

Diversity, Inclusion and Cultural Safety Policy

Think Community Services (TCS)

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Think Mental Health acknowledge the Traditional custodians on the land on which we live and work, and of the many different nations across the wider regions from which we all come. In Canberra this is the Ngunnawal people. We pay our respects to the Elders past, present and emerging as the holders of the memories, the traditions, the culture and the spiritual wellbeing of the Aboriginal and Torres Strait Islander peoples across the nation.

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1.0 Purpose

This policy affirms the organisation's commitment to diversity, inclusion and cultural safety. It sets out governance, workforce and service delivery responsibilities across all Think Community Services (TCS).

The purpose of this policy is to:

- Establish governance and workforce responsibilities for diversity, inclusion, and cultural safety across all TCS services.
- Define TCS's commitments to priority and diverse population groups who are at higher risk of mental ill-health, distress, and suicide.
- Ensure services are delivered in ways that respect identity, autonomy, and self-determination.
- Ensure policies reflect best practice, legislative obligations, and applicable standards and accreditation requirements.

2.0 Scope

This policy applies to all Think Community Services staff, contractors, and governing body members involved in policy development, approval, implementation, and review or management of organisational policies. It applies across all services, programs, and operational areas delivered by TCS.

This policy applies to both the workforce and service delivery context covering how TCS treats its own staff and how TCS delivers service to consumer, carers, and the community. It does not apply to individual consumer support plans, clinical documentation, or operational work instructions that fall outside the policy suite.

3.0 Policy Statement

Think Community Services is committed to fostering a culturally safe, inclusive and equitable environment for all consumers, carers, staff, and stakeholders.

This policy aligns with:

- The principles of recovery, trauma-informed care, and human rights
- The organisation's mission, values, and applicable legislative, regulatory, contractual, and accreditation requirements relevant to the services delivered by TCS
- The Governance Framework and Quality, Safety & Clinical Governance Framework
- The Consumer and Engagement Participation Framework
- The Code of Conduct
- The Consumer Participation and Feedback Policy
- The Workplace Health, Safety and Wellbeing Policy
- Commonwealth and ACT anti-discrimination legislation
- Human Rights Act 2004 (ACT)
- National Principles for Child Safe Organisations
- National Aboriginal and Torres Strait Islander Health Plan 2021-2031
- ACT Government Guidance to Support Gender Affirming Care for Mental Health

- The Australian Charities and Not-for-profits Commission Act 2012 and ACNC Governance Standards
- Human Rights Act 2004 (ACT)
- The Privacy Act 1988 (Cth) and Australian Privacy Principles.

4.0 Guiding Principles

This policy is guided by the following principles:

Table 1 – Guiding principles of this policy

Principle	Description
Consumer Participation	Consumers, carers, families, and communities are engaged in the development, review, and improvement of culturally safe, inclusive, and responsive services and practices
Safety and Quality	Services and workplace practices promote safety, inclusion, dignity, respect, cultural safety, and high-quality care for all individuals
Evidence-Informed	Practices and approaches are informed by current evidence, legislation, lived experience, best practice guidance, and human rights principles relating to diversity, inclusion, and cultural safety
Cultural Responsiveness	Services recognise, respect, and respond to the diverse cultural, social, spiritual, linguistic, gender, sexuality, and identity needs of consumers, carers, staff, and communities, including Aboriginal and Torres Strait Islander peoples and other priority populations
Transparency and Accountability	Clear governance, responsibilities, and reporting processes support accountability for promoting diversity, inclusion, equity, and culturally safe practice across TCS
Continuous Improvement	Diversity, inclusion, and cultural safety practices are regularly reviewed and strengthened through consultation, feedback, learning, monitoring, and quality improvement activities
Accessibility	Information, communication, services, and workplace practices are designed to be inclusive, understandable, accessible, and responsive to diverse needs and abilities

5.0 Responsibilities

Table 2 – Responsibilities of specific roles in TCS

Role	Responsibility
Board of Directors	• Hold ultimate accountability for this policy • Approve this policy • Ensure organisational compliance with anti-discrimination and human rights legislation. Receive compliance reports • Oversee systems that promote culturally safe and inclusive practice

Executive Directors — Think Community Services	• Hold ultimate executive accountability for the policy suite and its alignment with governance obligations, accreditation standards, and legislative requirements • Monitor risk related to discrimination or exclusion • Oversee implementation of this policy across all services
Senior Management Committee (SMC)	• Monitor complaints and incident trends relating to discrimination • Review quality improvement initiatives related to inclusion • Ensure workforce capability in cultural safety across all services
Quality Improvement Committee (QIC)	• Review draft policies for compliance and quality alignment • Monitor the policy review schedule • Identify gaps arising from audits, complaints, or accreditation requirements
Consumer Advisory Group (CAG)	• Contribute consumer and carer perspectives to policy development and review, particularly for consumer-facing policies • Review consumer-facing policies and associated plain-language summaries • Provide formal input into policies identified as requiring CAG involvement
People and Administrative Services Manager	• Support the implementation of inclusive, equitable and culturally safe workforce practices across the organisation • Ensure recruitment, selection, onboarding and employment practices promote diversity, inclusion, equal opportunity and freedom from discrimination • Provide guidance to managers and staff regarding workplace diversity, inclusion, cultural safety, discrimination, harassment and reasonable workplace adjustments
Systems and Performance Lead	• Maintain the Document Register, including review dates, version history, and document status • Send alerts when policies are approaching their review date
Policy Owner	• Draft, consult, and review policies within their area of responsibility • Ensure the policy uses the standard TCS template and record of document control • Coordinate consultation with relevant stakeholders including staff, consumers, and external advisors as appropriate • Submit the completed draft to the QIC for quality review
Service Managers	• Communicate policy changes to all affected staff through team meetings and internal communication systems • Promote an inclusive workplace culture • Address discrimination or culturally unsafe behaviours promptly and in accordance with organisational policies • Ensure equitable access to services for all consumer groups
All Staff, Students, and Contractors	• Treat all individuals with dignity and respect • Practice in a culturally responsive and recovery-oriented manner • Report discrimination, harassment, or culturally unsafe practices through appropriate channels

Consumers and Carers	• Provide input into policy development through the CAG and other consultation processes • Provide feedback on consumer-facing policies and associated plain-language summaries
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5.1 Policy Development or Review

This policy is reviewed on a three-year cycle, consistent with the Document Review Alert System. A review is also triggered by:

- Changes to legislative obligations, applicable standards, accreditation requirements, or organisational needs.
- Incidents, complaints, or audit findings that identify a gap in or non-compliance with this policy.
- Consumer feedback, complaints, or audit findings.
- Strategic or operational priorities identified by the Board, Executive Directors, SMC, or QIC.
- Significant organisational change affecting the scope or application of this policy.

Reviews are managed in accordance with the Policy Development Policy. The next scheduled review date is recorded in the Document Register.

6.0 Policy Requirements

6.1 Definitions

Table 3 – Definitions of terms

Term	Definition
Diversity	The range of differences that make individuals unique, including but not limited to culture, race, sex, gender identity, sexual orientation, disability, religion, age, and lived experience.
Inclusion	The intentional creation of environments in which all individuals feel respected, valued, and able to participate fully.
Cultural Safety	An environment where individuals feel spiritually, socially, emotionally, and physically safe; where there is no assault on identity; and where power imbalances are recognised and addressed.

6.2 Commitment to Priority and Diverse Groups

TCS is committed to safe and inclusive practice, particularly for vulnerable groups who are at higher risk of mental ill-health, distress, and suicide. The identified priority groups include but are not limited to:

- Aboriginal and Torres Strait Islander peoples
- Culturally and linguistically diverse (CALD) communities
- People with disability
- LGBTQIA+ people, including people of diverse sexual orientations, gender identities and expressions, and sex characteristics

- Older persons (65 years and over)
- Males, particularly those over 50 years
- Veterans (serving or ex-serving Australian Defence Force members)
- Carers and families
- Individuals experiencing socioeconomic disadvantage.

Services will be delivered in ways that respect identity, autonomy, and self-determination for all individuals.

6.3 Service Delivery Commitments

TCS will provide services in a manner that promotes equitable access, inclusion, cultural safety and respect for individual identity and circumstances.

TCS will:

- Provide accessible and inclusive service environments across physical and phone service sites
- Use inclusive language and imagery in all consumer-facing materials and communications
- Offer reasonable adjustments for people with disability
- Support access to interpreters and culturally appropriate supports
- Embed consumer and lived experience input into service design consistent with the Consumer and Engagement Participation Framework
- Monitor equity in access and service outcomes
- Apply the National Principles for Child Safe Organisations across all services
- Apply the ACT Government Guidance on Gender Affirming Care for Mental Health in clinical practice
- Apply the National Aboriginal and Torres Strait Islander Health Plan 2021-2031.

6.4 Workforce Commitments

TCS is committed to provide a culturally safe, inclusive, and equitable workplace for all staff, students, and contractors.

TCS will:

- Recruit and retain workforce that reflects the diversity of the communities including actively supporting people with lived experience into peer worker roles
- Provide culturally safe supervision, professional development, and performance review processes for all staff
- Support staff to develop and maintain cultural safety competencies through the Annual Development Plan (ADP) process and the use of the Cultural Safety Audit Tool as a reflective framework in the Annual Performance Review (ARP)
- Address any report of discrimination, harassment, or culturally unsafe practice involving staff promptly and fairly
- Monitor workforce cultural inclusion through the annual staff survey.

6.5 Reporting and Response

Concerns relating to discrimination, harassment, or culturally unsafe practice may be raised through:

- The staff member's direct line manager or Team Lead
- The Service Manager
- The complaints process
- Whistleblower protections where applicable.

All reports will be managed in accordance with organisational policies and relevant legislation. Victimisation of individuals raising concerns will not be tolerated.

6.6 Annual Staff Survey – Cultural Inclusion

TCS conducts an annual all-staff survey that includes questions specifically designed to assess staff experience of cultural inclusion, safety, and respect in the workplace. Survey items address whether staff feel their cultural identity including heritage, language, gender identity, and live experience is respected and supported by the organisation.

Results of the cultural inclusion questions are reviewed by the Systems and Performance Team and reported to the SMC annually. Where results identify areas of improvement and organisational development, specific actions are documented in the Quality Improvement and Assurance Register. The annual staff survey is one of the TCS's formal mechanism for monitoring the implementation of this policy and ensuring the organisation's commitment to diversity, inclusion and cultural safety are experienced in practice by the workforce.

7.0 Implementation

This policy is implemented and communicated in accordance with the Policy Development Process. Implementation is the responsibility of the Policy Owner, systems and Performance Lead and Service Managers.

Table 4 – Implementation mechanisms for this policy

Mechanism	Description	Responsible
Induction and mandatory training	This policy is included in all-staff induction and relevant mandatory training, ensuring new and existing staff are aware of their obligations	People and Administrative Services Manager and Administrative Team
Staff communication	This policy is tabled at relevant staff meetings following approval or revision. Changes are communicated via internal systems	Service Manager
Document Register	This policy is uploaded to the Document Register and accessible to all staff via internal systems	Systems & Performance Lead
Consumer feedback	Diversity and inclusion monitoring is included in the consumer experience surveys and complaints data	QIC / Service Managers
Consumer Advisory Group	The CAG provides lived experience input on inclusive service design and cultural safety of consumer-facing materials	QIC / Systems & Performance Lead

Annual Staff Survey	The survey measure staff perceptions, confidence, and organisational commitment to cultural safety	SMC / QIC
Anonymous Staff Feedback and Suggestions	It is confidential channel for feedback about service delivery, organisational culture, workplace safety, and any other matter of concern	People and Administrative Services Manager and Systems & Performance Lead

8.0 Compliance Monitoring

Compliance with this policy is monitored through the following indicators. Results are reported to the QIC and, where required, escalated to the SMC.

Table 5 – Monitoring of compliance to this policy

Indicator	How Monitored	Frequency	Reported To
% of staff completing cultural safety mandatory training within required timeframe	Mandatory and Professional Training Register	Quarterly	SMC / QIC
Number of complaints and incidents relating to discrimination, harassment, or culturally unsafe practice	Complaints and Feedback Register/ Incident Register	Quarterly	SMC / QIC
Consumer feedback on inclusiveness and cultural safety of services	Consumer experience surveys / CAG feedback	Biannual	QIC
Workforce diversity and training participation data	HR records / Staff Information Register	Annually	SMC
Anonymous Staff Feedback and Suggestions	Internal Feedback Mechanism	Quarterly	SMC / QIC
Annual Staff Survey	Survey Results	Annually	SMC

9.0 Related Documents

The following documents should be read in conjunction with this policy.

Table 6 – Related internal documents

Doc ID	Document Title	Type	Relationship to this Policy
Parent governance documents			
GOV-FRM-01	Governance Framework	Framework	Overarching governance structure and accountability model

GOV-FRM-02	Quality, Safety & Clinical Governance Framework	Framework	Safety and quality system this policy must support
GOV-POL-01	Policy Development Policy	Policy	Governs the development, approval and review of this policy
Related framework			
GOV-FRM-05	Consumer Participation and Experience Framework	Framework	Diverse consumer participation in inclusive service design
Supporting policies and guidelines			
GOV-POL-02	Code of Conduct	Policy	All staff conduct must be inclusive, respectful, and culturally safe
CON-POL-02	Consumer Participation and Feedback Policy	Policy	Complaints about discrimination managed under this policy
WRK-GUI-01	Mandatory Training Guidelines	Guideline	Cultural safety is a mandatory training requirement
WHS-POL-01	Workplace Health, Safety and Wellbeing Policy	Policy	Inclusive and safe workplace for all staff
Registers and records			
QLT-REG-01	Document Register	Register	This policy is listed and tracked in the Document Register
WRK-REG-02	Mandatory and Professional Training Register	Register	This policy is listed and tracked in the Mandatory and Professional Register

10.0 References and Legislation

This policy should be read in conjunction with applicable legislation, regulatory requirements, organisational frameworks, and relevant standards that support governance, quality, safety, and service delivery across TCS:

- Privacy Act 1988 (Cth) and the Australian Privacy Principles.
- Human Rights Act 2004 (ACT)
- Disability Discrimination Act 1992 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Applicable national standards and accreditation requirements relevant to TCS services
- Applicable contractual, regulatory, quality, and safety requirements
- National Principles for Child Safe Organisations (Australian Human Rights Commission)
- National Aboriginal and Torres Strait Islander Health Plan 2021-2031
- ACT Government Guidance to Support Gender Affirming Care for Mental Health.