

# CULTURAL SAFETY POLICY & PROCEDURE

## Introduction

The Australian Academy of Commerce (AAC) is committed to providing a culturally safe, respectful and inclusive environment for all students, staff and stakeholders. A culturally safe environment recognises, respects and values the diverse identities, beliefs, languages, traditions and lived experiences of every individual within the AAC community.

This policy outlines AAC's commitment to actively fostering cultural safety through inclusive practices, the removal of systemic and individual barriers, the prevention of discrimination and racism, and the promotion of mutual respect and accountability. AAC acknowledges that cultural safety requires ongoing reflection, education and action to challenge bias and ensure all individuals feel safe, respected and supported.

By embedding cultural safety across its operations, AAC aims to uphold the dignity, wellbeing and equal participation of all members of its community, including students enrolled in ELICOS and VET courses. This policy aligns with AAC's legislative and regulatory obligations under the *Racial Discrimination Act 1975*, *Australian Human Rights Commission Act 1986*, and related Commonwealth and state anti-discrimination legislation

## Purpose

The purpose of this policy is to ensure that Australian Academy of Commerce (AAC) provides a learning and working environment that is safe, respectful, and inclusive for all individuals, particularly those from Aboriginal and Torres Strait Islander backgrounds and culturally and linguistically diverse (CALD) communities. Cultural safety is embedded into daily practice, decision-making, and service delivery, ensuring students and staff can engage without fear of discrimination or cultural disrespect.

## Scope

This policy applies to all AAC staff, contractors, students, and visitors. It governs all interactions within the RTO, including training, assessment, administration, marketing, and community engagement.

## Policy Statement

AAC is committed to fostering a culturally safe environment by:

- Embedding cultural safety principles into policies, procedures, and day-to-day operations.
- Recognising and valuing the diversity of all students and staff.
- Actively challenging behaviours, attitudes, and systems that perpetuate inequity or discrimination.
- Ensuring that all educational content and delivery methods reflect cultural inclusivity and respect.

## Definitions

<b>Cultural Safety</b>	A state in which an individual feels secure, respected, and valued in their cultural identity. It exists when organisational practices actively recognise, protect, and affirm that identity and where power imbalances, prejudice, or discrimination are addressed.
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<b>Cultural Competence</b>	The ability of individuals and organisations to work effectively across cultures through the integration of knowledge, skills, values and attitudes that enhance respectful interactions.
<b>Cultural Awareness</b>	An initial stage of recognising that cultural differences exist, including an understanding of one's own cultural influences and how these may impact others.
<b>CALD</b>	Culturally and linguistically diverse; used to describe communities with varied cultural backgrounds and languages other than English.

## Legislative and Regulatory Requirements

- Racial Discrimination Act 1975
- Australian Human Rights Commission Act 1986
- Anti-Discrimination Act 1991 (QLD)
- Outcome Standards for RTOs 2025 – Standard 2.5:
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 – Standards 6, 8 and 10

## Cultural Safety Procedure

### 1. Assessment of Cultural Safety Needs

- Conduct an annual review of AAC's environment, resources, and practices to identify cultural safety gaps.

### 2. Cultural Safety Training

- Provide induction and annual refresher training for staff to enhance cultural competence and awareness.

### 3. Curriculum and Assessment Design

- Ensure learning materials include culturally relevant examples and perspectives.
- Avoid content or assessment tasks that reinforce stereotypes or bias.

### 4. Engagement with Cultural Representatives

- Maintain relationships with Aboriginal and Torres Strait Islander elders and CALD community representatives to inform training delivery and student support practices.

### 5. Student Support and Feedback

- Provide culturally appropriate support services.
- Actively seek feedback from students about the cultural safety of the RTO environment.

### 6. Monitoring and Evaluation

- Review cultural safety measures annually through surveys, feedback forums, and policy audits.
- Document improvements in the Continuous Improvement Register and address any identified issues promptly.



## Procedure Summary Table

Step	Action	Responsibility	Timeframe	Reference / Use
1	Assessment of Cultural Safety Needs	Compliance Manager Annually in November, and after any significant incident or change	Annual cultural safety review report, risk assessment notes, continuous improvement actions raised	Actions closed on time, reduction in identified barriers, no critical issues outstanding
2	Cultural Safety Training	Directors of Study / Compliance Manager At induction for all new staff, then annually	Attendance records, training materials, post-training checks	One hundred percent staff completion by due date, improvement in staff confidence rating
3	Curriculum and Assessment Design	Directors of Study During validation cycles, and whenever TAS or tools are updated	TAS versions, mapping matrices, validation reports, change logs	Validation actions closed, positive student feedback on inclusive practice
4	Engagement with Cultural Representatives	CEO/delegate Twice per year, and when new programs or delivery sites are planned	Consultation schedule, meeting minutes, endorsements where applicable	Two or more engagements per year, adoption of agreed recommendations
5	Student Support and Feedback	Student Services Officer Ongoing, with support plans in place within five business days of need identified	Support plans, referrals, feedback and survey results	Student satisfaction meets target, timely resolution of support actions
6	Monitoring and Evaluation	Compliance Manager Quarterly and biennial policy review	Continuous Improvement Register, internal audit reports	Improvement trend across key indicators, no critical non-compliances
7	Assessment of Cultural Safety Needs	Compliance Manager Annually in November, and after any significant incident or change	Annual cultural safety review report, risk assessment notes, continuous improvement actions raised	Actions closed on time, reduction in identified barriers, no critical issues outstanding

## Roles and Responsibilities

Role	Responsibility
CEO	<ul style="list-style-type: none"><li>Providing leadership and oversight to ensure AAC's commitment to cultural safety is embedded across the organisation.</li><li>Ensuring this policy is implemented, appropriately resourced, and supported through organisational planning and decision-making.</li><li>Promoting a culture of respect, inclusion and accountability.</li></ul>

Compliance Officer	<ul style="list-style-type: none"> <li>Monitoring compliance with cultural safety obligations under relevant Commonwealth and state legislation.</li> <li>Ensuring this policy is reviewed regularly and remains current with legislative and regulatory requirements.</li> <li>Supporting staff to understand and meet cultural safety obligations.</li> </ul>
Student Services Officer (SSO)	<ul style="list-style-type: none"> <li>Providing culturally safe, respectful and inclusive support to students across all stages of the student lifecycle.</li> <li>Acting as a first point of contact for students who raise cultural safety concerns or require support related to cultural identity, background or experiences.</li> <li>Facilitating access to appropriate support services, reasonable adjustments or referrals where cultural factors impact student wellbeing, engagement or participation.</li> <li>Maintaining confidentiality and managing cultural safety matters in accordance with AAC policies and procedures.</li> <li>Escalating cultural safety concerns or incidents to the Compliance Officer or CEO where required.</li> </ul>
Directors of Study (VET and ELICOS)	<ul style="list-style-type: none"> <li>Ensuring culturally safe practices are embedded within training and assessment strategies.</li> <li>Supporting trainers and assessors</li> </ul>
Trainers & Assessors	<ul style="list-style-type: none"> <li>Delivering training and assessment in a culturally safe, inclusive and respectful manner.</li> <li>Integrating culturally appropriate teaching strategies, learning resources and assessment practices that support diverse student needs.</li> <li>Identifying and responding sensitively to cultural factors that may impact student engagement, participation or learning outcomes.</li> <li>Seeking guidance and support from Directors of Study or Student Services where cultural issues require additional support or adjustment.</li> <li>Modelling respectful, inclusive and non-discriminatory behaviour in all interactions with students and colleagues.</li> </ul>
Students	<ul style="list-style-type: none"> <li>Treat all members of the AAC community with respect, dignity and cultural sensitivity.</li> <li>Engage in learning activities in a manner that supports an inclusive and culturally safe environment.</li> <li>Refrain from discriminatory, racist, harassing or culturally unsafe behaviour.</li> <li>Raise cultural safety concerns or incidents through AAC's complaints and support channels.</li> <li>Participate respectfully in culturally diverse learning environments.</li> </ul>

## Policy Implementation

This policy is implemented through integration with AAC's Quality Management System and through the responsibilities assigned in Section 6.

- **Communication:** The policy is published on the staff intranet and included in staff induction. A summary is provided to students in the Student Handbook, and a full version is available on request.
  - **Resourcing:** Management ensures sufficient resourcing for staff training, consultation with cultural representatives, and updates to learning resources.
  - **Roll-out:** Changes arising from this policy are incorporated into Training and Assessment Strategies, assessment tools, and staff development plans. Trainers are briefed prior to delivery each term.
  - **Third parties:** Where third parties are engaged, contractual arrangements require adherence to this policy, and materials must accurately represent roles and responsibilities.
- Records:** Evidence of implementation, including consultation records, training attendance, validation reports, and updates to TAS and resources, is stored in the designated quality folders.
- Version control:** All documents referenced by this policy are controlled under the RTO's document control procedure, and changes are recorded in the change log.

## Monitoring and Review

- **Approach:** Monitoring and evaluation are conducted using the ADRI cycle, that is, Approach, Deployment, Results, and Improvement, and are embedded in AAC's self-assurance framework.
- **Indicators:** Key indicators include student satisfaction with cultural safety, participation in cultural safety training, the number and nature of complaints related to cultural matters, staff confidence measures, and adoption of recommended changes from cultural consultations.  
**Data sources:** Student and staff surveys, complaints and appeals register, incident reports, validation outcomes, professional development records, and stakeholder engagement minutes.  
**Schedule:** A quarterly report is prepared by the Compliance Manager and tabled at governance meetings. A biennial review of this policy is undertaken, with actions recorded in the Continuous Improvement Register.
- **Analysis:** Disaggregated analysis is conducted to identify disparities for Aboriginal and Torres Strait Islander students and culturally and linguistically diverse learners. Where disparities exceed agreed thresholds, targeted actions are implemented.
- **Internal audit:** Cultural safety requirements are included in the internal audit schedule at least once every two years, or sooner where risk indicates.
- **Reporting:** Findings from monitoring and audits are reported to management, and summary improvements are communicated to staff and students as appropriate.
- **Review and effectiveness:** The policy is reviewed biennially. Effectiveness is evidenced by improving trends in indicators, timely closure of actions, and positive feedback from students and community representatives.

## Version Control

Version	Date	Description	Approved by	Approval date	Author	Review date
V1.0	Dec 2025	New policy for AAC	CEO	13 January 2026	Compliance Officer	Dec 2027

## Policy and Document Information

<b>Author:</b>	Compliance Team
<b>Policy owner:</b>	Compliance Officer
<b>Approved by:</b>	CEO
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