and characteristics associated with a particular race.

The *Guideline: Race discrimination in the workplace* (Guideline) outlines five minimum standards which organisations should meet to comply with their positive duty to eliminate race discrimination in the workplace. As set out in the Guideline, a workplace race discrimination prevention plan is required by all medium and large organisations (see [Standard 2: Policies and procedures](#)).

For more information on the other minimum standards, see our [Guideline – Chapter 4: Understanding the positive duty](#).

In order to comply with the positive duty to eliminate discrimination in the workplace, employers must take reasonable and proportionate action when race discrimination is identified.

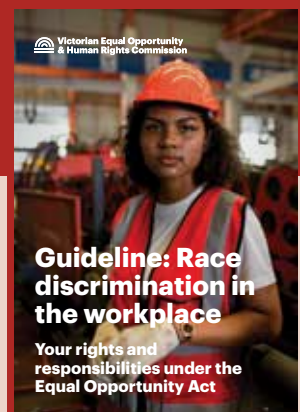
This guide is designed with medium and large organisations in mind. It should be adjusted according to the size, resources and nature of the organisation.

All organisations are encouraged to develop a race discrimination prevention plan to address racism within their organisation.

Employers may decide to combine this plan with their anti-racism policy. [Access our guide for writing an anti-racism policy](#).

For more information on anti-racism policies, take a look at the Commission's *Guideline: Race discrimination in the workplace*.

Download the Guideline at humanrights.vic.gov.au/resources.



How to write a prevention plan



This guide outlines a primary, secondary and tertiary prevention approach to ensure workplace race discrimination prevention is comprehensive and reflects best practice.

Step 1. Identify drivers, risks and gaps

- Identify the drivers of workplace race discrimination.
- Identify the risks specific to the workplace or industry.
- Identify whether there are any gaps in how you respond to workplace race discrimination.

Step 2. Respond to drivers, risks and gaps

- Consult with employees and employee representatives about what actions your workplace could take to address the drivers, risks and gaps, and identify any additional risks.
- Develop these actions and measures into a comprehensive prevention plan.

Step 3. Implement the prevention plan

- Communicate the prevention plan with employees and ensure it's understood by all.
- Monitor the success of implementation through regular reviews of reports and complaints data, and any other relevant trends.



Background

1. Outline race discrimination in your workplace.

- What does race discrimination mean for your workplace?
- Where can it occur?
- What impacts can it have on employees?
- Why are you writing this plan? What will it do?



For information on race discrimination in the workplace, see our [Guideline – Chapter 2: Understanding workplace racism](#). Organisations may also want to draw on their anti-racism policy – our [policy guide](#) outlines steps for writing your anti-racism policy.



Legal framework

2. Outline the legal framework you are following.

Which laws apply depends on where your organisation is based. In Victoria, the Equal Opportunity Act sets out the duties and obligations of employers to prevent and respond to acts of race discrimination in the workplace.

- What are your obligations under state and federal law?



For information on the legal context in Victoria and federally, see our [Guideline – Chapter 3: Understanding the law on workplace racism](#).



Drivers

3. Outline drivers of race discrimination in your workplace.

Some drivers include discriminatory policies and practices, power disparities in roles and leadership, and a lack of racial literacy.

- What are the specific drivers of race discrimination in your workplace?

➤ For information on drivers, see our [Guideline – Section 2.2: Why racism occurs](#) and [2.3.3 Where workplace racism occurs](#).

4. Outline relevant existing plans, policies or training that address these drivers.

These might be internal policies, strategic plans or strategies for addressing inequality or other forms of discrimination in the workplace.

- What are the existing internal policies, strategic plans or strategies for addressing inequality and race discrimination in the workplace?

➤ For information on developing policies and providing education and training, see our [Guideline – Standard 1: Racial literacy; Standard 2: Policies and procedures; and Standard 3: Organisational culture](#).



Risks

5. Complete a risk assessment of your workplace and detail results.

This will help identify the likelihood of workplace race discrimination occurring and the potential barriers for individuals reporting it. Potential risks to race discrimination in the workplace could include:

- employees don't feel culturally safe at work
- employees don't know what race discrimination is
- employees don't know what to do if they experience or witness race discrimination
- there are barriers to reporting race discrimination for people who experience it and/or for people who witness it.

➤ For more information on assessing risks, see our [Guideline – Standard 2: Policies and procedures](#).



Response

6. Complete an analysis of any gaps or areas for improvement in your response measures.

This may include organisational policies to respond to workplace race discrimination, reporting pathways, guides for staff and managers, and behavioural standards.



For information on responding to workplace race discrimination and reporting processes, see our [Guideline – Standard 4: Reporting and response](#).



Consultation

7. Outline your consultation process.

This will depend on the size and type of your organisation.

- How and when did you discuss race discrimination prevention strategies with staff, staff representatives or unions?
- What consultation pathways were available? For example, staff workshops, one-on-one, emails or via a manager survey.
- How were staff suggestions integrated into the prevention plan?
- How were staff informed about how their views and feedback were incorporated?



For information on how to consult with staff, see our [Guideline – Standard 2: Policies and procedures](#).





Actions

8. Identify actions for preventing workplace race discrimination.

These actions should:

- correspond to a particular driver, risk or gap
- have a timeline and responsible party
- be categorised by the type of prevention (driver, risk or response gap).

For example:

RESPONDING TO KEY DRIVERS, RISKS AND GAPS

Key drivers/ risks/gaps	Proposed action	Responsible party	Timeline
<i>Driver: Staff fear victimisation in reporting race discrimination</i>	<i>Ensure there are options for anonymous reporting, so staff do not have to report to managers if they are uncomfortable or it is inappropriate (i.e. if the manager is the alleged perpetrator)</i>	<i>Human Resources</i>	
<i>Risk: Lack of racially diverse representation in leadership positions</i>	<i>Conduct an audit of internal promotion policies and trends and develop pathways for aspiring First Peoples or racialised staff</i>	<i>Governance team</i>	
<i>Response gap: Lack of organisation-specific examples of race discrimination complaints/reports</i>	<i>Develop a set of case studies to show what reporting workplace race discrimination might look like in your organisation for inclusion in relevant policies and training</i>	<i>Human Resources</i>	

You may want to create separate tables for drivers, risks and gaps depending on how many you have.



Evaluation and ongoing monitoring

9. Outline the review process for the plan.

This should include how often the plan should be reviewed and who is responsible for reviewing and updating it.

The Commission recommends reviews be carried out annually.

- For information on monitoring and evaluating workplace race discrimination, see our [Guideline – Standard 5: Continuous improvement](#).

For more information, download the Commission's *Guideline: Race discrimination in the workplace* available at humanrights.vic.gov.au/resources or via the QR code.



This information is intended as a guide only. It is not a substitute for legal advice.



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