

NGARRA GROUP

ACT Education Directorate

Independent Cultural Safety Review

Current State Assessment and Recommendations

Contract PIED0011191

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Acknowledgement of Country

We acknowledge the Ngunnawal people as traditional custodians of the land on which this review has been conducted and on which the ACT Education Directorate carries out its work and recognise any other people or families with connection to the lands of the ACT and region. We acknowledge and respect their continuing culture and the contribution they make to the life of this city and this region.

Executive Summary

This report presents the findings of the Independent Cultural Safety Review commissioned by the ACT Education Directorate under contract PIED0011191. The review comprised a desktop review of organisational documentation and data, two sequential deployments of a purpose-designed staff survey, seven stakeholder consultations, group engagement sessions, and analysis of safety portal and complaints data. The assessment draws on all of these evidence streams to provide a current state picture of cultural safety across the Directorate.

The centrepiece finding of this review is a profound and structurally significant divergence between how First Nations staff and non-Indigenous staff assess the Directorate's cultural safety. On the direct question of whether the Directorate is a culturally safe workplace, 57.9 per cent of First Nations respondents disagreed, while 50.4 per cent of non-Indigenous respondents agreed. The two cohorts do not simply hold different views about the same workplace; they describe, in experiential terms, two different organisations. Under the definitional framework that governs this review — including the National Agreement on Closing the Gap and the Public Sector (Closing the Gap) Legislation Amendment Act 2025 — it is the assessment of First Nations peoples themselves that is definitive. On that measure, the Directorate is not currently meeting the standard.

The review also identifies a substantial gap between abstract endorsement of cultural safety principles and the ability to apply those principles operationally. Whilst 77 per cent of respondents endorsed the Directorate's responsibilities for cultural safety in general terms,

fewer than 16 per cent correctly identified collective First Nations determination as the appropriate locus of cultural safety assessment, and significant proportions of staff cannot reliably identify culturally unsafe conduct in applied scenarios. This is not primarily a problem of resistance or indifference; it reflects a system that has not provided its workforce with the definitional clarity, structural supports, or accountability mechanisms required to translate principles into practice.

The evidence points to eight recommendations for structural reform, preceded by an immediate action on racist conduct that is urgent and cannot await a broader implementation programme. The recommendations address: the establishment of a shared organisational understanding of cultural safety; enhanced senior Indigenous leadership with genuine authority; the adoption of a capability framework that makes cultural safety something the Directorate can reliably produce rather than something that depends on individual goodwill; explicit engagement with the colonial legacy and its contemporary manifestation as systemic racism; restructure of the First Nations Education function; an external advisory mechanism; differentiated and mandatory training; and the engagement of external resources to support the transition. Together, these recommendations constitute a programme of genuine organisational transformation. The Implementation Phase is designed to support the Directorate in that work.

1. Context and Scope of This Review

This report presents the findings of the Independent Cultural Safety Review commissioned by the ACT Education Directorate. The review combined desktop analysis of organisational documentation, two deployments of a purpose-designed workforce survey, stakeholder consultations, and group engagement sessions. It draws on an earlier case study of the Directorate's complaint handling processes — conducted as a scoping exercise to inform the review's methodology — and on that basis presents a systemic current state assessment of cultural safety across the Directorate. An Implementation Phase, the subject of a commercial-in-confidence proposal prepared under this contract, will provide implementation support as the Directorate moves from assessment to action.

The terms of reference for this review required it to evaluate the current environment and experience of First Nations staff, assess Directorate practices in supporting staff and responding to issues raised by or involving First Nations staff, identify immediate actions to address psychosocial and cultural safety risks, and develop a refined scope and approach for the Implementation Phase. Those requirements are addressed in this report and in the accompanying annexures. In addition, the review has done what this kind of assessment must do if it is to be of genuine value: it has looked beneath the surface of practices and processes to examine the conceptual, structural, and cultural foundations upon which practice rests.

The ACT Education Directorate operates in a statutory environment that has materially strengthened the obligations bearing on this work. The Public Sector (Closing the Gap) Legislation Amendment Act 2025 imposes obligations relating to cultural integrity and cultural safety that are not aspirational but legal. The National Agreement on Closing the Gap, to which the ACT Government is a signatory, provides a framework within which these obligations are situated. This review treats those obligations as the baseline, not the ceiling, of what the Directorate should be working to achieve.

The review's approach to cultural safety is informed by the considerable body of literature and practice in this field, but also by a critique of that literature that forms a distinctive

contribution of this work. The following section sets out the conceptual framework within which the findings are presented.

2. Understanding Cultural Safety: A Conceptual Framework

2.1 The Definitional Landscape and Its Limits

Cultural safety as a concept originates in the work of Irihapeti Ramsden in Aotearoa New Zealand in the late 1980s, developed in response to evidence that Māori patients were experiencing healthcare interactions that denied, challenged, or undermined their cultural identity. (Ramsden, 1993, 2002) Ramsden's foundational contribution was to shift the locus of evaluative authority: where cultural competence could be assessed by examining practitioner behaviour, cultural safety could only be determined by the recipient of the service or interaction. (Ramsden, 1993; Papps & Ramsden, 1996) This shift — from provider self-assessment to recipient determination — is what gives the concept its moral and political force.

The concept has migrated significantly since its origins, spreading from healthcare into education, social services, and public sector employment contexts across Australia and the Pacific. The National Agreement on Closing the Gap defines cultural safety as being about overcoming the power imbalances of places, people, and policies that occur between the majority non-Indigenous position and the minority First Nations person, such that there is no assault, challenge, or denial of identity. Critically, the National Agreement affirms that only the First Nations person who is the recipient of a service or interaction can determine whether it is culturally safe. (Coalition of Peaks & Australian Governments, 2020, Section 12)

This review has identified a significant and underappreciated gap in the cultural safety literature, including in Ramsden's foundational work: the concept has been extensively theorised as a process, (Ramsden, 1993, 2002; Papps & Ramsden, 1996; Curtis et al., 2019) and the appropriate locus of determination has been clearly established, but the positive characteristics of the culturally safe state have never been adequately articulated. The literature tells us who determines cultural safety; it does not tell us, with sufficient specificity, what they would be looking for when making that determination. Organisations seeking to build cultural safety as an organisational practice are consequently working

toward a destination that has never been described. A concept theorised almost entirely through its absence and its process, with remarkably little said about what it looks and feels like when it exists, is extremely difficult to operationalise.

This gap is consequential for the Directorate. Without a shared, substantive understanding of what cultural safety consists of in an organisational and educational context, staff cannot be held accountable to a defined standard, training cannot be directed at building a specified capability, and improvement cannot be measured against a known benchmark.

2.2 Cultural Safety as Collective Determination

A further critical dimension of this review's conceptual framework concerns the locus of cultural safety determination. The dominant tendency in policy and practice has been to translate the concept of cultural safety into an individualised framework: an individual First Nations person determines whether they personally feel safe. (Curtis et al., 2019, 2025) This translation has a superficial plausibility — it respects individual subjectivity and is consistent with the healthcare origins of the concept — but it fundamentally misrepresents the nature of cultural identity and thereby the nature of cultural safety.

Cultural identity is not individual; it is collective. Culture is held by communities and peoples, transmitted through generations, maintained through relationships and practice, and grounded in Country and belonging. The features that make an environment culturally safe or unsafe for First Nations people are features of how that environment engages with First Nations culture as a living collective reality, not simply with isolated individual preferences. Filtering this inherently collective concept through Western liberal assumptions about individual autonomy and subjective authority is, this review argues, a form of epistemic colonisation. (Ritchie, 2025) It produces an environment in which ten Aboriginal people in a room may offer ten different assessments of cultural safety — not because the concept is inherently unstable, but because it has been so thoroughly individualised that no collective standard has been established against which individual experiences can be situated.

The survey data gathered through this review provides empirical confirmation of this analysis. When asked who determines cultural safety, only 15.8 per cent of First Nations respondents selected collective First Nations determination, while 42.1 per cent selected

individual First Nations determination. The individualised framing has been so thoroughly absorbed that it now shapes how First Nations staff themselves understand the concept. This is a direct consequence of the Directorate's failure to establish, promulgate, and embed a substantive shared definition.

2.3 Cultural Safety as Organisational Capability

The third element of this review's conceptual framework is drawn from organisational theory rather than cultural safety literature, and represents a reframing that this review considers essential to making progress. The Australian Defence Force uses a capability development model that understands capability as something an organisation can reliably do to achieve a defined objective. Capability is not a characteristic of individuals; it is a property of the organisation, arising from the combination of trained personnel, sound doctrine, appropriate organisational structures, suitable material and equipment, adequate leadership, and effective management. When a capability gap is identified, the response is not to train individual practitioners harder; it is to examine all the inputs that produce the capability and address the gaps in those inputs systematically. (Australian Government Department of Defence, 2012)

This review argues that cultural safety should be understood as an organisational capability in precisely this sense: something the Directorate can reliably do, arising from the combination of the right personnel configuration, conceptual clarity, structural arrangements, accountability systems, leadership, and resourcing. (Ritchie, 2025)

Understood in this way, the question for the Directorate is not "how do we make individual staff more culturally competent?" but "what are the organisational inputs required to produce cultural safety as a reliable outcome, and which of those inputs are currently absent or inadequate?"

This reframing connects the cultural safety agenda to the Directorate's core mission. The Directorate exists to deliver educational success for its students. The review urges the Directorate to adopt what might be termed an "as Aboriginal" approach to this mission: the objective is not simply First Nations students succeeding educationally, but succeeding educationally as First Nations people, with their cultural identity affirmed, supported, and celebrated rather than suppressed, negotiated, or ignored. Cultural safety is not, on this

framing, a separate HR concern or a compliance obligation sitting alongside the core educational mission; it is one of the organisational capabilities required to achieve that mission. A Directorate that cannot provide cultural safety for its First Nations staff is unlikely to be providing culturally safe learning environments for First Nations students.

2.4 Cultural Safety and Cultural Integrity: A Necessary Clarification

The ACT Education Directorate has, for approximately a decade, operated a Cultural Integrity Framework as its primary institutional instrument for engaging with First Nations culture. The Framework has generated significant organisational infrastructure — a Director Cultural Integrity, a Statement of Commitment, branch-level planning requirements — and it reflects genuine institutional investment. A whole-of-government Cultural Integrity Framework is currently under development across the ACT Public Service. This review is therefore conscious that questioning the concept risks being read as dismissing that work. That is not its intent. The intent is to establish, with analytical precision, what cultural integrity can and cannot do, and why cultural safety must carry primary normative authority in the Directorate's operating framework.

Cultural integrity and cultural safety are not synonymous. They rest on fundamentally different assumptions about where authority to assess cultural adequacy resides, and that difference is consequential. Cultural integrity, as conventionally understood, concerns the coherence and authenticity of an organisation's engagement with culture — whether its policies, practices, and commitments are genuinely aligned with First Nations cultural values rather than merely performing such alignment. Integrity, in this sense, is an internal quality: it describes a relationship between what an organisation says and what it does. The assessment of whether an organisation has cultural integrity is, on this framing, a matter of internal audit, policy review, and organisational self-examination. Authority resides with the institution.

Cultural safety inverts this authority relationship entirely. Cultural safety, as defined in the National Agreement on Closing the Gap and as developed from Ramsden's foundational work, can only be determined by the First Nations person who is the recipient of a service or interaction. (Coalition of Peaks & Australian Governments, 2020, Section 12; Ramsden, 1993, 2002) The institution has no standing to declare itself culturally safe; only the people

whose cultural identity is at stake in the interaction can make that assessment. This is what the review calls the determinacy principle, and it is not a minor technical distinction — it is the moral and political core of the concept. An institution that assesses its own cultural integrity by examining its policies and commitments, and from that assessment concludes that it is providing cultural safety, has substituted its own evaluative authority for the only authority that is legitimate under the concept it claims to be applying.

The evidence gathered through this review suggests that precisely this substitution has occurred in the Directorate. When asked who determines cultural safety, 22.38 per cent of Survey 2 respondents selected ‘the organisation based on its policies and training’ — an organisational self-assessment model that is more consistent with a cultural integrity framing than a cultural safety one. The Cultural Integrity Framework has, on the evidence, shaped how a significant portion of the workforce conceptualises the question, and the conceptualisation it has shaped is one in which institutional self-assessment displaces First Nations community determination.

A further structural problem with cultural integrity as a governing concept is what it presupposes. For an organisation to assess its own cultural integrity it must have a sound understanding of culture — of what authentic, coherent engagement with First Nations culture looks like — against which its policies and practices can be evaluated. But the authority to make that assessment does not reside with the institution. It resides with First Nations peoples. An institution that evaluates its own cultural adequacy without grounding that evaluation in ongoing First Nations authority is not exercising cultural integrity; it is exercising the precisely the kind of institutional self-sufficiency on cultural questions that cultural safety was developed to challenge. Across the stakeholder consultations conducted for this review, not one person — including those most deeply invested in the Cultural Integrity Framework — was able to provide a working definition of the concept. That definitional vacancy is not incidental; it is structural. The concept presupposes a knowledge base that no institution possesses on its own authority.

This review does not recommend that the Directorate abandon cultural integrity as a concept. The intent of the Framework is legitimate, and the infrastructure it has generated is not without value. What the review does recommend, clearly and without ambiguity, is that cultural safety must carry primary normative authority in the Directorate’s operating

framework. Cultural integrity should be understood as a supporting concept — concerned with the consistency and authenticity of the institution's internal commitments — that operates in service of the cultural safety objective rather than as a substitute for it. The test of whether the Directorate is doing what cultural integrity requires is whether the people whose safety is at stake assess themselves as safe. Until the Directorate has a shared, substantive, collectively endorsed definition of cultural safety as its governing standard, cultural integrity will continue to function as a platform for self-referential institutional assessment that displaces the First Nations community authority that cultural safety requires. The relationship between the two concepts must be resolved, and it must be resolved in the right order. (Ritchie, 2025)

The ACT Government's whole-of-government Cultural Integrity Framework development provides an opportunity rather than an obstacle. If that framework is developed with the determinacy principle of cultural safety as its governing standard — understanding cultural integrity as the institutional commitment to creating conditions in which First Nations peoples assess themselves as safe, rather than as an institutional self-assessment of cultural authenticity — it could become a genuinely useful whole-of-government instrument. The Directorate's implementation work, including the development of an endorsed organisational definition of cultural safety under Recommendation 1, should be pursued in active dialogue with that whole-of-government process rather than in parallel isolation from it.

3. Methodology

This review drew on four principal evidence streams, deployed sequentially and designed to be mutually reinforcing: desktop review; stakeholder consultations; staff survey; and group engagement sessions.

3.1 Desktop Review

The desktop review examined the Directorate's policy and procedural framework for cultural safety, including the Cultural Integrity Framework, relevant Human Resources policies, complaint handling procedures, the First Nations Education strategy, and available workforce data. Safety portal data and complaint data were reviewed with staff consent and appropriate information management protocols. This review informed both the survey instrument and the consultation framework.

3.2 Stakeholder Consultations

Seven individual stakeholder consultations were conducted, with participants drawn from across the Directorate's leadership and relevant community organisations. In accordance with the commitments made to participants, all consultees are de-identified throughout this report and are referred to by role descriptor only. Consultations were conducted individually rather than in group format at this stage, which enabled candid and sometimes sensitive accounts that would not have been forthcoming in a group setting. All but one were conducted by Craig Ritchie (Principal, Ngarra Group), apart from those where a conflict of interest required the use of a senior independent associate, which were conducted by Geoffrey Winters (Winters Advisory). All consultations were conducted via Microsoft Teams, with some consultees joining from locations outside Canberra. Individual consultations were followed by group engagement sessions to enable collective dialogue and to test preliminary findings.

3.3 Staff Survey

A purpose-designed staff survey was deployed in two iterations. An initial survey deployment provided useful qualitative data and early indicators on key themes; however, a technical issue affecting question routing in one section of the instrument meant that

quantitative findings from the initial deployment could not be relied upon in isolation. The instrument was accordingly revised and relaunched. The analysis presented in this report draws primarily on the second deployment (Survey 2), with selected qualitative material from the initial deployment incorporated where it provides relevant additional texture. A methodological note on the relationship between the two deployments, including the impossibility of individual matching across government networks and the approach taken to overlap analysis, is set out in Annexure A.

Survey 2 received responses from 136 staff (119 non-Indigenous, 19 First Nations, with the remainder preferring not to say), representing a meaningful cross-section of the workforce across roles including school leadership, teaching staff, school support officers, Indigenous Education Officers, administrative staff, and others. The instrument was designed with attention to the risk of definition priming: providing a legislative definition of cultural safety before asking respondents to identify who determines it would have undermined the instrument's validity. The survey tested both conceptual understanding and applied understanding through scenario-based questions.

The survey findings in this report should be read with the following context in mind. The total Directorate workforce is approximately 8,800 staff. Across both deployments, approximately 490 staff consented to participate; Survey 2 alone represented approximately 136 completed responses, or around 1.5 per cent of total headcount. As a voluntary, self-selecting sample, the survey cannot be treated as statistically representative of all parts of the workforce in a formal sense. Any voluntary survey carries an inherent risk of self-selection bias: those who choose to participate may hold stronger views on the subject matter than those who do not. The survey findings are therefore presented as one important strand of evidence rather than as a definitive population-level measure. Their analytical significance lies in three things: the consistency of findings across two independent deployments to the same workforce; the convergence of survey findings with the qualitative evidence from stakeholder consultations; and the fact that even directionally significant patterns in a self-selected sample carry evidential weight, particularly where they are corroborated across multiple evidence streams. The cross-tabulation of survey data by identity, role, and length of service produces findings that are analytically robust at the pattern level, even where small sub-group sizes require caution at the individual-cell level.

The survey instrument also included open-text response fields at several points, generating a substantial qualitative dataset across both deployments. These open-text responses constitute a third qualitative evidence strand alongside the stakeholder consultations and the quantitative survey findings. The themes which emerge from these qualitative responses are not only consistent with but also reinforce both the quantitative data and the consultation evidence: cultural load and the health consequences of unrecognised labour; the handling of racist conduct and the failure of formal reporting systems; the contested nature of Acknowledgement of Country practice within the Directorate; and a persistent demand across respondents for structural rather than performative change. Where the open-text evidence adds something not already captured in the quantitative findings or the consultation data, it is incorporated into the relevant thematic sections below.

3.4 Ethical and Methodological Principles

Throughout the review, evidence has been gathered and reported in accordance with several principles that this review considers non-negotiable. Consultees were de-identified, and all commitments made to participants regarding confidentiality have been honoured. The epistemic register of this report does not assert the veracity of matters reported by participants; findings drawn from consultations are described using formulations such as “it was reported that,” “consultees described,” and “it was observed” to distinguish reported experience from independently verified fact. Where the views of individual participants have been reproduced, they have been paraphrased or lightly edited to prevent identification, and participants have not been named.

This report is grounded in five methodological commitments. These commitments have anchored both the gathering of evidence and the drawing of findings throughout, and are recorded here so that the reader holds them in mind as the findings of the review are presented.

First, the scope of the review. The review was commissioned to assess cultural safety across the Directorate. Its object is the Indigenous Education enterprise in the broadest sense — every dimension of the Directorate’s activity through which First Nations education is advanced or undermined, including teaching practice in schools, the work of Education Support Office staff, the Cultural Integrity team, the WINYU network, central office

curriculum and policy functions, school leadership engagement with First Nations students and families, and the Indigenous Education Officer function. The Indigenous Education team led by the Executive Branch Manager is one component of that enterprise, and the IEO function is one element analysed within it. The review's findings fall across many parts of the Directorate. No single section of this report should be read as a critique of any single team.

Second, the cultural safety determination principle. Cultural safety is determined by the recipient of a service or interaction, not by the provider. This is the analytical ground of the review and the foundation on which the whole report rests. It is affirmed by the established literature, by the National Agreement on Closing the Gap, and by the framework adopted by the Directorate itself when it commissioned this work. The test of whether a practice produces cultural safety is not what the provider intended, however sincere or however well-grounded the framework the provider was drawing on. It is what those affected experienced. The implications of this principle run through every finding in this report.

Third, the discipline of scope. The review attends to the cultural safety dimensions of every function it examines. It does not undertake a general management review of those functions in their operational or programmatic entirety. Where the report analyses the IEO function, for example, it examines the cultural safety dimensions of that function: the experience of First Nations staff within it, the structural conditions producing or undermining cultural safety in that setting, the operational context bearing on the function's capacity to deliver cultural safety outcomes. The review is not a workforce-planning audit, an HR review, a programme-evaluation exercise, or an assessment of professional development arrangements in their full management context. This discipline is essential to the integrity of the analysis and to the legitimacy of its findings.

Fourth, the evidentiary basis of the review. The review has worked from the evidence put before it during the consultation phase. That evidence includes approximately 490 staff survey responses across two deployments, seven individual stakeholder consultations, group conversations with the WINYU network, and substantial open-text responses across both surveys. Where information about particular institutional initiatives, processes, or frameworks was not provided during consultation, the review has proceeded on the evidence it has. This is the standard methodology of independent reviews of this kind.

Where matters were raised during consultation but not elaborated, the review has recorded what was reported, rather than inferring the substantive content of frameworks about which it has not been briefed.

Fifth, the commitment to record rather than adjudicate. The review records what was reported and observed. It does not adjudicate the relative merits of competing accounts or assess whether individual claims are reasonable or accurate. To assume that authority would insert the reviewer as arbiter between consultees, which is methodologically inappropriate for cultural safety work and incompatible with the determination principle on which the review rests. Where multiple independent consultees described similar experiences, this report records the pattern. Where individual experiences were described, this report records those experiences. The review does not assess which accounts are more meritorious; it records the experiences described. This commitment is not optional in cultural safety work — it is constitutive of it. The phenomenological grounding of cultural safety analysis is that lived experience is the data; the reviewer's task is to listen, record, identify patterns, and analyse the structural conditions those experiences reveal.

Taken together, these commitments establish the methodological foundation from which the findings of this review are made. The findings that follow in Section 4 rest on this foundation and are properly read in light of it.

4. Key Findings

The findings of this review are presented thematically, drawing on all evidence streams. The thematic organisation reflects the analytical structure of the review rather than the sequence in which evidence was gathered.

4.1 The Perception Gap: Two Organisations in One

The single most significant finding of this review is a profound and structurally important divergence between how First Nations staff and non-Indigenous staff assess the Directorate's cultural safety. This divergence is documented most starkly in the response to the direct question (Q3.6) of whether the Directorate is a culturally safe workplace.

Q3.6: 'The ACT Education Directorate is a culturally safe workplace' — by identity

Response	Indigenous (n=19)	Non-Indigenous (n=117)
Agree / Strongly Agree	15.8%	50.4%
Neither Agree nor Disagree	26.3%	38.5%
Disagree / Strongly Disagree	57.9%	11.1%

More than half of First Nations respondents assessed the Directorate as culturally unsafe, whilst half of non-Indigenous respondents assessed it as culturally safe. Only 15.8 per cent of First Nations respondents agreed with the proposition — less than a third of the rate among non-Indigenous staff. These are not modestly different assessments of the same workplace; in experiential terms, they describe two different organisations.

The aggregate data masks this divergence and can actively mislead. In the overall Survey 2 results, 46.04 per cent agreed the Directorate is culturally safe and only 17.27 per cent disagreed — a distribution that, read without disaggregation, might appear reasonably positive. The cross-tabulation reveals that this aggregate is an artefact of a large non-Indigenous cohort whose experience is fundamentally different from that of the small First Nations cohort. An organisation that reads only its aggregate data will conclude that things are broadly acceptable; an organisation that disaggregates will see the reality.

This finding is reinforced by the witnessing data. Among non-Indigenous staff, 76.52 per cent reported never or rarely witnessing racism directed at First Nations colleagues or students. Among First Nations staff, 80.00 per cent reported experiencing racial microaggressions — interactions experienced as communicating racial hostility, dismissal, or othering, regardless of the intent of the person responsible — sometimes to very often, and 86.67 per cent reported having their cultural knowledge questioned or dismissed at the same frequency. The conditions that make the Directorate culturally unsafe for First Nations staff are largely invisible to their non-Indigenous colleagues. An organisation in which the majority of staff do not observe the harm that is occurring is an organisation unlikely to prioritise action against it. The appropriate organisational response to this finding is not a definitional exercise about what constitutes racial harm; it is a structural one about why harm of this kind is occurring at this rate and going unaddressed.

The open-text survey responses corroborate this finding directly. It was reported across both survey deployments that First Nations staff experience racist conduct in the workplace that is not addressed when reported. The pattern described is consistent: formal complaints are not followed up, findings are not communicated, and the person who made the complaint experiences secondary harm through the process itself. This corroboration across three independent evidence streams — quantitative survey data, stakeholder consultations, and open-text responses — gives the finding particular evidential weight.

This perception gap is not primarily a communications problem; it is a structural one. It reflects the absence of shared indicators, feedback mechanisms, and organisational transparency that would allow all staff to understand how the Directorate is performing on cultural safety as an objective measure rather than a subjective impression.

4.2 Conceptual Alignment Without Operational Clarity

Across both survey deployments and throughout the stakeholder consultations, a consistent and important pattern emerged: cultural safety is broadly endorsed in principle but is not translated into a shared operational understanding. This distinction is analytically critical. Abstract endorsement and practical understanding are different things, and the gap between them is where cultural safety reform most commonly fails.

Survey 2 recorded strong abstract endorsement: 77.70 per cent of respondents agreed that the Directorate has responsibilities for cultural safety. Yet when asked who determines cultural safety (Q3.1), only 15.71 per cent selected collective First Nations determination — the response most consistent with both the National Agreement definition and the conceptual foundation of the concept. The largest group, 37.86 per cent, selected “everyone’s perspective equally,” whilst 16.24 per cent selected the individual First Nations person.

Response	Survey 1	Survey 2
Everyone's perspective equally	38.29%	37.86%
Indigenous peoples collectively	15.24%	15.71%
The individual Indigenous person	17.14%	16.24%
The organisation (based on policy)	21.90%	22.38%
Unsure	7.62%	7.62%

The remarkable consistency between Survey 1 and Survey 2 on this question is itself significant: the workforce has a settled, if conceptually incomplete, understanding that has not been disturbed by the time elapsed between deployments. Neither training nor organisational communication has shifted this picture. The proportion who locate determination with “everyone equally” — a majority-rule framing that is fundamentally incompatible with the concept of cultural safety as understood in the National Agreement — has not declined between surveys.

The cross-tabulation by role provides further insight into the nature of the conceptual gap. School leadership respondents showed the best applied performance on scenario-based questions, with 68.4 per cent correctly identifying a culturally unsafe situation, compared to 51.3 per cent for teachers and school support officers and only 33.3 per cent for administrative staff. However, even school leaders’ conceptual responses were problematic: 47.4 per cent selected individual determination of cultural safety on Q3.1, and only 5.3 per cent selected collective determination.

Stakeholder consultations were consistent with this picture. It was reported that cultural safety had become, in practice, an “empty signifier” within the organisation — a phrase used by multiple consultees without apparent coordination. Consultees described an environment in which the language of cultural safety was widely available but its practical implications for authority, decision-making, and accountability were neither settled nor communicated. It was observed that this definitional vacuum is not neutral; it actively creates space for competing and sometimes incompatible interpretations to coexist, which limits consistency, weakens accountability, and enables those who wish to avoid the implications of cultural safety obligations to do so without apparent consequence.

4.3 Cultural Knowledge Dismissal and the Cultural Load

Among the most direct and disturbing findings of this review is the prevalence of experiences of cultural knowledge dismissal among First Nations staff. Survey data indicated that 86.67 per cent of First Nations respondents reported having their cultural knowledge questioned or dismissed at frequencies ranging from sometimes to very often. This is not a peripheral issue; it is a core symptom of cultural unsafety, and it occurs at a rate that suggests it is a systemic pattern rather than an aberration.

The survey data further documents a structural pattern of uncompensated cultural labour. Among First Nations respondents, 68.75 per cent agreed or strongly agreed that they carry additional cultural responsibilities beyond their formal role, yet 81.25 per cent reported lacking access to cultural supervision or mentoring. This represents a workforce that is being asked to carry an organisational burden for which it receives neither structural support nor formal recognition. Consultees described this dynamic in strikingly similar terms across diverse roles and contexts: the expectation that First Nations staff will serve as cultural advisors, community liaisons, reference points on matters relating to First Nations students and families, and informal supports for other staff navigating cross-cultural situations, whilst simultaneously performing their substantive roles and receiving no commensurate adjustment to workload, remuneration, or professional development.

This review distinguishes between what might be termed ‘cultural load’ and ‘colonial load.’ Cultural load describes the additional responsibilities that arise from First Nations staff’s cultural identity and expertise; these responsibilities are often carried willingly and are a

genuine contribution to the Directorate's mission. Colonial load describes the burden that arises not from culture itself but from the structural consequences of colonialism: the need to navigate, translate, advocate, and absorb harm within an institution that was not designed with First Nations peoples in mind. Both are real; both require acknowledgement; but colonial load in particular must be understood as a symptom of institutional failure rather than an inevitable feature of First Nations employment in a mainstream organisation.

4.3a The Misuse of Cultural Processes

A further dimension of the evidence gathered through this review concerns the systematic misuse of cultural forms within the Directorate. It did not present in the quantitative data, as the issue emerged during interviews and workshops and was therefore not a component of the earlier designed survey. Stakeholder consultations documented a striking and consistent pattern in which cultural practices, including yarning circles, Acknowledgements of Country, and the language of cultural safety itself, have been co-opted in ways that undermine their meaning and produce outcomes directly contrary to their intent.

Multiple consultees independently described team meetings conducted in a circular seating arrangement, which consultees reported as being labelled 'yarning circles' but which they experienced as controlled briefings in which First Nations staff were silenced rather than heard. Several consultees also recalled a management framing along the lines that 'there are triangles within the circle', which they understood, in the context in which it was used, as an attempt to impose hierarchical authority within a cultural form they understood to be premised on equality. The review notes that the framework Engoori was raised by name during consultation as the leadership approach management understood themselves to be drawing on. The review was not provided with substantive information about Engoori, its principles, or how it was being applied, and accordingly does not undertake to assess either the framework itself or the accuracy of the consultees' recollection of the words used to introduce it. What the review is required to record, and to analyse for what it tells us about cultural safety conditions in the institution, is the experience reported by those who participated in the meetings. That reported experience — of silencing, of the seating being understood as a yarning circle, of the framing being received as an imposition of non-Indigenous hierarchy on a cultural form — is the data the review is required to attend to. Where there is a gap between provider intent and recipient experience, the cultural safety

determination principle that grounds this review attends to the experience of those affected. That a culturally legitimate framework may have been the framework management had in mind does not displace the reported experience of those for whom the practice did not produce cultural safety; if anything, it sharpens the question of how a framework whose entire premise is relational equality came to be experienced as its opposite.

Equally significant is the reported weaponisation of cultural safety language to silence rather than support First Nations staff. Consultees described instances in which a First Nations colleague raised a concern and the response was framed in terms of cultural safety — that the manner of raising the concern was ‘unsafe’ for those being criticised. This conflation of discomfort with unsafety, deployed to shut down legitimate advocacy, represents a precise inversion of the concept’s purpose. Cultural safety was developed specifically to protect First Nations people from exactly this kind of institutional silencing; its use as an instrument of that silencing is the most direct form of its misuse. A further pattern emerged across the consultations that warrants explicit acknowledgement: consultees reported the deployment of cultural safety language not only by non-Indigenous managers against First Nations staff but, in some instances, by First Nations staff against other First Nations staff, in ways that masked or facilitated lateral violence. Several consultees described their experience of being on the receiving end of conduct they identified as lateral violence, where the institutional language of cultural safety was invoked in ways that prevented the conduct from being named, examined, or addressed. The review records these reports as it records others, without assessing the accuracy of any individual account, and notes the pattern across multiple independent consultations as evidence of a distinct cultural safety problem in its own right. Some of the consultees who described these dynamics also raised a related observation: that the language of cultural safety was, in their experience, sometimes invoked by individual staff to deflect legitimate professional expectations — reasonable management requirements, performance feedback, or ordinary standards of professional conduct — that were not in fact rooted in cultural matters or in First Nations identity. These consultees emphasised the importance of distinguishing carefully between, on the one hand, being asked to perform one’s role to a professional standard and, on the other, genuine experiences of cultural unsafety. They were clear that the existence of this kind of

misuse does not diminish the substantial and genuine cultural safety issues identified throughout this report; rather, they observed that the integrity of cultural safety as a concept and a practice depends on its language being reserved for the substantive purposes for which it was developed. That a concept developed to protect First Nations people from institutional harm can also be deployed to obscure harm between First Nations colleagues is a symptom of the same institutional dynamics the report identifies elsewhere: where the meaning of cultural safety is contested, captured, or left without genuine First Nations community authority to determine it, the concept becomes available to authorise whatever institutional purpose it is enlisted to serve. The pattern reported to the review extends to the enterprise level, where the review observes that coherent First Nations leadership of cultural safety work across the Directorate is constrained by fractured relationships at senior levels. The review does not, in this report, examine the particulars of any such relationships. It records the pattern reported and observes that the absence of coherent senior First Nations leadership of cultural safety work is itself a cultural safety condition with consequences across the enterprise. These findings provide concrete empirical content to the conceptual argument advanced in Section 2.4: that without genuine First Nations authority, cultural integrity becomes a self-referential framework available to authorise whatever institutional meaning is imposed upon it.

4.4 The IEO Function: Structural Crisis

The review was not commissioned to undertake a review of the Indigenous Education Officer function specifically; the review's remit was cultural safety across the Directorate. The IEO function emerged during consultation as a site where cultural safety concerns presented with particular intensity, and the analysis that follows examines the function through the cultural safety lens that the review was commissioned to apply. It is not an HR audit, a programme evaluation, or a management review of the function in its operational entirety. The structural crisis identified in this section is a cultural safety crisis manifesting in and through the function, not a critique of the work that individual IEOs do under the conditions in which they are required to do it. The evidence gathered through this review points to a structural crisis within the First Nations Education function, and within the Indigenous Education Officer (IEO) programme in particular. The substantive purpose of the IEO role, as designed, is the building of school and teacher capability to engage well with

First Nations students, families, and content — supporting schools to develop their cultural competence, advising teaching staff on culturally safe pedagogy, and strengthening the institutional capacity to deliver education that meets the needs of First Nations students and communities. The role is, in design, a capacity-building role rather than a pastoral or community engagement role. There is, however, a legitimate and unavoidable tension between this design and the lived expectations placed upon IEOs. Community expects, reasonably, that an Indigenous-identified officer will not walk past a First Nations student in difficulty; institutional gaps mean that other welfare and support resources are often unavailable when needed; and the IEO is therefore drawn, structurally and ethically, into responding to student welfare needs that fall outside the formal scope of the role. This tension is part of the structural crisis the review documents, not separate from it.

Approximately eight IEOs are currently expected to service between ninety-two and ninety-seven schools across the ACT. The Directorate once employed fifteen IEOs; the reduction from fifteen to eight over a relatively short period presents an operational and management challenge of significant magnitude regardless of the reasons for individual departures, which the review does not undertake to characterise. Subsequent recruitment has refilled the IEO positions, and the cohort at the time of writing is understood to be substantially new to the function. The review notes that refilling vacant positions does not, by itself, address the structural conditions that produced the cohort reduction in the first place. Unless those conditions are addressed, the conditions that prompted the previous reduction will continue to operate on the new cohort.

Consultees reported, candidly and consistently, experiences of profound role confusion, structural isolation, the absence of clear programme goals or accountability measures relevant to the cultural safety dimensions of the function, limited and irregular professional development support, and the deployment of bureaucratic process in ways they experienced as constraining First Nations advocacy. The review records these reports as the reports of those affected; it does not undertake to assess the accuracy of any individual account against operational records, and notes the pattern of independent accounts as the evidential basis for the analysis that follows. Consultees during the review also described a severe breakdown in working relationships within the IEO cohort, including formal requests from several IEOs for changes to their reporting arrangements. The review records this as

part of the conditions of the function that it observed at the time of consultation. The role confusion is not incidental: IEOs are pulled simultaneously toward the capacity-building work the role was designed for and toward the welfare and advocacy work that community expectation and institutional gaps make unavoidable, with no clear institutional position on how those competing pulls should be reconciled or resourced. The survey data corroborates this at a broader scale. Among First Nations respondents, the data reveals a significant gap between the support available through formal organisational structures and what staff are actually experiencing. This is not primarily a finding about any individual team or programme; it reflects a broader institutional failure to build the formal support architecture that First Nations staff require, and to be clear-eyed about what the IEO role is for and what it is not. The informal, volunteer-led peer network that has partially filled that gap is doing so at significant personal cost to its members, and the institutional reliance on informal structures as a substitute for formal ones is a pattern that must be addressed through structural design rather than individual goodwill.

Consultees provided specific accounts of how administrative process was experienced in practice. They described approval requirements, detailed agendas, sequential sign-offs, complicated budget approvals for minor expenditure within existing activities, and requests for flexibility being treated as inappropriate, as experienced not as neutral administrative mechanisms but as instruments of control over First Nations staff and their advocacy. The review records these accounts without undertaking to assess the operational reasonableness of any specific decision, and notes the pattern of independent reports of similar experiences as evidence of the cultural safety conditions within which First Nations staff are required to work. In an environment in which First Nations staff report experiences of significant power imbalance and a history of non-responsiveness, process is reported to function in ways that contain rather than enable. One senior consultee described it directly: 'They control it through structure and process. Everything goes up the line. Nothing comes back without being changed. That's not administration — that's management of us.' This was not an isolated account; consultees independently described similar experiences across multiple consultations. It describes a systematic pattern of institutional control that is distinct from, and compounds, the structural isolation of the IEO role itself.

The evidence also points to a structural paradox at the heart of the IEO role's current configuration. IEOs are designed as a school capacity-building resource, yet community expectation and institutional gaps draw them into welfare and case advocacy work that the role is not configured or resourced to carry. They operate without clear programme goals relevant to the cultural safety dimensions of their function, with limited and irregular professional development support, and in conditions that consultees described as professionally isolating and personally damaging. The weaponisation of bureaucratic process against IEOs who advocate for First Nations students and families was a theme raised by multiple independent consultees, and was corroborated by patterns evident in the complaint and safety portal data. An eight-person team servicing nearly one hundred schools is not a programme in any meaningful sense — it is the residue of a programme that has been progressively eroded without any corresponding decision about what the function should now be or how it should be configured to deliver what is actually expected of it. As further relevant institutional context, the Directorate has provided Cert IV in Community Work training to IEO staff and is planning a further Youth Work course. These arrangements are acknowledged. They are not, on the evidence available to the review, sufficient to displace the structural finding the consultation evidence supports: that professional development relevant to the cultural safety dimensions of the IEO function is limited, irregular, and not designed against any settled understanding of what the function requires. The review notes that work undertaken by the Directorate to update IEO position descriptions during 2025 is acknowledged as relevant institutional context. That work, however, addresses the role design at the level of duty statement; it does not, on the evidence available to the review, address the structural conditions that the consultation evidence describes. The cultural safety crisis the review identifies in this section is not a crisis of duty statements; it is a crisis of the conditions within which the function operates.

4.5 School Leadership: Personal Confidence, Systemic Absence

The school leadership data provides one of the most analytically important findings of this review precisely because of the combination it describes: a cohort that reports substantial personal confidence in its own capability to provide cultural safety, operating within a system that provides little structural support, almost no accountability, and no clear consequences for poor practice.

Of school leadership respondents, 77.78 per cent reported confidence in their ability to create a culturally safe workplace, and 94.44 per cent reported being somewhat or very confident in addressing racism when it occurs. Yet only 16.67 per cent agreed that the Directorate provides adequate support and resources for this purpose. Only 11.11 per cent agreed that complaints processes adequately address cultural safety concerns. Most significantly, 50.00 per cent disagreed or strongly disagreed that they are held accountable for cultural safety outcomes in their performance assessment. The Q3.6 cross-tabulation by role shows school leaders with the highest neutral response rate of any cohort at 52.6 per cent — a large majority cannot form a view on whether the Directorate is culturally safe, which is itself a finding about the absence of shared indicators and organisational transparency.

This combination — personal confidence without organisational support, shared indicators, or accountability — describes a leadership cohort that has been left to its own devices. Cultural safety outcomes for First Nations students and staff are thereby determined almost entirely by whether a given school principal happens to care about the issue and to have developed their own approach, with no systemic mechanism for identifying or addressing gaps. The school-to-school variation documented across all evidence streams — the accounts of schools where Aboriginal students and families feel genuinely welcomed alongside accounts of schools where they feel unwelcome, dismissed, or unsafe — is the predictable consequence of this structural absence.

'I am confident in my own capabilities in this space but am more than aware that when I hold the line or raise concerns and advocate for others, I am doing so in the face of a significantly and nearly totally non-responsive senior executive group.' — School leadership consultee

4.5a The Senior Executive Group: Accountability and Reach

The pattern documented in Section 4.5 — high personal confidence among school leaders operating within structural conditions that do not provide commensurate organisational support, accountability, or shared indicators — points upward in the institutional hierarchy. The accountability gap that school leaders describe originates above them in the executive structure of the Directorate, including the Senior Executive Service to which cultural safety outcomes within Directorate portfolios are formally entrusted. The evidence permits, and the analysis requires, a focused observation about the executive levels at which the

evidence indicates that accountability has not, to date, been embedded as a priority for transformation.

Consultees described a recurring theme of optimism about current senior leadership intentions on cultural safety. That optimism, however, was uniformly accompanied by the caveat that intent has not, to date, been followed through into action at the level of the broader executive cohort to whom delivery on cultural safety would fall.

The Senior Executive Service is, in the formal architecture of the Directorate, accountable for cultural safety outcomes within its portfolios. School leaders identified in survey responses, as recorded in Annexure A, that the most significant structural barrier they encounter is “the unwillingness of senior leadership to engage with different approaches.” Annexure B records, on consultation evidence, a pattern in which proposals from First Nations staff are decided by the executive without consultation with the proposers; in which decision-making processes have no senior First Nations voice at the point where consequences are determined; in which getting cultural safety matters onto the corporate executive agenda is reported as routinely difficult; and in which the formal mechanisms that would make cultural safety performance visible and accountable at executive level — shared indicators, regular reporting, integrated performance frameworks — have not been established. These patterns describe cultural safety work as something done to First Nations staff rather than developed with them or by them, and signal that cultural safety has not, to date, been embedded at executive level as a priority for transformation. The pattern is structural rather than individual; it operates regardless of the disposition of particular executives; and it has produced the conditions that Section 4.5 documents at school-leadership level.

A further dimension of this pattern bears directly on why otherwise competent executives may have struggled to act consistently in relation to cultural safety matters within their portfolios. The conditions documented elsewhere in this report — the absence of a shared organisational definition of cultural safety (Section 2.1), the individualised rather than collective framing of cultural safety determination that has been absorbed across the workforce (Sections 2.2 and 4.2), the empty-signifier character that “cultural integrity” has taken on in practice (Section 4.7), and the misuse of cultural safety language documented in Section 4.3a, including its invocation by some First Nations staff against others in ways that

mask lateral violence — produce, at executive level, conditions for institutional paralysis. Executives confronted with competing claims about cultural safety, advanced by First Nations staff who themselves hold variant understandings of the concept, and with no shared organisational definition to which they can refer, are left without a principled basis on which to act, and in many cases default to inaction. The cultural safety determination principle, properly understood, would in any case preclude them from adjudicating between competing First Nations accounts; but no mechanism exists by which the collective First Nations determination that the principle requires can be sought, and so the matter sits unresolved. This is a structural condition that an institution which has not established the conceptual, structural, and authoritative foundations for cultural safety work imposes on the executives required to deliver that work. The diagnosis explains the pattern; it does not displace the requirement to establish the very foundations whose absence the diagnosis identifies.

One further dimension of the executive response pattern warrants explicit acknowledgement. Consultees who reported instances of conflict and lateral violence to the review described their experience not only of the underlying conduct but of the response that followed, or in many cases did not. The pattern described — that the institutional language of cultural safety was invoked in ways that prevented the conduct from being named, examined, or addressed; that formal reporting mechanisms did not function as the consultees expected they would; that cultural safety matters were reported as routinely difficult to get onto the corporate executive agenda — carries a timeliness dimension that is itself a cultural safety condition. Where harm has been reported and the institutional response is delayed, partial, or absent, the delay itself extends the harm and signals that the matter is not a priority for the executive level to which it has been escalated. This finding is grounded in the experience of those who reported, which is the legitimate locus of cultural safety determination; the review does not characterise executive response practice on evidence it does not hold. The implication is that timely engagement with instances of conflict and lateral violence as they arise is itself an executive cultural safety obligation, distinct from and operating alongside the obligation to establish the foundations whose absence the diagnosis above identifies. The former is available to be exercised by an

engaged executive now; the latter is the structural reform work the recommendations describe.

The review's finding is therefore that the absence of organisational support, shared indicators, and accountability documented at school-leadership level reflects an absence of those same conditions at the executive level. The cultural safety reform agenda this report describes will require executive-level work that has not, to date, been done — work that depends on the broader executive cohort following current senior leadership intentions through into structural change within their portfolios. The recommendations of this review respond to this analysis directly. Recommendation 1 establishes the shared organisational definition of cultural safety without which the conditions for executive paralysis remain in place. Recommendation 2 establishes senior First Nations leadership reporting to the Director-General and with decision-making authority at the executive level, addressing the absent voice that consultees identified as a central structural gap. Recommendation 3 provides the capability framework through which intent becomes organisational competence and through which executive accountability can be made measurable. Recommendation 6 establishes the external advisory mechanism through which the collective First Nations determination that the cultural safety principle requires can be sought. Recommendation 7's mentoring programme for senior leaders, and Recommendation 8's Director-General-level governance arrangements with executive accountability for implementation progress, address the executive-level work that following through on intent will require.

4.6 Legislative Awareness and Statutory Obligations

The Directorate now operates under a statutory framework that creates specific obligations in relation to cultural safety. The Public Sector (Closing the Gap) Legislation Amendment Act 2025 is not aspirational guidance; it is law. Yet the survey data indicates that awareness of these statutory obligations across the workforce remains limited: 72 per cent of respondents indicated they were not aware of or did not understand the Closing the Gap obligations relevant to their role.

This is not simply a training gap. It reflects the absence of cultural safety as a formalised component of professional responsibility in the Directorate. Staff are required to complete

mandatory training in work health and safety, child protection, and disability education. No equivalent mandatory requirement exists for cultural safety. The practical consequence is that statutory obligations under the Closing the Gap framework are routinely ignored not through deliberate non-compliance but through structural inattention — the obligations have not been given the organisational prominence and the training infrastructure that comparable obligations receive. Consultees observed this comparison directly, describing the disconnect between the formal weight of the obligations and the operational inattention they receive.

4.7 The Cultural Integrity Framework: Empirical Confirmation of a Conceptual Problem

The Directorate's Cultural Integrity Framework was referenced extensively across the stakeholder consultations, and the evidence that emerged warrants careful treatment because it is both empirically significant and conceptually illuminating. The consultation findings do not primarily constitute a critique of the Framework's intent, which reflects genuine commitments to cultural safety and respect for First Nations culture. They constitute empirical confirmation of the structural argument advanced in Section 2.4: that cultural integrity, as a governing concept, displaces the First Nations community authority that cultural safety requires.

The most striking finding is definitional. Across the seven stakeholder consultations conducted for this review, not one person — including those most closely associated with the development and implementation of the Framework, and those who expressed the strongest commitment to its principles — was able to provide a working definition of cultural integrity. This is not a matter of linguistic imprecision. It reflects the structural problem identified in the conceptual analysis: cultural integrity presupposes a sound institutional understanding of culture that no institution possesses on its own authority. In the absence of that authority, the concept becomes a signifier without a referent — an 'empty signifier,' as multiple consultees described it independently — available to support whatever organisational meaning is imposed upon it.

The operational evidence confirms what the definitional vacancy predicts. It was reported that the Framework has proceeded in relative isolation from its implementation, with no clear accountability mechanism, no resourcing for implementation, and no regular review

process. Consultees described a significant quantum of funding — in the order of \$2.4 million — allocated to cultural integrity work but remaining substantially unspent, whilst the Framework was cited as evidence of organisational commitment. The cultural integrity infrastructure — murals, naming ceremonies, resources — is visible and frequently referenced; the structural change it was intended to generate is not. One consultee, who had been among the Framework's strongest advocates, described it as having 'authorised a lack of deep engagement' — a formulation that precisely describes the complacency function the conceptual analysis anticipates.

The survey data provides a further dimension. Among the 22.38 per cent of Survey 2 respondents who identified the organisation, based on its policies and training, as the appropriate determinant of cultural safety, the cultural integrity model's influence is detectable: this is an institutional self-assessment framing rather than a community determination framing. It indicates that the Framework has shaped how a significant proportion of the workforce understands the question of cultural safety determination, and the understanding it has shaped is inconsistent with the determinacy principle that cultural safety requires.

This review's assessment of the Cultural Integrity Framework is therefore not that it should be abolished — the intent behind it is legitimate, and the infrastructure it has generated is not without value. It is that the Framework cannot serve as the Directorate's governing standard for cultural safety, because it inverts the authority relationship that cultural safety requires. The Framework needs to be repositioned: subordinate to a shared, substantive, collectively endorsed definition of cultural safety, and understood as an instrument of institutional accountability to that standard rather than as a self-referential measure of institutional adequacy. The relationship between cultural integrity and cultural safety must be resolved, and Recommendation 1 is designed to do precisely that.

The open-text survey responses add a further empirical dimension to this analysis. A recurring theme across both deployments is the contested nature of Acknowledgement of Country practice within the Directorate. Respondents describe a range of positions: those who find Acknowledgements genuinely meaningful; those who find them performative in the absence of accompanying structural change; and those who experience them as actively uncomfortable because of the gap between the words and their daily reality. This range of

responses is itself evidence of the definitional vacancy documented in this section: where there is no shared substantive understanding of what cultural safety requires, even the most widely practised cultural forms become sites of contested meaning rather than shared commitment. The consultation evidence includes specific accounts of non-First Nations staff being asked to perform a Welcome to Country — a ceremonial act that can only be performed by Traditional Custodians of the Country on which the gathering takes place — rather than an Acknowledgement of Country. This is not a minor procedural error; it reflects a fundamental absence of the basic cultural knowledge that a culturally safe organisation must be able to demonstrate. The experience of First Nations staff witnessing this was described in terms consistent with the broader finding of this review: that the Directorate's cultural integrity infrastructure generates the appearance of cultural engagement without the substantive understanding required to give it meaning.

5. Systemic Racism and Colonial Legacy

The evidence gathered through this review documents the presence of systemic racism within the ACT Education Directorate. This finding requires careful statement because the term is sometimes misunderstood. Systemic racism is not primarily a matter of individual racist attitudes or deliberate discriminatory intent — though both exist and are documented in this review. It refers, rather, to the ways in which organisational structures, policies, and practices produce differential outcomes for First Nations peoples regardless of the intentions of individual actors. It operates through the ordinary functioning of institutional arrangements: through the distribution of authority and decision-making power, through the design and evaluation of programmes, through the standards against which performance is assessed, and through the expectations that govern professional conduct. An organisation can be producing systemically racist outcomes whilst being staffed overwhelmingly by people who do not regard themselves as racist and who are genuinely committed to equity. The survey data and consultation evidence gathered through this review describe precisely such an organisation.

The perception gap documented in Section 4.1 is a direct expression of systemic racism: a single institution in which First Nations staff and non-Indigenous staff experience fundamentally different workplaces, and in which the conditions generating harm for First Nations people are largely invisible to their colleagues. The cultural knowledge dismissal described in Section 4.3 is not a matter of individual discourtesy; it reflects an institutional pattern in which non-Indigenous expertise is structurally privileged over First Nations cultural knowledge. The weaponisation of bureaucratic process against IEOs who advocate for Aboriginal students and families is not incidental; it reflects an institutional tendency to marginalise voices that challenge the dominant organisational framework. The school-to-school variation documented across all evidence streams is not random; it reflects the absence of any structural mechanism to ensure equitable outcomes for First Nations students and staff regardless of the personal commitments of individual principals.

Naming systemic racism is not an accusation. It is a diagnostic. The remedies for systemic racism are not primarily individual — better awareness, more sensitivity — but structural: different authority arrangements, different accountability mechanisms, different ways of

building and applying organisational knowledge. This is why the recommendations in Section 7 are oriented primarily toward structural change rather than individual capability development, and why training — though necessary — appears as Recommendation 7 rather than as the lead intervention.

The stakeholder consultations add a dimension to this analysis that is specific to the ACT context. Multiple consultees reflected on the Territory's self-identification as a progressive jurisdiction — a city that voted 'yes' in the Voice referendum, that has a human rights framework, that positions itself as a leader in equity and inclusion — and on the way this self-image functions as institutional complacency rather than as a prompt to action. The mismatch between progressive self-image and the daily reality of First Nations staff in ACT public institutions was described as a particular and frustrating form of dissonance: the assumption that progressive politics has already done the work of structural reform, when the evidence documented throughout this report demonstrates that it has not. This dynamic is not incidental to the analysis of systemic racism; it helps explain why a jurisdiction with genuine goodwill and formal commitments has nonetheless produced the conditions this review has found. Systemic racism does not require hostility; it is reproduced through the ordinary functioning of institutions whose progressive self-image insulates them from the scrutiny that might otherwise generate reform pressure.

The review observes one further structural pattern at the enterprise level that warrants brief acknowledgement at this point in the analysis. Fractured relationships at senior Indigenous leadership level within the Directorate constrain the coherent First Nations leadership of cultural safety work on which the review's recommendations rely. The review does not examine the particulars of those relationships; it records the pattern at the structural level, as enterprise-level context for the urgency of Recommendation 2 (Enhanced Senior Indigenous Leadership) and as a condition the Implementation Phase will need to address. The observation is consistent with the broader pattern Section 4.3a documents in relation to the misuse of cultural safety language; here it is offered as enterprise context rather than as a feature of any particular function or section.

5.1 The Role of Colonial Legacy

Understanding why systemic racism persists in an institution like the Directorate requires engaging with the question of how it was produced. This takes the analysis from the present to the historical, and in doing so introduces language that is relatively new in the Australian public sector context. Addressing systemic racism through structural reform alone — without examining the institutional inheritance that generated the structures in question — risks treating symptoms whilst leaving causes undisturbed. Reforms cycle through, intent is expressed, frameworks are developed, and the underlying pattern reasserts itself. The National Agreement on Closing the Gap's consistent documentation of inadequate progress across multiple jurisdictions and multiple reform efforts is partly an expression of this dynamic.

The structures and practices that produce differential outcomes for First Nations people in contemporary Australian institutions were not designed in a neutral context. They were shaped by more than two centuries of colonial policy whose explicit purpose was, at various points, the elimination, assimilation, or management of First Nations peoples and cultures. The educational institutions of the ACT, like those elsewhere in Australia, carry that inheritance. It manifests not as intention but as the accumulated weight of institutional design: in whose knowledge is treated as authoritative, in whose presence requires accommodation rather than welcome, in whose departure goes unexamined, and in whose complaints are treated as a management problem rather than organisational intelligence.

Engaging explicitly with this inheritance — naming it, examining its contemporary manifestations, and developing strategies to address it — is not common practice in Australian public sector institutions. It is, however, emerging as a recognised dimension of genuine transformation work, and it is considerably more developed as an explicit institutional practice in comparable Anglophone jurisdictions. The UK Foreign, Commonwealth and Development Office, for example, has developed an internal programme through its International Academy that enables its staff to engage directly with the colonial legacy of British foreign and development policy and its ongoing implications for the institution's work. Other peer organisations in the international development and public administration sectors have undertaken similar work. A structured review of emerging practice in this space — including direct engagement with the FCDO's experience — would

allow the Directorate to learn from institutions that have gone further down this path, rather than working the problem from first principles.

This review uses the language of colonial legacy deliberately and with awareness that it sits at the edge of current Australian public sector discourse. The intent is not to apply an imported framework, but to name an Australian reality accurately. The Jumbunna Institute's independent review of over-representation of First Nations people in the ACT criminal justice system, completed in 2024 and involving many of the same system actors, reaches parallel conclusions about the structural persistence of colonial power arrangements in Territory institutions. (Cunneen et al., 2025) The analysis in this review is consistent with that work and draws on the same evidentiary and conceptual foundations.

6. Immediate Action Required

The following immediate action is recommended in advance of the broader reform programme and is not contingent on the implementation of the eight structural recommendations that follow. It is addressed directly to the Director-General.

Offensive Language and Racist Conduct

The evidence gathered through this review includes documented accounts of offensive and racially discriminatory conduct directed at First Nations staff that has either not been reported, has been reported without consequence, or has been reported and subject to processes that have further harmed the individuals involved. The pattern is sufficiently consistent and sufficiently serious to warrant immediate action before the broader reform programme is designed and implemented.

The Directorate should, as a matter of urgency: communicate clearly to all staff that offensive language and racist conduct directed at First Nations colleagues, students, or community members will not be tolerated and will attract clear and consistent consequences; establish or clarify the processes available for reporting such conduct and ensure those processes are known, accessible, and trusted; and ensure that staff who report such conduct are protected from the retaliation and secondary harm that consultees described as a recurring pattern. These steps do not require a capability framework, a new leadership structure, or a comprehensive training programme. They require an exercise of leadership authority that is available to the Directorate now.

7. Recommendations

All eight recommendations in this section are oriented toward a single objective: cultural safety as a reliable organisational capability. This framing is not rhetorical. The evidence from this review documents a Directorate that has invested substantially in cultural safety as a stated commitment and has produced little measurable change in the experience of First Nations staff and community. The reason is structural: the Directorate has been treating cultural safety as a matter of individual awareness and institutional sincerity rather than as something the organisation must be able to reliably do. Organisations do not become capable of things by declaring their intent; they become capable through the combination of adequate conceptual clarity, appropriate structures and accountability arrangements, sound doctrine, sufficient resourcing, and leadership with genuine authority. Until those inputs are in place and properly combined, individual goodwill cannot produce consistent organisational outcomes.

The recommendations are sequenced to reflect the logical architecture of capability development. The first three recommendations address the inputs without which capability cannot be built at all: a shared definition that gives the Directorate a coherent object to orient effort toward; a senior First Nations leader with the governance authority to drive the programme; and a capability framework that translates the definition into defined standards, measurable indicators, and accountability mechanisms. These are not three independent reforms — they are the conceptual, leadership, and operational foundations that every subsequent recommendation depends upon. Recommendations 4 through 7 address the structural conditions required to exercise and sustain the capability: confronting systemic racism and colonial legacy; rebuilding the First Nations education enterprise; establishing community accountability; and equipping staff through differentiated training. Recommendation 8 provides the governance architecture that gives the whole programme structural permanence.

The recommendations are not a menu from which the Directorate can select preferred items. Taken together they describe the minimum set of changes required to move from the current state documented in this report to an organisation capable of reliably delivering cultural safety. Each recommendation is presented with focussed actions that give

operational content to the strategic intent. The implementation design work proposed in Recommendation 8 will develop more detailed workstream plans for each area.

Rec 1

Develop and Promulgate a Shared Organisational Understanding of Cultural Safety

The Directorate must establish a shared, substantive definition of cultural safety that moves beyond statement of principle to operational specification. The definition should clarify who determines cultural safety, how it is assessed, and what it requires in practice across different roles and contexts. It should be grounded in the National Agreement framework and the Public Sector (Closing the Gap) Legislation Amendment Act 2025, and should reflect the collective rather than individualised nature of cultural determination. Once developed — through a process that authentically engages First Nations staff and community — it must be embedded in policy, training, and performance frameworks with sufficient prominence to displace competing and incompatible understandings. Critically, the process of developing this shared definition must also resolve the relationship between cultural safety and cultural integrity, establishing cultural safety as the Directorate's primary governing standard and positioning cultural integrity as a subordinate instrument of institutional accountability to that standard.

Focussed Actions

1. Commission a First Nations-led process to develop an endorsed organisational definition of cultural safety, drawing on the voices of First Nations staff, community representatives, and relevant expertise. The process should be structured to produce a collective outcome rather than aggregate individual views.
2. As part of the definition development process, formally resolve the relationship between cultural safety and cultural integrity in the Directorate's operating framework. The resolution should establish cultural safety as the primary governing standard, grounded in the determinacy principle — that only First Nations peoples can assess whether cultural safety has been achieved — and reposition cultural integrity as a supporting concept concerned with the consistency and authenticity of the Directorate's internal commitments in service of that standard. This resolution should be formally endorsed at Director-General level.
3. Ensure the endorsed definition and the cultural safety / cultural integrity relationship resolution inform the Directorate's engagement with the ACT Government's whole-of-government Cultural Integrity Framework development process. The Directorate should advocate within that process for a

framework grounded in cultural safety's determinacy principle rather than in institutional self-assessment.

4. Embed the endorsed definition in all relevant policies, procedures, induction materials, and performance frameworks, with a clear statement of who holds determination authority under the definition.
5. Develop accessible, role-specific guidance that translates the definition into the practical contexts of school leadership, teaching, HR, and administrative roles.

Rec 2

Establish Enhanced Senior Indigenous Leadership

The evidence points to a systemic absence of senior First Nations leadership with genuine authority over the cultural safety agenda. The Directorate should establish an enhanced senior Indigenous leadership capacity at or near the Executive Group Manager level, with specific responsibility for leading the implementation of the cultural safety reform programme, influencing decision-making at executive level, and providing visible accountability across the organisation. This is not a matter of representation; it is a matter of governance. The reform described in these recommendations cannot be led from a position that lacks the authority to hold the organisation to account.

Focussed Actions

6. Create a senior Indigenous leadership position at or near Executive Group Manager level, with a direct reporting line to the Director-General and defined executive-level decision-making authority over the cultural safety reform agenda.
7. Ensure the role carries explicit accountability for implementation progress across all eight recommendations and is resourced with adequate dedicated staff support.
8. Develop a clear position description that distinguishes this leadership role from existing cultural advisory or liaison functions, ensuring it carries governance authority rather than advisory status only.
9. Ensure the appointee has access to external networks and professional development appropriate to the seniority and complexity of the role.

Rec 3

Adopt a Capability Approach to Cultural Safety

The Directorate should adopt a capability development model for cultural safety, understanding it as something the organisation can reliably do to achieve its core educational mission rather than something that depends on the goodwill or personal commitment of individual staff members. This requires the development of defined

standards and expectations for cultural safety across role types; measurable indicators that allow the organisation to assess its performance; integration into performance frameworks at all levels; and continuous improvement mechanisms. The Defence capability model — in which capability is understood as an organisational property arising from the combination of trained people, sound doctrine, appropriate structures, and adequate leadership and management — provides a productive analogy.

Focussed Actions

10. Commission a scoping exercise to map current Directorate arrangements against the inputs required to produce cultural safety as an organisational capability, identifying gaps across personnel, doctrine, structure, leadership, and management dimensions.
11. Develop defined standards and measurable indicators for cultural safety performance at organisational, team, and individual levels.
12. Integrate cultural safety performance expectations into the Directorate's performance assessment and accountability frameworks at all levels, including for school principals.
13. Establish regular reporting mechanisms that make cultural safety performance visible at executive level, including disaggregated data on the experience of First Nations staff.

Address Systemic Racism and Confront Colonial Legacy

Rec 4

The evidence gathered through this review documents the presence of systemic racism within the Directorate: structural arrangements, policies, and practices that produce differential outcomes for First Nations peoples regardless of the intentions of individual staff members. Addressing systemic racism requires more than individual awareness-raising; it requires deliberate engagement with the institutional arrangements that produce inequitable outcomes, and a sustained commitment to restructuring them. The Directorate must develop an explicit anti-racism strategy that names systemic racism as a structural phenomenon and is supported by accountability mechanisms commensurate with its seriousness. This strategy must also engage with the colonial inheritance that shaped current institutional arrangements — not as a historical exercise, but as a practical prerequisite for understanding why those arrangements persist and how to change them. Explicit engagement with colonial legacy is emerging practice in Australian public administration; the Directorate has the opportunity to lead in this space and to draw on the growing body of comparable institutional practice from peer organisations nationally and internationally.

Focussed Actions

14. Develop an explicit anti-racism strategy that identifies the structural dimensions of systemic racism within the Directorate, establishes measurable targets for reducing differential outcomes for First Nations staff and students, and assigns clear accountability for progress to named positions.
15. Commission, in partnership with First Nations scholars and community knowledge holders, an institutional analysis of how colonial legacy manifests in current Directorate structures, policies, and practices, and use the findings to inform specific structural reforms rather than symbolic acknowledgement.
16. Review existing policies and procedures for evidence of structural bias, with particular attention to complaint handling, performance management, recruitment and retention, and the distribution of decision-making authority over matters affecting First Nations staff and students.
17. Commission a structured environmental scan of how comparable public institutions in Australia, the United Kingdom, Canada, and New Zealand are engaging with systemic racism and colonial legacy in their organisational practice. This scan should include direct engagement with relevant institutional programmes — such as the programme developed internally by the UK Foreign, Commonwealth and Development Office through its International Academy to equip staff to understand and address the colonial dimensions of the department's history and current work — and should identify models and lessons applicable to the ACT public sector context.
18. Establish ongoing partnerships with First Nations scholars and research institutions, including Canberra-based and ACT community-connected researchers, to ensure the Directorate's engagement with systemic racism and colonial legacy is grounded in First Nations intellectual authority and continuous community knowledge.
19. Commission, in partnership with First Nations scholars and research institutions, an issues paper and targeted literature review examining how colonial legacy has been conceptualised and addressed in settler colonial public administration. The review should draw on Australian, United Kingdom, Canadian, and New Zealand experience; assess emerging conceptual frameworks, institutional practice, and programme models relevant to the ACT public sector context; and give particular attention to the mechanisms by which colonial inheritance manifests in contemporary institutional arrangements and the structural interventions that have proven most effective in addressing it. The issues paper should be developed under First Nations intellectual authority and should directly inform the Directorate's anti-racism strategy and broader engagement with colonial legacy under this recommendation.

Rec 5**Rebuild the First Nations Education Enterprise**

The evidence from this review does not describe a First Nations education enterprise in need of refinement. It describes one that is severely fractured and, in its current configuration, irredeemably so. The IEO programme has attrited from fifteen to eight officers. Even at the original staffing level, fifteen IEOs serving ninety-three ACT Government schools does not constitute a viable service delivery model; at current levels it is not a programme in any operational sense. The weaponisation of bureaucratic process against IEOs who advocate for First Nations students and families, documented across multiple independent consultations, is not incidental: it reflects structural conditions that will not be corrected by incremental adjustment. Rebuilding this enterprise requires three distinct, sequenced pieces of work: the development of a First Nations Education Strategy that provides the rationale for restructure; the restructure of the enterprise itself, owned by Directorate leadership; and an independent expert review of the IEO programme delivery model.

Focussed Actions

19. Develop a First Nations Education Strategy, through an authentic consultative process with First Nations staff, community organisations, and families, that articulates what educational success as First Nations people means for First Nations students in ACT Government schools, establishes the Directorate's strategic priorities for First Nations education, and defines the organisational capability required to deliver them. The strategy should be endorsed at Director-General level and should provide the framework within which the enterprise restructure is designed.
20. On the basis of the endorsed strategy, the Directorate's senior First Nations leader, supported by the Director-General, should lead the restructure of the First Nations education enterprise. The restructure should address clarity of roles, reporting lines, resourcing, and accountability, and should be designed to deliver the strategy rather than to rearrange existing arrangements.
21. Commission an independent expert review of the IEO programme delivery model from specialists in education programme design and service delivery. The review should examine what outcomes the programme should deliver, what delivery approaches are viable across ninety-three schools, what comparable jurisdictions have done, and what configuration is achievable within realistic resourcing parameters. The Directorate should run this commission through its own procurement processes, with terms of reference developed to reflect the evidence gathered through this review.
22. Introduce formal mechanisms to acknowledge, resource, and appropriately distribute cultural responsibilities currently carried informally by First Nations staff across the Directorate, including workload recognition, role clarity, access to cultural supervision, and remuneration where appropriate.

Rec 6**Establish an External Advisory Mechanism**

An external advisory mechanism should be established to provide independent cultural expertise, community connection, and accountability beyond internal organisational change. The design of such a mechanism — whether an advisory committee, an independent cultural authority, or a Special Adviser to the Director-General, or some combination — should be developed through authentic engagement with First Nations community organisations, including the WINYU network. The evidence indicates that First Nations staff draw their primary professional support from peer networks rather than formal structures; an external advisory mechanism should be designed to complement and resource that community connection rather than replace it.

Focussed Actions

23. Develop, through genuine engagement with First Nations community organisations and the WINYU network, a design for an external advisory mechanism with appropriate terms of reference, membership, resourcing, and accountability.
24. Ensure the mechanism has a formal role in monitoring and reporting on implementation progress, providing independent assessment of the Directorate's performance against these recommendations.
25. Resource the WINYU network appropriately as a complementary internal voice, recognising the evidence that First Nations staff rely on it as their primary source of professional support within the Directorate.
26. Ensure the mechanism has continuity arrangements that protect its effectiveness through leadership changes and organisational restructures.

Rec 7**Implement Focussed and Differentiated Training Programmes**

Training in cultural safety should move from general awareness to role-specific capability development, with different programmes designed for different cohorts reflecting the different conceptual starting points and practical contexts documented in the survey data. A foundational programme for all staff should address the definitional and legislative framework. A programme for school leadership should address the specific accountability dimensions and the structural barriers to providing school-level cultural safety. A programme for HR and administrative staff should address the particular risks identified in the complaint and people management context. Completion of the foundational programme should be mandatory in the same way that child

protection and work health and safety training are mandatory. The design and delivery of the tiered programmes should be commissioned from specialist adult education and training providers through the Directorate's own procurement processes, briefed against specifications developed through the Implementation Phase.

Focussed Actions

27. Establish the AIATSIS CORE (Cultural Orientation and Responsive Education) foundational programme as the baseline mandatory cultural capability requirement for all Directorate staff, with completion tracked and reported alongside other mandatory training obligations.
28. Commission specialist adult education and training providers, through the Directorate's own procurement processes, to design and deliver the tailored masterclass-level programmes for school leadership, HR and people management staff, and administrative staff. Procurement briefs should be developed from the specifications produced through the Implementation Phase and should require that providers ground their programmes in the Directorate's endorsed cultural safety definition and capability framework.
29. Establish a structured mentoring programme for senior leaders designed to build cultural capability, confidence, and accountability at the executive level.
30. Ensure all commissioned training programmes are subject to independent quality assurance review against the procurement specifications before delivery, and are reviewed at regular intervals against the organisational capability indicators established under Recommendation 3.
31. Commence procurement planning for the training programme commissions at the outset of the Implementation Phase, recognising that ACT Government procurement timelines require early initiation if training is to be available when the capability framework is complete.

Rec 8

Adopt and Resource a Structured Implementation Work Programme

The Directorate should adopt a structured work programme to implement the recommendations of this review, establishing the governance, sequencing, accountability, and resourcing arrangements necessary to translate the recommendations from report findings into sustained organisational change. The work programme should be formally endorsed at Director-General level and treated as a standing institutional commitment rather than a time-limited project.

Focussed Actions

32. Commission an implementation design phase, within three months of this report's acceptance, to produce a detailed implementation plan, a governance framework for the reform programme, workstream scoping briefs for each major recommendation, and an implementation risk assessment. The implementation design phase should involve First Nations staff and community representatives alongside the Directorate's senior leadership.
33. Establish a dedicated governance mechanism for the reform programme, with direct reporting obligations to the Director-General, clear accountability for implementation progress, and a mandate to report publicly on progress at regular intervals.
34. Ensure that the governance mechanism has First Nations representation, and that the external advisory mechanism established under Recommendation 6 has a formal role in implementation oversight.
35. Resource the implementation work programme in a manner commensurate with its scope and the Directorate's obligations under the Public Sector (Closing the Gap) Legislation Amendment Act 2025, including through engagement of specialist external expertise where workstream scoping briefs identify capabilities the Directorate does not hold internally.

8. Next Steps: Implementation Phase

The Directorate does not approach this reform from a position of resistance. The evidence gathered through this review consistently described a workforce that is ready to engage, willing to learn, and genuinely concerned about the experiences of First Nations colleagues and students. The survey data's strong willingness to participate further, the consistent personal confidence of school leaders in their own capability, and the candour with which consultees engaged with the review all point to an organisation that, given the right structural conditions, has the human foundations for genuine transformation.

The open-text survey responses are unambiguous on this point. A consistent theme across both deployments is the demand for structural rather than performative change.

Respondents across identity groups reported awareness that training and awareness activities have not produced the structural changes required. The demand is for accountability mechanisms, leadership with genuine authority, and consequences for inaction. This convergence between quantitative findings, consultation evidence, and open-text responses across two independent survey deployments constitutes one of the strongest evidential conclusions of this review: the Directorate's workforce already understands what is needed, and is waiting for the institution to act.

What the Directorate currently lacks is not intent but structure: a shared definition to orient effort, a leadership architecture to drive accountability, a capability framework to make improvement measurable, and a reform programme with the resources and expertise required to move from assessment to action. The Implementation Phase is designed to provide these things. The Implementation Phase Programme, prepared as a commercial-in-confidence proposal under the contract, sets out a two-stage structure: an initial bounded design phase in which the architecture of the reform programme is developed in collaboration with the Directorate and with First Nations staff and community, followed by substantive workstreams addressing each of the eight recommendations in sequence.

The work described in these recommendations is substantial. It is also necessary. The Directorate's core mission — to enable all of its students to achieve educational success — requires it. The statutory framework within which it now operates requires it. And the First Nations students, staff, and communities who rely on the Directorate require it. This review

has sought to provide the honest assessment without which genuine reform cannot begin. Ngarra Group looks forward to supporting the Directorate through the work that follows.

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Annexures

Annexure A — Survey Data Analysis: Methodology and Findings (including cross-tabulation report)

Annexure B — Stakeholder Consultation Report (de-identified)

Annexure C — Implementation Phase Programme and Costings (commercial-in-confidence; not released for public distribution)

Annexure A

Cultural Safety Workforce Survey: Consolidated Analysis

Independent Cultural Safety Review | ACT Education Directorate

Ngarra Group | Contract PIED0011191 | April 2026 | Confidential

1. Introduction and Methodology

This document presents the consolidated analysis of the Cultural Safety Workforce Survey deployed as part of the Independent Cultural Safety Review commissioned by the ACT Education Directorate. The survey was deployed in two iterations; this report presents the findings from both deployments, with primary analytical weight given to the second deployment which corrected a technical flaw identified in the first.

1.1 Survey Design and Deployment

The survey was designed to assess four dimensions of the Directorate's cultural safety landscape: conceptual understanding of cultural safety; applied understanding through a scenario question; awareness of legislative obligations; and direct assessment of the workplace. A further section gathered demographic data to enable cross-tabulation by identity, role, and length of service. Separate sections for First Nations staff, school leadership, and the broader workforce provided role-specific data.

1.2 Survey 1: Initial Deployment

The survey was initially deployed in late January 2026. It was closed after a technical flaw was identified in the survey routing logic: a conditional branching error meant that some respondents were directed to sections that did not apply to their role, and vice versa. Quantitative findings from Survey 1 are treated as indicative only. Open-text responses from Survey 1 are incorporated into the qualitative analysis at Section 10 where they provide relevant additional texture.

1.3 Survey 2: Relunched Deployment

The survey was relaunched in early February 2026 with the routing logic corrected. It collected 193 consents, with 188 respondents completing the demographic section and between 139 and 140 completing the core quantitative section. The corrected routing produced reliable sub-group data for the first time, particularly for the First Nations staff section (Section 4A) and the school leadership section (Section 4B).

1.4 Comparability and Limitations

Direct comparison between the two surveys must be approached with care. It is not possible to identify where individual respondents appear in both datasets; the overlap analysis at Section 1.5 provides an estimate of the likely degree of double-counting but cannot resolve it at the individual

level. Movement between surveys on any single measure should therefore be understood as directional rather than precise.

Cross-tabulations involving small sub-groups require particular caution. The First Nations staff cohort in Survey 2 comprises nineteen respondents. Findings from this cohort are analytically significant and directionally robust, but percentage figures should be read as indicative of patterns rather than as precise population estimates.

1.5 Estimation of Overlap Between Surveys

Because both surveys were deployed to the same workforce within a short interval, it is probable that some respondents completed both. The overlap analysis uses three approaches: email matching; IP address analysis; and contextual reasoning about survey fatigue and voluntary participation rates.

Email matching identified seven respondents who provided the same email address in both surveys. A further individual was identified through a near-match. IP address analysis identified a pool of addresses appearing in both surveys, but because most respondents completed the survey from shared ACT Government network addresses, this approach cannot isolate individual overlap with precision.

The majority of respondents (86 per cent of Survey 2) completed the survey from ACT Government network IP addresses shared across the workforce. Individual matching from IP data is therefore not reliable.

Taking account of these factors, the estimated overlap lies in the range of 15–35 respondents, or approximately 8–18 per cent of the Survey 2 sample. This range is acknowledged in the analysis where it is relevant.

1.6 Respondent Profile

Across both deployments, approximately 500 staff consented to participate — a substantial proportion of the Directorate's workforce. Survey 2 collected 193 consents. Role distribution across Survey 2 included teachers and school support officers (the largest cohort), administrative staff, school leadership, and First Nations Education Officers. The First Nations cohort comprised nineteen respondents in the core section.

1.7 Attrition Analysis

Survey 2 recorded 193 consents, of which 188 completed the demographic questions and between 139 and 140 completed the core questions (Sections 3.1–3.6). Attrition is therefore approximately 27 per cent from consent to completion of the core section. This is within the normal range for workplace surveys of this length and sensitivity.

By role, Indigenous Education Officers completed at 100 per cent (n=4), followed by 'Other' roles at 92.9 per cent, School Leadership at 88.9 per cent, teachers at 74.0 per cent, and administrative staff at 69.6 per cent.

2. The Conceptual Gap: Goodwill Outstripping Understanding

The most consequential finding across the combined dataset is the persistent gap between the workforce's evident goodwill toward cultural safety as a principle and its practical understanding of what cultural safety requires. This gap is not a minor inconsistency; it is a structural feature of the Directorate's cultural safety landscape that has direct implications for training design, accountability frameworks, and the governance of cultural safety reform.

2.1 Who Determines Cultural Safety

In both surveys, the most popular response to the question of who determines whether a workplace is culturally safe was 'everyone's perspective equally' — a majority-rule framing that is fundamentally incompatible with the determinacy principle at the heart of cultural safety. Under the National Agreement on Closing the Gap definition, and under the conceptual framework applied in this review, only the First Nations person who is the recipient of a service or interaction can determine whether it is culturally safe.

Q3.1 Who determines cultural safety? (Survey 1 and Survey 2 comparison)

Response	Survey 1	Survey 2	Movement
Everyone's perspective equally	35.80%	37.86%	+2.06 pp
Individual First Nations person	20.58%	17.14%	-3.44 pp
First Nations peoples collectively	16.87%	15.71%	-1.16 pp
The organisation	13.17%	20.71%	+7.54 pp
Unsure	13.58%	8.57%	-5.01 pp

The most notable movement between surveys is the increase in respondents selecting 'the organisation based on policy and training' (from 13.17 per cent to 20.71 per cent). This increase is analytically significant and may reflect the influence of the Cultural Integrity Framework, which by design positions the organisation as the assessor of its own cultural adequacy.

The two responses closest to the correct understanding — individual and collective First Nations determination — together account for 32.85 per cent in Survey 2, down from 37.45 per cent in Survey 1. The directional movement across both surveys is away from First Nations determination and toward organisational self-assessment.

2.2 The Cross-Tabulation Reveals a More Complex Picture

The disaggregation by identity reveals a finding of considerable analytical significance. Among non-Indigenous respondents, the dominant response is ‘everyone equally’ (40.7 per cent). Among First Nations respondents, however, the dominant response is ‘the individual First Nations person’ (42.1 per cent) — the individualised framing that represents a partial rather than complete understanding of the determinacy principle.

Q3.1 by Identity (Survey 2)

Response	First Nations (n=19)	Non-Indigenous (n=118)
Everyone’s perspective equally	21.1%	40.7%
Individual First Nations person	42.1%	13.6%
First Nations peoples collectively	15.8%	16.1%
The organisation	10.5%	22.0%
Unsure	10.5%	7.6%

First Nations respondents are far less likely than non-Indigenous staff to select ‘everyone equally’, which is consistent with a better understanding of the power dynamics the question addresses. However, the high proportion selecting individual determination over collective determination is consistent with the individualised framing that has been documented in the cultural safety literature as a problematic consequence of the concept’s migration from its nursing origins.

The disaggregation by length of service produces a further insight. The proportion selecting ‘everyone equally’ is remarkably stable across service length categories, but the proportion selecting collective First Nations determination falls sharply with longer service, whilst individual determination rises. This is discussed further at Section 2.4.

Q3.1 by Length of Service — selected responses (Survey 2)

Length of service	Everyone equally	FN collectively	Individual FN
1–3 years (n=24)	37.5%	25.0%	4.2%
4–7 years (n=33)	39.4%	18.2%	15.2%
8–15 years (n=33)	39.4%	9.1%	15.2%
15+ years (n=46)	34.8%	13.0%	28.3%

2.3 The Paradox of Abstract Agreement

The abstract agreement on underlying principles is virtually identical across both surveys. When asked whether cultural safety is about power imbalances (Q3.2), 77.70 per cent agreed or strongly agreed in Survey 2 — statistically unchanged from Survey 1 (77.95 per cent). This stability across two separate deployments confirms the finding is a genuine feature of the workforce’s disposition rather than an artefact of survey conditions.

Q3.2 Cultural safety involves power imbalances (aggregate)

Response	Survey 1	Survey 2	Movement
Agree / Strongly Agree	77.95%	77.70%	–0.25 pp
Disagree / Strongly Disagree	10.12%	10.07%	–0.05 pp

2.3a The Paradox Proven at Individual Level

The paradox between Q3.1 and Q3.2 can be demonstrated not merely as an aggregate pattern but as a contradiction occurring within individual respondents. Among the 53 Survey 2 respondents who selected ‘everyone’s perspective equally’ on Q3.1 — indicating they believe cultural safety is determined by majority consensus — a substantial proportion simultaneously agreed on Q3.2 that cultural safety is about overcoming power imbalances between Indigenous and non-Indigenous positions. These two positions are logically inconsistent: a majority-rule determination mechanism is precisely the kind of power arrangement that cultural safety is designed to address.

The cross-tabulation also reveals that this misconception has operational consequences. When the Q3.1 responses are mapped against the language scenario at Q3.3, respondents who selected

‘everyone equally’ are significantly less likely to correctly identify the scenario as a cultural safety concern than those who selected First Nations determination.

2.4 Length of Service and Conceptual Understanding

The cross-tabulation by length of service produces a finding that is, at first glance, counterintuitive. On Q3.1, the proportion selecting collective First Nations determination declines with longer service, while individual determination increases. Staff with more than fifteen years of service are the most likely cohort to select individual First Nations determination (28.3 per cent), and the least likely to select collective determination (13.0 per cent).

This pattern suggests that longer-serving staff may have absorbed a more individualised framing of cultural safety through prolonged exposure to the Directorate’s cultural integrity infrastructure — which has historically emphasised personal relationships and individual cultural competence over collective authority. Newer staff, by contrast, may be arriving with conceptual frameworks from pre-service education or broader professional discourse that are more aligned with the collective determination model.

3. Applied Understanding: The Language Scenario

The scenario question translates the conceptual gap into operational terms. Respondents were presented with a situation in which a teacher makes a comment about the ‘proper’ use of English in a professional context, directed at a First Nations colleague. They were asked whether this constitutes a cultural safety concern, a matter of individual preference, or they were unsure.

Q3.3 Language scenario (aggregate)

Response	Survey 1	Survey 2	Movement
Clearly a cultural safety concern	45.23%	50.36%	+5.13 pp
Might be	20.75%	20.86%	+0.11 pp
Individual preference	24.48%	20.14%	-4.34 pp
Unsure	9.54%	8.63%	-0.91 pp

Survey 2 showed a modest improvement, with 50.36 per cent correctly identifying this as clearly a cultural safety concern, compared with 45.23 per cent in Survey 1. However, more than a third of respondents — combining the ‘individual preference’ and ‘unsure’ categories — did not identify a textbook example of linguistic racism as a cultural safety concern. This is the applied counterpart of the conceptual gap documented at Section 2.

3.1 Role-Based Variation

The cross-tabulation by role category reveals meaningful variation in applied understanding. School Leadership respondents showed the highest rate of correct identification (68.4 per cent), followed by teachers and school support officers (51.3 per cent). Administrative staff showed the lowest rate of correct identification (33.3 per cent), with ‘Other’ roles in between.

Q3.3 Correct identification by role (Survey 2)

Role	n	% Correct
Indigenous Education Officer	4	75.0%
School Leadership	19	68.4%

Role	n	% Correct
Teacher / School Support Officer	78	51.3%
'Other' roles	13	46.2%
Administrative Staff	21	33.3%

The administrative staff result (33.3 per cent) is particularly notable given that this cohort constitutes a significant proportion of the total workforce and is frequently the first point of contact for First Nations families and community members in school and central office settings.

3.2 Identity-Based Variation

Among First Nations respondents, 63.2 per cent correctly identified the scenario as a cultural safety concern — higher than the non-Indigenous rate (49.6 per cent) but not as high as might be expected given the direct relevance of the scenario to lived experience. This finding is consistent with the individualised framing documented at Section 2.2: if cultural safety is understood primarily as a matter of individual experience rather than collective authority, a scenario involving a comment about language may not trigger a cultural safety assessment automatically.

3.3 Administrative Staff: A Compliance-Oriented Cohort

Administrative staff present a distinct conceptual profile that warrants specific attention. This cohort had the lowest rate of correct identification on the scenario question and showed a disproportionately high rate of selecting 'individual preference'. Their qualitative responses suggest a compliance orientation — cultural safety understood primarily in terms of policy adherence rather than relational or structural dynamics. This has implications for training design: a generalised cultural awareness programme is unlikely to shift understanding in a cohort whose conceptual starting point is administrative rather than cultural.

4. Legislative Awareness: A Compliance Risk

The data on awareness of the Public Sector (Closing the Gap) Legislation Amendment Act 2025 is virtually unchanged between the two surveys, confirming that this is a stable and embedded feature of the Directorate's workforce profile rather than an artefact of any particular deployment condition.

Q3.4 Awareness of Closing the Gap legislative obligations (aggregate)

Response	Survey 1	Survey 2	Movement
Understand requirements	27.27%	28.06%	+0.79 pp
Aware but unsure	52.07%	51.80%	-0.27 pp
Not aware	14.05%	17.99%	+3.94 pp
Unsure	6.61%	2.16%	-4.45 pp

In both surveys, approximately 72 per cent of the workforce either does not know about or does not understand their obligations under the Closing the Gap legislative framework. Given that this legislation creates specific legal obligations on ACT Government agencies, this is a compliance risk as much as a cultural safety issue.

4.1 Variation by Identity, Role, and Service

Legislative awareness varies significantly by identity. Among First Nations respondents, 47.4 per cent understand their legislative requirements — nearly double the non-Indigenous rate of 25.6 per cent. This finding is consistent with the broader pattern: First Nations staff are carrying more of the institutional weight of cultural safety knowledge than their non-Indigenous colleagues.

Q3.4 by Identity (Survey 2)

Response	First Nations (n=19)	Non-Indigenous (n=117)
Understand requirements	47.4%	25.6%
Aware but unsure	26.3%	54.7%
Not aware	21.1%	17.9%

Response	First Nations (n=19)	Non-Indigenous (n=117)
Unsure	5.3%	1.7%

4.2 The Service-Length Gradient

The length-of-service data reveals a clear gradient in legislative awareness. Among staff with more than fifteen years of service, 40.0 per cent understand their obligations — compared with lower rates among shorter-serving staff. This gradient is consistent with the general pattern that longer-serving staff have greater institutional knowledge. However, even among the most experienced cohort, 60 per cent do not fully understand their legislative obligations under the Closing the Gap framework.

5. The Perception Gap: Two Organisations in One

The single most powerful finding to emerge from the cross-tabulation of the raw data is the divergence between how First Nations and non-Indigenous staff assess the Directorate's cultural safety. This divergence is so substantial that it cannot be understood as a difference of degree; it is a difference of kind. The two cohorts describe, in experiential terms, two different organisations.

Q3.6 Workplace cultural safety assessment by identity (Survey 2)

Response	First Nations (n=19)	Non-Indigenous (n=117)
Disagree / Strongly Disagree	57.9%	11.1%
Neither Agree nor Disagree	26.3%	38.5%
Agree / Strongly Agree	15.8%	50.4%

More than half of First Nations respondents assessed the Directorate as culturally unsafe, while half of non-Indigenous respondents assessed it as safe. Under the definitional framework governing this review — including the National Agreement on Closing the Gap — it is the assessment of First Nations peoples themselves that is definitive. On that measure, the Directorate is not currently meeting the standard.

The aggregate data masks this divergence. In the overall Survey 2 results, 46.04 per cent agreed the Directorate is culturally safe — a figure that might be read as modest but plausible. Disaggregated by identity, that aggregate figure is revealed as the arithmetic product of two radically different distributions.

5.1 The Self-Assessment Pattern

Q3.6 Workplace assessment (aggregate, both surveys)

Response	Survey 1	Survey 2	Movement
Agree / Strongly Agree	42.79%	46.04%	+3.25 pp
Neither	41.56%	36.69%	-4.87 pp

Response	Survey 1	Survey 2	Movement
Disagree / Strongly Disagree	15.64%	17.27%	+1.63 pp

In both surveys, the neutral category was the single largest or nearly the largest response group. This indicates a workforce in which a significant proportion is either genuinely uncertain about the Directorate's cultural safety or is unwilling to commit to an assessment. In the context of the perception gap, this neutral position may reflect non-Indigenous staff whose limited visibility of harm to First Nations colleagues produces uncertainty rather than positive assessment.

5.2 The Witnessing Gap

The witnessing-of-racism data confirms and extends the perception gap. Among non-Indigenous staff, 76.52 per cent reported never or rarely witnessing racism directed at First Nations colleagues. Among First Nations respondents, 80.00 per cent reported experiencing racial microaggressions sometimes to very often. The two cohorts are not simply reporting the same environment differently; the non-Indigenous majority is structurally positioned not to see what the First Nations minority routinely experiences.

This perception gap is not merely an analytical observation; it is a structural barrier to change. An organisation in which the majority cannot see the harm being experienced by the minority will not generate the internal pressure required to address that harm without deliberate structural intervention.

5.2a The Perception Gap in Mean Scores

The Likert scale data allows the perception gap to be expressed as mean scores on a five-point scale (1 = Strongly Disagree, 5 = Strongly Agree). On Q3.6, the mean score for First Nations respondents is 2.42, compared with 3.47 for non-Indigenous respondents — a gap of 1.05 points on a five-point scale. This is a large and analytically significant difference.

5.3 Self-Assessment by Length of Service: The Survivor Effect

The cross-tabulation of Q3.6 by length of service reveals a notable pattern. Staff with 1–3 years of service have the highest rate of disagreement (i.e., assessing the Directorate as culturally unsafe) in the first years of service, which then falls before rising again among the longest-serving staff.

The qualitative evidence — particularly the IEO attrition data from the consultations, documenting a decline from fifteen to eight officers — suggests a survivor effect: First Nations staff who find the

Directorate most unsafe are disproportionately likely to leave. The survey captures only those who remain.

6. First Nations Staff Experience

The corrected routing in Survey 2 provides the first systematic quantitative evidence of how First Nations staff experience the Directorate as a workplace. Section 4A was completed by nineteen respondents. The findings are directionally clear and consistent with the qualitative evidence from the stakeholder consultations.

6.1 Cultural Identity and Belonging

When asked whether they feel able to express their cultural identity at work without code-switching or minimising who they are, responses were divided. A substantial proportion reported that they do not feel this freedom. This finding is the quantitative counterpart of the consultation theme documented in Annexure B: the expectation that First Nations identity be expressed in limited, instrumentalised forms.

6.2 Experiences of Racism

The racism data is stark. Of First Nations respondents, 80.00 per cent reported experiencing racial microaggressions sometimes to very often. This is not an outlier finding; it is consistent across the consultation data, the open-text responses, and the cross-tabulations. These are not marginal experiences affecting a small number of outliers. They describe the routine workplace reality of the majority of First Nations staff who responded to the survey.

6.3 Cultural Load

Of First Nations respondents, 68.75 per cent agreed or strongly agreed that they carry additional responsibilities at work because of their cultural identity. This is the quantitative measure of the cultural load theme documented extensively in the consultation report. Combined with the finding that 81.25 per cent report no access to cultural supervision, the data points to a workforce carrying significant informal institutional labour without structural support.

6.4 Support Structures: Formal vs Informal

The support structures show a revealing divergence. When asked about support from WINYU, the peer-led First Nations staff network, 62.50 per cent of respondents felt supported. When asked about support from the First Nations Education team itself, 56.25 per cent strongly disagreed. The community that First Nations staff trust is informal and peer-based; the formal institutional structure is experienced as actively unsupportive.

6.5 What First Nations Staff Are Asking For

When asked what systemic changes would most improve cultural safety, the most frequently selected responses were: a senior First Nations leader with genuine decision-making authority; clear and consistent consequences for racist conduct; and integration of cultural safety into school accountability frameworks. Awareness training was among the least frequently selected options.

This hierarchy of priorities is itself a finding. What First Nations staff are asking for is not more training for their non-Indigenous colleagues; it is structural change. The survey data is consistent with and reinforces the structural orientation of the eight recommendations in the main report.

7. School Leadership: Confident but Unsupported

Section 4B (n=18) provides the first quantitative picture of how school leaders understand their cultural safety responsibilities. The picture is characterised by a striking combination of personal confidence and structural absence.

Of school leaders, 72.22 per cent agreed or strongly agreed that they understand their statutory obligations under the Closing the Gap framework — considerably higher than the workforce average of 28.06 per cent. This is consistent with their higher-than-average rate of correct identification on the language scenario (68.4 per cent at Section 3.1). School leaders know more than the average staff member.

However, only 16.67 per cent agreed that the Directorate provides adequate support for addressing cultural safety in their school. And 50 per cent disagreed or strongly disagreed that they are held accountable in their performance assessment for cultural safety outcomes. The combination — confident in personal understanding, unsupported by institutional structures, and not held accountable — describes precisely the conditions under which individual goodwill produces variable outcomes across schools rather than consistent institutional performance.

When asked about barriers, school leaders identified the unwillingness of senior leadership to engage with different approaches as the most significant structural constraint. This finding points upward in the hierarchy: the barrier experienced by school leaders is not their own capacity but the institutional culture above them.

8. The Broader Workforce: Willing, Under-Equipped, and Not Seeing Clearly

Section 4C (n=113–115 in Survey 2) captures the non-Indigenous, non-leadership workforce — the largest cohort in the Directorate and the group whose cultural safety understanding most directly shapes the daily experience of First Nations students and staff.

8.1 Training and Development

On training adequacy, 38.60 per cent disagreed or strongly disagreed that they have received adequate cultural safety training for their role. A further 24.56 per cent were neutral, suggesting genuine uncertainty about whether training has adequately prepared them. Fewer than 40 per cent were confident in the adequacy of their preparation. This is a workforce that recognises its own gaps, which is a foundation for change — but the gaps are real and currently unaddressed.

8.2 Ally Identification and Practice

Of the non-Indigenous cohort, 74.31 per cent identified as allies to First Nations colleagues. This is a high rate of self-identification and consistent with the strong abstract endorsement of cultural safety principles documented at Section 2.3. However, the gap between ally self-identification and applied understanding documented throughout this report suggests that ally identity is not translating consistently into ally practice.

8.3 The Witnessing Gap Revisited

Among the general workforce, 35.65 per cent reported never witnessing racism directed at First Nations colleagues, and a further proportion reported rarely witnessing it. This is not consistent with the experience reported by First Nations staff. The gap is not explained by differences in exposure; school-based staff are in the same physical environments. It reflects a structural difference in what is visible depending on who you are in the institution.

9. Organisational Capability: A Contested Proposition

The proposition that cultural safety is something an organisation can reliably deliver through its systems received only modest endorsement from the workforce overall, with the finding showing movement in a slightly negative direction between surveys.

Q3.5 Cultural safety as organisational capability (aggregate)

Response	Survey 1	Survey 2	Movement
Agree / Strongly Agree	56.79%	53.24%	-3.55 pp
Neither	21.40%	25.18%	+3.78 pp
Disagree / Strongly Disagree	21.81%	21.59%	-0.22 pp

The cross-tabulation by identity reveals an interesting divergence. Among First Nations respondents, agreement with the capability proposition is lower than among non-Indigenous respondents. This is consistent with an interpretation in which First Nations staff, who have direct experience of the gap between institutional aspiration and organisational reality, are less confident that cultural safety can be reliably produced by the Directorate's systems as they currently exist.

By role, School Leadership showed the strongest agreement at 68.4 per cent, followed by teachers at 51.3 per cent and administrative staff at a lower rate. The pattern is consistent with the general finding that those with more institutional knowledge and experience of accountability frameworks are more confident in the organisational capability proposition.

10. The Qualitative Evidence: Convergent Themes

The open-text responses across both surveys constitute a substantial qualitative dataset. The themes are remarkably consistent across surveys, role types, and identity groups, suggesting genuine structural conditions rather than individual variation.

10.1 Cultural Load and the Colonial Burden

Multiple respondents describe carrying cultural responsibilities beyond their formal role — leading cultural responsiveness activities, supporting First Nations students informally, answering colleagues' cultural questions, and managing the emotional consequences of microaggressions — without recognition, compensation, or reduction in other workload. This is reported as cumulative and health-affecting.

10.2 The Handling of Racist Conduct

It was reported across both surveys that First Nations staff experience racist conduct in the workplace that is not addressed when reported. The pattern described is one in which formal reporting systems do not function as intended: complaints are not followed up, findings are not communicated, and the person who made the complaint experiences secondary harm through the process itself.

10.3 Acknowledgement of Country as a Site of Tension

A recurring theme across both surveys and the stakeholder consultations is the contested nature of Acknowledgement of Country practice in the Directorate. Respondents describe a range of positions: those who find Acknowledgements genuinely meaningful; those who find them performative without accompanying structural change; and those who find them actively uncomfortable because of the gap between the acknowledgement and the daily reality.

10.4 Internal Division and Lateral Violence

Respondents in both surveys raised the sensitive issue of lateral violence among First Nations staff and community members. This theme is documented with care: it is noted where it is reported, but the analysis consistently distinguishes between the structural conditions that generate workplace stress — which are institutional — and the interpersonal dynamics that may result from that stress.

A further dimension of this theme is treated substantively in Section 4.3a of the main report and Theme Two of Annexure B, where the consultation evidence is set out in full. In summary, the consultations documented a pattern in which the institutional language of cultural safety was

reported to have been deployed not only by non-Indigenous managers against First Nations staff but, in some instances, by First Nations staff against other First Nations staff, in ways that masked or facilitated lateral violence. Some of those consultees raised a related observation: that the language of cultural safety was, in their experience, sometimes invoked by individual staff to deflect legitimate professional expectations — reasonable management requirements, performance feedback, or ordinary standards of professional conduct — that were not in fact rooted in cultural matters or in First Nations identity. The consultees who described these dynamics emphasised that the existence of this kind of misuse does not diminish the substantial and genuine cultural safety issues identified throughout the review; rather, they observed that the integrity of cultural safety as a concept and a practice depends on its language being reserved for the substantive purposes for which it was developed. The open-text responses considered in this annexure are consistent with the broader institutional pattern the consultations identified. The survey instrument was not designed to test the specific dynamics now documented in the consultation evidence, and this annexure does not extend the analysis beyond what the open-text material supports. Readers seeking the fuller analytical treatment of how cultural safety language has been deployed in ways that obscure rather than expose institutional harm are directed to Section 4.3a of the main report.

10.5 Broader Cultural Diversity Concerns

Respondents from non-Indigenous culturally and linguistically diverse backgrounds raised questions in both surveys about the relationship between cultural safety frameworks oriented toward First Nations peoples and the needs of other cultural groups. The analysis treats this as a legitimate question without allowing it to displace the specific focus on First Nations cultural safety that this review was commissioned to address.

10.6 Demand for Structural Action

A consistent theme across both surveys is the demand for structural rather than performative change. It was reported that respondents across identity groups are aware that training and awareness activities have not produced the structural changes required. The demand is for accountability mechanisms, leadership with genuine authority, and consequences for inaction — not more of the same.

Cross-Tabulation: Summary Implications

The cross-tabulation analysis adds three layers of understanding to the aggregate findings that are essential to the review's recommendations.

First, the perception gap between First Nations staff and the broader workforce is not a marginal finding or an artefact of small sample sizes. It is the dominant structural feature of the dataset. Any analysis or recommendation that does not centre this divergence will fail to engage with the most important thing the data documents.

Second, conceptual understanding varies meaningfully by role, identity, and length of service, and these variations have direct implications for training design. A single awareness programme delivered to the full workforce will not address the distinct starting points of school leadership, administrative staff, teachers, and First Nations staff. Role-differentiated training, grounded in the capability framework recommended under Recommendation 3, is the appropriate response.

Third, the finding that First Nations staff are themselves divided on who determines cultural safety — with a substantial proportion endorsing the individualised rather than collective framing — is a direct consequence of the Directorate's failure to establish, promulgate, and embed a shared substantive definition. The definitional vacuum documented in Section 2 has shaped how the concept is understood even among the people whose authority the concept is designed to protect.

Cross-tabulations involving small sub-groups (particularly Indigenous Education Officers at n=4 and 'Prefer not to say' at n=3-4) should be interpreted with caution. Percentage figures for these groups are directionally informative but are not statistically robust at the individual-cell level.

11. What the Combined Dataset Tells Us

The two survey deployments, taken together, provide a dataset of unusual strength for a review of this kind. The combination of aggregate findings, cross-tabulations, and open-text responses across two independent deployments to the same workforce produces a picture that is internally consistent and directionally clear.

The story the data tells is consistent and clear. The Directorate has a workforce that broadly supports cultural safety in principle, genuinely does not understand what it requires in practice, does not see the harm being experienced by First Nations colleagues, and does not have the structural conditions required to produce cultural safety reliably. The challenge is not one of goodwill; it is one of structural absence.

Most fundamentally, the relaunched survey provides what the initial deployment could not: a direct, quantitative account of how First Nations staff experience the Directorate. That account is stark. The majority assess the Directorate as culturally unsafe. The majority experience microaggressions routinely. The majority carry institutional labour that is not recognised or resourced. Under the definitional framework governing this review, this is the definitive assessment.

The challenge facing the Directorate is not one of workforce resistance. The willingness is evident across every measure of abstract endorsement. The challenge is one of structural deficit: no shared definition, no accountability mechanisms, no senior First Nations leadership at decision-making level, no institutional infrastructure to translate goodwill into reliable organisational performance.

11.1 Recommended Repeat Survey

The review recommends that the Cultural Safety Workforce Survey be re-administered at the conclusion of the Implementation Phase. The core questions (Q3.1 through Q3.6) should be held constant to enable direct comparison with the Survey 2 baseline established here. Section 4A should be retained in its current form; Sections 4B and 4C may be revised in light of changes to the workforce's role structure.

The repeat survey should be understood not as a standalone evaluation exercise but as a component of the capability framework's continuous improvement mechanism. The perception gap documented here — and particularly the First Nations assessment of workplace cultural safety — is the primary measure against which the Implementation Phase should ultimately be assessed.

The findings of this report are consistent with and directly inform the eight recommendations set out in the Independent Cultural Safety Review. The survey evidence provides the principal quantitative strand of the evidentiary base, alongside the stakeholder consultation analysis in Annexure B and the desktop review of Directorate documentation. Formal recommendations and their focussed actions are set out in Section 7 of the main report.

Annexure B

Stakeholder Consultation Report

Independent Cultural Safety Review | ACT Education Directorate

Ngarra Group | April 2026 | Confidential

1. Executive Summary

This report presents the findings of in-depth interviews with seven First Nations educators and administrators and notes from two staff workshops held in February 2026 as part of the Independent Cultural Safety Review commissioned by the ACT Education Directorate.

The dataset is consistent, detailed, and in several respects urgent. Participants articulate a Directorate that publicly positions cultural integrity as foundational, yet in practice provides few structural mechanisms to give that commitment effect. The distance between policy aspiration and lived experience is not incidental; it is a recurring and institutionalised pattern that First Nations staff navigate every working day.

Five interconnected themes emerged:

1	Cultural Safety as Everyday Practice: Participants describe the absence of culturally safe conditions — including the expectation that First Nations staff suppress or ‘turn on and turn off’ their identity in professional contexts — as a systemic and structural problem, not an interpersonal one.
2	The Misuse of Cultural Processes: Cultural forms including yarning circles, Acknowledgements of Country, and the Cultural Integrity Framework are being deployed in ways that participants experience as controlling, performative, or appropriative.
3	Structural Invisibility and Lack of Meaningful Voice: First Nations staff at all levels describe a Directorate that consults without genuinely listening, creates advisory structures without decision-making power, and processes complaints without follow-through. The IEO programme is structurally isolated and under-resourced.
4	Cultural Load and Unequal Recognition: First Nations staff carry informal responsibilities — for student welfare, community liaison, cultural education, and colleague wellbeing — that are systematically unacknowledged, uncompensated, and in some cases actively discouraged.
5	Leadership, Accountability and the Conditions for Change: There is genuine optimism about current senior leadership intentions, but structural barriers — including the absence of senior First Nations leadership at decision-making level and a history of complaint-suppression — constrain the Directorate’s capacity for reform. Sustained progress will require institutional redesign, not individual effort.

Several divergent perspectives are noted and discussed at Section 11, including disagreement about the Cultural Integrity Framework and varying accounts of the relative weight of structural versus interpersonal factors.

2. Methodological Note

This analysis applies Braun and Clarke’s reflexive thematic analysis (RTA) — a well-established qualitative methodology that treats themes not as features that emerge passively from data, but as constructs the analyst actively builds through sustained, interpretive engagement with the material. It is well suited to this policy context because it is oriented toward meaning and pattern rather than frequency; it requires an explicit and transparent interpretive position; and it generates rich findings that go beyond description to offer interpretation of what data patterns signify.

The analytic process followed five stages: familiarisation with the full dataset prior to any coding; generation of initial codes across all materials; grouping codes into candidate themes; review and refinement of themes for coherence and distinctiveness; and development of interpretive accounts. Attention was given throughout to relationships between themes, which inform the cross-cutting analysis at Section 10.

All identifying information has been removed. Names and school names have been replaced with neutral role descriptors (for example, ‘a senior administrator’, ‘a classroom teacher’). Given the small size of the First Nations workforce within the Directorate, role descriptors are deliberately approximate. Where a direct quote could not be sufficiently de-identified without losing its meaning, the material has been paraphrased.

3. Dataset Overview

The dataset comprises nine sources: seven individual interviews and notes from two staff workshops held in February 2026. All participants are First Nations people working within or recently associated with the ACT Education Directorate or its schools. Roles span classroom teaching, Indigenous Education Officer (IEO) positions, senior administrative and team-leadership roles, and facilitative positions within the First Nations education team.

Participants bring significant collective experience: several have worked in their current or related roles for more than a decade, and most have direct experience of both school-based and Directorate-level environments. The two workshops are treated analytically as supplementary data — useful for corroborating patterns found in individual interviews — rather than as primary sources. The consistency of key findings across very different role types is itself analytically significant.

Across the two workshops, most if not all IEOs participated. This level of engagement is analytically significant and has been considered in interpreting the workshop data, particularly in relation to themes concerning the IEO programme and structural isolation.

4. Overview of Themes

Five themes were identified through the analysis. They are analytically distinct but mutually reinforcing: weakness in any one area compounds the others. Together they point to an interconnected system of conditions rather than a collection of separate problems. Themes 1, 3, and 4 are present across all or nearly all data sources; Themes 2 and 5 are strongly represented but somewhat more concentrated in specific role types.

5. Theme One: Cultural Safety as Everyday Practice

The Gap Between Policy and Experience

The foundational pattern running through this dataset is a profound and recurring disjunction between the Directorate's policy positioning — that cultural integrity is 'at the heart of everything we do' — and the daily experience of First Nations staff working within it. Cultural safety, for participants, is not primarily a question of ceremonial acknowledgement or curriculum content. It is a question of whether First Nations people can be fully themselves in their workplace.

Across interviews and workshops, participants describe a condition in which First Nations identity is tolerated in limited, instrumentalised forms: welcomed as a resource when it serves institutional needs, and discouraged or suppressed when it becomes politically inconvenient or professionally assertive.

"There's a tension when you walk into school. I feel like I have to tiptoe around certain topics, like I need to be appeasing. Cultural safety should mean I can walk in without that."

— A classroom teacher

Several participants reflect on the conceptual distinction between comfort and safety, noting that the Directorate tends to conflate the two. Creating an environment free of difficult conversations is not the same as creating a culturally safe one; in fact, suppressing difficult conversations may actively undermine cultural safety by preventing the honest engagement that genuine respect requires.

"People think cultural safety means everyone feels comfortable. But that's not the same thing. Safety means you can speak truth, raise concerns, be who you are — and not be punished for it."

— A senior administrator

The data reflects a broadly shared experience of being expected to suppress or minimise First Nations identity in professional contexts — a preference for the 'domesticated' expression of Indigenous identity over its fuller, more assertive form. This expectation operates not through explicit policy but through the accumulated weight of institutional response: who gets listened to, whose complaints are acted on, whose identity is described positively by those with institutional power.

A recurring motif is that cultural safety ultimately requires structural conditions, not individual goodwill. It should not be the responsibility of First Nations teachers to educate their principals about policy compliance.

“It shouldn’t be on the First Nations staff to inform leadership about what’s required. That’s where the safety disappears — when you’re having to challenge your own boss just to get basic things acknowledged.”

— A classroom teacher

Prevalence and distribution

This theme was present in some form across all nine data sources. It functions as both a standalone finding and the interpretive frame through which the other four themes are best understood.

6. Theme Two: The Misuse of Cultural Processes

When Cultural Forms Become Control Mechanisms

A striking pattern in this dataset is the extent to which cultural forms — including yarning circles, Acknowledgements of Country, the Cultural Integrity Framework, and even the language of cultural safety itself — are described as having been co-opted or misused in ways that undermine their meaning and produce the opposite of their intended effect.

Multiple IEOs describe team meetings conducted in a circular seating arrangement, which they reported as being labelled ‘yarning circles’ but which they experienced as controlled briefings in which First Nations staff were silenced rather than heard.

“They set us up in the circle and call it a yarning circle. But we aren’t actually allowed to have a turn. If we raise something, we get shut down. They use the circle to keep us quiet — which is the opposite of what it’s supposed to be.”

— An Indigenous Education Officer

Several participants also recalled a management framing along the lines that ‘there are triangles within the circle’, which they understood, in the context in which it was used, as an attempt to impose hierarchical authority within a cultural form they understood to be premised on equality. Participants reported that the framework Engoori was raised by name as the leadership approach management understood themselves to be drawing on. This analysis records what was reported; the substantive treatment of the relationship between provider intent and recipient experience is set out in Section 4.3a of the main report.

“You can’t take our cultural practices and change them to fit a management structure. That’s not how it works. And when we pointed it out, we were told the hierarchy still existed. It was insulting.”

— An Indigenous Education Officer

The Cultural Integrity Framework — designed with genuine intent — is described by multiple participants as having become, in practice, a tool for limiting engagement rather than deepening it. The framework is described as ‘domesticating’ First Nations culture: providing institutional cover for a shallow, display-based form of cultural acknowledgement that substitutes for substantive change.

“In ten years of cultural integrity, we’ve got murals and purchased resources. What we haven’t got is structural change. The framework ended up authorising a lack of deep engagement, not requiring it.”

— A senior administrator

Participants also describe the language of cultural safety being invoked to silence rather than support First Nations staff. When First Nations colleagues raise concerns, the response is sometimes framed in terms of cultural safety — that the manner of raising a concern is ‘unsafe’ for those being criticised. The effect is to position the person raising concerns as the source of the problem. A further pattern emerged across the consultations that warrants explicit acknowledgement: participants reported the deployment of cultural safety language not only by non-Indigenous managers against First Nations staff but, in some instances, by First Nations staff against other First Nations staff, in ways that masked or facilitated lateral violence. Several participants described their experience of being on the receiving end of conduct they identified as lateral violence, where the institutional language of cultural safety was invoked in ways that prevented the conduct from being named, examined, or addressed. The review records these reports as it records others, without assessing the accuracy of any individual account, and notes the pattern across multiple independent consultations as evidence of a distinct cultural safety problem in its own right. Some of the participants who described these dynamics also raised a related observation: that the language of cultural safety was, in their experience, sometimes invoked by individual staff to deflect legitimate professional expectations — reasonable management requirements, performance feedback, or ordinary standards of professional conduct — that were not in fact rooted in cultural matters or in First Nations identity. These participants emphasised the importance of distinguishing carefully between, on the one hand, being asked to perform one’s role to a professional standard and, on the other, genuine experiences of cultural unsafety. They were clear that the existence of this kind of misuse does not diminish the substantial and genuine cultural safety issues identified throughout this analysis; rather, they observed that the integrity of cultural safety as a concept and a practice depends on its language being reserved for the substantive purposes for which it was developed. That a concept developed to protect First Nations people from institutional harm can also be deployed to obscure harm between First Nations colleagues is a symptom of the same institutional dynamics this analysis identifies elsewhere: where the meaning of cultural safety is contested, captured, or left without genuine First Nations community authority to determine it, the concept becomes available to authorise whatever institutional purpose it is enlisted to serve. The pattern reported to the review extends to the enterprise level, where the review observes that coherent First Nations leadership of cultural safety work across the Directorate is constrained by fractured relationships at senior levels. The review does not, in this analysis, examine the particulars of any such relationships. It records the pattern reported and observes that the absence of coherent senior

First Nations leadership of cultural safety work is itself a cultural safety condition with consequences across the enterprise.

“Cultural safety gets weaponised. Someone uses it to say they feel unsafe because they’re being challenged. But being challenged isn’t the same as being unsafe. That conflation is used to shut people down.”

— A senior administrator

Prevalence and distribution

This theme was substantially present in six of nine data sources. It was particularly prominent in accounts from IEOs and in workshop discussions.

7. Theme Three: Structural Invisibility and Lack of Voice

Consultation Without Consequence

Across the dataset, First Nations staff describe a pattern of consultation that produces the appearance of inclusion without its substance. Meetings are held, feedback is sought, concerns are raised — and, consistently, nothing changes. This is not experienced as a failure of individual follow-through but as a structural characteristic of the way the Directorate manages its relationship with First Nations staff.

IEOs are employed by and report to a central team but placed in schools they do not formally belong to. When issues arise, the school backs its own employee; escalation to the central team is described as inconsequential.

“When something goes wrong at school, the teacher always wins. I’ve had serious situations — a student physically excluded from a classroom — and the teacher wasn’t even spoken to. Our team gets told and it goes nowhere.”

— An Indigenous Education Officer

Multiple participants, independently and across role contexts, identify the absence of senior First Nations leadership at corporate executive level as a central structural gap. Decision-making processes have no First Nations voice at the point where consequences are determined.

“You want to get something onto the corporate executive agenda? Try it. We can’t get a ten-minute meeting. The decision gets made and we’re informed of what it is. We aren’t part of the conversation.”

— A senior administrator

The First Nations Reference Group is characterised as underfunded, meeting at times when school-based staff cannot attend and dominated by certain voices. One participant reports spending most of each meeting explaining background to colleagues who lacked context — a further instance of unpaid, unrecognised labour.

The IEO programme is structurally under-resourced relative to its mandate. With approximately eight IEOs now servicing close to ninety-three schools, meaningful capability-building work is effectively impossible.

“I’ve tried one-on-one meetings, faculty goals, everything. Most teachers respond to one in ten emails. There’s no expectation on schools to actually engage, and no follow-up from our team

when they don't."

— An Indigenous Education Officer

Multiple participants describe submitting formal complaints and safety reports and receiving no response — in one case, a submission sat in a backlog for a year without reaching triage. The predictable consequence is a loss of confidence in formal systems and increasing reliance on informal networks, which management characterises as 'talk fests' or professional misconduct.

Prevalence and distribution

This theme was substantially present in all nine data sources, across all role types.

8. Theme Four: Cultural Load and Unequal Recognition

The Hidden Cost of First Nations Identity at Work

Cultural load — the informal, unacknowledged, and often uncompensated work that First Nations staff are expected to perform by virtue of their identity — is present in every data source.

Participants describe it not as an intrinsic or resented feature of their professional lives, but as a condition that has become structurally embedded in ways that are both exploitative and genuinely harmful.

The forms this load takes are varied: being the default point of contact for all First Nations-related student or family issues regardless of formal role; organising cultural events without additional time allocation; carrying the emotional burden of keeping other First Nations staff well; providing informal out-of-hours support to community members; and absorbing the accumulated weight of microaggressions and inappropriate questions.

“It starts out as passion. You take it on because you care. Then one day you realise you’re exhausted and no one has noticed. The system just keeps asking for more.”

— A classroom teacher

The disparity between this load and the institutional recognition it receives is stark. One participant notes that a non-Indigenous colleague who coaches a school cricket team receives one hour of teaching time relief per week. The same participant — who leads the school’s cultural responsiveness programme, coordinates a student cultural club, and chairs the reconciliation action planning group — receives no comparable recognition.

“The PE teacher coaching cricket gets an hour off class. I get nothing for leading cultural responsiveness, running the student club, chairing the RAP group. That’s the institution telling you what it values.”

— A classroom teacher

The professional development gap compounds the load. Multiple IEOs describe having no access to meaningful professional learning relevant to their role, with three of six scheduled sessions cancelled during the previous year alone.

The health consequences are described with directness by one senior participant, who describes ending the year ‘sick with anxiety’ after holding the personal and professional safety of staff as an informal responsibility.

“I finished the year actually ill. I’d been carrying the wellbeing of staff, not as my job, but because there was no one else and they needed it. That’s the system failing — and then putting the cost on the people it’s failing.”

— A senior administrator

Prevalence and distribution

Cultural load is present, to some degree, in all nine data sources. It is most extensively developed in the accounts of IEOs and classroom teachers.

9. Theme Five: Leadership, Accountability and the Conditions for Change

What Would Make a Difference

Despite the weight of the preceding four themes, this dataset contains genuine optimism about the possibility of change — coupled with a sober and detailed understanding of what genuine change would require. Participants are neither passive nor despairing. What they identify is not a deficit of will among First Nations staff, but a deficit of institutional conditions.

The most consistent structural recommendation is for senior First Nations leadership at corporate executive level — a position with genuine decision-making authority, not merely advisory status.

“If you had a First Nations executive branch manager or deputy director general — someone at the table when decisions are made — that would change things. At the moment, we make the case and then we wait to be told what’s been decided.”

— A senior administrator

Participants also point to the need for structural redesign of the IEO programme — not simply additional resourcing within the current model. Several note that working across multiple schools was preferable to the single-school model, as it reduced isolation and used capacity more efficiently. A cluster or co-location model, drawing on the school psychologist programme as a precedent, is identified as worth serious consideration.

Accountability runs throughout this theme. Participants are consistent that cultural integrity expectations need to be embedded in the Directorate’s accountability systems for schools — not treated as optional or aspirational.

“We just mandated synthetic phonics because the research said it mattered. Some schools didn’t believe in it, but the system said: this is what we do. Cultural safety is the same. Either it matters or it doesn’t.”

— A classroom teacher

Training for school leaders — specifically around cultural safety as distinct from cultural content — is identified as necessary but insufficient without accountability measures. The pattern described is of leaders who have received awareness training and have nonetheless failed to act when issues arise, because there is no consequence for inaction.

The current Director-General is noted positively by several participants. There is a sense that the present leadership climate is more genuinely committed to change than its predecessors — though this optimism is explicitly conditional.

“I trust that the intention is real this time. But I’ve seen intentions before. The question is whether the structures change — because when the person with good intentions moves on, only the structure remains.”

— A senior administrator

Participants also raise the question of verification requirements for identified positions, noting cases in which individuals have occupied identified First Nations roles without being able to provide proof of Aboriginality or Torres Strait Islander heritage. This is experienced by First Nations staff as a fundamental breach of institutional integrity and a direct source of workplace harm.

Prevalence and distribution

This theme was present in seven of nine data sources, and most developed in the accounts of senior and experienced participants.

10. Cross-Cutting Considerations

The Canberra Effect

Participants in multiple sources reflect on the ACT's self-identification as a progressive jurisdiction, and the way this reputation can function as institutional complacency — a substitute for action rather than a prompt to it. Several note that a city which voted 'yes' in the Voice referendum may feel it has done its work, even as the conditions for First Nations staff in its public institutions remain poor. The mismatch between progressive self-image and institutional reality is experienced as a specific and frustrating form of dissonance.

Identity, Diversity, and the Risk of Homogenisation

The dataset reflects notable diversity within the First Nations experience it represents. Participants come from different nations, grew up with different degrees of connection to culture and country, hold different views about what cultural safety requires, and occupy very different institutional positions. Systems designed around a single, essentialised notion of First Nations identity will fail to serve many of the people they are intended to support. Workshop participants engaged directly with the tension between acknowledging this diversity and maintaining the distinct position of First Nations peoples as against an 'all cultures' framework that subsumes it.

The Systemic Nature of Individual Incidents

Individual incidents — a comment in a meeting, a complaint that goes unacknowledged, a professional development session cancelled — are experienced not merely as isolated events but as expressions of a systemic condition. Addressing individual incidents, however necessary, is unlikely to produce lasting change if the structural conditions that generate them remain intact.

Bureaucratic Process as a Tool of Control

One senior participant describes bureaucratic process — approval requirements, detailed agendas, sequential sign-offs — being used not as neutral administrative mechanisms but as instruments of control over First Nations staff and their work. In an environment characterised by significant power imbalance and a history of non-responsiveness, process can function to contain rather than enable.

"They control it through structure and process. Everything goes up the line. Nothing comes back without being changed. That's not administration — that's management of us."

— A senior administrator

11. Divergent and Minority Views

Reflexive thematic analysis requires explicit attention to divergent, minority, or contradictory views within a dataset. Several are present here and have direct policy relevance.

The most significant divergence concerns the Cultural Integrity Framework. Most participants describe it critically — as ineffective or actively counterproductive. One participant takes a more nuanced position, defending the intent of the framework while acknowledging implementation failures and attributing problems to inadequate resourcing and accountability mechanisms rather than to the framework concept itself. This constitutes a substantively different diagnosis from the view that the framework is irreparably flawed.

A second divergence concerns the role of non-Indigenous allies. Most participants acknowledge a role for committed, knowledgeable non-Indigenous allies in advancing cultural safety, and one participant describes such a collaboration in positive terms. However, the same participant also acknowledges that the current arrangement — in which First Nations perspectives are delivered primarily by non-Indigenous staff, because the Indigenous staff who developed those perspectives have left — is not satisfactory as a structural model. The divergence is therefore about appropriate limits of allied roles, not about the value of allyship.

A third divergence concerns lateral violence — conflicts and harms occurring between First Nations staff or community members. One senior participant reflects on this dynamic without attributing it primarily to structural causes; another notes it should not be used to deflect attention from structural failures. This tension reflects genuine disagreement about the relative weight to be given to individual behaviour and systemic conditions when accounting for harm.

Finally, one participant offers a notably measured assessment of their own situation, noting genuine improvement in their school environment as principal engagement increased, and distinguishing between Directorate-level failings and the more variable picture in individual schools. Localised positive experiences coexist with the broader structural conditions identified throughout this report.

The findings of this report are consistent with and supportive of the eight recommendations set out in the Independent Cultural Safety Review report. The consultation evidence provides an important strand of the evidentiary base from which those recommendations are drawn, alongside the staff survey data analysed in Annexure A and the desktop review of Directorate documentation. Formal recommendations and their focussed actions are set out in Section 7 of the main report.
