

# SPA Policy 36 – Indigenous Participation Policy

Rev: A, 1/8/21



## Scope

This document outlines Stabilised Pavements of Australia's (SPA) policy and procedure in relation to improving our outcomes in relation to indigenous participation.

## Field of Application

This policy and procedure apply across all our business operations.

## Definitions

**Indigenous** refers to Aboriginal or Torres Strait Islander persons. SPA respects and utilises self-identification of Indigenous staff to internally report on indigenous employment; unless a client requires alternative validation methods.

**Indigenous enterprise** means an organisation, operating a business, that is 50 per cent or more indigenous owned. It may take the form of a company, incorporated association or trust. A social enterprise or registered charity may also be an Indigenous enterprise if it is operating a business.

## Policy

Stabilised Pavements of Australia is committed to advancing the opportunities of Aboriginal and Torres Strait Islanders. This commitment is demonstrated by having a targeted approach to improving indigenous participation outcomes within our organisation, and understanding our performance obligations to community and clients regarding indigenous participation.

This Policy aims to support achieving Indigenous participation outcomes through indigenous business engagement, indigenous employment and retention, and creating a culturally safe work environment that supports indigenous peoples and cultures.

In order to help achieve this outcome, SPA is committed to promotion of the following principles:

- Providing Indigenous people with access to employment and career development opportunities at SPA through processes which encourage Indigenous employees
- Respecting and learning about Indigenous culture and people and the importance of indigenous participation in achieving the company goals and objectives
- Actively engaging and procuring the goods and services of indigenous businesses for SPA facilities and projects
- Forming long-term relationships with indigenous communities and businesses.
- Recognising the rights of indigenous employees and suppliers to be provided a workplace that is culturally safe free of any racism.

## Policy Implementation

SPA will implement our policy and associated principals through the following means:

- Establish internal Indigenous participation objectives and targets, and monitoring and reviewing targets to ensure continuous improvement
- Implementing Indigenous Participation Plans on projects as required by our Clients
- Meeting and exceeding the Indigenous participation objectives and targets required by Clients
- Engaging with Indigenous businesses through the following priorities relevant to the location of a project: Traditional Owner > local Indigenous business > Indigenous business
- Where necessary, breaking down work packages into scopes ("scope segmentation") which fits within the capacity of the Indigenous business.
- Creating a culturally safe work environment
- Providing staff with Cultural Awareness Training
- Participating in events that celebrate Indigenous culture and people
- Providing career development pathways for Indigenous employees
- Providing mentoring for new Indigenous employees
- Forming win-win partnerships with Indigenous organisations and communities that support Indigenous economic development
- Seeking to promote work practices that recognise and value the Indigenous histories, backgrounds, and perspectives
- providing employees with access to communicate any complaints of behaviour or circumstances that may contradict this policy
- Ensuring heritage incident management processes are understood and complied with, per relevant state and federal legislation across all SPA projects
- Communicating SPA's expectations to employees including their responsibilities under this policy and the implications of breaching this policy

## Roles and Responsibilities

All SPA employees are accountable for ensuring that their own behaviour complies with SPA's commitments as outlined within this policy and other referenced documents.

Responsibilities of all employees:

- Inform themselves of SPA policies and procedures in relation to Indigenous Participation and undertake relevant Cultural Awareness training as provided by SPA
- Seek to treat others fairly, with respect and without discrimination or harassment
- Report breaches of this policy according to the processes outlined under this procedure

Responsibilities of supervisors or managers:

- Provision of adequate training for workers, relevant to their roles and responsibilities, to support achieving Indigenous Participation objectives.
- Ensuring that Indigenous employees are provided a culturally safe work environment

- Identifying local Indigenous Participation Coordinators for projects as required
- Implementing procurement strategies to improve Indigenous participation.
- Achieving Indigenous business participation requirements as defined by clients for each project
- Do what is reasonably practical to identify and engagement of Indigenous businesses during the tendering process
- Inform employees of their responsibilities under this policy and encourage them to comply with the requirements of this policy
- Monitor and report on any breaches of this policy

### Complaints, Incidents, and Investigations

#### Indigenous Worker Complaints

SPA shall ensure that Indigenous employees have clearly defined processes and opportunities to report or communicate any instances of discrimination. Indigenous employees who feel they have been a victim or who have witnessed behaviour or environments that contradict this policy should refer to SPA-POL-08 Employee Grievance Handling. Any incidents or complaints that are reported can either be completed verbally or in writing to the Regional Manager or Executive General Manager.

#### Heritage Incidents

Any cultural heritage incidents or Indigenous community complaints shall be reported promptly to either the Regional Manager or Executive General Manager. Any incidents that are in breach with relevant Indigenous heritage legislation are to be managed by the Executive General Manager.

#### Indigenous Community or Business Complaints

Indigenous business or community complaints will be investigated by an independent person who is appointed by either the Executive General Manager or General Manager. The General Manager or Executive General Manager are responsible for ensuring these complaints are managed and resolved effectively.

#### Breaches of Policy

Breaches of this policy will be viewed as a serious matter and treated in the same way as any breach of company policy.

Employees whose behaviour is in breach of the requirements of this policy will be subject to disciplinary action as per SPA Policy SPA-POL-09 Discipline – Management of Inappropriate Behaviour. In the case of subcontractor noncompliance, this should result in a review of the subcontractor's terms of engagement and could result in termination of contract.

Note that any behaviour or actions that are contradictory to any legislation applicable to this policy may be referred to the regulatory agency in the case where circumstances require SPA to do so. This may result in action against the individual on behalf of the regulatory body.

## Policy and Legislation References

### Government Policy

- Commonwealth Indigenous Procurement Policy (IPP)
- Western Australia Aboriginal Procurement Policy (APP)
- Queensland Indigenous (Aboriginal and Torres Strait Islander) Procurement Policy (QIPP)
- Victorian Aboriginal Affairs Framework and Victorian Aboriginal Economic Strategy
- South Australia Aboriginal Economic Participation Strategy
- Northern Territory Procurement Governance Policy

### Legislation

- The Aboriginal and Torres Strait Islander Heritage Protection Act 1984
- Aboriginal and Torres Strait Islander Act 2005
- Aboriginal Heritage Act 1972 (WA)
- Aboriginal Heritage Act 1988 (SA)
- Aboriginal Cultural Heritage Act 2003 (QLD)
- Aboriginal Heritage Act 2006 (VIC)

## Advice and Support

Internally, Indigenous employees should seek advice from their supervisor. If an employee does not feel that this is an appropriate channel for advice or support based on the circumstances, internal support should be sought from either the Regional Manager or Executive General Manager.

Internal procurement and project personnel should seek the support of the relevant manager for Indigenous community engagement and business participation.

Support from external bodies may include the following:

#### **Indigenous Management Group Pty Ltd**

Indigenous participation service 1800 464 464  
[www.imgwa.com.au](http://www.imgwa.com.au)

#### **Supply Nation**

Indigenous business register  
[supplynation.org.au](http://supplynation.org.au)