

DIVERSITY, EQUITY AND INCLUSION

Policy

CGSI-ACA-POL-013 | Version 1.5

CG Spectrum Institute Pty Ltd

Approved by the Governing Body | 26 August 2026

Effective 26 August 2026

Classification: Public

Contents

1.0 Purpose	3
2.0 Scope and Application	4
3.0 Definitions	5
4.0 Responsibilities	9
5.0 Principles	10
6.0 Preventing and Responding to Racism	11
6.1 Commitment	11
6.2 How CGSI applies the definitions	11
6.3 Culturally safe environments	12
6.4 Reporting and response	12
6.5 Guidance and professional development	13
6.6 Recording, monitoring and reporting	13
7.0 Review, Consultation and Publication	14
8.0 Related Documents	14
Version Control	16

1.0 Purpose

CG Spectrum Institute (CGSI) is committed to a diverse, equitable and inclusive environment in which students, Staff and stakeholders are valued and respected, and are able to participate fully and achieve their potential. This policy sets out how CGSI embeds diversity, equity and inclusion across its operations.

CGSI does not tolerate racism in any form. It is committed to preventing racism, to responding promptly and fairly when it occurs, and to fostering racial equity and cultural safety across its community.

1.1 This policy is the definitional source

This policy is the single source of CGSI's definitions of racism and its forms, including antisemitism, Islamophobia and racism towards Aboriginal and Torres Strait Islander peoples, and of cultural safety. The Wellbeing and Safety in the Learning and Working Environment Policy and Procedure and the Student Grievance, Complaints and Appeals Policy apply those definitions and do not restate them. Where any CGSI document is inconsistent with section 3.0 of this policy, this policy prevails.

1.2 Commencement and effect

This policy takes effect on 26 August 2026, on approval by the Governing Body and replaces version 1.3.

The requirements set out in this policy apply from that date. They are not deferred to 1 January 2027.

The Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026 introduces requirements to address racism and to create culturally safe environments, and applies to all registered higher education providers from 1 January 2027. From that date a provider must hold definitions of racism, including towards Aboriginal and Torres Strait Islander peoples, antisemitism, Islamophobia and other forms of racial discrimination and vilification, which are specific to the needs of its community. It must implement policies and complaint handling processes that embed safe, respectful and inclusive behaviour across all operations, and provide clear guidance to students and Staff. CGSI adopts those requirements ahead of the date on which it is obliged to.

CGSI's obligations under the Racial Discrimination Act 1975 (Cth), the Disability Discrimination Act 1992 (Cth), the Disability Standards for Education 2005, the Sex Discrimination Act 1984 (Cth), the Age Discrimination Act 2004 (Cth), the Racial and Religious Tolerance Act 2001 (Vic) and the Equal Opportunity Act 2010 (Vic) are current obligations and are not affected by that commencement date.

1.3 Definitions adopted by CGSI

The definitions in section 3.0 are CGSI's own, prepared for CGSI's community. They are informed by the definitions in use across the Australian higher education sector, including the definition of antisemitism adopted by Universities Australia in February 2025, and by the

requirements of the Instrument. CGSI is not a member of Universities Australia and has not adopted that definition by reference.

CGSI has drafted its three required definitions in parallel form, so that no form of racism is defined more narrowly or more expansively than another. CGSI has deliberately not adopted any definition that treats criticism of a government as racism in itself, because CGSI trains students for industries in which practitioners make work about politics, religion, history and conflict, and because a definition that captures political expression would be unworkable in a critique environment. Clause 6.2 sets out how the definitions are applied.

2.0 Scope and Application

This policy applies to:

- all prospective, current and former Students;
- all Staff, being workers within the meaning of the Model Work Health and Safety Act, and therefore including mentors, teaching assistants, contractors and volunteers;
- the Governing Body, the Academic Board and all other CGSI committees;
- Affiliated Organisations, being organisations that use CGSI's intellectual property in their name, marketing, recruitment or governance documents; and
- entities that conduct activities on behalf of CGSI, including industry partners, work integrated learning hosts, education agents and service providers.

It applies across every setting in which CGSI operates, including online delivery, one-to-one mentor sessions, critique and review sessions, Slack and other digital channels, industry events, work integrated learning placements, and on-site and hybrid delivery at the GameChanger Academy.

Conduct occurring outside a CGSI setting is within scope where it affects the safety, wellbeing or participation of a Student or Staff member at CGSI.

2.1 CGSI's context

CGSI is a small, non-university higher education provider. It delivers online, with hybrid delivery from the GameChanger Academy in Melbourne. It does not operate a campus, does not provide or arrange student accommodation, and does not have a residential community or a student union. Its teaching workforce is a distributed network of industry mentors rather than a resident academic faculty.

The Higher Education Standards Framework is principles-based and allows for contextual interpretation across different types of provider. Where it applies, this policy is implemented in a manner proportionate to CGSI's size, delivery model and resources. Proportionality affects how CGSI meets a requirement. It does not reduce the requirement, and it is not a ground for departing from an obligation that applies to CGSI in full.

3.0 Definitions

The following definitions are specific to CGSI's community as required by the Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026. They are applied in accordance with clause 6.2.

Term	Definition
Anti-racism	Active and sustained effort to identify and remove racism, including in structures, systems, curriculum and practice. Anti-racism is more than the absence of racist conduct. It requires CGSI to look for racism it has not been told about.
Antisemitism	Discrimination, prejudice, hostility, harassment or violence directed against Jewish people as Jewish people, whether as individuals or as a community, on the basis of their Jewish identity, ancestry, religion, culture, or perceived association with any of those things. It includes denying or distorting the Holocaust; attributing collective guilt to Jewish people for the actions of any individual, group or state; the use of antisemitic tropes or conspiracy theories, including those concerning Jewish power, wealth, loyalty or control; requiring a Jewish person to account for, denounce or justify the actions of any government; excluding, harassing or intimidating a person because they are Jewish or are perceived to be Jewish; and conduct of that kind occurring online or through digital technology. Criticism of the policies or actions of a government, including the government of Israel, is not antisemitism on that basis alone. Conduct is antisemitism where it is directed at Jewish people as Jewish people, or where it relies on the tropes described above, rather than where it expresses a political view. Clause 6.2 sets out how CGSI applies this definition.
Cultural safety	An environment in which a person is safe in their identity, and in which there is no assault, challenge or denial of who they are or of their needs. It is determined by the person receiving the treatment, not by the person providing it. Cultural safety is more than cultural awareness.
Culturally safe environment	A study, work, social and digital environment in which all people can participate fully without having to conceal, defend or explain their race, ancestry, religion or culture, and in which behaviour that undermines that participation is identified and addressed.
Discrimination	Treating a person less favourably on the basis of a protected attribute, or applying a requirement or practice that disadvantages people with a protected attribute where that requirement is not

Term	Definition
	reasonable. Discrimination may be direct or indirect, and may occur without any intention to discriminate.
Diversity	The range of differences that make individuals unique, both visible and invisible, including race, ancestry, culture, religion, language, gender, sexual orientation, disability, neurotype, age, caring responsibilities and socio-economic background.
Equity	Recognising that people have different circumstances, and identifying and removing the structural and systemic barriers that prevent full participation. Equity is not the same as treating everyone identically.
Inclusion	When all people feel, and are, valued and respected, have access to opportunities and resources, and are able to do their best work.
Institutional and systemic racism	Racism produced by the ordinary operation of an organisation's structures, systems, policies, practices, curriculum, workforce composition or culture, whether or not any individual intends it. It can occur where no person has behaved badly, and it is CGSI's responsibility to address it whether or not a report is made.
Intersectionality	The way in which race, ancestry, religion, gender, sexual orientation, disability, neurotype and other attributes combine, so that a person may experience a compounded disadvantage that is not explained by any one attribute alone.
Islamophobia	Discrimination, prejudice, hostility, harassment or violence directed against Muslims as Muslims, against Islam as a religion, or against people perceived to be Muslim, on the basis of that identity or perception. It includes attributing collective guilt to Muslims for the actions of any individual, group or state; treating Muslims as inherently suspect, violent, foreign or disloyal; hostility directed at religious dress, observance, dietary practice or prayer; requiring a Muslim person to account for, denounce or justify the actions of any government or group; excluding, harassing or intimidating a person because they are Muslim or are perceived to be Muslim; and conduct of that kind occurring online or through digital technology. Criticism or academic discussion of religious belief or practice, including Islam, is not Islamophobia on that basis alone. Conduct is Islamophobia where it is directed at people because of that identity or perception, or where it relies on the tropes described above. Clause 6.2 sets out how CGSI applies this definition.
Protected attribute	An attribute protected under applicable Commonwealth, State or Territory law, including race, colour, descent, national or ethnic

Term	Definition
	origin, immigrant status, religion or religious activity, age, sex, pregnancy, breastfeeding, sexual orientation, gender identity, intersex status, marital or relationship status, disability, carer or family responsibilities, and political belief or activity where applicable.
Racial discrimination	Treating a person less favourably than another in a comparable situation because of their race, colour, descent, national or ethnic origin, or immigrant status.
Racial harassment	Unwelcome conduct related to a person's race, colour, descent, national or ethnic origin, religion or culture that has the purpose or effect of violating their dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment. It may arise from a single incident or from a pattern of incidents that are individually minor.
Racial vilification	A public act that incites hatred against, serious contempt for, or revulsion or severe ridicule of, a person or group on the ground of race, and, where applicable, on the ground of religious belief or activity.
Racism	Prejudice, discrimination, exclusion, hostility, harassment or violence directed at a person or group because of their race, colour, descent, national or ethnic origin, ancestry, religion or culture, or because of an assumption about a person's characteristics, abilities or behaviour on those grounds. Racism may be interpersonal, institutional or systemic. It includes antisemitism, Islamophobia, racism towards Aboriginal and Torres Strait Islander peoples, and any other form of racial discrimination or vilification.
Racism towards Aboriginal and Torres Strait Islander peoples	Discrimination, prejudice, hostility, harassment or violence directed against Aboriginal and Torres Strait Islander peoples on the basis of their identity, ancestry, culture or connection to Country. It includes interpersonal, institutional and systemic racism; denying, diminishing or disrespecting the cultures, identities, histories, languages, knowledges or rights of Aboriginal and Torres Strait Islander peoples; questioning a person's Aboriginality or requiring a person to prove it; appropriating or using cultural expression, knowledge, story or imagery without consent, authority or attribution; deficit framing that attributes disadvantage to culture or identity rather than to structural cause; and conduct of that kind occurring online or through digital technology. This definition is read with the First Nations Policy.

Term	Definition
Reasonable adjustment	A measure or action taken to enable a person with a protected attribute to participate on the same basis as others, where the measure does not impose unjustifiable hardship on CGSI.
Staff	Has the same meaning as worker under the Model Work Health and Safety Act, and therefore includes employees, mentors, teaching assistants, contractors and subcontractors and their employees, labour hire workers, apprentices and trainees, work experience students, and volunteers, whether paid or unpaid.
Student	A prospective, current or former student of CGSI, including a student undertaking non-award study, an enabling or bridging course, or a foundation program.

4.0 Responsibilities

Governing Body

Holds strategic oversight of CGSI's compliance with the anti-racism requirements of the Threshold Standards. Receives reporting on institutional risk arising from racism through the Finance and Risk Committee.

Academic Board

Holds oversight of this policy, approves it, and monitors its implementation, including de-identified reporting on patterns of racism-related conduct and on the effectiveness of CGSI's response.

Finance and Risk Committee

Oversees the institutional risk associated with racism, including systemic and reputational risk, alongside its standing oversight of wellbeing and safety.

Dean of Learning and Teaching, as policy owner

Maintains this policy, coordinates the guidance and professional development required by clause 6.5, ensures curriculum and critique practice are consistent with clause 6.3, and ensures matters are escalated in accordance with clause 6.4.

Chief of Staff

The first point of contact for Staff for a report of racism. Receives the report, provides immediate support, and refers it for management under the applicable grievance arrangements. Responsible for the racism-related elements of recruitment, screening and professional development for Staff.

Student Success Coordinator

The first point of contact for Students reporting racism, and for any other wellbeing, safety or conduct matter. Receives the report, provides immediate support, explains the pathways and support available, records the matter for the Critical Incidents Register, and refers it to the Grievance Advisor. Must complete the professional development required by clause 6.5, being the first Staff member likely to receive a report. Does not investigate, does not determine a pathway, and is not a decision-maker.

Head of Student Engagement

Receives referred reports of racism as Grievance Advisor, determines the pathway, coordinates the response, and refers matters in accordance with the Student Grievance, Complaints and Appeals Policy.

Director of Institutional Effectiveness and Governance

Maintains the Critical Incidents Register, prepares the de-identified analysis required by clause 6.6, and reports to the Academic Board and the Finance and Risk Committee.

Mentors and teaching Staff

Set the standard in the sessions they lead. Must model inclusive critique, address racist conduct when it occurs rather than deferring it, refer matters in accordance with clause 6.4, and complete the professional development required by clause 6.5. A mentor is not required to resolve a report and must not investigate one.

All members of the CGSI community

Must ensure their own conduct and interactions are respectful and free from racism, must not engage in, contribute to or condone racism, and should act as an ethical bystander where it is safe and effective to do so.

5.0 Principles

1. CGSI complies with all applicable anti-discrimination, equal opportunity and racial and religious tolerance legislation.
2. CGSI cultivates a culture that respects and reflects diverse identities and experiences.
3. CGSI does not discriminate on the basis of any protected attribute, in the recruitment of Students or Staff or in the operation of its policies, procedures and activities.
4. CGSI does not tolerate racism in any form, and takes proactive steps to foster racial equity and cultural safety.
5. CGSI treats racism as a systemic risk as well as a matter of individual conduct, and looks for it rather than waiting to be told about it.
6. CGSI defines all forms of racism in parallel terms, so that no community within CGSI is afforded less protection than another.
7. CGSI protects academic and creative freedom, and does not treat the study, discussion, depiction or critique of race, religion, history, politics or conflict as racism.
8. CGSI provides equitable access to opportunities and resources, and makes reasonable adjustments, within the limits of its resources.
9. CGSI recognises that disadvantage is compounded where attributes intersect, and does not analyse race in isolation.

6.0 Preventing and Responding to Racism

6.1 Commitment

CGSI does not tolerate racism in any form. CGSI is committed to preventing racism and to responding promptly, fairly and consistently when it occurs, across all of its operations, including online learning and working environments, digital channels, and interactions with contractors, industry partners and visitors.

Racism is a form of unsafe behaviour under the Wellbeing and Safety in the Learning and Working Environment Policy and Procedure. A person who engages in, contributes to or condones racism may be subject to disciplinary action.

6.2 How CGSI applies the definitions

CGSI applies the definitions in section 3.0 to conduct, not to ideas.

Context matters. Whether conduct is racism is assessed on its content, its context, its effect, and the relationship between the people involved, including any imbalance of power such as that between a mentor and a Student. A single remark may be racism. A pattern of remarks that are individually minor may also be racism.

CGSI trains Students for industries in which practitioners make work about identity, religion, history, conflict and politics. The study, discussion, depiction, critique and creation of such work is legitimate and is protected. Engaging critically with a religion, a political position, a government or a historical event is not racism. Requiring a person to account for, denounce or justify their ancestry, religion or perceived group is.

The following are not, by themselves, racism under this policy:

- the expression of a political opinion, including about the actions of a government;
- the academic study, teaching or discussion of race, religion, conflict or history;
- the depiction of a group, a religion or a historical event in creative work, where the depiction serves the work and is not gratuitous;
- robust critique of a Student's work, including critique of how a group is represented in it; and
- a good-faith error of terminology, fact or pronunciation.

The following are racism under this policy regardless of whether harm was intended:

- conduct that relies on a trope named in the definitions in section 3.0;
- treating a person as a representative of, or as accountable for, a group;
- conduct that a reasonable member of the affected group would experience as hostile, demeaning or exclusionary; and
- conduct that is repeated after the person has asked for it to stop.

Intent is relevant to CGSI's response and to any sanction. It is not relevant to whether the conduct occurred.

CGSI will not characterise a report of racism as vexatious merely because it is not substantiated, or because the person who made it chose not to proceed.

6.3 Culturally safe environments

CGSI's obligation is not limited to responding to incidents. CGSI takes responsibility for the conditions that produce racism, and addresses the following features of its own model.

The unobserved session

Teaching at CGSI happens largely in one-to-one and small-group sessions conducted online and without observation. Norms are therefore set session by session by individual mentors. CGSI addresses this through mentor professional development, through conduct standards for one-to-one sessions, and by making the reporting pathway visible to Students inside the learning environment rather than only in policy documents.

A global community

CGSI's Students and Staff are distributed across many countries and bring materially different understandings of what constitutes reportable conduct. CGSI does not assume shared norms. It states its expectations explicitly at orientation and induction, provides information in a form that can be translated, and prioritises access to interpreter services where needed or requested.

Curriculum, critique and representation

CGSI addresses cultural safety through the discipline as well as alongside it. This includes inclusive and accessible design in briefs and portfolio work, critique practice that separates the work from the person, attention to how groups are represented in student work, and the use of cultural expression, knowledge, story and imagery only with appropriate consent, authority and attribution.

Workforce and mentor composition

CGSI recruits mentors from working practitioners in industries with documented patterns of under-representation. Sourcing mentors only through referral networks reproduces the composition of those networks. CGSI therefore widens its sourcing channels deliberately, and reports workforce and mentor composition to the Finance and Risk Committee.

6.4 Reporting and response

1. A Student may report racism through any of the channels set out in the Student Grievance, Complaints and Appeals Policy, being in person, by email to the Grievance Advisor or the Student Success Coordinator, by telephone, and online using the online disclosure and complaint form. A report may also be made using the Formal Complaint and Appeals Lodgment Form, CGSI-ACA-FRM-003, or in any other written or spoken form. Contact details for those roles, and the link to each form, are published on the Learning Management System and the CGSI website. A report may be made anonymously.

2. A Staff member may report racism to the Chief of Staff, who is the first point of contact for Staff. Where a report concerns the Chief of Staff it is made to the Higher Education Principal Executive Officer, and where it concerns the Higher Education Principal Executive Officer it is made to the Chair of the Governing Body. Any disciplinary consequence for a Staff member is dealt with under the applicable employment arrangements.
3. A third party may report racism where the person responding to the report is a Student or a Staff member.
4. Reports and complaints involving racism are managed under the Student Grievance, Complaints and Appeals Policy and the Wellbeing and Safety in the Learning and Working Environment Policy and Procedure. This policy supplies the definitions; those instruments supply the process.
5. CGSI does not require a person who reports racism to keep the matter confidential, and does not promise absolute confidentiality. Information is shared only with those who need it, and the person is told what will be shared and with whom.
6. No person will be disadvantaged in their study, employment, engagement, assessment or progression because they reported racism, provided information, supported another person to do so, or participated in a process.
7. Where conduct may also amount to a criminal offence, CGSI will assist the person to contact the police if they wish, and nothing in this policy limits their right to do so at any time.

6.5 Guidance and professional development

CGSI provides clear, practical guidance to Students and Staff on recognising, preventing and responding to racism. The guidance states what the definitions mean in practice, gives worked examples drawn from CGSI's own delivery context including critique sessions and digital channels, names the reporting channels, and explains what happens after a report is made.

Guidance is delivered through orientation and induction, the learning management system, the CGSI website, the Staff and Student Handbooks, mentor professional development, and the intercultural competence module required of Staff and Students within six months of onboarding. It is provided in plain English and in a form that can be translated.

Staff who receive or respond to reports of racism receive specific professional development on responding safely and on the limits of their role.

6.6 Recording, monitoring and reporting

1. All reports and complaints involving racism are recorded on the Critical Incidents Register.
2. De-identified data is analysed at least every six months to identify patterns, barriers and systemic causes, including patterns by discipline, by cohort and by delivery mode.
3. Findings are reported to the Academic Board and to the Finance and Risk Committee, and are used to revise curriculum, professional development, guidance and this policy.

4. An increase in recorded reports in early reporting periods is to be read as evidence of improving reporting infrastructure rather than of deteriorating safety.
5. CGSI does not treat the absence of recorded reports as evidence of the absence of racism.

7.0 Review, Consultation and Publication

This policy is reviewed at least every three years, and earlier where a regulatory change, a change in CGSI's delivery model, or a finding from the analysis at clause 6.6 indicates that review is required.

Review and development occur through engagement and collaboration with Students, Staff, Aboriginal and Torres Strait Islander Students and Staff, Jewish and Muslim members of the CGSI community, other groups disproportionately affected by racism, people with lived experience of racism at CGSI, and subject matter experts. A record of consultation is maintained. Where CGSI cannot identify representation from within its own community for a particular group, it seeks external expertise rather than proceeding without either.

This policy is published on the CGSI website. It is drafted in plain English and is able to be translated, taking into account the demographics of CGSI's Students and Staff. Its classification is Public.

8.0 Related Documents

Policies and procedures

- Wellbeing and Safety in the Learning and Working Environment Policy and Procedure, CGSI-WHS-POL-002
- Student Grievance, Complaints and Appeals Policy, CGSI-ACA-POL-022, and Procedure, CGSI-ACA-PRO-011
- First Nations Policy, CGSI-ACA-POL-017
- Student Discipline Policy and Procedure, CGSI-ACA-POL-021
- Student Welfare and Support Policy and Procedure, CGSI-ACA-POL-027
- Students at Risk Policy and Procedure, CGSI-ACA-POL-028
- Work Integrated Learning Policy and Procedure, CGSI-ACA-POL-030
- Student Selection and Admission Policy and Procedure, CGSI-ACA-POL-025
- Assessment and Moderation Policy and Procedure, CGSI-ACA-POL-006
- Course Design, Development and Approval Policy, CGSI-ACA-POL-010
- Student and Staff Codes of Conduct
- Formal Complaint and Appeals Lodgment Form, CGSI-ACA-FRM-003
- Critical Incident Policy and Procedure, and the Critical Incidents Register

- Whole-of-Organisation Gender-based Violence Prevention and Response Plan, and the Gender Equality Action Plan

Legislation and standards

- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth) and Disability Standards for Education 2005
- Sex Discrimination Act 1984 (Cth), including the positive duty at section 47C
- Age Discrimination Act 2004 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Racial and Religious Tolerance Act 2001 (Vic)
- Equal Opportunity Act 2010 (Vic), including the positive duty
- Higher Education Standards Framework (Threshold Standards) 2021, as amended by the Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026
- National Higher Education Code to Prevent and Respond to Gender-based Violence 2025
- Model Work Health and Safety Act and applicable work health and safety law

Sector and industry reference

- Universities Australia, Statement on Racism, 27 February 2025
- VicScreen, DEI Roadmap to 2033 (2024)

Version Control

Document information

Field	Detail
Document	Diversity, Equity and Inclusion Policy
Document code	CGSI-ACA-POL-013
Version	1.5
Replaces	1.4 (DRAFT, not endorsed). Last endorsed version 1.3, Academic Board, August 2025
Status	Approved by the Governing Body, 26 August 2026
Effective date	26 August 2026
Definitional status	Single source of CGSI's definitions of racism and its forms
Policy owner	Dean of Learning and Teaching
Prepared by	Director of Institutional Effectiveness and Governance
Approval authority	Governing Body, on the recommendation of the Academic Board
Review cycle	At least every three years, with consultation under section 7.0
Next review date	August 2029
Classification	Public

The full version history for this document, including change notes, approving body and effective date for each version, is recorded in the Policy, Procedure and Forms Register, CGSI-GOV-REG-004.