INCLUSION, DIVERSITY AND CULTURALLY SAFE SERVICE DELIVERY POLICY AND PROCEDURE

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Purpose and Scope

This policy and procedure ensures Bilingual Care's care and services are accessed, planned for, and delivered to meet the diverse and individualised needs of consumers, including gender, age, language, ethnicity, cultural background, sexual orientation, religious beliefs, and family responsibilities. It ensures that all consumers, regardless of their culture, language, gender, sexual orientation, abilities, age, beliefs or personal history, feel welcomed, valued, safe and fully supported.

This policy and procedure outlines Bilingual Care's commitment to recognising and respecting the individual identities of consumers and safely meeting their needs, expectations, and rights in line with the *Aged Care Diversity Framework* and *Action Plans*[1] and based on NSW Health's *Integrated Trauma-Informed Care Framework: My story, my health, my future*[2].

This policy and procedure applies to all potential and existing consumers, as well as all staff, and meets relevant legislation, regulations and Standards.

Applicable Strengthened Aged Care Quality Standards

- *Standard 1. The Individual*
- *Standard 2. The Organisation*
- *Standard 3. The Care and Services*
- *Standard 4. The Environment*
- *Standard 5. Clinical Care*
- *Standard 6. Food and Nutrition*

This policy and procedure supports all Aged Care Quality Standards and is essential to providing consumer-centred care.

Definitions

Cultural awareness - sensitivity to the similarities and differences that exist between two different cultures and the use of this sensitivity in effective communication with members of another cultural group. It is also the awareness that one's own cultural values are not universal, nor automatically 'better' than another set of values.

[1] Department of Health, Disability and Ageing, 2017, *Aged Care Diversity Framework*, Australian Government, accessed 12 March 2026, https://www.health.gov.au/our-work/aged-care-diversity-framework-initiative?language=en

[2] NSW Health, 2023, *Integrated Trauma-Informed Care Framework: My story, my health, my future*, NSW Government, accessed 12 March 2026, https://www.health.nsw.gov.au/patients/trauma/Pages/itic-framework.aspx

Cultural competence – occurs when a business has structures in place to support the flexibility of its staff so they can meet the needs of Aboriginal and Torres Strait Islander and culturally and linguistically diverse consumers.

Cultural safety – delivering services in a way that people feel safe and secure in their identity, culture, and community. This includes planning and applying policies, strategies, and programs that consider, acknowledge, and incorporate the history, traditions, diversity, and circumstances of the Aboriginal and Torres Strait Islander and culturally and linguistically diverse groups that the business works with.

Cultural safety and competency are about recognising the centrality of culture, language and country for Aboriginal people and people from culturally and linguistically diverse backgrounds in delivering quality supports. Culture and language are powerful influencers in supporting the positive identity, self-determination, and well-being necessary to enhance service access, equity, and effectiveness.

Trauma[3] - the overwhelming physical, emotional or psychological response to an event or repeated experiences that are perceived as harmful, threatening or unsafe. It may arise from a single incident or from ongoing, cumulative or unresolved situations, and can be experienced individually, as a group or across generations. Trauma can affect how a person feels, behaves, copes, and engages with services, and may influence their physical and mental health over their lifetime. While its impacts can persist, healing is possible and supported through safe, respectful and trauma-informed care.

Trauma aware and healing informed care – recognising that people may have experienced trauma at some point in their lives, and that these experiences can affect how they feel, communicate and respond to care. It involves understanding the impact of trauma, avoiding actions that may trigger distress or re-traumatisation, and creating a safe and respectful environment where the person maintains choice, control and dignity.

Unsafe Cultural Practice - any action which diminishes, demeans, or disempowers the cultural identity and wellbeing of an individual.

Policy

Bilingual Care recognises, respects, and supports the unique identities, histories and lived experiences of every consumer. We strive to provide care that meets their needs and expectations whilst also upholding each person's rights, dignity and emotional safety.

Bilingual Care understands that to provide better care and service outcomes for consumers, all staff must understand each consumer's cultural identity, and be respectful of their gender, age, language, ethnicity, sexual orientation, religious beliefs, family responsibilities and past experiences, including trauma. To deliver safe, high-quality and healing-informed services, all staff are expected to approach each interaction with cultural humility, curiosity, sensitivity and respect.

Bilingual Care is committed to working in genuine partnership with consumers and their representatives/supporters so that their cultural preferences, personal values and needs can be understood and meaningfully incorporated into care planning and service delivery. Staff must appreciate that what is culturally safe and preferred for one consumer can be different

[3] NSW Health, 2023, *Integrated Trauma-Informed Care Framework: My story, my health, my future*, NSW Government, accessed 12 March 2026, https://www.health.nsw.gov.au/patients/trauma/Pages/itic-framework.aspx

to what is culturally safe and preferred for another. This means adapting care to honour each consumer's preferences, supporting their sense of control, and avoiding actions that may cause distress or re-traumatisation.

Bilingual Care is committed to delivering services that mean all consumers feel safe, empowered, respected and supported in maintaining their health, wellbeing, and independence.

Procedures

Initial Access and Care Planning

During initial access conversations with potential consumers and their representatives or supporters, the Managing Director must begin to gather information from the consumer about their cultural identity, gender, age, language, ethnicity, sexual orientation, religious beliefs, and family responsibilities. They must ensure further conversations and care planning incorporates this information and explores the consumer's preferences further.

At the point of assessment and care planning the Managing Director must acknowledge and capture the above information about the consumer, and their preferences in relation to:

- medical interventions, death and dying, and end of life care
- food preferences including preparation and eating
- religious practices and rituals including responding to death and funerals, coming of age, 'men's business', 'women's business' and cultural ceremonies
- preferred activities and
- direct care worker preference.

Further historical information must be gathered regarding the consumer's identified cultural group and the individual themselves (for example, any linkages to cultural massacres or forced relocation away from land or country, or specific stolen generation linkage) as well as any traumas the consumer may have experienced during their life.

The consumer's identity information and preferences must be captured in their *Care Plan* and reviewed as per the *Care Review Policy and Procedure*.

Working with Aboriginal and Torres Strait Islander and Culturally and Linguistically Diverse Consumers

Bilingual Care is committed to supporting consumers from Aboriginal and Torres Strait Islander and culturally and linguistically diverse backgrounds to maintain and strengthen their connection to their community, culture, spirituality, and language.

Bilingual Care works collaboratively with consumers from diverse backgrounds to provide holistic service delivery. Staff delivering services to consumers from Aboriginal and Torres Strait Islander or culturally and linguistically diverse backgrounds should consider:

- that these communities are extremely diverse
- the cultural context and the potential for significant cultural differences between people in terms of spiritual, ecological, consensual, and communal beliefs and values
- the impacts of racism and prejudice
- translating written, electronic and verbal information or making it available in Easy English for people who are not proficient in the English language
- that some migrants and former humanitarian entrants are not literate in their own language

- communicating in a community's preferred medium (some communities may prefer printed information rather than verbal)
- allowing sufficient time for cross-cultural input and communication
- incorporating a family-sensitive approach to support and including extended family members and significant others in service delivery by providing a range of flexible, culturally appropriate ways to engage
- providing more flexible appointment times and lengths and
- providing services in alternative, outreach, home and/or community environments.

Staff should also apply cultural protocols when supporting consumers from diverse backgrounds, including:

- recognising gender, how people are expected to interact with the opposite sex (including married and unmarried people of the opposite sex) and taking this into account when selecting a staff member to support a male or female consumer
- for culturally and linguistically diverse consumers, depending on the period of time spent in Australia, migration experience, country of origin and pre-migration experience, communities may have mixed attitudes towards government and people of authority
- for Aboriginal and Torres Strait Islander consumers, recognising kinship and the impact this may have on service delivery and
- understanding the importance of notifying appropriate people in a consumer's community of an intended visit.

Partnerships

Where possible, staff must identify and provide referrals and linkages to community services and activities that are operated by or for a consumer's community.

The Leadership Team will work closely with Aboriginal and Torres Strait Islander and culturally and linguistically diverse services in its region to establish partnerships to benefit its consumers and their communities. These partnerships should also inform Bilingual Care's culturally secure and competent service delivery.

Personal contact with community representatives such as Elders and Community Leaders may also be required for them to maintain an awareness of Bilingual Care, its entry criteria, how to access it, and commitment to any partnership arrangements.

Staff Support

Through its recruitment and staffing processes, Bilingual Care endeavours to develop a culturally diverse and competent workforce to support culturally appropriate and safe service delivery.

In line with Bilingual Care's *Training and Development Policy and Procedure*, staff are regularly provided with training and development opportunities, which includes cross-cultural training and support to develop skills and knowledge about different communities and people from diverse backgrounds. They may also be trained in engagement skills and the use of interpreters.

Bilingual Care also endeavours to employ staff from diverse backgrounds and will consider the following strategies to support and retain them:

- hold events that celebrate workplace diversity and encourage employees to share their cultures and experiences

- set up internal and external mentoring and supervision arrangements with people of the same background and
- support them to fulfil cultural and social obligations to their family and community.

Environment

Consumers from diverse backgrounds may prefer specific gender workers and may also prefer workers from the same cultural background. Staff allocation should be based on staff skills and training, gender, and other cultural factors. If Bilingual Care is not able to meet these needs/preferences, staff should provide referrals and linkages to other appropriate services and work closely with other services to ensure services are delivered in a way that is holistic, culturally safe, and culturally competent. See the *Providing Information, Advice and Referral Policy and Procedure* for more information.

Where there are significant barriers for people to access Bilingual Care, it may be appropriate to take the service to them, such as offering outreach services through another more accessed agency, or home visits.

Promotion

Bilingual Care's promotional and consumer materials will be appropriate and welcoming of Aboriginal and Torres Strait Islander and culturally and linguistically diverse people and inform communities of the business' entry criteria, services offered and access requirements. Local ethnic and community radio stations, websites, press and other media may be used to promote services.

Bilingual Care will also consider appointing people from diverse backgrounds to decision-making and advisory committees to enhance partnerships and communication processes and involving Community Leaders and Elders in face-to-face engagement and collaboration.

Interpreters

Bilingual Care recognises that the provision of language services is a matter of quality and safety for consumers. The delivery of safe, high-quality services requires effective communication with consumers and their representatives or families and Bilingual Care has a duty to provide language services appropriate to a person's needs. Accredited interpreters must be made available at no cost to consumers and, if relevant, their supporters.

Where an interpreter is required, staff must first assess how well the person can understand information in English. An effective method for assessing English proficiency is to conduct a short, informal interview with the person, asking for basic details about their reason for making contact and their background. Stressful or unfamiliar environments may affect a person's ability to communicate effectively, even if they generally have a level of proficiency in English suitable for that type of appointment or meeting.

An interpreter must be engaged if a person requests one.

Where a consumer has limited or no English language skills or uses Auslan, Bilingual Care must offer them the use of a professionally interpreter to ensure the consumer understands and can communicate in response to the information being provided to them.

Every reasonable effort must be made to use an interpreter before a family member or friend of the consumer is asked to assist. They may assist in communicating with a consumer where

an interpreter is required but is not available and a matter must be dealt with in a restricted timeframe. The decision to do so, and the circumstances justifying that decision, must be documented in the consumer's file or relevant record. As soon as practicable the services of a professional interpreter must be engaged to ensure the information has been accurately conveyed, especially in the case of medical or complex situations.

Any individual under the age of 18 must never be asked to act in the place of an interpreter.

Unless they are an interpreter or employed for their language skills, staff members who speak a language other than English may only assist with communicating low risk information such as making appointments or obtaining basic personal details such as name and address. Unaccredited bilingual staff cannot be used to communicate information that is legally binding or puts the consumer or Bilingual Care at risk.

The following are critical points at which people with low English proficiency should have access to information in their preferred language:

- the consumer is being informed of their rights (for example, privacy, confidentiality) and responsibilities (for example, fees)
- the consumer is required to make significant decisions concerning their lives (for example, provision of test results, medication regimes, other interventions, undertaking assessment and *Care Plan*ning, conducting assessment outcomes)
- essential information needs to be communicated and understood to inform decision making (for example, procedures and referral options) and
- giving informed consent (for example, to treatment, release of information, power of attorney and guardianship matters).

Staff can access interpreters and translators through the Translating and Interpreting Service (TIS). Services provided by TIS include:

- telephone interpreting
- on-site interpreting (spoken languages and Auslan)
- language translations and
- video remote interpreting.

Interpreting bookings including those for video remote interpreting can be made at https://www.tisnational.gov.au/en/Our-services/Information-for-agencies/How-TIS-works-for-agencies

Consumers or their supporters can request a preferred interpreter. However, while the use of the consumer's preferred interpreter is recommended, if that interpreter has a qualification lower than a professional level, they can only interpret basic information. A professional interpreter must be used for the communication of critical or legally binding information.

Information regarding access to interpreters is provided in Bilingual Care's *Consumer Information Pack* and clearly displayed in Bilingual Care's foyer, along with other information regarding how Bilingual Care will deliver culturally competent services. Relevant contact details will be included in Bilingual Care's *Referral Database*.

Translation

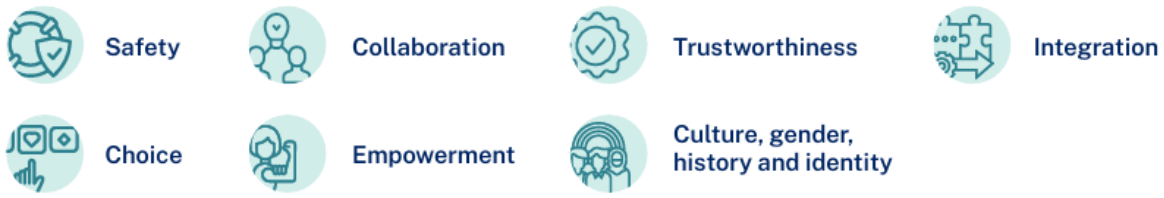
Translated information can supplement interpreting services and provides information that the consumer can later refer to, or provide to family, carers, and other support persons to aid understanding. Some people may prefer written information. Bilingual Care will provide

information in other languages where possible to support the consumer's understanding.

Trauma Aware and Healing Informed Care

Trauma aware and healing informed care is an approach to providing support that recognises that many people may have experienced trauma at some point in their lives, and that these experiences can affect how they feel, communicate, and respond to care. Trauma informed care focuses on creating a safe, respectful and empowering environment where a person's emotional, cultural and psychological safety is prioritised. This approach involves understanding the impact of trauma, avoiding actions that may trigger distress or re-traumatisation, and ensuring the person maintains choice, control and dignity at all times during their interactions with Bilingual Care.

Bilingual Care is guided by seven core principles[4] in providing trauma aware and healing informed care:



1. **Safety** - ensuring the consumer feels physically, culturally, religiously, socially and psychologically safe.

2. **Collaboration** - working with the consumer to understand their triggers and maintaining their dignity through partnership and shared decision-making.

3. **Trustworthiness** - being honest, predictable and clear about what will happen and when during support delivery. Being trustworthy involves being reliable, accountable, respecting boundaries, and information is not shared without the express consent of the person. It is expected that it will take time and effort to build trust particularly where trust has been broken.

4. **Integration** – care is smooth, coordinated and uninterrupted, addressing all of a person's health needs in partnership with them, their family and carers. It is person-centred, continually improved, and supported by shared responsibility and open information-sharing (with consent) with relevant stakeholders.

5. **Choice** - supporting the consumer's right to make decisions and giving them options wherever possible.

6. **Empowerment** - focusing on the consumer's strengths, building confidence, and helping them to feel in control of their own care experience

7. **Culture, gender, history and identity** - respecting and responding to each person's unique cultural background, gender, identity, religion, sexual orientation and abilities.

[4] NSW Health, 2023, *Integrated Trauma-Informed Care Framework: My story, my health, my future*, NSW Government, accessed 12 March 2026, https://www.health.nsw.gov.au/patients/trauma/Pages/itic-framework.aspx

This should also acknowledge and address the impacts of historical trauma, such as genocide and institutional racism, and support healing through connection to culture and tradition.

While every individual and family is unique, it is acknowledged that some groups may face higher risks of trauma or experience it differently due to their cultural or historical context. Care must therefore be personalised, culturally informed and sensitive to these diverse experiences.

To embed trauma aware and healing informed processes across Bilingual Care, the Leadership Team will:

- ensure that trauma aware and healing informed principles are part of policies, procedures, job descriptions and performance expectations
- ensure trauma-informed values (safety, trust, empowerment, choice, collaboration, cultural humility) are part of Bilingual Care's values and drive quality improvement activities
- allocate resources (time, training, budget, supervision) to support genuine and informed care and services
- include trauma awareness in risk management, identifying where re-traumatisation risk may occur (personal care, communication, transitions, complaints handling, restrictive practices)
- provide training for all staff on trauma, its impacts, trauma-informed principles and practical skills e.g. de-escalation, safe communication, consent-based practice
- provide reflective practice, supervision or debriefing opportunities to help staff process challenging interactions and prevent compassion fatigue
- respect and protect personal and sensitive information about cultural identity, gender preferences, traumas and beliefs as per Bilingual Care's *Privacy and Confidentiality Policy and Procedure*
- review intake, assessment, service exit and complaints processes to ensure they avoid re-traumatisation e.g. minimise repeated storytelling, provide options, ensure clear explanations and use transparent, predictable and respectful communication, especially during transitions or changes in care
- involve consumers in co-designing their *Care Plans*, communication preferences, routines and safety needs and invite input from families or chosen supporters (with the person's consent)
- promote predictable routines and explain any changes in advance to support emotional safety
- create care environments and approaches that reduce triggers e.g. noise, rushed activity, unexpected touch, crowded spaces

Ongoing Support

With their consent, any information pertaining to a consumer's unique identity must be highlighted and listed with priority as part of their records.

Bilingual Care staff must respect each consumer's language preferences (including acknowledging first languages) and provide interpreting and translation services for all required communication if needed.

Staff must engage with consumers and their representatives to encourage them to provide regular feedback and education, and to share stories and knowledge of their culture and background, to shape the way Bilingual Care interacts with and supports its local community and consumers.

During the management and resolution of any incidents or complaints raised in Bilingual Care, staff responsible must ensure individual consumer preferences are considered and enact Bilingual Care's open disclosure process (see the *Open Disclosure Policy and Procedure*). This includes providing timely information in a format and language that is understood.

Staff Training and Education

Bilingual Care will ensure all staff understand and know what is required to make each consumer feel respected, valued, and safe, including receiving culturally safe, trauma aware and healing informed care and services.

As per the *Onboarding and Induction Policy and Procedure*, all staff will be provided Induction, which will include training on cultural awareness, cultural competence, and cultural safety (including what is deemed as unsafe cultural practice). Training on specific areas will be provided where required, for instance, gender diversity and LGBTIQA+ awareness, different cultures and religious beliefs, use of interpreters and translators, and referral and support networks.

Staff will also be educated on the individual cultural preferences, language, ethnicity, sexual orientation, religious beliefs, and family responsibilities of consumers before working with them, to ensure care delivered makes the consumer feel comfortable and safe.

Bilingual Care will encourage consumers (where comfortable and able) to educate their allocated care workers on their individual preferences and welcomes feedback in relation to whether their expectations of cultural safety and inclusiveness are being met by staff.

Bilingual Care will research the different cultural groups within its service area and link with elders and other experts who can provide information and education on how best to support its specific community.

Supporting Documents

Documents relevant to this policy and procedure include:

- *Care Review Policy and Procedure*
- *Onboarding and Induction Policy and Procedure*
- *Open Disclosure Policy and Procedure*
- *Privacy and Confidentiality Policy and Procedure*
- *Providing Information, Advice and Referral Policy and Procedure*
- *Training and Development Policy and Procedure*
- *Care Plans*
- *Consumer Information Pack*
- *Referral Database*

Monitoring and Review

This policy and procedure will be reviewed at least annually by the Leadership Team. Reviews will incorporate staff, consumer, and other stakeholder feedback.

Bilingual Care will include staff, consumers, and stakeholders in its organisational service delivery planning in all areas possible, including how to ensure culturally safe care and

services are delivered to meet individual's needs.

Annual satisfaction surveys will assess consumer, staff, and other stakeholders' satisfaction with Bilingual Care's inclusive and culturally safe care and services and how they can be improved.

Bilingual Care's *Continuous Improvement Plan* will be used to record improvements identified and monitor the progress of their implementation. Where relevant, this information will be considered as part of Bilingual Care's service planning and delivery processes.

DOCUMENT CONTROL

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