

# Table of Contents

Foreword ..... 2

Project Objective ..... 3

Methodology ..... 3

Key Findings..... 5

    Differences of Approach ..... 5

    Constitutional Protections ..... 6

    Legal Protections ..... 7

    Employment Equity and Affirmative Action ..... 7

    Fostering Belonging and Integration ..... 8

    Use of Terminology ..... 9

Appendices

    Appendix A: Glossary of Terms

    Appendix B: Methodology

    Country Profiles

# Acknowledgments

This report was produced by our student interns and supported by Mosaic Institute staff:

Student Researchers:

- Neha Dhaliwal, University of Toronto Peace Conflict & Justice
- Uros Krtolina, University of Toronto Mississauga, Political Science
- Astrid Ling, University of Toronto Peace Conflict & Justice
- Cameron Ting, University of Toronto Peace Conflict & Justice
- Michael Tolkunow, University of Toronto Peace Conflict & Justice
- Shreya Vohra, University of Toronto Peace Conflict & Justice
- Vivian Whalen, Ryerson University Professional Communications

Mosaic Institute Staff:

- Alexis Cochrane, Communications Specialist
- Rachel Mansell, Vice President, Operations
- Abigail Shakespeare, Manager Development & Public Engagement

## Foreword

Mosaic equips people with the tools to dismantle prejudice in their own communities through research, dialogue, policy, and training. We believe that everyone has a right to be free from prejudice & discrimination. We value inclusion, education, and conflict resolution. At Mosaic, Canada's diversity isn't a problem – it's a solution.

Our community-grounded research and policy work amplifies the voices of Canada to inform equitable solutions to systemic problems. We tackle issues like improving race relations, access to mental health resources, and the gendered impact of COVID-19.

Our facilitated dialogues create space for intersectional conversations that result in action-oriented recommendations. We convene experts in areas such as Indigenous-settler relations, trauma-informed education, or online hate to hear from them, and co-create solutions that make sense.

Our programs equip real people to break down the barriers they experience, and build back better. We train students across Canada to address root causes of conflict and become leaders for a more peaceful and just world.

Over the past 14 years, our award-winning work has touched over 150,000 people in Canada and around the world. At Mosaic, we don't just create solutions – we build better communities.

Our interest in communities is actually what led us to look at different multiculturalism policies around the world. Mosaic's mission so to equip people with tools. So, over the past 8 months we championed three youth-led initiatives to commemorate the anniversary:

- Personal reflections by our undergraduate researchers on how multiculturalism affects newcomers, education, and aging – three issues close to their hearts ([click here to access](#)).
- A case study on the federal multiculturalism policy and Education in Ontario, which is provincially regulated. That paper is forthcoming.
- A global comparative analysis on multiculturalism policies and international commitments to multiculturalism – resulting in this report and a visual, interactive online exhibit of our findings ([click here to access](#))

We've created a comparative analysis of how Canada's approach to multiculturalism, while not perfect, is unique in the world. Our work highlights how 19 other countries across the globe approach multiculturalism in their domestic policy, international advocacy, and civil society, measured against a matrix of Canada's key elements. This interactive web element is youth-led and youth-created. Their perspectives are imperative to consider as we look ahead to the next 50 years of multiculturalism both here at home, and abroad.

We hope you find this report as illuminating as we did while compiling it.

*Rachel Mansell*

Rachel Mansell  
Vice President Operations  
The Mosaic Institute

## Project Objective

2021 will mark the 50<sup>th</sup> anniversary of Canada’s multiculturalism policy. To reflect on the past half-century of multiculturalism in Canada, and situate Canadian multiculturalism within the contemporary global context, this report identifies nineteen other countries with multiculturalism or diversity policies (see: Appendix: A-S). It then elucidates the character and extent of these policies, contrasting them against both each other and a common baseline – in this case, the *Canadian Multiculturalism Act*.<sup>1</sup> The goal of this report is to leave the reader with both a greater knowledge and understanding of Canadian multiculturalism, as well as the similarities and differences of multiculturalism and diversity policies globally. It does not discuss the effectiveness of the policies, which was beyond the scope of this analysis.

## Methodology

In 1988, the Canadian Parliament passed the world’s first national multiculturalism law: the *Canadian Multiculturalism Act*.<sup>2</sup> Its passage not only enshrined into law many of the key principles and policies that had collectively comprised Canada’s multiculturalism policy since 1971, but also proved to be highly influential, both domestically and internationally. In the years subsequent to its passing, other countries followed in Canada’s footsteps, implementing similar policies of their own, and to the present day, the *Canadian Multiculturalism Act* continues to provide the fundamental framework for Canada’s contemporary multiculturalism policy. It is for these reasons that, in keeping with the stated objective of reflecting on the past half-century of Canadian multiculturalism, this brief will utilize the *Canadian Multiculturalism Act* as a baseline to which the policies of other countries will be compared.

The main points of this comparison, comprehensively drawn from the *Canadian Multiculturalism Act*, have been divided into three categories of measures: “Domestic Legal”, “Domestic Practical,” and “International.” The purpose of these three broad categories is to provide a simple framework which can be used to evaluate each country’s multiculturalism and diversity policies, as well as to contrast them with the Canadian baseline. A sample chart, used as a template for all nineteen countries analyzed, is shown below:

Domestic Legal	Domestic Practical	International
Government-led; not civil society - domestic <ul style="list-style-type: none"> <li>Accountability mechanism</li> </ul> Constitutional Protections for Equal Rights <ul style="list-style-type: none"> <li>Fundamental Freedoms (speech, etc.)</li> <li>Human Rights Act, or similar protection against discrimination (available avenues for redress)</li> <li>Section 27: “Multicultural Heritage” (i.e., explicit recognition of multiculturalism)</li> </ul>	Valuing and Active Promotion of Diversity <ul style="list-style-type: none"> <li>Recognition of Diversity as a Reality</li> <li>Government Support for Diversity Programs, Heritage Languages, etc.</li> <li>Active Efforts to Remove Barriers to Participation in Society</li> <li>Active Efforts to Promote Mutual Understanding (e.g., Black History Month, allocation of funding)</li> </ul> Multiculturalism as a means to Integration	Signatory to international treaties? <ul style="list-style-type: none"> <li>Treaties: International Covenant on Civil and Political Rights, International Covenant on the Elimination of All Forms of Racial Discrimination</li> <li>International Promotion of Multiculturalism</li> </ul>

<sup>1</sup> Government of Canada, “Canadian Multicultural Act,” *Justice Laws Website*, accessed October-November 2020, <https://laws-lois.justice.gc.ca/eng/acts/c-18.7/page-1.html>

<sup>2</sup> “Canadian Multiculturalism Act, 1988,” Pier 21, accessed October 2020, <https://pier21.ca/research/immigration-history/canadian-multiculturalism-act-1988>

	<ul style="list-style-type: none"> <li>• The linkage of multiculturalism to democratic values</li> <li>• Multiculturalism as a way to generate belonging</li> </ul> <p>Affirmative Action Policies</p>	
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The “Domestic Legal” category consists of constitutional protections for fundamental freedoms, which are key for ethnic or religious minorities to be able to practice their culture, follow the tenets of their religion, or speak their native language within a multicultural context. It also includes anti-discrimination laws, human rights commissions, and government-led accountability mechanisms.

The “Domestic Practical” category encompasses practical efforts by governments and civil society to promote diversity, integration, and belonging. Examples include government-funded second language programs, efforts to promote diversity or link multiculturalism to integration, and active efforts to increase interethnic ties. Also included in this section is affirmative action or policies related to the goal of employment equity, which although not in the *Canadian Multiculturalism Act*, are a popular means to address inequalities in diverse societies globally. Government-led practical initiatives that can also be considered “Domestic Legal” actions have been primarily listed under the “Domestic Practical” heading.

The International category observes signatory or ratification action on the International Covenant on Civil and Political Rights<sup>3</sup> and the International Covenant on the Elimination of All Forms of Racial Discrimination,<sup>4</sup> two treaties explicitly mentioned in the *Canadian Multiculturalism Act*. In addition, this section covers any action taken to promote multiculturalism internationally.

In order to ensure geographic representation and manage the scope of the project, two countries were selected per continent for analysis. This selection was based on geographic and cultural diversity, demographics, internal group divisions, notable minority policies, or unique attributes, such as historical colonial rule. The following nineteen countries were selected:

Africa	Asia	Europe	Oceania	North America	South America
Nigeria South Africa Uganda	South Korea India Singapore	United Kingdom Russia France	Malaysia Australia New Zealand Fiji	United States of America Mexico Trinidad and Tobago	Brazil Peru Colombia

<sup>3</sup> “International Covenant on Civil and Political Rights,” United Nations Treaty Collection, United Nations, accessed November 26, 2020, [https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg\\_no=IV-4&chapter=4&clang=\\_en](https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-4&chapter=4&clang=_en)

<sup>4</sup> “International Convention on the Elimination of All Forms of Racial Discrimination,” United Nations Treaty Collection, United Nations, accessed November 26, 2020, [https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg\\_no=IV-2&chapter=4&lang=en](https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-2&chapter=4&lang=en)

## Key Findings

In researching the multicultural and diversity policies of these nineteen countries, several notable findings, similarities, and contrasts arose. This section will outline these key findings, illustrating the key differences and similarities in how each country manages diversity in relation to the Canadian baseline. These findings can be broadly grouped into six sections: differences of approach, constitutional protections, legal protections, employment equity, fostering belonging and integration, and use of terminology.

### *Differences of Approach*

One of the main impetuses that led to the creation of the first Canadian multiculturalism policy in 1971, and subsequently the passage of the *Canadian Multiculturalism Act* in 1988, were the efforts of civil society and immigrant groups who increasingly demanded their place within Canadian society and identity.<sup>5</sup> In other words, bottom-up pressure helped to precipitate the adoption of multiculturalism in Canada, which in turn became the top-down purview of the Canadian state. This relationship remains intact today: Canadian civil society continues to promote and help shape multiculturalism policies, but through required annual reviews,<sup>6</sup> the Canadian government has made it incumbent upon itself to ensure their implementation.

The most comparable top-down/bottom-up relationship to Canada's is naturally seen in the country most similar to Canada: in Australia, the activism of immigrants (i.e., bottom-up) likewise culminated in a (top-down) multiculturalism policy in 1977.<sup>7</sup> However, in the last two decades, public enthusiasm for multiculturalism has waned and state policy has reflected that, moving to a softer embrace of the ideal.

By contrast, most countries examined exhibit a stronger top-down focus. Countries such as India<sup>8</sup> and Malaysia,<sup>9</sup> and Colombia<sup>10</sup> root their diversity policies in their constitutions, with their governments constitutionally-obliged to enact provisions for affirmative action and work to protect minority languages, religions, and cultures. Others, such as South Africa<sup>11</sup> and Russia,<sup>12</sup> have limited top-down policies written into their constitutions, but neither state has placed great stress on them in recent years.

Finally, the United States is unique in being a country with tremendous diversity<sup>13</sup> and a multicultural society, all the while having little official support for multiculturalism policies. In the case of the USA, multiculturalism is an almost purely bottom-up effort, an on-the-ground reality that is fostered by civil society groups operating within the freedoms accorded by the country's constitution.

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<sup>5</sup> Laurence Brosseau and Michael Dewing, "Canadian Multiculturalism," Research Publications, *Library of Parliament*, accessed October 2020, [https://lop.parl.ca/sites/PublicWebsite/default/en\\_CA/ResearchPublications/200920E](https://lop.parl.ca/sites/PublicWebsite/default/en_CA/ResearchPublications/200920E)

<sup>6</sup> Brosseau and Dewing, "Canadian Multiculturalism."

<sup>7</sup> Elsa Koleth, "Multiculturalism: a review of Australian policy statements and recent debates in Australia and overseas," Research Paper no. 6, Parliament of Australia, 2010-2011,

[https://www.aph.gov.au/About\\_Parliament/Parliamentary\\_Departments/Parliamentary\\_Library/pubs/rp/rp1011/11rp06](https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1011/11rp06)

<sup>8</sup> "The Constitution of India," Indian Government, accessed November 12, 2020,

[https://www.india.gov.in/sites/upload\\_files/npi/files/coi\\_part\\_full.pdf](https://www.india.gov.in/sites/upload_files/npi/files/coi_part_full.pdf)

<sup>9</sup> "Malaysia 1957 (rev. 2007)," Constitute Project, accessed November 25, 2020,

[https://www.constituteproject.org/constitution/Malaysia\\_2007?lang=en](https://www.constituteproject.org/constitution/Malaysia_2007?lang=en).

<sup>10</sup> Constitute Project, "Colombia's Constitution of 1991 with Amendments through 2005." n.d.,

[https://www.constituteproject.org/constitution/Colombia\\_2005.pdf](https://www.constituteproject.org/constitution/Colombia_2005.pdf).

<sup>11</sup> "South Africa 1996 (rev. 2012)," Constitute Project, accessed November 4, 2020,

[https://www.constituteproject.org/constitution/South\\_Africa\\_2012?lang=en](https://www.constituteproject.org/constitution/South_Africa_2012?lang=en).

<sup>12</sup> "Russian Federation's Constitution of 1993 with Amendments Through 2014," Constitute Project, accessed November

19, 2020, [https://www.constituteproject.org/constitution/Russia\\_2014.pdf?lang=en](https://www.constituteproject.org/constitution/Russia_2014.pdf?lang=en)

<sup>13</sup> Jeanne Batalova, Brittany Blizzard, and Jessica Bolter, "Frequently Requested Statistics on Immigrants and Immigration in the United States," *Migration Policy Institute*, February 14, 2020, <https://www.migrationpolicy.org/article/frequently-requested-statistics-immigrants-and-immigration-united-states>

### ***Constitutional Protections***

While constitutional protections are central to the rights of minority groups in Canada to practice their cultural traditions, other countries vary in their constitutional commitment to minority rights. Two countries, Australia and the UK, have relatively few constitutional protections for minority rights. Australia is the only developed Western democracy with no formal bill of rights<sup>14</sup> and the UK's ancient, uncodified constitution<sup>15</sup> has only recently been updated to include brief mentions of language and cultural rights for minority groups in Wales and Northern Ireland.

By contrast, the majority of constitutions examined include provisions that, at a minimum, prohibit discrimination. Russia's constitution,<sup>16</sup> for example, protects against discrimination of minority nationalities, but has no further provisions for affirmative action. Others, such as South Korea,<sup>17</sup> Malaysia,<sup>18</sup> South Africa<sup>19</sup> Uganda,<sup>20</sup> Trinidad and Tobago,<sup>21</sup> and the USA, have additional protections, which range from basic provisions like freedom of religion to more specific ones pertaining to their unique demographics or history (ex. the USA's 15th constitutional amendment prohibits withholding the right to vote based on race).<sup>22</sup>

Several countries include more extensive protections for minority groups in their constitution, such as obligations for affirmative action and cultural promotion. Brazil,<sup>23</sup> Peru,<sup>24</sup> Mexico<sup>25</sup> and India each have provisions that protect Indigenous and minority languages. Peru grants Indigenous languages official status where they are dominant and encourages bilingual education<sup>26</sup>, and India guarantees education in citizens' mother tongue language.<sup>27</sup> Fiji, being a country that has a majority indigenous population, guarantees rights for all citizens and it acknowledges the differences between its indigenous groups<sup>28</sup>. Additionally, Mexico,<sup>29</sup> Peru<sup>30</sup> and India<sup>31</sup> each have minimum standards for political representation among certain Indigenous and minority groups. Brazil and Nigeria<sup>32</sup> have gone further by requiring the implementation of specific affirmative action programs. Brazil has a provision that requires the government to train personnel in diversity awareness<sup>33</sup> and Nigeria's constitution

<sup>14</sup> "How are human rights protected in Australian law?" Australian Human Rights Commission, accessed November 26, 2020, <https://humanrights.gov.au/our-work/rights-and-freedoms/how-are-human-rights-protected-australian-law>

<sup>15</sup> "What is the UK Constitution?" University College London, accessed November 18, 2020, <https://www.ucl.ac.uk/constitution-unit/what-uk-constitution/what-uk-constitution>.

<sup>16</sup> Constitute Project. "Russian Federation's Constitution of 1993 with Amendments Through 2014."

<sup>17</sup> "Korea (Republic of) 1948 (rev. 1987)," Constitute Project, accessed November 11, 2020, [https://www.constituteproject.org/constitution/Republic\\_of\\_Korea\\_1987?lang=en](https://www.constituteproject.org/constitution/Republic_of_Korea_1987?lang=en).

<sup>18</sup> Constitute Project, "Malaysia 1957 (rev. 2007)."

<sup>19</sup> Constitute Project, "South Africa 1996 (rev. 2012)."

<sup>20</sup> "Constitution of the Republic of Uganda 1995", Government of Uganda, accessed February 08, 2021, [https://statehouse.go.ug/sites/default/files/attachments/Constitution\\_1995.pdf](https://statehouse.go.ug/sites/default/files/attachments/Constitution_1995.pdf)

<sup>21</sup> Government of the Republic of Trinidad and Tobago. "Constitution of the Republic of Trinidad and Tobago." 1976. [https://rgd.legalaffairs.gov.tt/laws2/Alphabetical\\_List/lawspdfs/1.01.pdf](https://rgd.legalaffairs.gov.tt/laws2/Alphabetical_List/lawspdfs/1.01.pdf).

<sup>22</sup> "Fifteenth Amendment," Interactive Constitution, National Constitution Centre, accessed October 22, 2020, <https://constitutioncenter.org/interactive-constitution/amendment/amendment-xv>

<sup>23</sup> Article 231-232. See: "Constitution of the Federative Republic of Brazil," Organization of American States, accessed October 29, 2020, [https://www.oas.org/es/sla/ddi/docs/acceso\\_informacion\\_base\\_dc\\_leyes\\_pais\\_b\\_1\\_en.pdf](https://www.oas.org/es/sla/ddi/docs/acceso_informacion_base_dc_leyes_pais_b_1_en.pdf)

<sup>24</sup> "Peru 1993 (rev. 2009)," Constitute Project, accessed October 29, 2020, [https://www.constituteproject.org/constitution/Peru\\_2009?lang=en](https://www.constituteproject.org/constitution/Peru_2009?lang=en).

<sup>25</sup> "Mexico 1917 (rev. 2015)," Constitute Project, accessed October 21, 2020, [https://www.constituteproject.org/constitution/Mexico\\_2015?lang=en](https://www.constituteproject.org/constitution/Mexico_2015?lang=en).

<sup>26</sup> Constitute Project, "Peru 1993 (rev. 2009)."

<sup>27</sup> Indian Government, "The Constitution of India."

<sup>28</sup> Constitution of the Republic of Fiji

<sup>29</sup> Constitute Project, "Mexico 1917 (rev. 2015)."

<sup>30</sup> Constitute Project, "Peru 1993 (rev. 2009)."

<sup>31</sup> Indian Government, "The Constitution of India."

<sup>32</sup> "Constitution of the Federal Republic of Nigeria 1999," World Intellectual Property Organization, Accessed November 5, 2020, <https://www.wipo.int/edocs/lexdocs/laws/en/ng/ng014en.pdf>

<sup>33</sup> Article 215. See: Organization of American States, "Constitution of the Federative Republic of Brazil."

implores its government to foster a sense of belonging among groups, even going as far as to encourage inter-marriage between ethnic groups.<sup>34</sup>

### ***Legal Protections***

Whereas many countries have strict anti-discrimination provisions in their constitutions, others have supplemental legislation to help guard and protect the rights of minorities. In Canada, a key piece of legislation that coexists alongside the *Charter of Rights and Freedoms* in this manner is the *Canadian Human Rights Act* (1977).<sup>35</sup> This act both prohibits discrimination on the basis of race or religion, as well as on other grounds, and created the Canadian Human Rights Commission, which investigates claims of discrimination.

Similar laws exist elsewhere: the United Kingdom, Peru, South Korea, Australia, and the United States all have additional legislation barring discrimination. In Australia and the United Kingdom, this legislation supplements unwritten constitutions; in the United States, the famed Civil Rights Act was passed in 1964 to stem centuries of discriminatory practices against African-Americans.<sup>36</sup> In both Uganda<sup>37</sup> and Trinidad and Tobago,<sup>38</sup> government policies exist to promote equality of opportunity, and to prevent discrimination. India, by contrast, has only the 1989 *Scheduled Caste and Scheduled Tribe (Prevention of Atrocities) Act*,<sup>39</sup> intended to bolster protections for those from lower castes, and lacks any more encompassing anti-discrimination legislation beyond the prohibitions in its constitution.

Most countries have likewise created a court or body specifically to handle complaints about discriminatory practices – among them, the United Kingdom (Equality and Human Rights Commission), United States (Equal Employment Opportunity Commission), and Australia (Human Rights Commission). Nigeria's Federal Character Commission, meanwhile, is unique in both predating its most recent constitution and having the additional responsibility of upholding affirmative action laws, in addition to hearing complaints.<sup>40</sup>

### ***Employment Equity and Affirmative Action***

Similar to Canada's *Employment Equity Act*,<sup>41</sup> which calls for proactive policies in order to increase representation of minority groups in federally funded hires, several countries have introduced government-led legislation to diversify hiring practices within government and private corporations. South Africa and Australia<sup>42</sup> have both introduced limited affirmative action legislation. The USA requires federal government agencies and their private partners to develop affirmative action policies,<sup>43</sup> while Nigeria uses hiring quotas to ensure no group has predominance in government

<sup>34</sup> Organization of American States, "Constitution of the Federative Republic of Brazil."

<sup>35</sup> Government of Canada, "Canadian Human Rights Act," *Justice Laws Website*, accessed October-November 2020, <https://laws-lois.justice.gc.ca/eng/acts/h-6/>

<sup>36</sup> The Editors of Encyclopedia Britannica, *Encyclopedia Britannica*, "Civil Rights Act," Chicago: Encyclopedia Britannica, 2009, <https://www.britannica.com/event/Civil-Rights-Act-United-States-1964>

<sup>37</sup> "A New UNESCO project is "Re-shaping cultural policies" in Uganda", UNESCO, November 04, 2019, accessed February 08, 2021, <https://en.unesco.org/news/new-unesco-project-re-shaping-cultural-policies-uganda>

<sup>38</sup> Government of the Republic of Trinidad and Tobago, "Policy Framework for Multiculturalism," 2012, <http://www.culture.gov.tt/wp-content/uploads/2015/07/2012-01-National-Multiculturalism-Policy-Framework-Draft.pdf>.

<sup>39</sup> Devyani Srivastava, "Scheduled Castes and Tribes (Prevention of Atrocities) Act, 1989 & Rules, 1995: A Guide," edited by Prasad, Devika and Hazarika, Sanjoy, *Commonwealth Human Rights Initiative*, accessed November 12, 2020, [https://www.humanrightsinitiative.org/download/1528350081Scheduled%20Castes%20and%20Scheduled%20Tribes%20\(Prevention%20of%20atrocities\)%20Act,%201989.pdf](https://www.humanrightsinitiative.org/download/1528350081Scheduled%20Castes%20and%20Scheduled%20Tribes%20(Prevention%20of%20atrocities)%20Act,%201989.pdf)

<sup>40</sup> Mustapha, Abdul Raufu. "Institutionalising Ethnic Representation: How Effective is Affirmative Action in Nigeria?" *Journal of International Development* 21 (2009), 574.

<sup>41</sup> Government of Canada, "Employment Equity Act," *Justice Laws Website*, accessed December 15, 2020. <https://laws-lois.justice.gc.ca/eng/acts/E-5.401/>

<sup>42</sup> "Australia," *Multiculturalism Policies in Contemporary Democracies*, Queen's University, accessed November 26, 2020, <https://www.queensu.ca/mcp/immigrant-minorities/evidence/australia>

<sup>43</sup> Lynne Eisaguirre, *Affirmative Action: A Reference Handbook*, (Santa Barbara, Calif.: ABC-CLIO, 1999), 27-33.

agencies under the "Federal Character Principle."<sup>44</sup> By contrast, acts passed in Malaysia and the UK primarily address the private sector: Malaysia has instituted several iterations of policies meant to promote business opportunities for underrepresented ethnic groups,<sup>45</sup> whereas section 159 of the UK's 2010 *Equality Act* allows employers to hire the more diverse candidate of two equally qualified candidates if they believe the diverse candidate to be disadvantaged.

Notably, those countries which require government agencies to take affirmative action in their hiring processes (Nigeria, USA, in addition to Brazil), also require that federally funded universities adopt affirmative action policies. Federal universities in Brazil<sup>46</sup> and Nigeria must adopt quotas to ensure diversity; American universities that receive federal funds are required to develop affirmative action policies for faculty, which have often and voluntarily been extended to students.<sup>47</sup> It is also notable that India has codified its employment and educational affirmative action provisions into its constitution, rather than through additional government legislation.

### ***Fostering Belonging and Integration***

A key tenet of the *Canadian Multiculturalism Act*, and a main aim of multiculturalism in general, is to foster belonging and integration within the historically exclusionary institution of the nation-state. The *Canadian Multiculturalism Act*<sup>48</sup> thus contains provisions which call for the preservation and retention of minority languages, assistance in funding or government recognition of cultural events, and the utilization of multiculturalism (including through initiatives like exchanges) to generate goodwill across cultural boundaries and form a connection to the state.

One of the common cornerstones of global diversity policies is the protection and preservation of minority languages. Among the countries examined, Nigeria's National Education Policy is the most ambitious. With 500 languages spoken within its borders,<sup>49</sup> Nigeria aims to educate every child in their mother tongue and then, in upper grades, also in one of the three major national languages (Yoruba, Igbo, or Hausa),<sup>50</sup> with the goal of fostering national unity while respecting the country's ethnic and linguistic diversity. Countries like India<sup>51</sup> and Russia<sup>52</sup> have similar policies, but with greater devolution to local authorities, similar to Canada's arrangement with Québec on language and cultural matters. Meanwhile, countries such as Mexico<sup>53</sup> and India<sup>54</sup> have policies to preserve smaller and Indigenous languages, as well as to increase the availability and accessibility of learning materials in those languages. Conversely, others make relatively little effort in protecting or fostering minority languages.

<sup>44</sup> Mustapha, Abdul Raufu. "Institutionalising Ethnic Representation: How Effective is Affirmative Action in Nigeria?" *Journal of International Development* 21 (2009), 561-576.

<sup>45</sup> Max U. Montesino, "Multi-ethnicity in the Malaysian Workplace: The Net Balance of 25 Years of Affirmative Policies as Observed by a Foreign Visitor," *Indiana University-Perdue University Fort Wayne*: 2.

<sup>46</sup> Edward Telles and Marcelo Paixão, "Affirmative Action in Brazil," *LASAForum* 44, no.2 (2013): 10-12. <https://forum.lasaweb.org/files/vol44-issue2/Debates4.pdf>

<sup>47</sup> Harry J. Holzer and D. Neumark, "Affirmative Action: What Do We Know?" *Journal of Policy Analysis and Management* 25, no. 2 (2006): 464.

<sup>48</sup> Government of Canada, "Canadian Multicultural Act."

<sup>49</sup> "Nigeria," *The World Factbook*, Central Intelligence Agency, accessed November 5, 2020, <https://www.cia.gov/library/publications/the-world-factbook/geos/ni.html>

<sup>50</sup> Denise Merkle, Gillian Lane-Mercier, and Jane Koustas. *Minority Languages, National Languages, and Official Language Policies* (Chicago: McGill-Queen's University Press, 2018), 238-240.

<sup>51</sup> Articles 350A and 351 of the Indian Constitution. See: Indian Government, "The Constitution of India."

<sup>52</sup> Article 68(3) of the Russian Constitution. However, Russia does not explicitly recognize the right to be educated in one's native language (Article 43). See: Constitute Project, "Russian Federation's Constitution of 1993 with Amendments Through 2014."

<sup>53</sup> "National Movement for Cultural Diversity in Mexico," UNESCO, accessed on October 21, 2020, <https://en.unesco.org/creativity/policy-monitoring-platform/national-movement-cultural>.

<sup>54</sup> "National Education Policy 2020," Ministry of Human Resource Development, Indian Government, accessed November 12, 2020, [https://www.education.gov.in/sites/upload\\_files/mhrd/files/NEP\\_Final\\_English\\_0.pdf](https://www.education.gov.in/sites/upload_files/mhrd/files/NEP_Final_English_0.pdf)

For example, in Australia, where multiculturalism is embraced as a national value, the education system is geared towards having students gain competency in English.<sup>55</sup>

A second component of many diversity policies examined is state recognition and funding of cultural events. South Korea, for example, funds art-based cultural projects for North Korean refugees,<sup>56</sup> as well as collaborative efforts with neighboring countries.<sup>57</sup> Russia has a special, albeit nugatory, category of NGOs called 'National-Cultural Autonomy' groups. In this unique bottom-up arrangement, smaller ethnic minorities are permitted to form government-recognized cultural organizations, with the objective of fostering and preserving their culture.<sup>58</sup> The most common method, however, tends to be recognition of diversity or cultural minorities through national holidays or proclamations. Both Brazil<sup>59</sup> and Australia,<sup>60</sup> for example, have national holidays dedicated to the celebration of diversity and anti-discrimination, while the United States government frequently proclaims heritage months to celebrate the history of particular minority groups.<sup>61</sup> Fiji, goes even further, creating a policy called 'home-zoning' which refers to the strategy of sending children to the nearest school, in order to create a multi-ethnic schooling environment<sup>62</sup>.

Finally, many countries – both in ways similar and different to Canada – utilize multiculturalism and diversity policies to generate goodwill across cultural boundaries and form a connection to the state. These efforts can range from simple cultural exchange, such as India's *Ek Bharat Shreshtha Bharat* program<sup>63</sup> or Nigeria's National Youth Corps,<sup>64</sup> which aim to bring different groups into contact with each other, to more encompassing efforts. One key difference between Canadian and Australian multiculturalism, for instance, is the latter's explicit outlining of "shared responsibilities,"<sup>65</sup> to which minorities are expected to abide, including loyalty to Australia and respect for Australian law and democracy. In Canada, multiculturalism is also expected to foster loyalty to the state and respect for its institutions, but these are largely unspoken objectives, with multiculturalism itself believed to induce such outcomes.

### *Use of Terminology*

Like Canada, Australia embraces the term "multiculturalism,"<sup>66</sup> owing to its own multiculturalism policy and legislation. Similarly, Mexico's constitution has recently been revised to include mention of "multiculturalism."<sup>67</sup> Besides Mexico and Australia, few of the countries explored in this project commonly use the term "multiculturalism." Rather, several of the countries use other specific terms in their constitutions, legislation and literature that reflect their unique demographic make-up.

<sup>55</sup> Koleth, "Multiculturalism: a review of Australian policy statements and recent debates in Australia and overseas," 54.

<sup>56</sup> "Republic of Korea 2018 report," Periodic Reports, UNESCO, accessed November 11, 2020, <https://en.unesco.org/creativity/governance/periodic-reports/2018/republic-korea>.

<sup>57</sup> UNESCO, "Republic of Korea 2018 report."

<sup>58</sup> Alexander Osipov, "National Cultural Autonomy in Russia: A Case of Symbolic Law," *Review of Central and East European Law* 35, no. 1 (2010): 49-53, doi: <https://doi-org.myaccess.library.utoronto.ca/10.1163/157303510X12650378239955>

<sup>59</sup> Felipe Arocena, "Multiculturalism in Brazil, Bolivia, and Peru," *Race and Class* 49, no. 4 (2008): 1-21, DOI: 10.1177/0306396808089284

<sup>60</sup> "About - Harmony Week," Home Affairs, Australian Government, accessed November 26, 2020, <https://www.harmony.gov.au/about>

<sup>61</sup> For example, "African American History Month," Law Library of Congress, Library of Congress, accessed October 22, 2020, <https://www.loc.gov/law/help/commemorative-observations/african-american.php>

<sup>62</sup> Naidu, Vijay. "Fiji: The Challenges and Opportunities of Diversity." (2013), pg. 16. <https://www.refworld.org/pdfid/525fbfa4.pdf>

<sup>63</sup> "About," Ek Bharat Shreshtha Bharat, Indian Government, accessed November 12, 2020, <https://ekbharat.gov.in/Pages/About/Introduction>

<sup>64</sup> Naomi A. Moland, "Can Multiculturalism Be Exported? Dilemmas of Diversity on Nigeria's Sesame Square," *Comparative Education Review* 59, no. 1 (February 2015): 9.

<sup>65</sup> "Multicultural Australia: Australia's multicultural statement," Home Affairs, Government of Australia, accessed on November 26, 2020, <https://www.homeaffairs.gov.au/mca/Statements/english-multicultural-statement.pdf>

<sup>66</sup> Government of Australia, "Multicultural Australia: Australia's multicultural statement."

<sup>67</sup> Constitute Project, "Mexico 1917 (rev. 2015)."

Malaysia considers itself to be a "multiethnic" nation, owing to its three main ethnic groups: the Malay, Chinese and Indians. Russia describes itself as "multinational" in its constitution,<sup>68</sup> which is reflective of its "ethnic federalism,"<sup>69</sup> wherein many national minorities have their own autonomous republic. India<sup>70</sup> and Nigeria<sup>71</sup> share the motto, "Unity (with)in Diversity," which demonstrates both countries' attempt to foster a unifying national identity while respecting diversity within. Lastly, Brazil refers to itself as a "racial democracy"<sup>72</sup> stemming from the idea that its three dominant races, the Afro-Brazilians, Portuguese and Indigenous, live in harmony.

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<sup>68</sup> Constitute Project, "Russian Federation's Constitution of 1993 with Amendments Through 2014."

<sup>69</sup> Peter Rutland, "The Presence of Absence: Ethnicity Policy in Russia," in *Institutions, Ideas and Leadership in Russian Politics*, ed. Newton J. and Tompson, W. (London: Palgrave Macmillan, London, 2010), 116, DOI: [https://doi.org/10.1057/9780230282940\\_6](https://doi.org/10.1057/9780230282940_6)

<sup>70</sup> Patrick A. Edewor, Yetunde Aluko, and Sherif Folarin, "Managing Ethnic and Cultural Diversity for National Integration in Nigeria," *Developing Country Studies* 4, no. 6 (January 2014): 70.

<sup>71</sup> Ratna Ghosh, "Multiculturalism in a Comparative Perspective: Australia, Canada, and India," *Canadian Ethnic Studies* 50, no. 1 (2018): 29, DOI: 10.1353/ces.2018.0002.

<sup>72</sup> Arocena, "Multiculturalism in Brazil, Bolivia, and Peru," 2.

## Appendix A: Glossary of Terms

Affirmative Action: action taken to remedy existing inequalities among particular social groups.

Bi-culturalism: the New Zealand model. co-existence of two cultures

Bottom-Up: grassroots or civil society-led action

Diversity: consisting of multiple different qualities.

Multiculturalism: the act of promoting multiple cultural traditions, particularly those that are marginalized.

Multicultural: consisting of multiple cultural traditions. It is most frequently used to describe the populations of Peru and Mexico.

Multiethnic: the Malaysian/Colombian model. In this context, it is the recognition that a country consists of multiple ethnic groups.

Multinational: the Russian model. In this context, it is the recognition that multiple nations exist within the Russian state.

Positive Discrimination: action to discourage discrimination, see “affirmative action”.

Racial Democracy: the Brazilian model. It is the idea that Brazil’s three races – Afro-Brazilians, Portuguese, and Indigenous – live harmoniously together in a democratic state. In recent years, due to systemic inequalities between ethnic groups, the model has begun to be questioned.

Secularism: The separation of religion and other identity markers from the state and public life.

Top-Down: government-led action

‘Unity (with)in Diversity’: the model used by India and Nigeria. In this context, it refers to a state attempt to foster a unifying national identity while respecting and fostering diversity within.

## Appendix B: Methodology

Domestic Legal	Domestic Practical	International
<p>Government-led; not civil society - domestic</p> <ul style="list-style-type: none"> <li>• Accountability mechanism</li> </ul> <p>Constitutional Protections for Equal Rights</p> <ul style="list-style-type: none"> <li>• Fundamental Freedoms (speech, etc.)</li> <li>• Human Rights Act, or similar protection against discrimination (available avenues for redress)</li> <li>• Section 27: “Multicultural Heritage” (i.e., explicit recognition of multiculturalism)</li> </ul>	<p>Valuing and Active Promotion of Diversity</p> <ul style="list-style-type: none"> <li>• Recognition of Diversity as a Reality</li> <li>• Government Support for Diversity Programs, Heritage Languages, etc.</li> <li>• Active Efforts to Remove Barriers to Participation in Society</li> <li>• Active Efforts to Promote Mutual Understanding (e.g., Black History Month, allocation of funding)</li> </ul> <p>Multiculturalism as a means to Integration</p> <ul style="list-style-type: none"> <li>• The linkage of multiculturalism to democratic values</li> <li>• Multiculturalism as a way to generate belonging</li> </ul> <p>Affirmative Action Policies</p>	<p>Signatory to international treaties?</p> <ul style="list-style-type: none"> <li>• Treaties: International Covenant on Civil and Political Rights, International Covenant on the Elimination of All Forms of Racial Discrimination</li> <li>• International Promotion of Multiculturalism</li> </ul>