



**THE DIOCESAN SCHOOL  
FOR GIRLS**

**POLICY ON RACISM AND OTHER  
FORMS OF DISCRIMINATION for  
PUPILS**

**Ratified November 2018**

Dates of Approval by the Relevant Committee Structures: Council	November 2018
Implementation Date	November 2018
Revision History	Next review: November 2023
Review Cycles	5 years or when necessary
Policy Applicability	All the girls of the DSG
Policy Owner	Head of Transformation

Implementation Checklist	Responsibility	Date
Website	F. Hardisty	November 2018
Notification of: Staff Girls Parents	D. Wright D. Wright S. Frayne	

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# POLICY ON RACISM AND OTHER FORMS OF DISCRIMINATION<sup>1</sup>

## for PUPILS

### 1. PREAMBLE

1.1 As a school community, we at DSG are fully committed to act according to the values and principles of our Christian faith in the Anglican tradition, and to promote the fundamental rights and freedoms of every person at DSG as required by our South African Constitution and related legislation<sup>2</sup>. Our school must be a safe place where all staff and pupils are free to live and work, knowing that they are respected, valued and welcome irrespective of race, citizenship, culture, language, gender, religious and political conviction, social class, sexual orientation or ability. We are committed to promoting mutual understanding across difference and eliminating prejudice. We wish to equip all those who pass through our school for a better collective future.

1.2 We will therefore not tolerate the expression of racism, prejudice or discrimination whether in speech, writing, attitudes, actions, or any other form. Derogatory, hurtful and hateful practices of any form have no place in our school community and are not in keeping with our ethos or values.

1.3 We want everyone who learns, teaches, works or visits here to know this and have therefore developed two key documents in consultation with the DSG Community. The two documents are intended to be read in conjunction as they present two perspectives on the same issue. The first document is our Community Agreement, which is a statement of our best intentions as a community to stay committed to each other, especially around issues of difference and identity, and to the work of coming to understand one another more deeply. The Agreement describes in practical terms how we can do this. The Community Agreement describes the behaviour and attitudes to which we as a community hold ourselves accountable.

1.4 The second document is this policy on Racism and other forms of Discrimination. This document outlines:

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<sup>1</sup> Whilst we are clear that all forms of discrimination are to be condemned equally, we are very aware of South Africa's particular history of legalised racial segregation and the continued effect this has had on all its citizens. For this reason, we single out racism for special mention.

<sup>2</sup> The Constitution of the Republic of South Africa, 1996; Promotion of Equality and Prevention of Unfair Discrimination Act, Act 4 of 2000.

- i. behaviour and attitudes that are expected of pupils,
- ii. behaviour and attitudes that are unacceptable,
- iii. steps to follow if anyone behaves towards you or someone else in a way that that is not acceptable and contravenes this policy,
- iv. action that will be taken against those who contravene this policy.

## 2. OBJECTIVES OF THIS POLICY

The objectives of this policy and the procedures are:

- 2.1 To clearly communicate the school's stance on diversity and belonging.
- 2.2 To challenge and invite deep reflection on racist and discriminatory belief systems.
- 2.3 To communicate to pupils the attitudes and standard of behaviour expected of them both on and off campus in relation to other pupils of DSG, SAC or any other school, all staff and any visitors to DSG.
- 2.4 To eliminate (get rid of or put a stop to) from the DSG community any words, actions or practices that arise from racist or discriminatory belief systems.
- 2.5 To describe the options available to pupils who wish to report incidents of racism or discrimination as well as the steps to be followed once a report has been made.
- 2.6 To ensure that there are always choices and effective processes available to pupils who report incidents of racism or discrimination.

## 3. DEFINITIONS<sup>3</sup>

3.1 'The Staff' comprise:

- i. Senior Management of School (Head, Deputy Heads, Housemistresses, Grade Heads, Chaplain)
- ii. Teaching Staff
- iii. Wellness Team
- iv. Administrative Staff
- v. Support Staff
- vi. Student Assistants and Coaches (whether they are fixed-term or indefinite, full-time or part-time employees).

3.2 For the purpose of this policy '**complainant**' means any person or group within our school community who reports a contravention of this policy, thereby initiating one of the processes described in this policy.

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<sup>3</sup> As per Act 4 of 2000.

- 3.3 For the purpose of this policy **'racism'** is:
- i. the belief that all members of each race possess characteristics, abilities, or qualities specific to that race, especially so as to distinguish it as inferior or superior to another race or races;
  - ii. prejudice, unfair discrimination, or antagonism directed against someone of a different race based on the belief that one's own race is superior;
  - iii. actions taken whose effect is to perpetuate and maintain the power, influence and/or well-being of one race over another<sup>4</sup>.
- 3.4 For the purpose of this policy, **'discrimination'** is the unfair (unjust) or unfavourable treatment of an individual or group of individuals on the basis of race, gender, sex, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language and birth; or on any other ground where discrimination:
- i. encourages, causes or perpetuates (keeps going) systemic disadvantage;
  - ii. undermines human dignity; or
  - iii. negatively impacts on the equal enjoyment of a person's rights and freedoms in a serious manner<sup>5</sup>.
- 3.5 For the purpose of this policy **'harassment'** means unwanted conduct which is persistent or serious and demeans, humiliates or creates an unsafe (hostile or intimidating) environment and which is related to the person's race, gender, sex, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language or birth. Harassment is most often intended to bring about submission by threatening or imposing negative consequences.
- 3.6 For the purpose of this policy the terms **'respondent'** and **'alleged offender'** refer to any person whose behaviour is reported as contravening this policy and who is required to respond to those allegations through the procedures outlined in this policy.

## 4. INFORMATION AND EDUCATION

- 4.1 DSG is, first and foremost, an educational institution. We therefore acknowledge our responsibility, in partnership with parents, guardians and caregivers, to provide a range of opportunities for our pupils to be educated about racism, prejudice and discrimination. We want to foster a safe environment within which we can all be challenged to reflect on our own attitudes and behaviours. We also wish to develop a culture of learning and listening, so that we are better able to understand the potential impact that direct or indirect racism, unconscious bias and discriminatory attitudes and practices can have on our friends, peers, the broader DSG community, and our society.

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<sup>4</sup> Racist and discriminatory attitudes and beliefs find expression in racist and discriminatory actions, both in the behaviour of individuals and in the policies and entrenched practices of institutions, communities, societies and nations. For the purposes of this policy our definition focuses on the behaviour of individuals.

<sup>5</sup> We recognise that 'discrimination' can refer to a positive action or decision taken in favour of an individual or a group of individuals, which benefits them in some way, when such action is undertaken in the interests of redress, reparation or empowerment. The term 'unfair discrimination' is used in South African law to denote prejudicial discrimination as described above in the policy. We use the term 'discrimination' in this document to encompass all forms of 'unfair discrimination' for ease of reference and understanding.

#### 4.2 DSG will strive to ensure that:

- i. The School's formal and informal curricula reflect and promote values of inclusivity, diversity, equality and human dignity.
- ii. All pupils are regularly made aware of their constitutional rights and responsibilities; the history and impact of ideologies and practices of racism and discrimination; the meaning and practice of diversity, inclusivity and tolerance and the relevant DSG policies. Pupils will also be made aware of the DSG Community Agreement and its implications for interactions within the school environment.
- iii. All academic staff promote equity and demonstrate sensitivity to context and diversity in their specific courses and/or boarding houses.
- iv. Administration and support staff promote equity and demonstrate sensitivity to context and diversity on campus.
- v. This policy is readily accessible to all pupils of the DSG.

## 5. REQUIREMENTS OF THE POLICY

#### 5.1 This policy is to be read in conjunction with:

- i. the Community Agreement
- ii. the Discipline Policy
- iii. the DSG Handbook

#### 5.2 The School prohibits any behaviour that is:

- i. racist, or
- ii. unfairly discriminates against any individual or group.

#### 5.3 The contravention of 5.2 may lead to formal disciplinary action (see Section 8 below).

#### 5.4 It is the responsibility of every pupil to read and apply the requirements of this policy.

#### 5.5 Racist and/or discriminatory practices may comprise, but are not limited to, any of the following practices:

- i. **Direct Racism or Discrimination** – i.e. a clear and overt act of racism or unjustifiable discrimination.
- ii. **Indirect Racism or Discrimination** - i.e. when a rule or practice seems to treat everyone fairly, but actually unfairly discriminates against individuals or groups.

#### 5.6 Examples of direct racism and discrimination could include, but are not limited to, the following utterances, actions and practices:

- i. Hate speech, i.e. spoken or written words that are intended to offend, insult, intimidate, or threaten an individual or group based on a trait, attribute or identity marker such as race, gender, colour, ethnicity, ability, class, country of origin, sexual orientation, religious belief, political conviction, etc. Hate speech can encourage further discrimination, intimidation, and/or violence toward the group or individual being targeted.

- ii. Derogatory remarks concerning a person's race, gender, colour, ethnicity, ability, class, country of origin, sexual orientation, religious belief, political conviction, or any other marker of identity or difference and/or derogatory comments about a person based on any of the abovementioned attributes.
- iii. Use of slang terms to refer to someone of another race, gender, colour, ethnicity, ability, class, country of origin, sexual orientation, religious belief, political conviction, or any other marker of identity or difference.
- iv. Cat-calling, wolf-whistling or any other attempt to embarrass or humiliate someone publicly in relation to their race, gender, colour, ethnicity, ability, class, country of origin, sexual orientation, religious belief, political conviction, or any other marker of identity or difference.
- v. Physical abuse e.g. hitting, shoving, tripping, pinching, slapping, punching or threats of physical abuse which the offender overtly associates with the victim's race, gender, colour, ethnicity, ability, class, country of origin, sexual orientation, religious belief, political conviction, or any other marker of identity or difference.
- vi. Creation and publishing of memes or other representations of persons in social media which are derogatory or offensive to any person on the basis of race, gender, colour, ethnicity, ability, class, country of origin, sexual orientation, religious belief, political conviction, or any other marker of identity or difference.
- vii. Graffiti or chalking of slogans which are derogatory or offensive to others on religious, racial, sexual orientation, gender or other grounds, unless these are used in academic projects with the intention of critiquing, challenging or disrupting the prejudice expressed.
- viii. Wearing racist insignia.
- ix. Declining to participate in school activities (such as groupwork) or share living/working space for overt reasons pertaining to race, gender, colour, ethnicity, ability, class, country of origin, perceived or actual sexual orientation, religious belief, political conviction, or any other marker of identity or difference.
- x. Offensive physical gestures or body language referring to persons of a particular group.
- xi. Deliberately excluding individuals from activities on the grounds of race, gender, colour, ethnicity, ability, class, country of origin, sexual orientation, religious belief, political conviction, or any other marker of identity or difference.
- xii. Telling jokes that are derogatory or offensive to members of a particular race, gender, sex, class, sexual orientation, language or religious group.
- xiii. Slang terms or derogatory comments about interracial relationships.
- xiv. Telling someone that they do not belong in the school based on some perceived or real characteristic or telling someone to go back to wherever they may be from (implying non-belonging).
- xv. Imitating accents or speech patterns with the intention of mocking or ridiculing.

- xvi. Negative, discriminatory or offensive comments about individuals or groups pertaining to:
- |                   |  |
|-------------------|--|
| appearance        | physical ability                       |
| clothes           | intellectual ability                   |
| food              | culture                                |
| accent or dialect | religion                               |
| language          | country of origin                      |
| social status     | family                                 |
| financial status  | perceived or actual sexual orientation |
- xvii. Any other form of negative or derogatory action, behaviour or treatment related to markers of identity or difference.

## 6. APPLICATION OF THE POLICY

This policy and these procedures apply to all pupils<sup>6</sup> of the DSG.

## 7. GUIDING PRINCIPLES

- 7.1 DSG commits itself to promoting an environment in which the dignity of all is respected and protected. Victims of racism or discrimination should never feel that their grievances are ignored or trivialised, or fear reprisals.
- 7.2 All staff and pupils have a role to play in creating and maintaining an environment in which racism and discrimination are unacceptable. They should strive always to ensure that their conduct does not cause offense and they should discourage unacceptable behaviour on the part of others.
- 7.3 All staff members must take appropriate action in accordance with this policy when instances of racism and/or discrimination at the School are brought to their attention.
- 7.4 Allegations of racist or discriminatory words, actions or practices will be taken very seriously and investigated rigorously and promptly. If allegations are found to have substance, the procedures outlined in 8.6 to 8.8 will be initiated, as appropriate.
- 7.5 Unsubstantiated, frivolous or malicious allegations will also be viewed in a serious light and the person making such allegations may themselves face disciplinary action.

## 8. PROCEDURES

- 8.1 These procedures will apply in instances when there are allegations of racism and/or discrimination as outlined in Section 5 of this document.

<sup>6</sup> There is a similar but separate staff policy in accordance to the ISASA requirements and the Employment Equity Act 55 of 1998.

- 8.2 This policy document is recognised as serving alongside the Code of Conduct and Disciplinary Policy in existence, and where appropriate the procedures in the Disciplinary Policy will apply.
- 8.3 These procedures aim to resolve any complaints/reports of racism or discrimination in a sensitive, efficient and effective way. Procedures commence with the first conversation a complainant initiates with a staff member, or the first report made on the anonymous reporting app SpeakUp and the particular steps taken thereafter will depend on the severity or seriousness of the matter reported.
- 8.4 The School recognises that it is first and foremost an educational institution and that in all circumstances we should be mindful of this role. The age (i.e. maturity level) of the complainant(s) and respondent(s) as well as the following criteria will be kept in mind when the severity of the incident is assessed:
- i. Was the behaviour **hurtful**?
  - ii. Was the behaviour **intentional** or **deliberate**?
  - iii. Has the behaviour been **persistent**?
  - iv. Has the behaviour **continued** in spite of warnings to the individual to desist?

## **8.5 ADVICE AND ASSISTANCE**

### **8.5.1 Reporting to a staff member**

8.5.1.1 Allegations of behaviour motivated by racism or other forms of discrimination are sensitive and potentially serious issues. A complainant (who may be the direct victim or a witness to an incident) may therefore wish to approach a staff member for advice and assistance before laying a formal complaint. Whilst it is recommended that the complainant approach the Head or a Deputy Head, a psychologist, one of the Heads of the Transformation Portfolio, a Housemistress or Deputy Housemistress or the Chaplain, pupils are free to approach any member of staff with whom they feel comfortable. Whoever is first approached will:

- i. listen and ask questions so that they have a full account of the incident(s);
- ii. provide support and advice;
- iii. assist the complainant in clarifying whether the offending behaviour they describe may indeed constitute racism or discrimination;
- iv. discuss ways in which the problem might be resolved;
- v. provide ongoing support and care to the complainant throughout the process, whatever course of action is chosen.

8.5.1.2 This initial discussion will be confidential<sup>7</sup> and the identity of neither the alleged victim (if the complainant is a witness) nor the alleged offender need be revealed at this stage.

8.5.1.3 If it is clear that the offence described does constitute racist or discriminatory behaviour, the Head or delegate will be notified and the complainant will be encouraged to accompany the staff

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<sup>7</sup> It must be noted that the one caveat to confidentiality is that if the person receiving the report deems that the complainant or some other person is at risk of harm, in which case the report will need to be escalated via appropriate channels.

member to meet with the Head in order to lay a formal complaint. In consultation with the Head, the complainant may be guided to proceed to a Remedial Discussion, Restorative Intervention, or Disciplinary Committee referral. The complainant may also request that the complaint/report simply be noted for tracking purposes and that no further action be taken at that stage. The final decision regarding the course of action to be taken rests with the Head. Counselling may be provided as the sole process, or alongside all or any of these interventions.

8.5.1.4 The need for parents to be informed of and perhaps drawn into a process will be assessed and discerned on a case-by-case basis, in consultation with the complainant, but with an emphasis on alerting them to issues sooner rather than later.

### **8.5.2 Reporting on the anonymous reporting app SpeakUp**

Alternatively, a complainant can post any report of racism or discrimination on the reporting app SpeakUp, which all girls have access to on their iPads or cellphones. This can be posted anonymously. Every report is received by the Head and the administrators of the app who respond to each report. The administrators may request additional information in order to assist the complainant in clarifying whether the offending behaviour they describe may indeed constitute racism or discrimination and for the report to be thoroughly investigated<sup>8</sup>. The app allows for this to happen without compromising the anonymity of the person reporting. The administrator of the app will liaise with the Head and other relevant structures within the school (such as the Wellness Team or the Deputy Head in charge of discipline) and will continue the conversation with the complainant as long as is needed to collect all information required and to provide feedback on actions taken and their outcomes.

## **8.6 REMEDIAL DISCUSSIONS**

8.6.1 If the complainant wishes to remain anonymous, and/or does not wish to pursue a Restorative Intervention or a Disciplinary process, and if the Head feels that the complaint warrants it, or if multiple minor complaints have been made about a particular person, a Remedial Discussion may be instituted.

8.6.2 A Remedial Discussion involves the Head or Senior Staff Member holding a conversation with the alleged offender in which she/he would indicate that concerns have been raised about the pupil's behaviour and describe the nature of the concerns, without revealing the identity of the complainant if she/he wished to remain anonymous. The alleged offender will have an opportunity to respond to these concerns. The Head may then describe the forms of speech and behaviour which constitute racism and/or discrimination and which are unacceptable at DSG and explain that, to whatever extent that the pupil has been involved in such behaviour (which she has now been made aware of), this must stop immediately. The pupil may be provided with a copy of the Racism and Discrimination Policy.

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<sup>8</sup> It must be noted that the school cannot take any action if the reporter does not provide enough information for the report to be thoroughly investigated.

8.6.3 The Head will take the following into consideration when deciding if a Remedial Discussion would be appropriate:

- i. the wishes of the complainant
- ii. risk to the complainant
- iii. risk to any other person
- iv. severity of the offence and the hurt or harm caused
- v. the history of the alleged offender with regard to similar offences.

8.6.4 Remedial discussions serve an educative (remedial) purpose in that they alert offenders, who may be unaware of the offence that they are causing, to the unacceptable nature of racist/discriminatory behaviour, and the hurt and/or harm caused by such behaviour. They invite the alleged offender to reflect on their attitudes and behaviour and to consider making changes where necessary. These discussions also signal to the school community at large the school's intolerance of any forms of racism or discrimination.

## **8.7 RESTORATIVE INTERVENTION**

8.7.1 A Restorative Intervention (RI) can be instituted if a complaint has been investigated and verified and if the complainant, those supporting her and the Head, believe that a discussion or action that involves the alleged offender can potentially resolve a matter. A Restorative Intervention would focus on the consequences of the offence (hurt and/or harm caused) with the emphasis being on a response of acknowledgement of hurt and/or harm by the alleged offender as well as a sincere expression of remorse. Collective problem solving is then used to agree upon some form of restitution/amends to be made, which would include concrete steps to avoid recurrence of offending behaviours. The decision to initiate a Restorative Intervention rests with the Head.

8.7.2 If a Restorative Intervention seems appropriate, the alleged offender will be provided with a description of the complaint and invited to an RI meeting. The alleged offender may accept or decline the invitation. If the alleged offender disputes the allegation, the RI cannot proceed. A Restorative Intervention can only proceed if both parties agree to participate and if the alleged offender accepts responsibility for hurt and/or harm caused. If the alleged offender disputes the allegation, refuses to attend or refuses to accept responsibility for hurt and/or harm caused, the matter will be referred to the Disciplinary Committee for further investigation and action.

8.7.3 If the alleged offender accepts the invitation and acknowledges hurt and/or harm caused, the Restorative Intervention meeting will, as a matter of necessity, involve a senior teacher as witness, a School psychologist or person qualified to facilitate the Intervention, the complainant, the alleged offender and one representative each of their choosing from within the School community.

8.7.4 The proceedings of such meetings will be confidential, with a record kept only of the mutually agreed upon outcome of the meeting. This record may be used in later disciplinary processes (aggravating circumstances relating to sanction) should there be a repeat offense.

8.7.5 If a restorative agreement is reached which satisfies the complainant and is accepted by the offender, the meeting will be concluded. Practices of accountability will be implemented to ensure that the agreements reached are honoured. A restorative agreement is binding and failure to abide by the agreement could result in disciplinary action. Restorative agreements will always include the provision that the unacceptable behaviour in which the offender engaged should not be repeated with the complainant or any other person. Should this occur, it would constitute a breach of the restorative agreement and could be used in evidence in further disciplinary processes.

8.7.6 If the matter remains unresolved once the Restorative Intervention meeting is concluded, or if the agreements made in the process are not honoured, the matter will be referred to the Disciplinary Committee for further investigation and action.

## **8.8 FORMAL DISCIPLINARY PROCEDURE**

8.8.1 Whilst restorative options will be prioritised and adopted/tried wherever possible, the Head may refer a complaint directly to the Disciplinary Committee without instigating a Remedial Discussion or a Restorative Intervention, if the severity and circumstances warrant this, and particularly if doing so will avoid any further possible harm to the complainant. A complaint may also be referred to the Disciplinary Committee if an alleged offender disputes the complaint/allegation, or if a complaint remains unresolved after a Restorative Intervention.

8.8.2 Once a complaint is referred to the Disciplinary Committee, the DSG Disciplinary procedures will be followed, as per the DSG Discipline Policy.

## **8.9 LAYING A COMPLAINT AGAINST A PUPIL FROM ST ANDREW'S COLLEGE**

8.9.1 In order to lay a complaint of racism or discrimination against a pupil at St Andrew's College, a DSG pupil could approach a staff member for advice and assistance (as per par. 8.5.1) and then proceed to lay a formal complaint with the Head of the DSG, or she could approach the DSG Head directly. The DSG Head will refer the matter to the Head of St Andrew's College for further investigation. At that point, the procedures and requirements outlined in the St Andrew's College Policy on Racism and Unfair Discrimination for Learners would come into effect.

8.9.2 The Head of St Andrew's College will provide feedback to the DSG Head on:

- i. the outcome of the investigation
- ii. any action taken
- iii. any outcomes of action taken.

## **8.10 LAYING A COMPLAINT AGAINST A MEMBER OF STAFF FROM EITHER DSG OR ST ANDREW'S COLLEGE**

8.10.1 In order to lay a complaint of racism or discrimination against a staff member at either DSG or St Andrew's College, a DSG pupil could approach a staff member for advice and assistance (as per par. 8.5.1) and then proceed to lay a formal complaint with the Head of the DSG, or she could approach the DSG Head directly.

8.10.2 If the complaint involves a DSG staff member, the Head will institute an investigation and the DSG Staff Policy on Racism and Other Forms of Discrimination would come into effect.

8.10.3 If the complaint involves a St Andrew's College staff member, the DSG Head will refer the matter to the Head of St Andrew's College for further investigation. At that point, the St Andrew's College Staff Policy on Racism and Unfair Discrimination would come into effect.

8.10.4 The Head of St Andrew's College will provide feedback to the DSG Head on:

- i. the outcome of the investigation
- ii. any action taken
- iii. any outcomes of action taken.

## **8.11 RECORD KEEPING**

For every formal report of racism and/or discrimination, a standard incident report will be completed. Any action taken, or a decision not to take action, will be recorded and signed by all concerned. Should a Remedial Discussion, Restorative Intervention or Disciplinary Process ensue, records will be kept of these interventions and their outcomes.

## **9. CONFIDENTIALITY**

The School will make every effort to ensure that at all times complaints about racism and discrimination are handled in a manner which keeps the identities of persons involved confidential within the wider School community.

## **10. PROVISION FOR REVIEW OF POLICY AND PROCEDURES**

The policy and procedures will be reviewed from time to time and appropriate changes made if necessary.