

First Nations Policy

CGSI-ACA-POL-017

CG Spectrum Institute Pty Ltd

Applied across the corporate group as a standard of good practice

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First Nations Policy

1.0 Purpose

CG Spectrum Institute (CGSI) is committed to respecting, protecting and honouring the rights of First Nations peoples. This policy sets out CGSI's ongoing commitment to creating and sustaining a diverse, inclusive and respectful environment; to establishing, recognising and embedding clear principles, objectives and acts of cultural recognition into CGSI's practices; and to furthering opportunities for First Nations peoples to participate in the delivery and study of its courses.

CGSI is committed to preventing and responding to racism towards Aboriginal and Torres Strait Islander peoples, and to fostering cultural safety across its community. CGSI seeks and acts on the guidance of First Nations people in the planning and implementation of initiatives under this policy. Consultation arrangements are documented, and participation and outcomes are reported to the Academic Board annually.

This policy also carries the First Nations limb of CGSI's obligations under the National Higher Education Code to Prevent and Respond to Gender-based Violence. Standard 1.4(h) of that Code requires the Institute's Whole-of-Organisation Gender-based Violence Prevention and Response Plan to reflect the needs, experience and agency of community members who are disproportionately affected by gender-based violence, and names First Nations people among them. Racism and gender-based violence are not separate concerns where they are experienced together, and this policy is read with the Whole-of-Organisation Plan and the Gender Equality Action Plan accordingly.

1.1 Commencement and effect

This policy takes effect on 26 August 2026, on approval by the Governing Body, and replaces version 1.0.

The requirements set out in this policy apply from that date. They are not deferred to 1 January 2027. The Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026, which introduces requirements to address racism and to create culturally safe environments, applies to all registered higher education providers from 1 January 2027. CGSI adopts those requirements ahead of the date on which it is obliged to.

2.0 Scope

This policy is developed in alignment with the international principles set out in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the National Indigenous Higher Education Objectives, and the Higher Education Standards Framework (Threshold Standards) 2021 as amended by the Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026, in particular standards 2.2, 2.3, 2.4, 3.2, 6.1, 6.4 and

6.10. The amendments relating to racism apply to CGSI from 1 January 2027 and the amendments relating to governance, including standard 6.2, apply to CGSI from 1 July 2027.

This policy applies to all staff, contracted mentors, students and visitors of CGSI, across both physical and online learning and working environments. It is applied across the corporate group as a standard of good practice. Contracted mentors are within scope regardless of engagement basis or location, and inclusion for the purposes of this policy does not determine or alter engagement status.

3.0 Definitions

Term	Definition and references
CG Spectrum Institute (CGSI)	Means CG Spectrum Institute Pty Ltd (ACN 085 501 837).
First Nations, First Nations peoples	Refers to Aboriginal and Torres Strait Islander peoples, defined as any person who is of Aboriginal and/or Torres Strait Islander descent; identifies as an Aboriginal and/or Torres Strait Islander; and is recognised by the First Nations community in which they live as Aboriginal and/or Torres Strait Islander.
Self-determination	The internationally recognised right of First Nations peoples to control their own affairs, maintain their culture and heritage, and determine their own future.
Cultural safety	Refers to overcoming the power imbalances of places, people and policies that occur between the majority non-Indigenous position and the minority Aboriginal and Torres Strait Islander person, so that there is no assault, challenge or denial of the person's identity, of who they are and what they need.
Racism towards Aboriginal and Torres Strait Islander peoples	Interpersonal, systemic and institutional racism, and conduct that denies, diminishes or disrespects the cultures, identities, histories and rights of Aboriginal and Torres Strait Islander peoples. * Definitions of racism generally, racial discrimination, racial vilification, antisemitism, Islamophobia and other forms of racial discrimination and vilification relevant to CGSI's community are set out in the Diversity, Equity and Inclusion Policy.
Marginalisation	Conduct, practice or arrangement, whether or not intended, that excludes a person or group from full participation in the life of the Institute, including from opportunity, decision-making, representation or recognition.
Contracted mentor	A practitioner engaged by CGSI to deliver mentoring, teaching or critique to students, whether engaged as an employee or as an independent contractor, and whether located in Australia or elsewhere.

Term	Definition and references
Visitor	Any person attending a CGSI campus, event or online activity who is not a student, staff member or contracted mentor, including industry guests, practitioners, assessors, partners and the guests of students.

4.0 Responsibilities

It is the responsibility of all staff, contracted mentors and students of CGSI to uphold this policy and to ensure that their behaviour and interactions are respectful, culturally safe, and free from racism.

The Academic Board holds oversight of this policy and monitors its implementation, including reports on cultural safety and on patterns of racism-related conduct affecting First Nations peoples. The Finance, Audit and Risk Committee oversees the associated institutional risk.

The Academic Director is responsible for:

1. overseeing adherence to this policy;
2. obtaining feedback from First Nations stakeholders to develop, review and refine practices, policy settings, observances and initiatives;
3. setting, measuring and reviewing reporting objectives; and
4. making CGSI's progress on related reporting objectives public.

The Higher Education Principal Executive Officer holds operational leadership for preventing and responding to racism, consistent with the role held under the Whole-of-Organisation Gender-based Violence Prevention and Response Plan, and is the designated contact for disclosures until the Staff Grievance Policy and Procedure commences.

Accountability for implementation of the safety obligations in this policy, in respect of students, staff, contracted mentors and visitors, rests with the officers named in this section and is reported to the Academic Board.

5.0 Principles

CGSI affirms its commitment to upholding the rights and dignity of First Nations peoples through the following principles.

Environment

CGSI fosters a diverse and inclusive environment that:

1. is fair and equitable;

2. recognises and values traditional and contemporary histories, values, languages, cultural practices and knowledge;
3. provides equal access to opportunities for all, including through contributions to decision-making, planning, delivery and evaluation of academic and governance practices;
4. is free from racism, discrimination, harassment, victimisation and vilification; and
5. allows everyone to feel a genuine sense of belonging.

CGSI provides a culturally safe environment for First Nations people to work or study, while allowing them to connect, network and be consulted on matters that are important to, or affect, them. CGSI also ensures cultural recognition, cultural awareness and learning opportunities for non-First Nations people in support of reconciliation.

Education

1. Ensuring processes are in place to support the achievement of educational outcomes for First Nations people that are at least equal to those of other Australian students, informed by the National Agreement on Closing the Gap (2020) and the First Nations Cultural Competency in Australian Universities Framework (Universities Australia, 2011); and
2. Seeking to partner with First Nations communities and organisations to provide scholarships, internships and mentorship programs to First Nations students and individuals interested in entering the workforce in the industry.

Employment

1. Encouraging recruitment, retention, employment pathways and career development for First Nations peoples at CGSI;
2. Ensuring appropriate recognition of the contributions that First Nations employees make to CGSI;
3. Ensuring First Nations employees have access to culturally appropriate practices, including flexibility around spiritual observances, holidays and ceremonies that are important to them; and
4. Ensuring that staffing policies, including recruitment, retention, promotion, and training and development, are inclusive and support diversity.

Governance and social responsibility

1. Identifying further opportunities to support self-determination, such as education and employment opportunities;
2. Upholding the unique rights of First Nations people;
3. Developing, promoting and engaging with First Nations stakeholders wherever relevant to support First Nations initiatives, by actively including First Nations voices and perspectives;

4. Respecting Indigenous Cultural and Intellectual Property (ICIP), including by obtaining prior and informed consent before using ICIP; and
5. Including opportunities for input from First Nations peoples in the development and review of relevant policy documents and procedures, as determined by the Governing and Academic Boards.

6.0 Cultural recognition

Welcome to Country

A Welcome to Country is where the Traditional Custodians welcome people to their land. With due regard to the nature, scale and significance of an event, it may be appropriate for CGSI to invite a representative of the Traditional Custodians to perform a Welcome to Country ceremony at the beginning of that event. A Welcome to Country may involve a single speech by the representative, and it may also include a performance such as a Traditional Welcome Song or Traditional Dance. CGSI acknowledges that there are local variations of a Welcome to Country and that it is important to liaise with the relevant Traditional Owner group to ensure accuracy and appropriateness.

Acknowledgement of Country

An Acknowledgement of Country recognises the unique position of First Nations peoples as Australia's first peoples and the ongoing custodians of this land. CGSI acknowledges Elders past, present and emerging as the Traditional Custodians of the land on which we live, study and work, and extends this acknowledgement to all First Nations people. CGSI provides an Acknowledgement of Country at all Governing Body, Academic Board and Committee meetings, and at significant Institute events, to celebrate the country in which many of us live and its rich history and culture.

7.0 Preventing and responding to racism

CGSI does not tolerate racism towards Aboriginal and Torres Strait Islander peoples in any form, whether interpersonal, systemic or institutional. CGSI is committed to preventing such racism and to responding promptly, fairly and consistently when it occurs, across all of its operations, including on campus and in online learning and working environments.

Definitions of racism, racial discrimination and racial vilification, including antisemitism, Islamophobia and other forms relevant to CGSI's community, are set out in the Diversity, Equity and Inclusion Policy.

How racism may manifest in CGSI's environment

CGSI's delivery model shapes where racism is most likely to occur and least likely to be observed. Teaching is delivered largely through one-to-one and small group online sessions that no third party observes. Mentors are drawn from working industry practice and are globally distributed. Critique of student work is a core teaching method, and the line between

rigorous professional feedback and disrespect is set session by session by the individual mentor. The student cohort is globally distributed and culturally diverse, and community channels operate outside timetabled sessions.

In that environment racism may be interpersonal and unwitnessed. It may present as differential treatment in critique, in access to opportunity, or in the allocation of industry connection. It may be systemic where curriculum content, imagery, the framing of student briefs or reliance on referral networks reproduces exclusion without any individual act occurring. CGSI addresses these through mentor conduct standards, inclusive curriculum and assessment design, deliberate widening of mentor and industry sourcing channels, and monitoring of complaint and disclosure patterns for emerging themes.

Guidance for students, staff, contracted mentors and visitors

Any member of the CGSI community who experiences or witnesses racism, whether in an online session, a community channel, on campus or at an Institute event, may raise it in the following ways.

- 1.** Students may raise it with their mentor, with Student Engagement, or through the Student Grievance, Complaints and Appeals Policy and Procedure.
- 2.** Staff and contracted mentors may raise it with the Higher Education Principal Executive Officer, or with the designated contact for disclosures, and, once that instrument commences, under the Staff Grievance and Complaints Policy and Procedure.
- 3.** Visitors may raise it with the CGSI staff member hosting the activity, who refers it to the Higher Education Principal Executive Officer.

A concern may be raised informally, without commencing a formal complaint. Support is available whether or not a formal complaint is made. Where conduct presents an immediate risk to a person's safety, it is escalated under the Wellbeing and Safety in the Learning and Working Environment Policy and Procedure.

Raising a concern in good faith does not expose any person to disadvantage. CGSI does not tolerate reprisal against a person who reports racism, or who supports another person to do so, and reprisal is itself treated as a breach of this policy.

CGSI communicates this guidance to students at orientation and within the learning environment, and to staff and contracted mentors at induction and through the professional development cycle.

Reporting and review

Reports and complaints involving racism are managed under the Student Grievance, Complaints and Appeals Policy and Procedure and the Wellbeing and Safety in the Learning and Working Environment Policy and Procedure, and, for staff and contracted mentors, under the Staff Grievance and Complaints Policy and Procedure once established.

Complaints handling processes provide for confidentiality, access to independent advice, advocacy and support for the complainant, and review by an appropriate independent third party where internal processes do not resolve the grievance. Those processes are designed and periodically reviewed in consultation with students and staff, including people with lived experience of discrimination, harassment, victimisation or violence, so that they are accessible, easy to navigate, promote cultural safety, and minimise administrative barriers.

Patterns of racism-related reports recorded on the Integrated Incidents Register (CGSI-RSK-REG-003) are reported to the Academic Board and the Finance, Audit and Risk Committee, consistent with CGSI's wider approach to unsafe behaviour.

8.0 Related

Related policies and procedures

Diversity, Equity and Inclusion Policy; Student Grievance, Complaints and Appeals Policy and Procedure; Student Discipline Policy and Procedure; Wellbeing and Safety in the Learning and Working Environment Policy and Procedure; Staff Grievance and Complaints Policy and Procedure (in development); Course Design, Development and Approval Policy; Course Evaluation and Review Policy; Staff Selection, Recruitment and Appointment Policy and Procedure; Student Selection and Admission Policy and Procedure; Student Welfare and Support Policy and Procedure.

Related plans

Whole-of-Organisation Gender-based Violence Prevention and Response Plan; Gender Equality Action Plan; Support for Students Policy Framework.

Related registers

Integrated Incidents Register (CGSI-RSK-REG-003).

Related legislation and frameworks

Racial Discrimination Act 1975 (Cth); Disability Discrimination Act 1992 (Cth); Disability Standards for Education 2005; Sex Discrimination Act 1984 (Cth); Australian Human Rights Commission Act 1986 (Cth); Age Discrimination Act 2004 (Cth); Racial and Religious Tolerance Act 2001 (Vic); Equal Opportunity Act 2010 (Vic); Tertiary Education Quality and Standards Agency Act 2011 (Cth); Higher Education Standards Framework (Threshold Standards) 2021, as amended by the Higher Education Standards Framework Amendment (Threshold Standards) Instrument 2026; National Higher Education Code to Prevent and Respond to Gender-based Violence 2025; United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP); National Indigenous Higher Education Objectives; National Agreement on Closing the Gap (2020); First Nations Cultural Competency in Australian Universities Framework (Universities Australia, 2011); VicScreen's Roadmap to 2033 (2024).

9.0 Review and Publication

This policy is reviewed by the date recorded in the document information table, and earlier where a regulatory change, a change in CGSI's delivery model, or a finding from the monitoring of concerns raised under section 7.0 indicates that review is required. Review is undertaken in consultation with First Nations stakeholders in accordance with clause 4.0.

This policy is published on the CGSI website. It is drafted in plain English and is able to be translated, taking into account the demographics of CGSI's students and staff. Its classification is Public.

Version Control

Document Information

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The full version history for this document, including change notes, approving body and effective date for each version, is recorded in the Policy, Procedure and Forms Register, CGSI-GOV-REG-004.