“Comfortable” Terms: Diversity Discourse and Institutional White Supremacy in UK Libraries

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ABSTRACT: Utilising a theoretical approach from Critical Race Theory and applying a method of Critical Discourse Analysis, this article aims to explore diversity discourse within EDI documents published by the UK library profession. It is vital that the profession have a shared vocabulary about what is meant by “diversity”, “inclusion”, and “equality” and that there is critical reflection on the professional culture to seriously interrogate the language and processes used to go about achieving any goals of social justice. As this article will show, the language used in EDI documents often prevents the library profession from unlearning white supremacy and only perpetuates it within the profession and its institutions. Quite contrary to their stated intentions, EDI documents can be used in institutions to validate an already deeply entrenched institutional culture and stall substantial change.

Keywords: Equality, Diversity, Inclusion, Institutional White Supremacy, Policy, Critical Discourse Analysis, UK

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Journal of Radical Librarianship, Vol. 1 (2023) pp.48–97. Published 09 May 2023.

Introduction

Since the passing of the Equality Act 2010, all public institutions in the United Kingdom have had to create policies and procedures regarding equality, diversity, and inclusion (EDI), track their individual institutional efforts, and publish them online (Government Equalities Office, 2011). As a result, the term "diversity" came into library discourse in the UK on a more substantial level after it became a public sector duty. In *On Being Included: Racism and Diversity in Institutional Life*, Sara Ahmed (2012) uses material from interviews with diversity practitioners in academic institutions in Australia and the UK and suggests compliance to the law creates opportunities for institutional level change but also brings dense limitations, which she argues is the consequence and intention of diversity discourse. If libraries aim to provide services to everyone in their respective communities, then the language of their EDI documents should be continuously and critically examined. As suggested by David James Hudson, there is a need to examine the history of the concept of diversity (Hudson, 2017). As Hudson states, it is "a liberal anti-racism, which has tended to emphasise reforming institutions over interrogating their more fundamental implication in broader systems of racial domination" (Hudson, 14, 2017). Thus, diversity (and by proxy inclusion) are ineffective aims for collective liberation.

Utilising Critical Race Theory, this article aims to explore diversity discourse within EDI documents published by the UK library profession. It is vital that the profession has a shared vocabulary about what is meant by "diversity", "inclusion", and "equality", and that there is critical reflection on the professional culture to seriously interrogate the language and processes used to go about achieving any goals of social justice. As this article shows, the language used in EDI documents often prevents the library profession from unlearning white supremacy, masks its complicity, and perpetuates it within the profession and its institutions. Quite contrary to their stated intentions, EDI documents can be used in institutions to validate an already deeply entrenched institutional culture and stall substantial change.

EDI documents are discovered in a variety of formats, as policies written directly on the webpage or as documents to download. They have a variety of titles or have differing approaches and purposes, such as equality impact assessments, equality outcomes, progress reports, and action plans, among others. Within this small sample, each organisation displays their EDI documents differently, and each displays differing levels of clarity and ease navigating the website to retrieve the EDI documents.

Institutions can choose a range of EDI documents so long as they are compliant with the Public Sector Equality Duty which is to: "publish information to show their compliance [...] at least annually [...] and set and publish equality objectives, at least every four years" (Government Equalities Office, 2011, 3). Organisations are free to choose the most appropriate document and process to suit their needs. As it says in the Human Rights Commission's *Essential Guide to the Public Sector Duty:* "Having due regard to the aims of the general equality duty is about informed decision-making, not about carrying out particular processes or producing particular

documents'' (Human Rights Commission, 2014, 17). As this article will show, this is what tends to happen. Equality Impact Assessments are templates that are provided by the UK government, or the devolved government, and are used to assess any new or revised policies, practices, or services "against the requirements of the public sector equality duty" (Scottish Government, 2014). According to the Equality and Human Rights Commission, they are not required (Human Rights Commission, 2014, 17). Equality Outcomes, according to Glasgow Life, are documents that are created to show progress on equality outcomes set by the city and Scottish government. Progress reports, accordingly, are the documents that are sent out more regularly to document this continued work and progress on these "Improvement Aims" (Glasgow Life, Equality Outcomes, 2018). Progress reports are smaller documents that depict how the institution is working on achieving their longer-term goals, or their Equality Outcomes.

Action plans, according to Arts Council England, are documents that the organisation is encouraged to create that "works for them, that are owned by the whole organisation, and that achieve measurable impact" (Arts Council England, 2017, 3). They are encouraged to approach an action plan like they would a "business plan" and to use SMART goals (Arts Council England, 2017). These documents' primary audience is internal; however, they are frequently publicly available online.

By contrast, EDI Policies are the policies developed since the passing of the Equality Act 2010 that are meant to override all other policies and serve as a reference so that equality can be covered at the start of the policy making and decision-making processes of the institution (Equality and Human Rights Commission, 2014, 7-8). These documents are written with the public and governing bodies as the primary audience. While the primary audience for action plans is internal staff and stakeholders, and the primary audience for policies is the public, it is significant to analyse both because the action plans give insight into how institutions are "doing" diversity, who is mentioned, and what institutions are doing or planning to do. The policy is oftentimes the commitment to do what the action plan is documenting. Additionally, some action plans include some policy elements or serve as the policy for the institution. This study only analyses EDI policies and action plans because they are the most common form of EDI documents available online.

Glasgow Life, the charity that delivers the public library service for Glasgow on behalf of the city council, has all the documents listed above and more. According to 2011 Census Data, Glasgow is predominantly white but has the highest population of People of Colour in Scotland (National Records of Scotland, 2011). The EDI documents are easy to find from the site homepage and are logically organised and categorised. From the homepage, they can be found by scrolling to the bottom of the page and clicking on "About Us", then scrolling down to the "How we operate our charity" section and clicking on "Equality, Diversity, and Inclusion". Glasgow Life has thorough information on its inclusive employment, such as equality and diversity statistics listed in workforce profiles and recruitment statistics, gender pay gap statements, statements on LGBT initiatives, race equality, disability, and recruitment of ex-offenders. They have published equality impact assessments for institutions and events. Finally, they have a published "Access and Inclusion" document on making their facilities more accessible to disabled people.

Camden Metropolitan Borough Council provides the public library service for Camden Metropolitan Borough, which is an ethnically diverse borough in London, according to 2021 Census data (Camden Metropolitan Borough, 2021)[1]. At the time of writing, Camden Council had only a short policy titled "Equality" directly published on a webpage. It was impossible to find the webpage from the homepage of the council, but a search for "equality" retrieves the page. There is an Equality Impact Assessment that is also published directly on the webpage. Both are published under the section "Your Council" and then the subsection "Your Local Community". Both are scarce and appear unfinished. Camden Council has since updated and expanded on this with their "Building Equal Foundations" report (Camden, 2020) which is not included in the analysis.

The British Library (BL) is the national library of the UK. The BL is in London which, according to UK Government census data on England and Wales, is the most "ethnically diverse region" in the UK (Office for National Statistics, 2019). It was included in this article under the assumption that due to its authority within the library field as the national library, its approach to EDI documents would serve as a benchmark to other library institutions. Due to the British Library Act, the BL is required to "make its services available [...] in particular, to [...] other libraries and industry" and it "may [...] contribute to the expenses of library authorities or other persons providing library facilities" (British Library, 2019). From the homepage, the EDI documents can be easily retrieved by going to the "About Us" page, "Governance", then "Corporate Policies". The BL has only an "Equality and Diversity" policy available to download with a brief commitment published directly on the web page.

Finally, the Chartered Institute of Library and Information Professionals (CILIP) is the UK's library and information association of information professionals. Like the BL, it was included in this article due to the role its EDI documents likely play in serving as a template for public libraries' iteration of an EDI document. According to CILIP's Action Plan from 2017, inequality is "manifest in the profession and professional leadership" (CILIP, 2017, 2). At the time of writing, CILIP's EDI documents can be found on the association's web page under the "About" heading. It includes a declaration and commitment by the board and president published directly on the web page, a downloadable action plan, and a downloadable progress report. CILIP has since published a new policy, or "commitment", and action plan called Changing Lives (CILIP, 2019) which is found by going to the "Community" drop-down menu, then selecting "Equalities, diversity & inclusion" from the list of options.

As mentioned, Critical Race Theory serves as the theoretical framework for this article. According to Critical Race Theory scholars in the United States and the UK, structural racism is embedded in and between institutions and works to perpetuate and universalize white supremacy, which situates power in whiteness (Chakrabarty, N., *et al*., 2012; Cole, 2017; M.; Warmington, P., 2019). Whiteness is not simply the race of the individuals who are already working in and holding positions of power in the institution. Whiteness is also a pattern of behaviour and a culture; it permeates

[1] It is crucial to note that the forces of gentrification and border violence may have significantly skewed the numbers in the few years since the last census.

institutional culture. According to Hudson, "(w)hiteness is [...] the production of shared norms underwritten by physical and epistemological violence, a violence invisibilized as a condition of governance (even as it may well be hypervisible to those whose dignity it assaults)" (Hudson, 2017, 214-215). In this sense, individuals within institutions can embody and reproduce white supremacy regardless of their own racial background. Thus, it is necessary to use a racialized lens rather than a race neutral lens to see clearly how power flows (Brook, Ellenwood, and Lazzaro, 2015). Institutional racism works in conjunction with and through structural racism. Structural racism includes the relationships between institutions and broader accepted cultural norms. White supremacy is prevalent in liberal countries and generally means whiteness is the ideal mode of existence, as it typically results in higher access to resources, wealth, and health for white people. White supremacy is present in multicultural liberal societies due to the history of colonization, the Transatlantic Slave Trade, and systematic anti-blackness. It is also important to note the difference between white supremacy and white nationalism. White nationalism is the desire for a white ethno-state where no People of Colour exist. I use the term People of Colour for consistency and efficiency, but it is necessary to mention critiques of the term that exist, such as it flattens many different people into one term, isn't specific, and perpetuates the normalisation of whiteness (Meraji, S., *et al*., 2020). Therefore, while white nationalism is evident in liberal societies through, for example, the presence of extremist groups and border violence, white supremacy is more subtle and in many ways normalised. CRT aims to end the systematic allocation of power and resources in white supremacy, not the existence of racial differences per se, while exposing the social constructedness of race. This article subscribes to Ruth Wilson Gilmore's definition of "racism" which is "the state-sanctioned or extra-legal production and exploitation of group-differentiated vulnerability to premature death" (Gilmore, 2007). Diversity discourse often fails to fully account for the existence of white supremacy and its violence by drawing attention to what is (which institutions, for example) or who is "diverse" (read non-white or mixed-race) and thus drawing attention away from the white supremacy within the institution. Diversity discourse also perpetuates "discourses of racelessness" (Hudson, 2017, 17), which essentialize race. Race will be acknowledged so far as to celebrate differences, but not analysed as to how it systematically and irrationally privileges whiteness over all others.

Liberal institutions are those institutions that espouse liberal values such as the equality and rights of individuals. The model of the individual, however, is usually based on the "able-bodied, heterosexual white male" (Kymlicka, 2002, 327). As Kymlicka argues, there is a clear need in liberalism for a "politics of recognition" to combat "status inequality" in addition to a "politics of redistribution" to combat "economic inequality", the former being the primary mode of liberal societies in addressing inequality. By solely prioritising protections of individual rights against individual discriminatory or racist acts against other individuals, liberalism fails to account for structural racism because intentional policies and practices that are based on the dominant culture (which uses structural racism as a step ladder) are inherent to the process of establishing liberal societies. Further, the process of determining what is valid, what is rational, and what exists, will inevitably be biased favourably towards those with the power to make those assertions. Literature on the core values of librarianship represents these values as generally liberal, espousing

values such as equity of access, rationalism, intellectual freedom, and neutrality or being "prejudice free" (McMenemy, 2009, 42). However, these values are not necessarily exempt from reproducing white supremacy (Chiu, Ettarh, and Ferretti, 2021).

Many democratic countries have since the 1990's been engaged in "neoliberal multiculturalism" (Seale and Mirza, 2019), or what Goldberg calls "racial neoliberalism" (Goldberg, 2008), an ideology that acknowledges racial differences but not structural racism and is primarily concerned with maintaining security and the freedom of the market. The term "racial neoliberalism" is used instead of "neoliberal multiculturalism" in this article because it is more explicit in placing race as a foundational element of capitalism. The library within this political context operates therefore as a "marketplace of ideas" (Seale and Mirza, 2019). All ideas, however harmful, are treated equally and the preservation of the "marketplace" takes precedence over the ideas to ensure business can go on undisturbed.

In the UK, one of the first public acknowledgements of any existing institutional racism, even within a liberal society, came with the publication of the MacPherson Report (Vincent, 2009), an investigation into racism in the police force following the murder of Stephen Lawrence, a Black teenager in London. The report helpfully differentiated between individual racism and institutional racism, however, as Ahmed suggests: "defines institutional racism in such a way that racism is not seen as an ongoing series of actions that shape institutions, in the sense of the norms that get reproduced or posited over time" (Ahmed, 2012, 45). It focuses only on what institutions fail to do, not what they actively do. In that sense, it fails to look inwards at its own whiteness and role in white supremacy and instead situates the problem in the relation between two different actors (the police officer and the person of colour) in its own lack of diversity, or its failure to properly enact appropriate "cultural competence" (Hudson, 2017) among its officers. The definition of institutional racism, conceived from this report, enables institutions to evade any accountability for their role in structural racism and therefore cannot continue unchecked.

Previous related studies coming out of the UK have only looked at broader concepts like "social justice" and "social cohesion" (Pateman and Vincent, 2010) or diversity as a desirable trait or descriptor to apply to collections, staffing, and service provision (Lambert, 1969; Clough and Qarmby, 1978; Roach and Morrison, 1998, 1999; Elliott, 1999; Durrani, 1999, 2002, 2003; Vincent, 2009; and Birdi, Wilson, and Mansoor, 2012). While some studies do allude to the need for structural or institutional change, as proposed by the study by Muddiman *et al.*, 'Open To All? The Public Library and Social Exclusion', none question the existing diversity discourse within the profession or within their respective institutions.

Muddiman *et al*. surveyed all Public Library Authorities (PLAs), conducted detailed case studies, and published three reports. Their findings include the need for an investigation into the underlying culture of libraries: "the internal procedures, cultures and traditions of library services themselves" (Muddiman *et al*., 2001). Further, the reports shows that previous attempts of UK public libraries to practise social inclusion are "weak", "voluntary", "uneven", and "time-limited", and that the "core rationale of the public library movement continues to be based on the idea of

developing universal access to a service which essentially reflects mainstream middle-class, white and UK values". This ultimately means they are "only superficially open to all" and provide "mainly passive 'access' to materials" (Muddiman *et al*., 2001).

In 2010, right before the passing of the Equality Act 2010, John Pateman and John Vincent published *Public Libraries and Social Justice* which argues that public libraries should fully embrace social justice by providing a needs-based library service and community-led service planning model. The book charts the history of libraries working to combat "social exclusion" in the UK and critiques the library's previous scheme centering on "excellence." The authors argue that the library's "[h]igh professional standards can be received and perceived as cultural elitism" (Pateman and Vincent, 2010, 9) and oppose its "project culture" and "short-termism" (Pateman and Vincent, 2010, 115). They mention the profession's tendency to approach EDI efforts as something that can be checked off of a list, and that there needs to be a shift within the professional culture starting with the language that is used: "[...] language is the basis of culture and if the professional language is changed this can help to shift the professional culture" (Pateman and Vincent, 2010, 16).

Pateman and Vincent fail to deeply analyse this language and to interrogate the structural racism and white supremacy the language obfuscates. While they do look at the history of the terms "social inclusion", "community cohesion", and "social justice", they don't critically interrogate the phrases themselves. They argue that there needs to be a shared strategy and structural change and that this can be accomplished by changing language: "[...] changing the structure will also help to change the organisational culture [...] by changing the language we use, we also start to change the culture" (Pateman and Vincent, 2010, 122). The authors demand a change in organisational culture yet still fail to examine that organisational culture and its language.

The library profession, including CILIP, remains rather quiet about structural racism in the UK, instead primarily using positive terms like "diversity", "equality", and "inclusion", rather than "white supremacy", or even "racism". Even the phrasing "social exclusion", which is frequently used in the UK, is a euphemism and thus ambiguous. This phrasing is helpful for the uses of institutions, nonetheless, since the solution is obviously going to be "inclusion". In fact, since the publication of the MacPherson Report, both the development of racial neoliberalism in the UK and the idea of "community cohesion" have created the environment for race to "become increasingly de-politicized as the state has more vehemently attempted to separate it from structure [...] while any proactive commitments to address racially structured inequalities have largely dissolved, biopolitical governing technologies are progressively used to police the racially inscribed figure" (Kapoor, 2013, 1030). The positivity and emptiness of the terms used in EDI documents are what institutions find unthreatening: they are comfortable terms for the institution.

As Nisha Kapoor suggests, the combination of the pre-existing equalities legislation into the single duty that made EDI documents mandatory flattens the protected characteristics, losing the specificity that each of them require and giving the institutions the freedom to choose which protected characteristics to address, which

documents to draft, and how to draft the document in such a way that suits their needs and matches with their goals, such as to save funding for more policing and better security from racialized threats (Kapoor, 2013 1037). The tendency to use positive-sounding language in EDI documents, as will be outlined later, and to not explicitly address a form of structural violence, perpetuates the confusion necessary under racial neoliberalism and creates milquetoast responses in addressing them, leaving them primarily unresolved. As such, “diversity” is a neoliberal promotional mechanism used by the library profession in the UK. The discourse it uses ultimately serves to continue the normalisation of whiteness and the perpetuation of white supremacy.

Using Critical Discourse Analysis (CDA) when looking at the EDI documents of the library profession will illuminate how the language in these documents function within their larger political context. According to Bryman in *Social Research Methods*, CDA figures in its analysis “the idea of a pre-existing material reality that constrains individual agency [..]” and CDA “emphasises the role of language as a power resource” (Bryman, 2012, 537). This is why CDA is a strong method to analyse EDI documents; it considers systems of power such as white supremacy and structural racism.

As is in the tradition of CDA, it is fitting to be self-reflective: “CDA researchers [...] make their own positions and interests explicit while retaining respective scientific methodologies and while remaining self-reflective of their own research” (Wodak and Meyer, 2001, 3). Therefore it is crucial to note that this article is significantly influenced and informed by the writing of feminists and scholars of colour, who have been critiquing “diversity” for decades, by personal experiences working with the Anti-Racism and Equity Workgroup in a public library in Baltimore, Maryland, and by the knowledge and lived experiences of Black people and People of Colour in my educational, activist, and professional communities who generously took the time to educate and share their experiences with me, a white library worker.

Methodology

The process of creating EDI documents is likely different in public libraries from the academic institutions Ahmed researched, as the former likely do not have the funds or capacity to train all staff, to form committees, or to hire a “diversity practitioner”. These deficiencies result in the EDI documents of libraries representing some of the only accessible evidence of diversity discourse in libraries.

This paper looks at EDI documents through a structural lens and only has the scope to analyse EDI documents as artefacts on the level of institutional racism. These documents disclose an element of structural racism through what is rendered invisible, taken for granted—and therefore indicative of a structural background—in the language. While the derivative nature and shared language of the documents signalled the structure of legal compliance, each institution made its own unique adjustments and interpretations as the Equality Act 2010 does not require a “prescribed process” (Government Equalities Office, 2011, 8). These varying choices between different library institutions revealed the institutional level of EDI documents.

First, the research involved briefly analysing the content of EDI documents from Glasgow Life, the BL, Camden Metropolitan Borough Council, and CILIP. These samples were selected to get a relatively broad range. Institutions were selected from areas across the UK that have very different populations in terms of race and different positions within the library field. The BL and CILIP were selected since they are considered authorities in the library field and other libraries would likely refer to their EDI documents as templates. Despite the fact the EDI documents in this article rarely apply to one individual library, because of different library branches for example, the phrase "institutional culture" is used instead of the more accurate "professional culture" for clarity.

Voyant was utilised to gain a basic idea of the frequency of terms and how a term is used in relation to other terms. Voyant Tools is a "web-based text reading and analysis environment" (Sinclair and Rockwell, 2023). The software was selected in part because of its accessibility as a free online tool available to anyone with an internet connection. This tool exposed the language used in the document, how it functions within the document, and similarities between the documents. The content analysis served as an entry point into the analysis because, as Ahmed mentions, EDI documents are often very similar between institutions, much like a copy and pasted "form". Thus, it is less necessary to compare documents with each other. Further, this meant that a small sample provided this study with an accurate reflection of the general content of EDI documents.

The methodology for conducting the content analysis involved uploading or copying and pasting the EDI documents into Voyant Analysis and using the summary provided of the most frequent terms listed, the Phrases tool to determine the most frequently appearing phrases, the Trends tool to determine which terms are used most consistently throughout the entire document, conducting searches of selected terms in the Reader tool, and finally using the Contexts Tool to illuminate term collocation with keywords to its left and right.

The Trends tool graphs "the distribution of a word's occurrence across a corpus or document" (Sinclair and Rockwell, 2023). To determine which terms occurred consistently across the entire document, the lines on the output graph that showed a significant increase or decrease were ignored, and those that were closest to moving across the graph horizontally in a straight line were selected.

The Contexts tool "shows each occurrence of a keyword with a bit of surrounding text (the context). It can be useful for studying more closely how terms are used in different contexts" (Sinclair and Rockwell, 2023). The two most frequently used terms of each document were searched in the tool and then most of the contextual phrases were listed in a table in either Appendix A or B. A weakness of this process is the bias involved when selecting which contexts to include in the list. Contexts were bypassed because they included too many keywords of metadata text such as the title or section heading, they were illegible, were irrelevant, or were very similar to contexts already listed. Relevance was determined from the research conducted for the literature review. Irrelevant contexts usually were often either too vague (too many stop words) or too specific (references to fiscal year, for example). The most frequent terms were selected to search in the Context tool to gain an objective

understanding of what terms, and thus general topics, dominate the document.

When searching for the selected truncated terms "structur*", "racism", "race", "white", "diversity", "inequality", "equality", "exclusion", and "inclusion", text such as the title may have figured into the final number. These terms were selected to determine how balanced the document was in its use of "happy" EDI terms or more "negative sounding language" such as "racism". "White" was searched to gauge how much othering occurs when the only stated race is of those who fit within the Black, Asian, and Minority Ethnic (BAME) category or to determine if there was any self-awareness of the institution's whiteness. Both "racism" and "structur*" were searched to determine how much background information and history is present in a document or any use of "structural". The term "diverse" was not searched but was apparent in one document because it was used in the first sentence. "Diverse" was not used as a search term because, as an adjective in contrast to its noun counterpart, it is less flexible and therefore less popular in EDI documents, which will be explored later.

The names of the institutions are included in the content analysis because their frequency is indicative as to who the audience is and the documents' aims. The frequent use of the institution's name and their collocation with EDI terms might work to connect it more, in the minds of readers, to the stated values and goals in the document. Further, the frequency of the institutions' names within the EDI documents may also serve to mask the derivative nature of the documents, making them appear as their own and as if the institution is unique in its approach.

Finally, Norman Fairclough's method of CDA was applied to interrogate and examine the language of the documents as active tools of white supremacy using a Critical Race Theory lens influenced by the work of Sara Ahmed, David Theo Goldberg, Anastasia Collins, and David James Hudson (see following literature review). CDA is a form of discourse analysis that treats "language as the topic, rather than as a resource" (Bryman, 2012, 522) and not as a neutral carrier but instead as an active agent in power relations and weighted with ideologies. This part of the research investigated how the language of EDI documents function in relation to their institutions in addition to loci of power such as white supremacy and racial neoliberalism. To this end, CDA is a useful approach to apply to texts representative of racial neoliberalism, considering its focus on uncovering the way language can create a "self-disciplining subject" (Bryman, 2012, 536).

In general, CDA methodology has the following core elements: it is problem-oriented, it treats language as the object of study and not as a neutral unit, and the "theory as well as methodology is eclectic, both of which are integrated as far as is helpful to understand the social problems under investigation" (Wodak and Meyer, 2001, 31). Fairclough's approach to CDA is "Dialectical-Relational" in the Marxist tradition which means "every social practice has a semiotic element" and that semiotic event is a record of "social conflict" which can be detected in "its linguistic manifestations in discourses, in particular elements of dominance, difference and resistance" (Wodak and Meyer, 2001, 27).

According to Fairclough, EDI documents are social events within larger social practices, or "orders of discourse" (Fairclough, 2003, 24), and policy is a form of

discourse (Wodak and Meyer, 2001, 3). While the combining of genres (the type of text and its intended purpose) in a policy document has become increasingly common under neoliberalism (Fairclough, 2003, 66), the EDI documents in this case are poor examples for this likely because they are a response to the Equality Act 2010, rather than fueled solely by promotional goals. Nevertheless, the language used does reflect neoliberalism, such as, for example, the language of measurement and personalised achievement. There is also a blending of predictions, facts, and evaluation, which will be explored later. Finally, the text analysis issues as conceived by Fairclough examined in these texts are assumptions, relations between sentences and clauses, and representation of processes and social actors.

Assumptions "reduce differences by assuming common ground" (Fairclough, 2003, 41) and create an "apparently consensual text" (Fairclough, 2003, 44). It can appear in the form of existential assumptions about what exists, in the form of propositional assumptions about "what is or can be or will be the case", or in the form of value assumptions about what is good or desirable (Fairclough, 2003, 55). According to Fairclough, signs of existential assumptions are found in the use of definite articles and demonstratives such as "the", "this", "that", "these", and "those". An example of propositional assumptions can be seen in the first two paragraphs of the Camden EDI Policy which move from stating what is ("Camden is") to what can be ("We encourage") to what will be the case ("our borough will be"). Signs of value assumptions are found in certain verbs such as "to help" which, for example, is used frequently in Glasgow Life's EDI Action Plan. Assumptions are "of particular significance in terms of the ideological work of texts" (Fairclough, 2003, 61) and contribute to building or maintaining hegemony in contrast to intertextuality. Intertextuality is more dialogical and leaves more room for uncertainty and possibility by giving space to difference, whereas assumptions diminish difference. Hegemony can be defined as the manufacturing of consent and uniformity through ideological means: "[...] seeking hegemony is a matter of seeking to universalize particular meanings in the service of achieving and maintaining dominance" (Fairclough, 2003, 58). EDI policies are excellent examples of assumptions because they assume the institution's workers, for example, share the same values or desire the same outcomes. EDI policies are examples of hortatory reports which are common contemporary genres and are usually based on assumed implicit values (Fairclough, 2003, 97). They are full of assumptions and portray "givens" that are "essential rather than contingent, and without time and depth" (Fairclough, 2003, 95-96). As texts, they are "promotional [...] concerned more to persuade people that these are indeed the only practicable policies than to open up dialogue" (Fairclough, 2003, 95-96). Hortatory reports follow a "logic of appearances" rather than an explanatory logic. A "logic of appearances" means the objects "often do not go any 'deeper' than listing appearances which evidence change, rather than offering explanatory accounts of change in terms of causal relations" (Fairclough, 2003, 89).

Equivalence occurs when meaning is created by combining sentences and clauses through addition and elaboration. The aim is usually to shift meaning to create new meanings and can be seen in discourse that seeks to merge new discourse with familiar discourse by bringing them into relation using equivalence and difference. Difference is a meaning relation between sentences and clauses that is created through semantic relations of contrast. For example, in the CILIP EDI action plan,

actions the institution will take are separated into different objectives or "quick wins", resulting in actions underneath one objective becoming equivalent and the actions under "longer term goals" being contrasted to the "quick wins".

Similarly, Collins demonstrates popular white supremacist rhetorical moves to naturalise itself or make itself "given," as Ahmed would call it, that are similar to Fairclough's text analysis issues used in this article. They are "equation, erasure, and explanation" (Collins, 2018, 41). "Equation" is the rhetorical process of equating two phrases or words that have different histories, contexts, and as a result, very different meanings. "Erasure" is the rhetorical process of erasing the context, history, and meaning of one word or phrase through the process of equation. Finally, "explanation" is the rhetorical process of confirming the authority of white supremacy by enabling it to disregard the shared experiences, pain, and countless written works by People of Colour regarding a phrase or word and re-establishing it as the authority on what is logical or what can be accepted as reality. These tactics are closest represented by Fairclough's text analysis issues used in this article as the following: "equation" is most like "equivalence" and both "erasure" and "explanation" are most similar to "assumptions".

Semantic/grammatical relations between sentences and clauses depend on genre. In the case of policy documents, they are hortatory reports and follow a "logic of appearances", as mentioned above. They also blend different types of statements such as factual, predictive, and evaluative. For instance, EDI action plans in many ways outline the intended effects (predictions) but do not give much information about the causes (factual). This is partly because such clauses are usually created after the policy and because explanatory detail would be considered too burdensome or backward-looking when the document is meant to document goals (evaluations) and outcomes, but also to maintain the "logic of appearances". Semantic relations that are used in policy documents are problem-solution relations. However, as Fairclough points out, they are often "ambivalent" about the problem, and the solutions may be targeted towards differing or even contradictory problems presented in the document. For example, the BL's EDI Policy is called the "Equality and Diversity Policy," implying that the institution has a problem in being equal and diverse. The solutions, as presented by this policy, are to "pro-actively tackle discrimination and disadvantage" (British Library, 2011, 2) and "try to minimise or remove disadvantage" (British Library, 2011, 4), but also to "take all claims of discrimination very seriously" (British Library, 2011, 8) through stating that "[a]ll staff have a responsibility to guard against any form of discrimination" (British Library, 2011, 9). The most common semantic relations between sentences and clauses in hortatory reports are additive (e.g. and) and elaboration (including exemplification, rewording, and using punctuation to connect clauses such as colons or hyphens). For example, in EDI documents the term "and" appears very frequently when they add all the various things they aspire to or are working to accomplish. A common example of elaboration is the use of bullet-pointed lists and colons in every EDI document referenced in this article.

Another unit of CDA analysis noted in EDI documents is the representation of processes and "social events" through recontextualization which can take the form of nominalizations and metaphors. Nominalizations are a form of abstraction and,

according to Fairclough, are:

> a resource for generalising, for abstracting from particular events and series or sets of events, and in that sense it is an irreducible resource in [...] governmental discourse […] such […] can erase or even suppress difference. It can also obfuscate agency, and therefore responsibility, and social divisions (Fairclough, 2003, 144).

Processes can be represented, according to Fairclough, either as obvious processes through description, for example in "explore securing funding" (CILIP, 2017, 6), as process nouns such as "progress" and "activities", or as nominalizations such as "destruction" and "creation". Nominalizations typically have a perceptible relationship with a verb, whereas process nouns do not. An example of nominalization in EDI documents is the word "inclusion". The EDI documents in this study often use process nouns and nominalizations.

Finally, the representation of social actors is another way that texts may be analysed with particular focus on the inclusion or exclusion of social actors (such as their suppression or backgrounding), their representation by a pronoun or noun, their grammatical role (as a participant in a clause or as a possessive noun or pronoun), whether they are active/passive, named/classified (by personal name or by category or class), or specific/generic (as an individual or as part of a group or category). For example, in EDI documents, social actors are represented differently depending on whether they are part of the institution, the public, and/or part of the groups with protected characteristics under the Equality Act 2010. Social actors who are part of the institution are backgrounded, are referred to by the pronoun "we", and may only appear as classified under a generic title or position. For example, in the BL EDI policy, the "policy owner" is marked down as the "HR BUSINESS PARTNER DIVERSITY POLICY & DIVERSITY MANAGER". Social actors who are a part of the public and from protected groups are represented by passive, classified, and generic nouns. They are the most visible in the documents, while the board members, institutional leaders, and writers of EDI documents are invisible. For example, under the heading "Glasgow Life Customers: Marketing," in Glasgow Life's EDI Action Plan, it says "[w]e will promote Glasgow Life at Mela in June to raise awareness of our services and encourage visitors from minority ethnic groups to Get the Most Out of Glasgow Life" (Glasgow Life EDI Action Plan, 2018, 9). This hypervisibility only serves to place the responsibility on the communities of colour themselves rather than on the institutions. Social actors who are a part of the public and not from protected groups are almost entirely suppressed, and they are only vaguely alluded to with reference to as constituents of the same city or location of the institution or as the customers of the institution in general. For example, as will be examined later, reference to the race "white" appears only once in one document. Social actors who are both part of the protected groups and part of the institution are rarely mentioned, except in the BL's policy, and are frequently represented by nouns, as passive, and classified by a category. For example, the example listed for dual discrimination is "because the individual is an Asian woman" (British Library, 2011, 7).

Literature Review

Racial Neoliberalism and White Supremacy in UK Libraries

As mentioned in the introduction, libraries as institutions espouse liberal values such as equity of access, rationalism, intellectual freedom, and neutrality (McMenemy, 2009, 40). However, on their own these values fail to situate and problematize the library's role and position within structural racism and white supremacy. For example, the library in the Victorian period was meant to educate the working class as a means of controlling them (Pateman and Vincent, 2010, 74). Additionally, libraries often participate in the process to assimilate immigrant communities into white British culture (McMenemy, 2009, 55; Birdi, Wilson, and Mansoor, 2011), thereby ignoring the history of British colonialism and imperialism. According to Melamed, white supremacy was reformed after WWII into a variety of types of liberalism through "official antiracisms" of institutions, such as today's racial neoliberalism:

> By controlling what counts as a race matter, an antiracist goal, or a truism about racial difference, official antiracisms have structured legitimate knowledges in the domains of law, public policy, economy, and culture. In a society in which normative power is pervasive, control over the means of rationality is as important as, if not more important than, control over other social forces. Thus, liberal antiracisms, which institutionally validate some forms of difference and make others illegible, have exerted their strongest influence in a viral fashion through the knowledge systems of liberal-capitalist modernity (Melamed, 2011,11).

Thus, as both liberal institutions with "official antiracisms" (Melamed, 2011) under racial neoliberalism and as professionals working within or parallel to educational sectors and working with texts, this is relevant to library professionals since, as explored by Melamed, "knowledge systems", are often a way that "official antiracisms" are disseminated.

The unique formulation of racial neoliberalism in the UK maintained a relatively progressive disguise under the New Labour government of the 90's and early aughts. As previously mentioned, it was during this time that "institutional racism" came into public discourse with the MacPherson Report. However, the race-explicit Race Relations (Amendment) Act 2000 was replaced by the vague Equality Act 2010. The latter combined the needs of all people with protected characteristics. Also, the creation of the Equality and Human Rights Commission (EHRC) combined all the individual equalities bodies that existed previously. This resulted in a shift in language with the use of explicit language regarding race, or "racial arrangement" to allow for the privatisation of racism and increased funding towards anti-terrorism programs (Kapoor, 2013, 1034), more policing, and surveillance of communities of colour. In short, while more People of Colour might be getting hired into institutions—which might also be debated (Equality and Human Rights Commission, 2016, 5)—they are also facing heightened police violence, deportations, and immigration control (Kapoor, 2013).

According to Goldberg, racism in Europe is frequently misunderstood as only existing in its most extreme archetypal forms:

> Racism [...] is taken as the exception in European societies, the expression solely of the 'far right', loony[2] extremists...such as the various forms of "national front" or neo-Nazi groups [...] Exceptional racism reinforces the status quo of exonerated, guiltless institutional forms and responsible individuals more silently and invisibly structuring European societies at large (Goldberg, 2008, 180-181).

Goldberg may intend to bring attention to the language often used by middle class white people to further distance themselves from any association with racism. For instance, the lack of education and alleged "stupidity" of racists is often used to situate racism as only existing in the working or uneducated classes, which benefits the white middle class and wealthy elite by absolving them and distracting them from the structures they benefit from. Further, the belief that racism exists only in extremism and the confusion of racism with racialism, racial difference, or the category of race itself, in addition to the ahistorical denial of race and racism in Europe, fostered fertile ground for conservatives to produce racial neoliberalism. This was done by using the same language of liberalism that initially was meant to materially address the set of conditions created by historical racism and colonisation, and transform it to signal racism in general as a means of preserving white supremacy and power (Goldberg, 2008, 337). Neoliberalism is "committed to individual freedom from state regulation" (Goldberg, 2008, 337) thus "[r]acist violence is relegated to the private realm" which means it is "faded into the very structure, embedded in the architecture [...] of neoliberal sociality, in its logical and social relations" (Goldberg, 2008, 341). As public institutions, public libraries in the UK are not exempt despite any presence of EDI documents; they can and do reproduce white supremacy and racial neoliberalism.

Diversity within racial neoliberalism is desirable "as a form of appeasement for those increasingly left behind [...] as convenient public relations [...] and advertising modalities for corporate interests" (Goldberg, 2008, 16-17). Yet diversity must be limited and in accordance with the standards of civil society. Otherwise it is perceived as a threat to the security of the state, or those in power. Due to the forces of globalisation, civil society replaced the state and is made up of self-policing and private individual entities, rendering violence less visible and camouflaged. Diversity, within civil society, is essentially a form of marketable racial mixture that is controlled and does not threaten white supremacy (Goldberg, 2008, 37).

Most libraries, especially national or public libraries, will claim that they welcome all and provide services to all. However, the use of CCTV surveillance cameras (Surveillance Camera Commissioner, 2019) in the UK polices the space, making it unsafe for Black, poor, migrant, trans, and neurodivergent people. Surveillance and policing are not neutral processes and harm People of Colour, especially Black people, at disproportionate rates. According to the Equality and Human Rights Commission's report "How Fair is Britain?", Black people in England and Wales are proportionally

[2] "Loony" is an ableist term derived from "lunatic" (Oxford English Dictionary, 2020).

incarcerated at higher rates in England and Wales, considering the smaller population of Black people in those two countries, than in the United States where there are more Black people in the population (Equality and Human Right Commission, 2010, 162). Therefore, despite libraries' commitment and aims towards neutrality, multiculturalism, and diversity, they are still structurally exclusive and reproduce white supremacy by actively participating in racial neoliberalism through surveillance (Robinson, 2016) and policing by banning patrons or calling the police on patrons (Austin, 2018).

While security measures will keep people out of the library, diversity involves bringing people in. What remains the same in both cases is the original institution. Ahmed uses the phrase "institutional whiteness" instead of institutional racism to underline what is often left unsaid in diversity discourse: "If diversity becomes something that is added to organisations, like colour, then it confirms the whiteness of what is already in place" (Ahmed, 2012, 33). This means that simply recruiting People of Colour under diversity mandates or diversifying collections ultimately fails at changing the white supremacy qua status quo existent in library institutions.

Sara Ahmed's Institutional Culture

Ahmed outlines the story of EDI documents and institutional culture. In her interviews she investigated how "having a policy becomes a substitute for action" because, as she discovered, often the policy itself is treated as the solution for combating inequality. In contrast to the scope of this article, she has knowledge and access to what the EDI documents and diversity *do*, not only the language of diversity and EDI documents. Ahmed's goal is to "explore the significance of this gap between 'saying' and 'doing' for how we can understand institutional power" (Ahmed, 2012, 55). Like the goals of this article, she wants to examine the relationship between power and language in diversity discourse.

According to Ahmed, an institution is a body of processes, or "effects of processes" (Ahmed, 2012, 20). It has a face in that it has a direction, and it also has a mind, or "modes of attention" (Ahmed, 2012, 30) that need to be refocused so that "diversity can come into view" (Ahmed, 2012, 30). Otherwise, the assumption is that the body would continue as usual, and diversity would be left behind. As she states, "[I]nstitutions can be thought of as verbs as well as nouns [...] to put the 'doing' back into the institution is to attend to how institutional realities become given, without assuming what is given by this given" (Ahmed, 2012, 21). She accounts for the processes that do or do not occur within individual institutions when diversity becomes an institutional goal. An apparent tension that Ahmed describes in how institutions approach "doing" diversity is that taking it on as a goal shows that diversity is not automatically a priority for the institution but also, perhaps ironically, the main goal is often to make diversity "recede from view", to make it a habit of the institution, i.e. to institutionalise it.

According to Ahmed's definition of what an institution is, in many ways the institution is inseparable from its institutional culture, from what it does unthinkingly. Institutional culture is a series of habits that are taken for granted: "When things become institutional, they recede. To institutionalise x is for x to become routine or ordinary such that x becomes part of the background for those

who are part of an institution" (Ahmed, 2012, 21). Because of this, as mentioned earlier, the goal is often to make diversity work routine, to make it "mainstream", and to embed it within the institution's habits.

As they develop a culture, institutions also develop a language: an accepted and commonly used vocabulary for "institutional speech acts". Ahmed describes this as a "tuning system", meaning that some language will sound out of tune to the institution and will either go unheard or be actively silenced (Ahmed, 2012, 63). Language that is accepted into the institution's common vocabulary, such as being used by authoritative figures within the institution in public ways, will have power within the institution. Institutions make a variety of institutional speech acts, some performative, and some non-performative. The non-performative speech acts are the commitments to diversity that are intended to lie dormant until needed by the institution, and the performative speech acts include constative utterances, such as "we are diverse" in responses to complaints of institutional racism. Ahmed focuses primarily on speech conducted by authorities in the institution and pays less attention to the language in the EDI documents themselves. It could be argued that EDI documents are both performative and non-performative as they contain elements of both.

Ahmed's "non-performativity" conceptualization describes discourse, either speech or text, that an institution creates or participates in that is intended to fail or not produce the results it proclaims. According to Ahmed, the failure of the "institutional speech acts […] to do what it says is not a failure of intent or even circumstance, but is actually what the speech act is doing" (Ahmed, 2012, 117). This is different from performative discourse, like a constative utterance, which takes place in the right time or place, to the right people, by the right person, to achieve the sought effect. Commitments, which are a common example of "non-performative" discourse, are often looking to the future: the institution commits that it will do it. But that is the goal of the institution in using the "non-performative", i.e., to simply say it *will* do it eventually and be in legal compliance. Institutions are made up of commitments, some of which may be related to diversity. Non-performativity can also be understood as the quality that discourse develops through over-repetition and standardisation that "stands-in" for the whole institution and how it will behave in the future. Its goal is to ensure the longevity of the institution through complying, through recruiting different people into the institution, and by letting go of any who refuse to assimilate into the institutional culture (or not hiring them in the first place). It is an expectation, and it is a legal requirement since 2010, for the institution to state the commitment but it is not necessarily an expectation to change. Regardless, as Ahmed insists, the non-performativity of the institution's stated commitments can be used by diversity practitioners as proof that the institution is not in keeping with its commitment.

Perhaps an indicative barometer of the "success" of diversity discourse's non-performativity can be seen through its application as an institutional defence against complaints of racism. Diversity's usefulness in marketing makes it a valuable quality to have, making institutions defensive if called out as not being diverse, but still less defensive than if they are called racist or called on to respond to a racist incident that have occurred within the institution. Often institutions respond to any criticism of

racism by "exercising their commitment as response" (Ahmed, 2012, 147) and use language that positions the institution as the subject with the hurt feelings rather than those who experienced the racism. Ahmed shows how "the creation of diversity as a political solution can participate in making those who speak about racism the cause of the problem" (Ahmed, 2012, 142) and as indebted to the institution.

Ahmed's objective is to determine what diversity "does" in institutions: "What are we doing when we use the language of diversity?" (Ahmed, 1, 2012). Phenomenology, or the philosophy of life, informs her work and "provides a critical lens through which to think about "institutional life" (Ahmed, 15, 2012). Some of her findings include how "having a policy becomes a substitute for action" (Ahmed, 11, 2012) within an institution. Ahmed neglects to account for how institutions are bodies of power, both today and throughout history, and ignores how they function within structural racism. She almost positions them as natural bodies that occur ahistorically. She acknowledges the "habits" of an institution but not the factors outside of the institution which create the institution itself or enable its habits. While she does discuss institutional racism and "audit culture", the focus remains primarily on individual institutions rather than relationships between institutions or within a broader culture.

The Life of EDI Documents

While it is a legal requirement for public libraries, as public institutions, to have an EDI document of some kind and publicly publish it, they are also required to publish annually how they are compliant and to publish "equality objectives" every four years (Government Equalities Office, 2011, 10). This is performed, in short, to review it as it is a "continuing duty" (Government Equalities Office, 2011, 5). Most EDI documents will point towards the law as proof of its purpose. Thus, institutions were committed to the "institutional speech act" of diversity once it became law. This is where it becomes difficult to determine the origin and intent. Did the institution only commit to diversity once it became mandatory? As Ahmed states, "Commitment is an interface between policy and action" (Ahmed, 2012, 140). The institution commits to diversity, so it commits to creating documents to document its commitment. Nevertheless, institutions in the UK are expected to list in their EDI Action Plans their institutional strategies, goals, outcomes, and measures. These measures take the form of Equality Impact Assessments, Equality Outcomes, EDI Progress Reports, EDI Policies, and EDI Action Plans. But who decides when diversity has been achieved? Who is behind the stated goals and outcomes? Are community members of colour consulted? Is the labour of People of Colour, or people from other marginalised groups, in the consultation process compensated or just expected? Finally, are their suggestions or consultations taken seriously and implemented? Like Ahmed critiques, consultations may occur but are often superficial because "[...] consultation can [...] be a technology of inclusion [...] you include 'the others' in the legitimising or authenticating of the document whether or not their views are actually included" (Ahmed, 2012, 99).

Further, neoliberalism creates the need for institutions to participate in what Ahmed calls "performance culture" (Ahmed, 2012, 84) and what Fairclough calls "promotional culture" (Fairclough, 2003, 106) to compete at diversity. Diversity then becomes a way of marketing the institution, a quality that can be measured and

tracked, and is a management term highly prized by human resources departments. Diversity is a "happy" term for the institution, meaning it describes a positive attribute of the institution so that the institution can perform well in competing against similar institutions through "audit culture", where institutions are measured against each other. To perform well, EDI documents are "friendly documents" (Ahmed, 2012, 156) and are often derivative of other institutions' EDI documents, suggesting how EDI documents are often formulaic and manufactured *for* institutions not *by* institutions, e.g., with complete staff consent and awareness. As such, the uptake of diversity has been criticised in the UK as part of an expanding trend of American "managerial discourse" (Ahmed, 2012, 52) and may be part of why so little from the UK is written about the concept in relation to libraries. An important distinction to note between academia and the public sector with regards to performance and audit culture to prove market value is that academic institutions are in direct competition with each other, while public library institutions are not. For example, academic institutions promoting their university as diverse to its students and their parents is decidedly profitable for the institution. This significantly affects the language that is used in these documents and the impact they have within the institution.

According to Ahmed, the institution assigns one or multiple individuals, usually from within the institution, to write the policy documents. This process usually takes some time and shows how the "document is not the starting point" (Ahmed, 2012, 88). As previously mentioned, the document may also be substantially copied from a version made by a similar institution, like a "form" (Ahmed, 2012, 89). The leaders, or someone with authority, approves the documents. A committee may be formed, and it is possible that there is an "equity officer" or someone hired or designated the lead "diversity practitioner" or "diversity champion". Finally, some institutions may require or recommend their staff take some kind of training, such as cultural competency training, which will be explored later.

The Story of "Diversity" and its Failures

Ahmed describes how terms can become "tired" as the process whereby terms have circulated so much, perhaps both inside and outside of the institution, that they lose their meaning in certain ways as well as their effectiveness: "The weightiness that words acquire means that the more they circulate, the less they can do" (Ahmed, 2012, 62). It would follow, then, that "diversity" will eventually become a "tired" term, if it has not already. Hudson's critique, and many others, claims diversity is already a "tired" term in that it is ultimately ineffective in addressing structural racism and racial neoliberalism, yet it is still widely used by institutions. However, as Ahmed predicted, that is part of what might make it effective. "Diversity" is like an "empty container" (Ahmed, 2012, 80) and "mobile" (Ahmed, 2012, 58), meaning it is flexible and malleable. This makes it handy to diversity practitioners because it can be used in a variety of ways. Further, "diversity" may get less "tired" than previous terms because its meaning is vague. Nevertheless, this vagueness makes it susceptible to abuse, and as Ahmed argues, this is part of the point of diversity.

Diversity is used frequently by institutions along with the term inclusion. In "On 'Diversity' as Anti-Racism in Library and Information Studies: A Critique", David James Hudson argues that Library and Information Science (LIS) diversity discourse

usually has the following characteristics: it may or may not mention race or racism at all, it sees "monocultural homogeneity" as the problem and therefore sees "multicultural heterogeneity" as the vision for racial justice, and thus logically results in inclusion as the best anti-racist response. He outlines how diversity as the "dominant mode of antiracism in LIS" fails to adequately address how it is "historically contingent" and he wants to excavate diversity discourse's "deeper logics, broader historical contexts, and productive absences" (Hudson, 2017, 5).

According to Hudson, diversity and inclusion discourse is merely a "trope of multiculturalism concerned chiefly with questions of representation" (Hudson, 2017, 3) and there is an oversaturation of focus on the profession's "demographic (mis)alignment" (Hudson, 2017, 7). The library that simply mirrors the "multicultural" world neglects to acknowledge the formulations of power and white supremacy as an existing and violent force in that world. This placement of concern regarding diversity solely in staffing and recruitment situates the issue in the non-white individuals being brought into the white institution through an "inclusion" response rather than looking at the white institution as a racialized space and what that means. In addition to recruitment changes, this causes institutions frequently to have their HR provide training such as "implicit bias" which fail to engage with structural racism and place the responsibility on individual behaviour. Most library professionals identify as white (Chowdhury, 2018). Regardless, as many have already pointed out (Brown, Ferretti, Leung, and Méndez-Brady, 2018; Hankins and Juarez, 2016; Jackson, Jefferson, and Nosakhere, 2012; Schlesselman-Tarango, 2017), merely increasing recruitment does not guarantee retention. This prompted calls for "*meaningful* inclusion" which seeks to ensure that new recruits have agency in the white institution. The arguments surrounding retention as an aim are meant to address the white supremacy present in the institutional culture that the "diverse" new hires are brought into and then struggle to have agency in, or at least not without lots of self-adjustment, silencing, and harassment.

To this end, inclusion is a mode of "liberal anti-racism" and is seen most vividly, according to Hudson, in the "cultural competency" training that an institution may offer or require their staff to participate in (Hudson, 2017, 15). Cultural competency training may also be called "cultural diversity training", "cultural awareness training", and "cross-cultural communication training". The aim of these trainings is to increase retention of "diverse" staff by educating staff about microaggressions and cultural differences. This positions racism as an interpersonal error or misunderstanding caused by ignorance, not as part of the intentional structure of racial neoliberalism, and the primary goal is to assuage workplace conflicts.

Hudson argues that inclusion as a response to racism is individualist, and thus cannot account for structural racism. Since LIS diversity discourse is "liberal anti-racism", by its own logic it equates racism with exclusion. This is an extremely limited view of racism: "[r]egimes of racial subordination are far more multifaceted in their operations [...] and, far from exclusion, have frequently taken the form of integration, whether through assimilation, cooptation, or more complex strategies of inclusive control" (Hudson, 2017, 13). Indeed, diversity discourse fails to acknowledge how "the integration of ostensibly anti-racist narratives represents a key strategy of contemporary white supremacist governance […]" in addition to how it avoids the

topic of whiteness altogether (Hudson, 2017, 5). It fails to account for how race and racism can be subliminally conveyed through such concepts as immigration, crime, terrorism, and poverty or through euphemisms, such as "urban", "inner-city", or even "multicultural", "community", and "global". This can be seen in LIS terms like "information poverty".

For example, CILIP's 2017 Progress Report for their Equalities and Diversity Action Plan reflects the "liberal anti-racism" of inclusion as described by Hudson. It claims its longer term goal for 2020 is to make "a clear statement of commitment to improving diversity and representation across the profession" (CILIP, 2018, 9) and "[I]dentify and target structural barriers to inclusion […]" (CILIP, 2018, 10). This document was last revised in January 2018. The fact that these tasks are still "ongoing" or are "longer term goals" indicates that many tasks remain uncompleted, but also that there is a keen interest in looking at structural racism. However, this may preclude any form of institutional self-reflection. Indeed, Hudson would argue that public libraries in the UK, and the library profession in general, should let go of the view that EDI can be completed and would challenge the field's insistence on practicality and "commodity solutions in the form of concrete policy recommendations, competencies, standards, activities, and other things that can be captured in bullet-pointed lists'' (Hudson, 2017, 26).

Finally, according to Collins in 'Language, Power, and Oppression in the LIS Diversity Void', diversity discourse is an oppressive language. Collins outlines a crucial difference between oppressive language and the use of language of oppression, through a skill she terms "oppression literacy". Oppressive language is, as expected, language that "invokes and enacts oppression" and that includes language that may be appearing to combat oppression but instead reinstates oppressive power structures (Collins, 2018, 47). For example, Collins argues "diversity and inclusion", especially in its overuse, is oppressive language. She calls it "insufficient [...] to address barriers to equity" (Collins, 2018, 47) and, like Ahmed and Hudson have shown, often reproduces white supremacy.

By contrast, understanding the language of oppression, or "oppression literacy" is knowledge of language that takes existing power structures into account and how language and individuals constantly operate under and through them, even while trying to unlearn or actively terminate them. Because of this, it involves the constant analysis of power to learn and unlearn language, especially terms that are frequently misunderstood, such as discrimination or prejudice against white people being misunderstood as racism. As Collins argues, "[l]anguage that accurately highlights systems of oppression at work is always more complicated than language that erases them, leaving them invisible and allowing them to continue operating uninterrogated" (Collins, 2018, 46). This occurs because language, like Collins mentions, becomes "taken for granted" and is often, sometimes for efficiency and capacity purposes, used without any critical reflection. Through her application of CDA, Collins exposes the distancing powers of language. Like Ahmed, she argues that since language is in the background, especially institutional language, it often goes unseen even in the library profession:

> […] language can communicate existing power and dominance with relatively

> little effort or intention, and libraries, being shot through with the intricacies of language at every conceivable level, can and do reproduce systems of oppression just that easily (Collins, 2018, 42).

What Collins is describing here is the dialectical relationship between language and "social practices", as defined by Fairclough.

EDI documents show the interplay between structural racism and institutional racism. These documents are legally required in the UK by structural forces larger than the institution, so the documents ensure the institution follows the law. They provide diversity practitioners within an institution with a tool to combat institutional racism. Yet the discourse of diversity habitually fails to adequately change institutions on an institutional level and always fails on a structural level and, as Ahmed, Hudson, and Collins would argue, structural change was never really the aim.

Nevertheless, CILIP has a "Special Interest Group," the "Community, Diversity, and Equality Group, which has the vision to "work towards development of a diverse library and information workforce" (CILIP, 2019). Objectives include to "develop partnerships and strategic alliances [...] engaged with [...] the struggle for social justice", "raise wider awareness", and to "[m]onitor, evaluate and challenge our professional values, with special emphasis on embedding diversity and equality […]" This language, especially the last objective listed, indicates a desire to look internally at the institutional culture that is embedded in libraries and librarianship in the UK. For example, in August 2020, the CILIP Board promised to work toward dismantling structural racism and to develop an Anti-racism Policy, working closely with BAME members (CILIP, 2020). As a major professional association with more independence from discourses of governance in comparison to city councils, the latter of which often provide the public library service in the UK or outsource it to the charity-sector, CILIP has more leeway. Therefore perhaps it bears more responsibility to critically examine the library profession's relationship to EDI and to lead the profession towards critical self-reflection.

Regardless, as Hudson writes in the wake of the murder of George Floyd and the ensuing surge in Black Lives Matter movements and flurry of institutional reactions:

> […] to witness the waves of such interest is to hear […] racism—referenced and recast at the lips of institutions that cannot, structurally speaking, divest themselves from that which they say *has no place on this campus, has no place in this library, has no place in our business*. It is to witness the moves, the loudest turns of phrase and seemingly unquestionable definitional logics, the readily available anti-racist commonsense by which the beautiful threat posed by this movement and moment is enclosed, incorporated, neutralized (Hudson, 2020, 4).

Hudson argues that today "diversity discourse" has receded in popularity, and that institutions have started using "systemic racism" in their posts, documents, and commitments, that they are "newly clad in anti-racist militancy" (Hudson, 2020, 11) – a warning about the "institutional enclosure" of liberation movements.

Content Analysis

EDI Policies

Note: the content from the analyses of the EDI Policies of Glasgow Life, Camden Council, and the BL is available in Appendix A.

When all the EDI policies in this article are compared to form a corpus in Voyant, there is a massive difference in document length with Camden Council's web page, which figures at only 395 words, and the BL's downloadable word document at 4,986 words. Glasgow Life's policy is in the middle of this range at 1,135 words. Although still formulaic, this range shows how institutions have the freedom to approach the creation and publication of EDI documents in different ways which, as mentioned earlier, Kapoor argues is a result of the all-encompassing Equality Act that gave public bodies the freedom to choose how they wanted to work on EDI and which protected characteristics they deemed worthy of attention. She argues, "Equality was no longer presented as a required attribute of a well-functioning society, but rather an additional burden on state services; it was inefficient." (Kapoor, 2011, 1038).

The most frequent terms in the EDI policies in this article are "equality", "policy", "discrimination", "library", and "diversity". Among the documents' consistently used terms, both Glasgow Life and Camden City Council consistently use their own names, while the BL in comparison consistently uses the terms "discrimination" and "staff". In fact, the term "British Library" is only used six times. This may be due to the difference in audience and that the public-facing policies of Glasgow Life and Camden City Council are attempting to link their institutions to EDI, whereas the BL is primarily outlining a harassment policy for internal staff. The fact that the names of the institutions are among the most frequently used terms demonstrates how the documents are both about what the institutions are doing as well as how they aspire to be perceived. Distinctive words from Camden Council's policy are "inequality", "Camden", "accessibility", "web", and "taskforce". The BL's distinctive words are "discrimination", "library", "staff", "diversity", and "person". Glasgow Life's distinctive words are "Glasgow", "want", "city", "Scotland", and "inclusion". The differences between the documents further illustrates the inconsistencies in approach to EDI as allowed under the Equality Act. While institutions should be able to adapt the document to be representative and relevant to their specific institution, the inconsistencies also contribute to the ambiguity and confusion regarding race, as Kapoor argues, they evade explicit language on race altogether (Kapoor, 2013, 1029).

EDI Action Plans

Note: the content from the analyses of the EDI Actions Plans is provided in Appendix B.

When Glasgow Life's Action Plan and CILIP's Action Plan documents are compared to form a corpus in Voyant, both have "equality" as a most frequent term. The other most frequent terms are "diversity", "equalities", "equality", "staff", and "Glasgow". As a term, Glasgow, figures high in frequency counts because Glasgow Life's action plan is longer at 2,723 words compared to CILIP's 1,883 words. For both documents, terms that originate from the stem "equal*", either "equality" or "equalities", occur the

most consistently throughout the entire document. Distinctive words between the two documents are “commence”, “leadership”, “Q4”, “date”, and “Q3” for CILIP and “Glasgow”, “life”, “GL”, “service”, and “customers” for Glasgow Life. The specificity in the language of CILIP’s Action Plan in comparison to Glasgow Life’s Action Plan suggests that the audience of CILIP’s Action Plan is either professional library staff or individuals working on EDI, whereas Glasgow Life is perhaps more targeted towards the public or individuals working in a variety of professions.

Findings from the Content Analysis

There does not appear to be a significant difference between the terms that occur most frequently nor the most consistently when comparing the content of action plans and policies. However, the distinctive terms for action plans are more activity-based, time-sensitive, and specific whereas the distinctive terms for policies are broad and more conceptual. The actions listed in the action plans disclose the various steps institutions take to tackle EDI. In doing so, they give the appearance that the work of anti-racism is temporary and achievable with quick, simple, and specific actions in the future. Rarely, if ever, do the action plans account for past actions of the institution. Indeed, the documents’ orientation to difference, which would be introduced by comparing the past actions of the institution to the current actions and the future plans of the institution and disclosing the unique experiences, attitudes, and history of the institution’s prior work on EDI, is based on assumptions instead of intertextuality, meaning difference is almost entirely omitted. As Ahmed would argue, this also works to absolve the institution of any responsibility for any prior incidents of institutional racism: “[...] the success of diversity is partly that it becomes detached from histories of struggle over inequality” (Ahmed, 2012, 80). Finally, this is further created by the predominant use of future tense in both policies and action plans, thus qualifying the institution as forward-looking—as in, ahistoric and unreflective.

The content analysis illuminated the primary audience of the different EDI documents through moderate shifts in the language. The vocabulary of EDI, however, such as the terms “equality”, “diversity”, and “inclusion”, remained relatively the same across all documents. The fact that the content of EDI documents consists so much of the vocabulary of EDI with rarely any definition of what those terms mean, how they relate to the institution specifically, and are not supported intertextually, shows how EDI documents are only superficially invested in critical self-reflection or addressing any difficult history or topics, if at all. However, this may make the documents more comprehensible to readers, and the relatively consistent use of EDI terms, while usually undefined, may increase readers’ capacity to anticipate the content or purpose of the documents. Nevertheless, this can also lead to the conclusion that EDI documents exist to ensure the continuing existence of the institution, not to change the institution. Indeed, as Ahmed states, EDI “shares an emphasis on the new [...] by sharing the emphasis on [...] business, in which the new becomes a core value or form of capital” (Ahmed, 2012, 63).

Finally, it becomes clear from the content analysis that the language in EDI documents is asserting the institution’s commitment to EDI, which becomes visible through the frequency of collocations of the name of the institution with the terms of EDI as shown by the Contexts tool. It is also clear that the language in EDI documents is concerned with asserting compliance to the law through the frequency of terms

and phrases such as “complies”, “will comply”, “Specific Duties”, “the law”, “legislation”, “requirements”, “Equality Duty”, “our obligations under the Equality Act 2010”, and “legal compliance”. The content analysis also shows the frequency of use of positive sounding language, in comparison to the rare use of negative sounding language, to appear in control, progressive, and as an active participant in the important work of EDI. The protected characteristics are rarely defined, and when they are it is in a very basic manner often involving listing terms that are sometimes confused with other terms, such as ethnicity for race. Interestingly, “BAME” and “Black” are never used, however “minority ethnic”, “white”, and “Asian” are both used once each. As Kapoor states, “the language of race”, if used at all, “has become more ambiguous” with the onset of racial neoliberalism in the UK (Kapoor, 2013, 1030).

Application of Critical Discourse Analysis

Assumptions in EDI Policies

The EDI policies utilise assumptions to reduce differences that would be introduced by intertextuality, such as the use of quotations or references. None of the EDI policies in this article are intertextual. If difference is introduced in EDI documents, equivalences are often used to flatten them and, for example, can be seen in the definitions EDI policies offer for “race”. Predictably, value assumptions feature heavily in the EDI policies, assuming that the reader agrees that equality, diversity, and inclusion are valuable and desirable, and even at times implying that this is the only way to achieve justice or to improve society. The “new” values of EDI are integrated into and made equivalent to the currently accepted institutional values: “[...] the word ‘diversity’ derives its value from what is already valued. Diversity is incorporated as an official term insofar as it is made consistent with the organisation’s goals” (Ahmed, 2012, 57). Assumptions that are implied through the creation of EDI policies and by not citing nor referring to the legislation that preceded it, or by not engaging with anti-racist or decolonial texts, is that EDI and those with protected characteristics covered by the Equality Act 2010 did not really exist before these policies were written, that these institutions would not otherwise be addressing EDI issues, nor that there is any history of individuals working on bringing EDI issues to the front. EDI Policies are attributed only to the institution itself and to the new law.

For example, Glasgow Life’s EDI policy states the following: “In line with the purpose of the general duty, we will work to [...] make the right decision, the first time round” (Glasgow Life EDI Policy, 2018, 9). The use of the phrase “Make the right decision” assumes that Glasgow Life has the power to make decisions on behalf of the public in relation to EDI. The social agents involved in such a decision are unmentioned and it assumes the knowledge and power of the reader to determine what is “right”. The phrase “more than ‘just thinking’ about” hints at intertextuality and social actors with the quotation marks. There is, however, no citation, source, or explanation. Nor is there any accountability process in place. Additionally, it is an evaluative statement, placing lower value on “thinking about” EDI and more value on action without any further exploration of what that might mean.

Existential assumptions are utilised, often in the introductory statements of the document, setting the stage with facts and descriptions about the institution and its location, usually referring to the multicultural location of the institution, and thus

assuming that it is necessary that the institution reflect that multiculturalism regardless of any lack of institutional culture changes or changes in power within the institution. Existential assumptions are similar to the "constative utterances" (Ahmed, 2012, 55) Ahmed describes as: "In the case of institutional speech acts, the institution is not only the subject and object of the sentence [...] but also the situation in which the speech act takes place […]" (Ahmed, 2012, 56) such as statements like "[o]ur city is changing all the time and we want everyone to feel welcome" (Glasgow Life, EDI Policy, 2018). While the institution is the subject and object of the speech act, this does not mean at all its institutional habits, or its whiteness, are addressed.

Further, the EDI policies make existential assumptions about those with protected characteristics by naming and listing them, assuming those characteristics are static and essentialized, and leaving characteristics from those in dominant groups invisible and therefore unquestioned, as Ahmed, Hudson, and Collins argue. Are these assumptions made because it is a "given" that those dominant groups exist? As Collins states, "we fail to question or challenge the power structures that situate some groups as 'owners' with the power to include (or exclude) and other groups as 'guests'" (Collins, 2018, 47). For example, Camden's EDI policy assumes it can "address the needs" of oppressed groups and the existence of any structural system of oppression is invisibilized as the cause:

> Camden has an ambitious agenda to address the needs of people who are faced with disadvantage or inequalities e.g. treated less favourably because of race, sex, disability, age, gender, reassignment, marriage and civil partnership, pregnancy and maternity/paternity, sexual orientation, transgender, religion/belief.

Existential assumptions are found in what is stated after the "because of", where rather than identifying the structural systems of oppression, such as white supremacy, the identities of those who are considered "diverse" by being under the provision of protected characteristics are listed. This furthers Ahmed's argument that those who are "diverse" become the problem through the language of EDI documents (Ahmed, 2012, 185) by, for example, being visible as opposed to the writers of the EDI documents.

At the time of writing, the Camden City Council EDI document is significantly smaller than all the others analysed for this article, and it is also the only one to be directly published on the webpage. It is the only EDI document to discuss web accessibility, which is ironic considering the web page itself is difficult to find from the Camden City Council homepage. Publishing the EDI document directly on the webpage is likely a response to an attempt to make the EDI policy as accessible as possible and to comply with the Freedom of Information Act. As Ahmed states: "[...] creating an ability to find information about what the organisation is doing becomes part of what the organisation is doing" (Ahmed, 2012, 96). The brevity of the document may also be due to this priority, increasing the possibility of the public to read the policy and comprehend it. However, it is poorly written as it is clearly unedited and has grammatical errors. This flaw is especially apparent in the second sentence: "We are home to some of the poorest and some of the wealthiest enjoy a good quality of life, others face hardships."

Diversity is assumed to be an overlooked asset to the borough: "We believe our borough will be a better, more creative and innovative place to work, visit and live in if we can harness the benefit of lots of different perspectives". This positions the borough as perhaps benefiting from increased tourism and more successful entrepreneurship rather than those mentioned in the second sentence quoted above who "face hardships". Additionally, the location of that sentence implies that poverty and "the poorest" are part of the spectacle of "diversity", a quality that is listed in such a way that implies it exists without any structural cause and exists as part of the consumable optics of diversity as "digestible difference" (Ahmed, 2012, 69). It is clear that the primary purpose of Camden's EDI Policy is to be a statement of commitment to diversity. Its lack of accessibility—it is difficult to find from the borough's homepage—serves as further proof of Ahmed's definition of statements of commitment as being "non-performative".

Definitions, or the lack thereof, of race in EDI documents are often indications of assumptions of the readers' prior knowledge and another form of avoiding intertextuality and difference. In Camden's EDI Policy, race is the only one of the protected characteristics that is given further definition, and it is defined as including "colour, nationality and ethnic or national origins". Several other terms are used but not further defined such as identities, pride, and cultures, yet the terms in the definition of race are undefined, assuming a knowledge of the differences between the terms and thus a flattening of those differences. Additionally, the language fails to acknowledge the complex histories and sociological factors relating to the creation and maintenance of race and racial difference as social constructs, positing race as an essential quality.

Similarly, the BL's EDI Policy mentions race only once, and the term is defined within the document as including "colour, nationality and ethnic origins" (British Library, 2011, 3). Some distinctive features of the EDI policy of the BL are the other definitions it provides for equality and diversity. Its definition of equality is:

> Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment, and to goods and services; the basis of which is supported and protected by legislation (British Library, 2011, 2).

As suggested by Ahmed, this language is more negative and can be perceived as threatening to the institution: "Diversity is more easily incorporated by the institutions than other words such as 'equality', which seems to evoke some sort of politics of critique or complaint about institutions and those who are already employed by them" (Ahmed, 2012, 65). The definition provided by the BL does not further define what the barriers are that it alludes to. Its definition of "diversity" is the following:

Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but for the Library (British Library, 2011, 3).

Diversity is something that is positive, celebratory, marketable, and thus, consumable (Ahmed, 2012, 69). Everyone is valued, which means that even those with power in the institution should be valued equally, which raises the question of how diversity brings change and what is meant by equality. Additionally, this view can make it extremely difficult for institutions to take accountability for racism when it does occur within their walls, instead often taking offence: "The language of diversity is often exercised in institutional responses to reports of racism" (Ahmed, 2012, 143). Indeed, as Ahmed argues, diversity "becomes identified as a more inclusive language *because* it does not have a necessary relation to changing organizational values" or behaviours unlike equality (Ahmed, 2012, 65).

Assumptions in EDI Action Plans

In contrast, assumptions in the EDI Action Plans analysed in this article are seen both in the introductory statements and commitments often found at the beginning of the documents and in their lack of intertextuality. EDI Action Plans tend to have more detailed background information than policies, as they are usually longer documents. However, they still have no form of intertextuality, and the lists of actions usually are devoid of any explanation. Generally, in comparison to EDI policies the equivalences in EDI Action Plans are seen in the offering up of solutions, often in a list of objectives, which makes up most of the document. The EDI Actions Plans use equivalences to position the institution's actions or methods to solve 'the problem' without naming the "the problem". As a result, the changes that will be brought to the institution will make it easy for what is visible (i.e. the new document and whoever is "diverse") to be viewed as the cause of the problem rather than institutional white supremacy. As Ahmed states: "[...] solutions are creating problems by concealing the problems in new ways" (Ahmed, 2012, 142).

Propositional assumptions are also used in the action plans and are any assertion of what will be. For example, that the inclusion of white staff will accomplish the desired outcomes in addition to the value assumption that the inclusion of white staff is productive or desirable: "Establish opportunities for staff to do project work with a different diversity group from their own e.g. white staff in the MELA" (Glasgow Life EDI Action Plan, 2018, 12). MELA is a "multicultural spectacular" which has its origins in India (Glasgow Life EDI Action Plan, 2018) and is essentially a celebration of diversity. Implicit in this statement above is the equivalence of the inclusion of white staff in MELA with "increasing staff's awareness of equality and diversity" and "building staff's respect to inclusion and diversity". The fact that the inclusion of white staff in the organising of MELA is offered as an educational opportunity to increase their awareness of equality and diversity again exposes the "additive" nature of diversity: the idea that just adding a different colour will effect change. It exposes how the inclusion of white people can be considered part of diversity and assumes that this is always a good thing. Thus, it exposes a priority in educating white staff at the expense of People of Colour who, as a result, may experience increased microaggressions. Their uncompensated labour in educating the white staff is also inferred. Another assumption can be seen in the inference of the existence of a "diversity group" and the implication that white staff are not the "diversity group," but those involved with MELA are. Additionally, there is no information about the history or cultural context of MELA.

One particularly harmful assumption made in Glasgow Life's EDI Action Plan is the need to: "Develop messages about open conversations with staff being able to talk about issues without feeling constrained by terminology or having to be so 'pc' that honest dialogue is curtailed" (Glasgow Life EDI Action Plan, 2018, 11). This equates the diminishment of "honest dialogue" with "having to be so 'pc'". Positioning "having to be so 'pc'" as the antithesis of "honest dialogue" is a white supremacist rhetorical move that equates politically correct speech with false or dishonest speech. Another implication of this assumption is that the process of educating white staff, for instance by allowing them to have "open conversations" and "being able to talk about issues without feeling constrained by terminology or having to be so 'pc'", is that the feelings and speech of white staff is valued more than the energy and mental health of staff of colour who will both be in spaces where these "conversations" are encouraged to happen openly and where any complaint brought up regarding parts of said conversations may be dismissed as infringing upon the "honesty" of the "dialogue". As Collins argued, this reproduces white supremacy by affirming the belief that People of Colour cannot be trusted when they share their experiences of racism or make requests for more sensitivity in language use, and that white people "should expect explanation that centers and integrates their worldview" (Collins, 2018, 42).

Finally, the introduction of the CILIP Action Plan suggests a degree of awareness of the performative culture that diversity discourse operates within with the following evaluative statement: "despite saying - and in some cases, doing - the 'right things', we do not feel that equalities and diversity are really 'living' values at the heart of our organisation" (CILIP, 2017, 1). CILIP's action plan seeks to change EDI from "talk" to a "set of values which define us". They have a goal of "becoming an organisation that truly represents and achieves diversity and celebrates and encourages it in others" (CILIP, 2017, 1). What does it mean to be an institution that "achieves diversity"? Who determines when diversity is achieved? Who decides that the action items listed are the best ways to do so? These questions are left open for interpretation or perhaps the answers are assumed to be obvious or unimportant.

Relations between Sentences and Clauses in EDI Documents

The relations between sentences and clauses in the EDI documents follow a "logic of appearances". The differences between factual statements, evaluative statements, and predictions are obscured (Faircough, 2003, 106). The blending of statements of fact, predictions, and evaluations work together to establish the institution both as a world-builder and as an authority in the world it builds. All EDI documents blend statements of fact, predictions, and evaluations. Most of the statements of fact are found in the beginning of the document where it attempts to situate itself as an institution in a particular city or location and how it relates to diversity. Predictions in EDI Documents are usually in future-tense and are about the benefits of embracing EDI and what the institution will do. Evaluations, which can also be assumptions of what is valuable as explored earlier, are often presented in the form of commitments.

Glasgow Life's EDI policy states that "Many different people live in Glasgow; people born in the city, people from other places, people who are young and people who are older. Our city is changing all the time and we want everyone to feel welcome" (Glasgow Life EDI Policy, 2018, 1). The last clause of the last sentence changes tense

from present to future and blends fact and evaluation. Following this paragraph is a paragraph in present tense. The rest of the document is written in future tense with several sentences starting with “we will” and “we want”. A large amount of the language looks towards the future, or makes predictions such as “need to”, “our vision”, and “we will work to”.

Interestingly, in the Camden EDI policy the verbs are both in future and past tense, perhaps indicating the institution’s desire to establish a record of EDI work, while the verbs in the BL's EDI policy are for the most part are in present and future tense, which may be indicative of its internal role. It also does not make as much use of statements of fact but makes lots of commitments. In some ways, this suggests that it is making subtle evaluations and subtle predictions of what will be.

One striking example of the blending of fact, prediction, and evaluation is found in the following statement: “It’s now the law, it makes great business sense, and it’s the right thing to do” (Glasgow Life EDI Action Plan, 2018, 2). The fact is “it’s now the law”. The prediction is that it will “make great business sense”. The evaluation is that “it’s the right thing to do”. This statement does not really define what “it” is and provides a hint at the chronology of the development of EDI at Glasgow Life and its underlying values. This sentence subtly implies that if it were not for the law and if EDI did not benefit the institution as a business, then it would not be a value of any major importance. Secondly, there is no further delineation of what makes it the “right” thing and what would be the “wrong” thing to do.

Representation of Processes in EDI Documents

There are several ways that the representation of processes is abstracted in EDI documents. For example, the verb “tackled” or “tackling” is used as a metaphor for a process in many EDI documents analysed in this study and is an example of the recontextualization of a process through metaphor. According to the Oxford English dictionary, to tackle means “to grip, lay hold of, take in hand, deal with; to fasten upon, attack, encounter (a person or animal) physically”, “to ‘come to grips with’, to enter into a discussion or argument with; to attack; to approach or question on some subject”, “to grapple with, to try to deal with (a task, a difficulty, etc); to try to solve (a problem),” “to attack, fall upon, begin to eat”, “to set to, to grapple with something”, and in sports, “to seize and stop” (Oxford English Dictionary, 2020). Using this verb situates the work of EDI in the realm of sport and competition or suggests that working on EDI is something that can be completed in an abrupt manner to continue other work. Tackling precludes long term engagement. It is a term that includes a degree of violence. Its wide spectrum of meaning also leaves room for mixed interpretation. The word means a level of difficulty is involved. What exactly is being “tackled” here? Is it the problem of racism or is it the new “problem” faced by institutions of compliance?

Another common representation of processes is through the term “embed”, which is often used in the list of actionable items in action plans. This is an example of abstraction and is used frequently without definition or explanation. Embed most commonly is used in the imperative form. “Embed”, according to the Oxford English Dictionary, means “to fix firmly in a surrounding mass of some solid material” and

that the surrounding mass of material is "to enclose firmly" (Oxford English Dictionary, 2020). Interestingly, the CILIP Action Plan uses "embed" both as an actionable item in the imperative and to describe "the issues" that are "structural" that the "longer-term goals" seek to address. This dual usage may be confusing to readers, but it also contributes to the appearance that their longer-term goals can ultimately cause structural change.

By contrast, "mainstreaming" is used in its noun variation, and specifically as a process noun. The word is only used once in Glasgow Life's EDI Policy, i.e. in "Report on mainstreaming the equality duty" as part of the specific duties for Scotland. "Mainstreaming" is the derivative of the verb "mainstream" which means "to incorporate *into* the mainstream" or, very specifically, "to place (a child with a disability) in a school or class for those without special needs (for all or part of the school day); to educate in such an integrated environment" (Oxford English Dictionary, 2020). The dominant group is implied by "mainstream". In the case of EDI documents, does this mean that mainstreaming EDI will entail incorporating the desirable elements of EDI into the white institution without changing that institution?

Both "mainstreaming" and "embed" imply the process of making EDI an integral concern and process for the institution to be applied to past and future work, services, policies, and programs at all levels. However, as Ahmed mentioned, mainstreaming is often a complicated process that can result in EDI becoming diluted or bypassed. This is the tension that diversity discourse brings, the ability to pass through the institution and "flow", but consequently losing some of its power to challenge and bring about change:

> The discourse of diversity is one of respectable differences - those forms of differences that can be incorporated into the national body. Diversity can thus be used not only to displace attention from the material inequalities but also to aestheticize equality... (Ahmed, 2012, 151).

Representations of processes, in this case, are a part of the aesthetic of EDI documents. Other process nouns that are used in EDI documents are "activities", "review", "practices", and "progress", all of which are used at least once in each EDI document analysed in this article.

Unlike process nouns that have a "verb-like quality", nominalizations often obscure the object and subject in the sentence which can exclude the "social actors". Fairclough defines nominalizations as "a type of grammatical metaphor which represents processes as entities by transforming clauses (including verbs) into a type of noun" (Fairclough, 2003, 220). Unsurprisingly, inclusion and diversity are common examples of nominalizations found in EDI documents. Inclusion is often used as an indirect object or as a proper noun, such as being used only as part of the title of the policy in Glasgow Life's EDI Policy or as part of the phrase "equalities, diversity, and inclusion", like in CILIP's Action Plan and Glasgow Life's Action Plan. In some other EDI documents, it is used as a common noun. It is used as part of "social inclusion" (British Library, 2011, 9) which gives some idea of the original clauses that may have preceded its inevitable nominalization resulting from its increased usage.

Finally, “diversity” is also a nominalization of the adjective diverse and the verb diversify. Similar to “inclusion”, it is often used in the title or section headings, as part of the title of a position such as “Policy and Diversity Manager” (British Library, 2011, 1), as a common noun like in “policy and practice” (British Library, 2011, 4), or as a proper noun like “Equality and Diversity Working Group” (British Library, 2011, 5) and “Diversity Conference” (Glasgow Life EDI Action Plan, 2018, 9). The term diversity is used in such a wide variety of ways in almost every document. As discussed earlier, the term has replaced older terms such as “equality” and “equal opportunities”, which were critiqued as being “tired” (Ahmed, 2012, 61), overused, or too negative. “Racism” is an “unhappy word” because it gets in the way of our capacity to “fulfil our commitment”; it is seen as a word that divides and excludes. “Diversity”, by contrast, is viewed as a positive term. It is focused on the “new”, like how the institution wants to portray itself. It is more “collaborative” than the “confrontational” language of equality. It is a more comforting term that is not “threatening”. Ahmed described it as “mobile” and said that “as a lighter word can thus do more” (Ahmed, 2012, 62) than “tired”, heavier terms like “equality”. It can easily be incorporated into the abstract language of institutions. Yet, as Ahmed warns, “[w]hat is being achieved by the mobility of these terms remains another question” (Ahmed, 2012, 60).

The term “Diverse”, by contrast, is used less frequently and it is often used in sections about staff or the public. It is interesting that EDI documents do not use “diversify” at all, which would more accurately capture what the institutions are trying to do, i.e. make themselves more diverse. Indeed, in comparison to the other terms used like “equality” and “inclusion”, “diversity” does not have a clear opposite, which may be why the term has become so popular as a “technology of happiness” (Ahmed, 2012, 153) and vacuous, making it to some degree flexible and effective to both the institution and the diversity workers as a means to achieving their goals. This lack of a clear opposite, however, results in it being difficult to define and completely understand. Thus, the use of nominalizations, process nouns, and metaphor in EDI documents contributes to the creation of highly abstracted representations of processes and structures as well as the participants involved, which is explored next.

Representation of Social Actors in EDI Documents

The representation of social actors or participants in EDI documents typically involves suppression and backgrounding. Fairclough explains that the

> Impersonal representation of social actors [...] can dehumanize social actors, take the focus away from them as people, represent them...instrumentally or structurally as elements of organizational structures and processes. The opposite extreme to impersonalization is naming - representing individuals by name (Fairclough, 2003, 150).

This process is seen both in the use of only pronouns, as well as unnamed “contributors” and the listing of a departmental name as the “policy owner”. The authorship of the document is oftentimes hidden and involves the work of multiple people.

The documents commonly use the first-person plural pronoun “we” and the possessive “our”. The words “them” and “those” also often appear, which suggests an us/them relationship dynamic. The term “family” is used in reference to city government officials, an example of “simulated social relations which [...] tend to mystify social hierarchy and social distance” (Fairclough, 2003, 76). Third-person pronouns are used to refer to staff with protected characteristics, creating another we/them dynamic. In the BL’s EDI Policy, the author(s) of the document are somewhat disclosed under “Policy Owner” and a list of contributors, referred to only by job title.

The BL’s EDI policy claims to outline responsibilities for staff at all levels and includes examples of how employers and managers might engage in discrimination. However, in some EDI Action Plans the subject part of the sentence is often missing in the institution’s list of proposed actions. By contrast, there is a section of the table in CILIP’s Action Plan that assigns each “quick win” or “longer-term goal” to a particular team or committee.

As Ahmed says, institutions can temporarily employ external consultants to work on EDI documents and can hire or designate the “equality ambassadors” (Glasgow Life EDI Action Plan, 2018, 3). Neither external consultants or equality ambassadors are credited in any of the EDI documents. Furthermore, staff have and are expected to continue working on an “equality profile” (Glasgow Life EDI Action Plan, 2018, 12), which is not defined but indicates a neoliberal, individualised, and personalised approach to EDI, and that it is something that can be measured or turned into data.

Additionally, as suggested earlier, the hypervisibility of social actors possessing the protected characteristics contrasts to the nearly complete evasion of any mention of those without the protected characteristics or who are a part of the institution reifies the normative and dominant groups. This occurs, for example, by vaguely listing protected characteristics like age, race, and gender while neglecting to define which age, races, or genders. If they do clarify, they often do not explain why and ignore the fact that the people in positions of power also have an age, race, and gender. As Ahmed argues, it turns those with protected characteristics into the problem and, as shown earlier, can place on them the responsibility for “solving the problem”.

Discussion and Conclusion

As is made clear through the application of CDA to EDI documents of the UK library profession, its evasive and inconsistent vocabulary and use of language reproduces white supremacy by silencing challenging historical accounts, questions, or discussions through avoiding intertextuality, by making unfounded assumptions on what is desirable or necessary, by establishing itself as the authority on EDI, and by obscuring the process of document creation. All this works together to maintain the current distributions of power within the institution.

As shown above, the blending of facts, predictions, and values contributes to aligning EDI values to pre-existing institutional values and culture when there may be no

precedent or proof of intentional and sustained efforts of institutional change in addressing EDI. The institution claims a position and authority on ideas, values, and processes that it might be unfamiliar with or has no prior relationship or history of engaging in.

Further, the assumptions made in EDI documents about the values and meaning of equality, diversity, and inclusion and the target audience's knowledge assumes either a basic understanding of EDI or a total lack of knowledge of EDI, which could indicate that the target audience has no prior knowledge or personal experience of EDI and are thus likely members of dominant groups. This indication is, of course, implicit, but an assumption of the whiteness of the target audience, for example, contributes to reproducing white supremacy through what Collins' pointed out as earlier as "explanation" (Collins, 2018, 41) for white audiences without any references to writers or researchers of colour. This contributes to the culture of ignoring the work of People of Colour and their experiences and ignoring any previous complaints or activism brought up by staff members. It also contributes to the history of co-optation, as suggested by Hudson, and the eventual appropriation of language, concepts, and ideas from People of Colour into the discourse of white institutions (Hudson, 2020).

This is also accomplished through the masking of the authors of the policies, which may include People of Colour. The policy, however, is meant to be viewed as being written by the institution, likely resulting in a predominately white institution being credited with any successful diversity efforts or positive change occurring because of the EDI document. The lack of named authors also contributes to an institutional culture that does not value accountability, slow growth, challenges, and mistakes. If the EDI document changes over time and the institution inevitably makes mistakes, the fact that no one who was involved in the document's creation can be easily held to account or approached with questions insinuates that the institution wants to be able to claim authority over and achievement of EDI by the creation of the document itself and that it is not open to discussion. Nevertheless, the attribution of the EDI document to the institution can be used by diversity practitioners or staff as a start for any breach in shared values to bring up complaints. It will just require more work on their part because the EDI documents provide evidence of the good will of the institution.

The recontextualization of processes through metaphor is another technique used to evade accountability because the language obscures any clear understanding of what working on EDI entails, who does it, and how it will be done. Furthermore, it neglects to situate the EDI in any historical account of how the institution came to value and enact it besides in the sense of complying with the law. Some institutions, for example, may have already had workgroups seeking to address EDI within the institution, but those workgroups became absorbed and more than likely co-opted by the committee (inevitably) created by senior leadership once EDI became a requirement under the law or became appealing to the institution. Other institutions may have had isolated individuals challenging institutional racism on their own. These different histories are important because as Ahmed suggested, the way an institution processes change is just as important as the change itself.

The assumption backing the creation of EDI documents is that diversity discourse can serve as a "language of reparation" (Ahmed, 2012, 164). Since racism is viewed as an issue of exclusion, diversity comes in through inclusion and achieves reparations for slavery, colonisation, exploitation—and the resulting material consequences—on behalf of the institution. While institutions do have a history of exclusion, simply switching to a rhetoric of inclusion is futile in the face of structural racism and racial neoliberalism. According to Ahmed, inclusion is a "technology of governance: not only as a way of bringing those who have been recognized as strangers into the nation, but also of making strangers into subjects, those who in being included are also willing to consent to the terms of inclusion" (Ahmed, 2012, 163). This technology of governance can be used to recentre whiteness since it has the power and authority to grant inclusion: "once the 'to be included' or 'not yet included' are the problem those who are already given a place by the institution are not only not the problem but can become the solution to the problem" (Ahmed, 2012, 185). The institution is the host and thus has more power and agency. This then requires gratitude from the "diverse" who are now included, and such gratitude is shown by not bringing up racism. However, following Hudson (2020), neither diversity nor institutions on their own will bring either reparations or justice.

While EDI Action Plans are slightly less preoccupied with diversity as a "form of image management" than EDI Policies (Ahmed, 2012, 102), they are still "non-performative" to the extent that their primary purpose is to situate the institution's EDI commitment and consequential actions into the future, and they outline the institution's process to "embed" or "mainstream" EDI. The senior leadership is making a commitment on behalf of the rest of the institution. This is, in a way, making promises before guaranteeing that it can follow through on those promises.

Diversity and inclusion discourse, as the "anti-racism modes" outlined by Hudson, make different people into the problem. As Ahmed states: "[...] the language of inclusion and repair makes those who are not included into the problem" (Ahmed, 2012, 185), thereby letting the white supremacy present in institutions continue unexamined. Therefore, to speak about racism or white supremacy is to be a threat to the institution. The institutional lack of serious reckoning with institutional and structural racism conveniently feeds into the notion of racism as only existing as a personal and individualised issue embodied by the singular 'racist' individual (Goldberg, 2008, 180-181). This allows the critique of racism to be directed towards that individual who is "not me", "not us" and absolves the institution of any responsibility. As such, diversity discourse is part of the institution's public relations. If diversity is the aim, and the institution is "working on it" or has even achieved some measurable goals, then accounts of racist incidents in the institution can be silenced.

If diversity is needed, as is implied by the existence of an EDI document, and diversity means the recruitment of individuals with the listed characteristics, then it can be logically ascertained that the institution has institutionalised whiteness. Whiteness is a "given": "Institutional habits refer not only to what an institution does or tends to do but also how certain people become habituated within institutions - how they come to occupy spaces that have already been given to them" (Ahmed, 2012, 123). Diversity as a goal distracts from the whiteness of the institution and the

unquestioned decisions and processes that make it the dominant culture of the institution. It places focus on the recruitment and inclusion of People of Colour who are then expected to integrate into the institutional culture of whiteness or allow institutions to celebrate their newfound diversity by using their body as proof in marketing materials. As Ahmed states: "Whiteness recedes when diversity becomes a solution to the problem of whiteness" (Ahmed, 2012, 185).

This study shows that if racism is viewed by institutions as simply any exclusion of People of Colour then, according to that logic, and without any understanding of structural racism or racial neoliberalism, discussing racism in general or exposing racism can be viewed as what is racist rather than the racism itself. For example, as Collins discussed, the language used in oppression literacy is often confused with oppressive language (Collins, 2018, 47). If exclusion is viewed as the problem, then *everyone* needs to be included and treated equally, including white people, and this can often result in the default mode of the institution and its whiteness to be protected. As Hudson states, "[...]a politics of inclusion and diversification leaves little room for asking deeper questions about the ways in which more fundamental assumptions and structures within the library world operate as sites for the perpetuation of white supremacy[...]" (Hudson, 2017, 14).

Rather than embed and mainstream diversity, the library profession in the UK needs to examine and account for its embeddedness within racial neoliberalism and white supremacy. If libraries in the UK, and especially public libraries, are truly committed to providing access to information and resources to everyone, then the relationships between libraries and their communities need to be attended to through confronting rather than avoiding historical and contemporary racial disparities, through the active restitution of resources and power, and through the consistent scrutiny of the internalised superiority that undercuts so much of the library profession in general (Ettarh, 2018). A small part of having a structural analysis involves having a common vocabulary and shared understanding of the structures in place that reproduce white supremacy and structural racism. Language is powerful and if the EDI documents are used by institutions as excuses, as Ahmed and this article has shown, then the language needs to be exposed and treated as a marketing and public relations tool, and organisers can put their efforts elsewhere.

Finally, for individual library workers and collectives of library workers who are seeking social justice and liberation and are struggling with how to work within institutions: protect your work and energy and, to quote Dean Spade, "attack and steal" (Barnard Center for Research on Women, 2023, 11:42).

Acknowledgements

I would like to thank my stepmother, Vivan Steemers, and my old friend, Kyliemax Grove-Peattie, for both taking the time to provide me with very helpful feedback, challenging questions, and for their encouraging words

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Appendix A: Content Analysis of EDI Policies

Content Analysis of Glasgow Life EDI Policy:

Most Frequent Terms	Most Frequent Phrases x #	Most Consistently Used (of the most frequent terms)	Presence of Searched Terms x #
“equality”	“Glasgow life equality and diversity and inclusion policy” x 10	“Glasgow Life”	“Equality” x 38
“Glasgow Life”	“action plan” x 4		“Diversity” x 14
“policy”	“Glasgow life will” x 4		“Inclusion” x 13
“diversity”	“in relation to” x 3		“Race” x 1
	“need to” x 3		“Structur*”, “racism”, “white”, “inequality”, and “exclusion” x 0
	“people who are” x 3		

Contexts for Glasgow Life EDI Policy’s Most Frequent Terms:

Keywords to Left	Term	Keywords to Right
to change that. Our vision	Glasgow Life	Equality, Diversity, and Inclusion Policy
the people who work for	Glasgow Life	representing the people of Glasgow

help them understand each other	Glasgow Life	Equality, Diversity, and Inclusion Policy
THE EQUALITY ACT 2010	Glasgow Life	will ensure that it complies
which provides a public function	Glasgow Life	will comply with the public
the Glasgow City Council family	Glasgow Life	has chosen to help with

Specific Duties) (Scotland) Regulations 2012	Glasgow Life	will: -Report on Mainstreaming the
we follow the law in	Equality	and help those who are
the people covered by the	Equality	law. We will work to
ensure that it complies with	Equality	legislation as outlined within the
to: -Take effective action on	Equality	issues - Make the right decision
more than just “thinking about”	Equality	-Needs rigor and an open

Content Analysis of Camden Metropolitan Borough Council’s EDI Policy:

Most Frequent Terms	Most Frequent Phrases x #	Most Consistently Used (of the most frequent terms)	Presence of Searched Terms x #
“equality”	“we are committed to” x 2	“Camden”	“Equality” x 7 “Structur*”, “racism”, “white”, “exclusion”, and “inclusion” x 0

“accessibility”	“to all our” x 2		“Inequality” x 4
“Camden”	“equality taskforce” x 2		“Race” x 1
“inequality”	“our equality” x 2		“Diverse” x 1
“people”			

Contexts for Camden Metropolitan Borough’s Equality Policy’s Most Frequent Terms:

Keywords to Left	Term	Keywords to Right
is representative at all levels	Equality	information and objectives we developed
requirements of the Public Sector	Equality	Duty and tackling inequality. Equality
Equality Duty and tackling inequality.	Equality	taskforce to help us achieve

Content Analysis of the British Library’s EDI Policy:

Most Frequent Terms	Most Frequent Phrases x #	Most Consistently Used (of the most frequent terms)	Presence of Searched Terms x #
“Policy”	“for example” x 5	“discrimination”	“Equality” x 43
“Discrimination”	“human resources” x 5	“staff”	“Diversity” x 28
“Equality”	“in addition” x 5		“Race” x 12

“Library”	“a disabled person” x 4		“Structur” x 1
“Staff”	“access to work” x 4		“Inclusion” x 1
	“compliance with” x 4		“Racism”, “white”, “inequality”, and “exclusion” x 0
	“equality of opportunity” x 4		
	“if they” x 4		
	“member of staff” x 4		
	“positive action” x 4		
	“the Equality Act 2010” x 4		

Contexts for British Library Equality and Diversity Policy’s Most Frequent Terms:

Keywords to the Left	Term	Keywords to the Right
Dignity and Respect at work	Policy	For issues regarding recruitment refer
measure progress in meeting our	Policy	statement
under the Equality act this	Policy	or the Dignity and Respect
collective responsibility to ensure this	Policy	is successfully implemented, there are

overall champions to ensure the	Policy	is implemented. -Communicating the strategy
to the Equality Impact Assessment	Policy	Each employee is responsible for
review and updating of this	Policy	Proposed changes to the policy
aims to proactively tackle	Discrimination	or disadvantage and aims to
or supported a complaint of	Discrimination	or raised a grievance under
Library takes all claims of	Discrimination	very seriously and will take

Appendix B: Content Analysis of EDI Action Plans

Content Analysis of Glasgow Life EDI Action Plan:

Most Frequent Terms	Most Frequent Phrases x #	Most Consistently Used (of the most frequent terms)	Presence of Searched Terms x #
“Glasgow Life”	“under representation in staff” x 3	“Glasgow Life”	“Equality” x 37
“Equality”	“we are” x 3	“Equality”	“Diversity” x 15
“Staff”	“with staff” x 3		“Inclusion” x 3
“Data”			“Race” x 1
“Review”			“White” x 1
			“Structur*”, “racism”, “inequality”, and “exclusion” x 0

Contexts for Glasgow Life EDI Action Plan's Most Frequent Terms:

Keywords to Left	Term	Keywords to Right
review and progress and why	Glasgow Life	is improving its practice in
within the workforce	Glasgow Life	Customers: Under-Representation in Service
is a core value of	Glasgow Life	embed equalities in service planning
Get the Most out of	Glasgow Life	We will collect data
their equality profile - Review current	Glasgow Life	mentoring schemes and adapt
champion in each service area	Glasgow Life	Employees: Under-Representation in Staff
Representation in Staff Objective Actions	Glasgow Life	has a workforce that reflects
groups as designated under the	Equality	Act 2010, these being
external consultants in 2014	Equality	ambassadors reviewed the action plan
Strengthen the message that	Equality	is a core value of
represent the Glasgow demographic	Equality	data on volunteers and target

findings and solutions...Embed	Equality	into annual service planning process
Staff are made aware of	Equality	and diversity is a core
staff Induction programme and strengthen	Equality	as a key message
award...Consider establishing an	Equality	and diversity champion in each

Content Analysis of CILIP's EDI Action Plan:

Most Frequent Terms	Most Frequent Phrases x #	Most Consistently Used (of the most frequent terms)	Presence of Searched Terms x #
"Diversity"	"commence complete" x 9	"Diversities"	"Diversity" x 47"
"Equalities"	"board and presidential team" x 9	"Equalities"	"Inclusion" x 11
"Commence"	"equalities impact assessments" x 3	"Leadership"	"Equality" x 8
"Team"	"the development of" x 3	"Team"	"Structural" x 3
"Leadership"	"we have" x 3		"Inequality" x 2

			"Racism", "race", "white", and "exclusion" x 0

Contexts for CILIP EDI Action Plan's Most Frequent Terms:

Keywords to the Left	Term	Keywords to the Right
That truly represents and achieves	Diversity	and celebrates and encourages it
that promotes and celebrates equalities	Diversity	and inclusion and proactively challenges
Continue to monitor equalities and	Diversity	as part of HR practice
the pledge Embed equalities and	Diversity	in the Public Libraries Skills
commitment to improving equalities and	Diversity	and representation across the profession
specific goal to improve	Diversity	of our membership
embed equalities and	Diversity	in the design phase for
statement of commitment to improving	Diversity	and representation across the profession
Formulate a clear policy on	Diversity	and representation in events organize
Section Heads embed equalities and	Diversity	into the corporate marketing

Promote & encourage actions which promote	Diversity	at Board and Trustee level
and Presidential Team completed require	Equality	Impact Assessments for all new
and our obligations under the	Equality	Act 2010
and other documents relating to	Equality	diversity and inclusion, Ongoing
data is required for the	Equality	and Diversity Action plan
April Board meeting. Embed	Equality	diversity and inclusion as a
Hold an annual	Equality	and diversity staff development day
with professional ethics and legal compliance	Equality	Act 2010