



SOUTH AUSTRALIAN  
PUBLIC SECTOR  
WORK HEALTH AND  
SAFETY FRAMEWORK  
FOR CULTURAL SAFETY  
Implementation Guide



**Government of  
South Australia**

## Introduction

The Work Health and Safety Framework for Cultural Safety (the Framework) provides information about cultural safety as an important element of mental health; how to address associated risks and how to support a culturally safe work environment.

Cultural safety is an integral component of a mentally healthy workplace where workers are supported and well at work. The South Australian Public Sector is committed to achieving mentally healthy workplaces by taking a holistic and inclusive approach promoting positive mental wellbeing, preventing psychological injury and illness and where it occurs, taking action to support recovery.

The Framework is designed to assist agencies to mature existing work health and safety systems so that:

- Workers can describe thoughts and behaviours that support cultural safety.
- Workers can identify culturally unsafe behaviours – i.e.: psychological hazards.
- Policies and procedures reference cultural safety where appropriate.
- Reporting systems are configured to allow reporting hazards and incidents arising from culturally unsafe behaviour.

**The Framework applies to all the workers employed or engaged by the South Australian Public Sector and those using and engaging with the South Australian Public Sector services. Implementation of the framework across the sector will be monitored through the HR Leaders Forum.**

## Purpose

This Implementation Guide (the guide) sets out the general tasks that will assist agencies to implement the framework. The guide is designed to:

- Help identify gaps which may exist in agency policies, procedures, reporting systems and training.
- Help integrate cultural safety as an identified psychosocial risk into agency risk management processes.
- Help agencies identify and respond to culturally unsafe practices in the workplace with case study examples.
- Provide indicative timeframes for implementation.

## Implementation

Implementation of this framework should take a collaborative approach involving expertise from disciplines such as Work Health and Safety, Diversity and Inclusion and Employee Engagement. Implementation timeframes may vary according to agency size. Table 1 provides guidance on timeframe, tasks and suggested processes that can be applied by agencies to implement the framework. Agencies should consider any other tasks, processes and stakeholders required relevant to their business processes.

Table 1

| Task  | Suggested Responsibility  | Suggested process  | Timeframe                    |
|---|---------------------------|--|------------------------------|
| 1. Obtain agency support to implement Framework                               | HR Director or equivalent | Present to appropriate governance committee (WHS, HR Diversity and Inclusion)                                      | Month 1                      |
| 2. Designate an Executive Sponsor to oversee framework implementation         | HR Director or equivalent | Request nomination from Senior Leadership Team<br>Appoint individual willing to assume role                        |                              |
| 3. Identify key stakeholders and establish project team and plan              | HR Director or equivalent | Seek nominations for project team  |                              |
| 4. Conduct gap analysis using Gap Analysis Tool (Appendix1)                   | Project Team              | Answer questions in Gap Analysis Tool (appendix 1)   | Month 2-3                    |
| 5. Add actions identified from the Gap Analysis in task 4 into a project plan | Project Team              | Use suitable project plan template   |                              |
| 6. Review and report against Gap Analysis findings                            | Project Team              | Present Gap Analysis findings to appropriate governance committee (WHS, HR, Diversity and Inclusion)               |                              |
| 7. Commence actions   | Project Team              | As per project plan  | Month 4-5                    |
| 8. Identify suitable performance measures and reporting mechanisms            | Project Team              | Recommend performance measures for approval at appropriate governance committee (WHS, HR, Diversity and Inclusion) |                              |
| 9. Develop communication plan announcing framework implementation             | Project Team              | Release in accordance with communication plan  | Month 6-7                    |
| 10. Commence measurement and reporting of agreed performance measures         | Agency reporting function | Incorporate results into relevant agency performance reports (WHS, Annual Reports, State of the Sector)            | 3 months post implementation |

## Measuring and Monitoring Performance

Measuring and monitoring performance is an essential element of implementation. It is important that agencies identify indicators to be measured and frequency of measurement. Monitoring and reporting should occur through agency governance committees and reports.

Table 2 provides examples of performance measures for consideration by agencies.

Table 2

| Suggested Performance Measure   | Possible source of measurement                                  | Frequency of measurement | Possible responsibility   |
|---|---|--------------------------|---------------------------|
| % of employees have completed Cultural Safety training                | Agency Learning Management Systems                              | Annually                 | Learning and Development  |
| % of employees have completed Psychosocial Hazard Management training | Learning Management Systems                                     | Annually                 | Learning and Development  |
| % cultural safety incidents reported                                  | Hazard and Incident Reporting System or HR reporting mechanisms | Quarterly                | WHS Manager or HR Manager |
| % psychological injury claims relating to cultural safety             | Injury Management System  | Quarterly                | WHS Manager               |
| % cultural safety complaints/grievances                               | HR reporting mechanisms   | Quarterly                | HR Manager                |
| % employees able to recognise and respond to cultural safety issues   | Survey  | Biennial                 | HR Manager                |

## Appendix 1 Sample Gap Analysis Tool - WHS Framework for Cultural Safety

This gap analysis tool is designed to identify gaps in agency systems and determine actions required to implement the Framework.

| Gap Analysis  | Example Findings  | Example Action Required   |
|---|---|---|
| Do agency WHS systems include cultural safety requirements?   | Agency WHS system does not include reference to cultural safety<br><br>Included in agency Aboriginal Cultural Learning Framework and Aboriginal Workforce Framework                         | Incorporate cultural safety requirements into: <ul style="list-style-type: none"> <li>• WHS Policy</li> <li>• Psychological hazard/incident reporting and management procedure</li> </ul>   |
| Do WHS roles and responsibility statements reflect cultural safety requirements?  | Reflected in Agency Reconciliation Action Plans but not evident in WHS Framework  | Review WHS roles and responsibility statements and incorporate cultural safety requirements<br><br>Review Psychological Hazard Management Policies/Procedures and incorporate cultural safety requirements or develop Cultural Safety Procedure |
| Do agency WHS hazard and incident reporting systems capture cultural safety hazards or incidents under the psychological /psychosocial/ mental stress category? | Agency question set for psychological hazards and incidents does not include cultural safety  | Request question set amendment within Hazard and Incident Reporting System to relevant system administrator or consider capturing via agency HR processes   |
| Do agency dispute resolution processes provide mechanisms for resolution of cultural safety issues?   | Not evident in HR procedures  | Incorporate cultural safety into relevant HR procedures (Refer Appendix 2 and 3)  |
| Do agency training and development programs include how to deal with cultural safety incidents in the workplace?  | Yes as part of Aboriginal Reconciliation Plans<br><br>Yes as part of Orientation and Induction<br><br>Yes in Diversity and Inclusion Framework<br><br>Not evident in WHS e-learning modules | Incorporate cultural safety into WHS Psychosocial Hazard and Incident Reporting training programs (Refer Appendix 2 and 3)<br><br>Develop Cultural Competency and Diversity Training (Refer Appendix 2 and 3)                                   |
| Does your agency monitor hazards/incidents relating to cultural safety?   | No  | Establish performance measures (Refer Table 2)<br><br>Incorporate monitoring and measurement into agency reports.   |

## Appendix 2: Recognising and responding to cultural safety in the workplace

The following scenarios and examples can be used to develop agency procedures, training and guidance material.

### Scenario Examples

- Jill is a descendant of the Stolen Generation. Her mother passed away when she was very young. Jill proudly identifies as an Aboriginal person but does not know a lot about her Aboriginal heritage. Jill wins a position as an Aboriginal Health Worker. John, an Aboriginal co-worker, finds out about Jill's new appointment and immediately confronts Jill saying 'how did you get the job, you're not Aboriginal, you don't even know who your mob is'. Jill feels very threatened and frustrated by these comments because she feels like she has to justify her Aboriginality and defend her identity.
- Mary, a new trainee, meets her Executive Director Kelly for the first time. Kelly asks Mary where she is from and when Mary indicates that she is Aboriginal, Kelly responds, 'really, you don't look Aboriginal'. Mary is very surprised by and uncomfortable with this statement and is unsure on how to respond.
- Pippa had work meetings all morning and was running behind time. Upon her return to the office another team made a 'joke' in the open plan office in front many people: "Pippa, are you finally back from 'walk-a-bout' or were you just on 'Nunga Time'?" Pippa felt embarrassed and hurt that negative and false stereotypical views of Aboriginal people were used as a 'joke' to highlight her delayed return to the office.

### (Source: Cultural Safety Survey 2015) Examples provided

- A Muslim woman was spoken of poorly because of her need to pray during work hours.
- A man from India was in our team a while ago and people would deliberately mispronounce his name (was obviously deliberate as they were able to get it right when the boss was around) and kept him on the outer.
- "Lesbians" always get away with things where as another employee would normally be disciplined.
- Referring to me as a typical Italian because I made a short black coffee using work Nespresso coffee machine. Making racist side remarks behind other people's back.
- Lack of understanding and acceptance of a Muslim employee's family commitments after the death of a relative.
- I have had people say to me "I don't know why we have to treat them differently" when an Aboriginal person was hospitalised, and we allow more family in the room that the policy allows for. I had extensive conversations with the whole team about cultural safety and the reasons behind this decision. Even on Monday, I had a manager introduce one of our staff as, "our Aboriginal trainee" - the way this was said did not sit well with me and it felt culturally unsafe. Talking about a patient. "If they have an emergency and they want to be treated then sorry but they are taking their Burqa off. I can't believe she came walking in here with her burqa on. We are in Australia." (to the patient in a busy waiting room) Take that thing off in here - if you are sick I need to see your face" I explained that once the patient was in a private space she took off her Burqa so I could more easily assess and treat her, but while in public spaces like corridors in the hospital, she preferred to wear it.

## Example of how to address cultural safety incidents

The following example of how to address cultural safety incidents in the workplace refers to scenario description one (Appendix 2), however equivalent options may apply in addressing all the scenario descriptions.

Jill to raise the situation with her supervisor/ manager.

Supervisor/ manager to offer support and reassurance to Jill by acknowledging her emotions and discussing what might be the appropriate action to take. Jill will also be reminded of her options such as contact with the agency's Employee Assistance Program (EAP) should she want to seek counselling, completing an incident report and or/ making a formal complaint.

Management to fulfil actions agreed with Jill (or explain the reasons should any agreed actions not go ahead). Management to also inform their relevant HR contact and maintain clear records of any written/ verbal communications and agreed actions to resolve the issue. Agreed actions could include supervisor/ manager to meet with John to seek his input and to explain the impact of the incident on Jill. The supervisor/ manager could then agree to John's participation to resolve the workplace incident and promote a positive working relationship moving forward.

Supervisor/ manager to finalise the incident by completing the incident investigation (if an incident report was generated), reporting back to all key parties (Jill, John and HR) regarding the actions undertaken and confirm if any further action or follow-up is warranted.

### Anticipated outcomes from intervention

Jill feeling supported by her employer and safe at the workplace.

Jill feeling empowered to report any scenarios of this nature in the future.

John feeling supported by his employer and safe at the workplace.

John having a greater awareness of the impact of his actions on others.

Manager and HR having a concise record of the incident, actions undertaken and their outcomes.

## Appendix 3 Recognising workplace behaviours that are not related to cultural safety

The following examples can be used to develop agency FAQs, training and guidance material.

| Examples (Source: Respectful Treatment at Work Guideline (DPC))  | Category              |
|--|-----------------------|
| Refusing to employ a person because of their ethnic background   | Racial discrimination |
| Subjecting an employee to less favourable terms or conditions of employment than others because of their ethnic background   | Racial discrimination |
| Disregarding the input, contributions or advice of others because of their ethnic background   | Racial discrimination |
| Writing racist graffiti, racist literature, clothing or posters  | Racial vilification   |
| Circulating, displaying or promoting racist material   | Racial vilification   |
| Making offensive, racist comments in a publication   | Racial vilification   |
| Comments or behaviours such as leering or staring, that is sexually suggestive   | Sexual harassment     |
| Sexually explicit pictures, objects or reading matter  | Sexual harassment     |
| Direct or implied sexual propositions, or requests for dates   | Sexual harassment     |
| Repeated and unreasonable behaviour or language that threatens, frightens, humiliates, belittles or degrades, including criticism delivered with yelling and screaming | Workplace bullying    |
| Repeated spreading of rumours, gossip and use of sarcasm   | Workplace bullying    |
| Repeated and unreasonable deliberate exclusion, isolation, ostracism, or sabotage of a person's work   | Workplace bullying    |