



**CSR**

The Centre for Social  
Responsibility in Mining

# Indigenous Employment Evaluation Tool



THE UNIVERSITY  
OF QUEENSLAND  
AUSTRALIA

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# Introduction

The Indigenous Employment evaluation (IEE) Tool is a reporting framework that has been developed as part of a larger study by CSRSM into Indigenous employment. The outcomes of the study are reported in *Indigenous Employment in the Australian Minerals Industry*, a research report by Tony Tiplady and Mary Anne Barclay. The IEE Tool is intended for use in conjunction with this report.

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## AUTHORS

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## PURPOSE OF THE TOOL

The Indigenous Employment Evaluation (IEE) Tool has been developed as a framework to assist mining companies to establish good practices in their Indigenous employment and training initiatives. The specific purposes of the Tool are to:

- establish appropriate evaluation criteria for assessing each aspect of a company's Indigenous employment initiatives
- establish a blueprint for an Indigenous employment evaluation system.

The IEE Tool has been designed to gather information on Indigenous employment practices across all levels of an organisation. Its primary purpose is to identify the strengths and weaknesses of a company's current Indigenous employment practices. The framework is applicable to operations of all sizes.

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## ABOUT THE IEE TOOL

The IEE Tool can be used for:

- assessing the Indigenous employment aspects of external or site managed community assessment programs
- comparing operations within the same company
- identifying and prioritising performance gaps
- developing an Indigenous employment strategy
- assisting stakeholders to evaluate the effectiveness of Indigenous employment practices in different companies.

The Tool has been developed using the Plan-Do-Check-Act (PDCA) model as a framework. This model is widely used in the minerals industry, so that the Tool is readily adaptable to existing management systems.

The IEE Tool is structured around the six levels of a performance management system: leadership, policy development, planning, implementation, performance monitoring and a review of progress.

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## INSTRUCTIONS FOR PRACTITIONERS

The structure of the IEE Tool is illustrated on pages 2 – 3 and the elements of the Tool are listed in the tables that follow. These elements appear as a series of statements relating to the six levels and 16 topic areas of the Tool.

The process for completing the evaluation is as follows:

**STEP 1:** Write Yes(Y), No (N), or Partial (P) to indicate the extent to which the statement applies to the company/operation.

**STEP 2:** The 'Comments' field can be used to record examples of partial compliance, or to note any other findings relevant to the topic area.

The **GUIDANCE NOTES** at the end of the handbook provide examples of the types of inputs that will enable practitioners to rate a company's Indigenous employment policies and practices. Sections with guidance notes are identified by an asterisk \*.

# Structure of the IEE Tool

## 1. LEADERSHIP

### 2. INDIGENOUS EMPLOYMENT POLICY

Overall Corporate policy

International policy (if applicable)

Site level policy

### 3. PLANNING

Aspects and impacts

Legal and other requirements

Objectives and targets

Management programs

### 4. IMPLEMENTATION PROCESS

Structure and responsibility

Training, awareness and competence

Communication

Document control systems

### 5. PERFORMANCE MONITORING

Monitoring and measurement

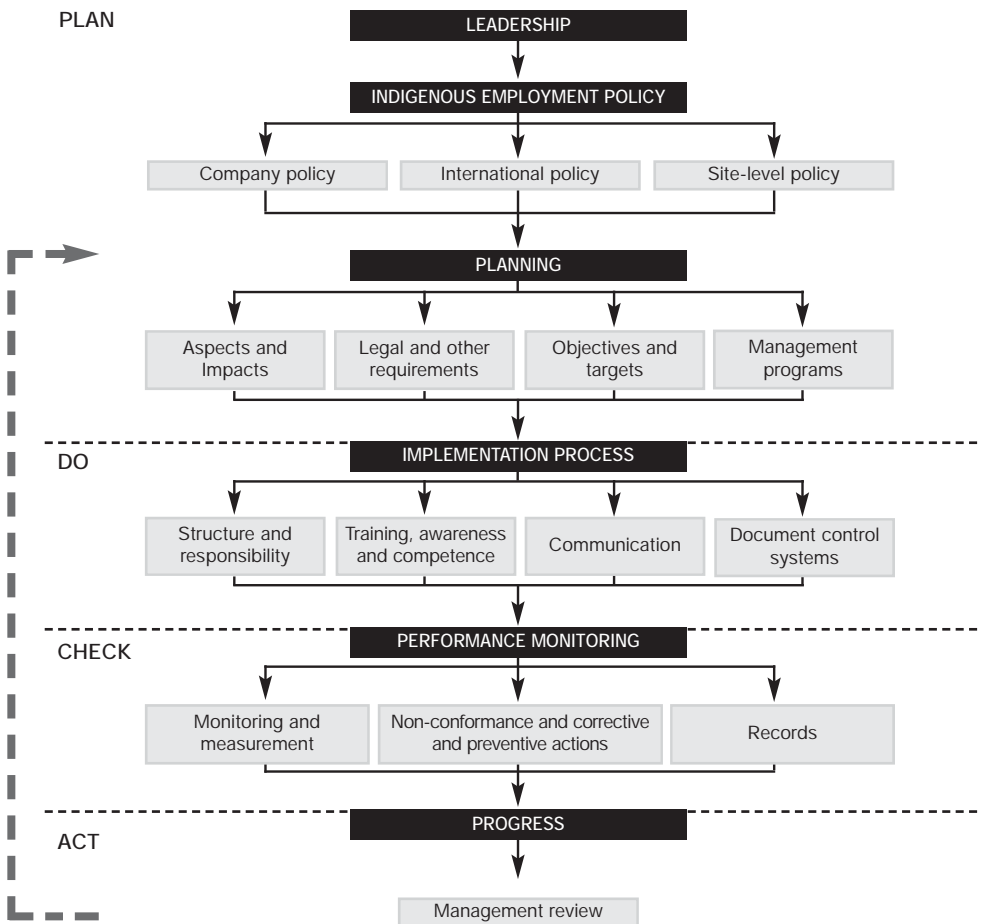
Non-conformance and corrective actions

Records

### 6. REVIEW PROGRESS

Management review

Figure 2: Indigenous Employment Evaluation framework



## EVALUATION TOPIC

### LEADERSHIP

#### Leadership \*

There is publicly available evidence of the company's commitment to Indigenous employment initiatives, e.g. reported on the corporate website.

The company's Annual Report affirms commitment to improving Indigenous employment outcomes.

### INDIGENOUS EMPLOYMENT POLICY

#### Corporate policy \*

The company has a corporate policy with overarching objectives that support its Indigenous employment and training policies.

The policy is promoted in the workplace.

The policy refers to career development opportunities for Indigenous employees.

The policy refers to respect for different cultures and employment practices.

The policy has guidelines that explain and clarify its intent regarding Indigenous employment commitments.

The policy refers to Indigenous employment and training commitments throughout its operations.

#### Site level policies \*

The operation has an Australian Indigenous policy.

The policy refers to Agreement commitments.

The policy defines "local" Indigenous people.

The policy refers to Indigenous employment.

The policy refers to Indigenous training.

The policy refers to Indigenous small business opportunities.

The policy is promoted in the workplace.

Indigenous employment objectives are consistent with overall company policy.

The operation requires major contractors to align themselves with its Indigenous employment and training objectives.

The operation has a HR Policy that refers to EEO and diversity.

The HR Policy includes specific adaptations for Indigenous cultural differences, e.g. provisions for cultural leave.

### PLANNING

#### Aspects and Impacts register \*

The company has a documented process for identifying factors within its control that impact on Indigenous employment outcomes.

The process refers to specific accountabilities.

The process refers to internal stakeholders.

The process refers to external stakeholders.

Y/N/P

COMMENTS

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## EVALUATION TOPIC

### Aspects and Impacts register \* continued

The process refers to Agreement requirements.

The process refers to timing.

The process includes a risk rating process and matrix to Australian Standards.

The Aspects and Impacts document is filed in a site register subject to controls that limit access to modify without authorisation.

### Legal and other requirements \*

The company has a corporate directory/database containing:

→ all relevant legislation

→ all Agreement requirements

→ all Community or External Relations Standards.

The Community/External Relations Standard/s articulate the relevant Indigenous employment or local employment standard/s.

The Community/External Relations Standard/s include clearly defined processes for operational personnel to implement.

### Objectives and targets \*

Indigenous employment objectives are consistent with the requirements of Indigenous Land Use Agreements (ILUAs).

The operation has an overall Indigenous employment target.

There is a specific timeframe for achieving the target.

The overall target takes account of the demographic characteristics of the region, i.e. the percentage of the population who are Indigenous.

The operation sets incremental Indigenous employment targets yearly to achieve the overall target in the specified timeframe.

### Management programs

The operation has a documented system that records all management programs or plans that are relevant to Indigenous employment.

The management program identifies:

→ aspects and impacts that affect Indigenous employment outcomes

→ the risk rating of each aspect

→ program objectives

→ the resources required (people, dollars, equipment and infrastructure)

→ planned completion date

→ person/s accountable.

Management programs or plans are approved by the General Manager.



Y/N/P

COMMENTS



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## EVALUATION TOPIC

### Management programs continued

The Management program or plans are monitored for completion by reporting progress monthly to the General Manager and/or the Managing Director.

## IMPLEMENTATION

### Structure and responsibility

#### HR Systems

The Indigenous employment accountabilities for all relevant roles on site, such as Communities, HR, Training and line leadership, are documented and signed off by the General Manager, Operations.

Indigenous employment targets are used as a measure of personnel performance and/or in reward and remuneration systems. This includes:

→ community roles

→ HR roles

→ training roles

→ line leadership roles.

#### Work readiness, recruitment and retention systems

The operation's work readiness (pre-vocational), recruitment and retention systems specify:

→ face-to-face recruitment and application processes

→ work readiness programs that select all/majority Indigenous intakes for the first 2 to 6 months

→ individual case management for the first 6 to 18 months

→ individual coaching for 6 to 18 months, with family support

→ alcohol and other drug testing that educates and does not permanently restrict employment options

→ security clearance systems that do not automatically eliminate all offenders.

#### Remote and regional recruitment practices

Remote and regional application and recruitment procedures are conducted face-to-face.

The company provides Indigenous applicants with support in preparing applications and resumes.

The site maintains a recruitment database.

Individual sites support local employment agencies.

#### Career path development

The operation has a career path development system for Indigenous employees.

The system records individual aspirations.

The system records development conversations, plans and opportunities.

The system records development opportunities actioned/completed.

Y/N/P

COMMENTS

## EVALUATION TOPIC

### Structure and responsibility continued

#### Exit interviews

The operation has a formal exit interview system.

The system records the reasons people leave.

The system documents actions planned and taken to address issues identified.

There is clear evidence of the system functioning for Indigenous people, e.g. Indigenous exit interviews are consistently completed.

#### Contractors

The operation's contract tendering requirements for prime contractors include specific targets for Indigenous employment.

The operation's contract tendering and contractor selection processes include a weighting for Indigenous employment.

The operation's prime contractors use the operation's Indigenous employment readiness and recruitment systems, procedures and practices.

### Training, awareness and competence

#### Training structure

The operation has an adequate ratio of trainers to trainees and apprentices.

The knowledge, skills and experience required of trainers and community personnel with Indigenous accountabilities are documented in the company's HR system.

#### Training programs

There is a budget allocated specifically to Indigenous employment and training in the current operational plan.

The budget is adequate to achieve the plan in:

→ HR

→ training

→ community

→ trainees and apprentices.

The operation has a work readiness (pre-employment /pre-vocational) program.

The operation has an Australian Quality Training Framework (AQTF) Traineeship program.

The operation has an Apprenticeship program.

The operation has a Cadetship/ Scholarship program.

#### Cultural awareness

The operation's Indigenous employment commitment is included in induction programs for all site employees and contractors.



## EVALUATION TOPIC

### Training, awareness and competence continued

The operation keeps records and monitors all induction attendance.

Corporate managers are required to conduct Indigenous induction procedures.

Company personnel are required to complete a cultural awareness program.

### Competence

The trainers have demonstrated knowledge, skill and experience in designing, implementing and maintaining Indigenous training programs.

### Communication \*

The operation has a documented process for regular formal communication across the relevant levels and functions of the operation about its Indigenous employment programs and initiatives.

The operation has a documented process for regular formal communication with external stakeholders.

Documentary evidence confirms that the process is being followed.

### Document control system

The operation's Indigenous employment system is subject to document control. The system includes:

→ yearly plans

→ the Aspects and Impacts register

→ management programs

→ recruitment data

→ retention data

→ traineeship data

→ apprenticeship data

→ evaluation records.

## PERFORMANCE MONITORING

### Monitoring and measurement \*

The Indigenous employment standards or the reporting system contain definitions for each Indigenous employment measure.

The Indigenous employment standards or the reporting system clearly define what the company means by 'Indigenous' and 'local Indigenous' people.

### Current and historical indicators

The operation's Indigenous employment measures include:

→ the proportion of the workforce that is Indigenous

→ the number of Indigenous employees (male and female)

→ the number of local and non-local Indigenous employees



## EVALUATION TOPIC

### Monitoring and measurement \* continued

- role type e.g. Trainee or General Manager
- position type e.g. permanent, contractor, part/ full time
- full time equivalent calculations
- turnover rates.

The data are collected quarterly (minimum).

The data are maintained on an historical basis.

### Assessment/audit

The operation has a documented process for conducting an internal/external audit of its Indigenous employment policies and procedures.

Included in the internal/external audit is a review of:

- policy objectives
- strategic plans
- Agreement requirements.

The operation has a documented process for conducting an internal/external audit.

Included in the external audit is a review of:

- Indigenous employment standards
- relevant legislation.

### Corrective and preventative actions \*

The operation has a corrective action planning register.

The register records:

- instances of non-conformance or non-compliance
- the nature and number of complaints and requests from Indigenous people
- the process for managing complaints and requests
- the outcomes of the process.

### Records

The operation keeps the assessment records from external assessments or reviews of complaints.

The operation tracks and completes action items identified in reviews or assessments.

## PROGRESS

### Management review \*

The operation has a documented process for management review such as minuted meetings and actions.

The actions are reviewed and closed out.





# Guidance Notes

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## LEADERSHIP

A company's leadership commitment can be identified by :

- its public statements to shareholders and other stakeholders
- the resources it allocates towards funding Indigenous employment initiatives.

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## INDIGENOUS EMPLOYMENT POLICY

Comprehensive Indigenous Employment policies make specific reference to:

- employing and training Indigenous people
- providing career development opportunities
- contributing to improvements in Indigenous education
- promoting cultural diversity in the workplace
- eliminating racism in the workplace
- providing business development opportunities for Indigenous people.

Depending on the structure of the company and the nature of its operations, it may be appropriate to develop separate policies for:

- the company's overall corporate operations
- secondary level policies, e.g. site level
- an International policy
- contractor policies.

Site level policies have different names in different operations, e.g.

- Community Policy
- Corporate Social Responsibility (CSR) Policy
- Australian Indigenous Policy.

Some companies have their own Australian Indigenous Policy that is in addition to, and complements, their Community Policy. Some operations have also developed site-specific Aboriginal Relations policies that support their Agreement commitments to local Indigenous groups.

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## ASPECTS AND IMPACTS REGISTER

An Aspects and Impacts Register identifies the key elements influencing Indigenous employment outcomes that are within the company's sphere of influence.

Examples of Indigenous Employment Aspects include documentary evidence of:

### Commitment

- Agreement reporting requirements, partnerships
- STEP and Corporate Leaders contracts.

### Promotional activities

- school visits
- advertising
- communication and promotion of Indigenous employment and training initiatives.

### Work readiness programs

- details of work readiness, traineeship apprenticeship and cadetship programs
- medicals
- alcohol and other drug testing
- security clearance
- health.

### Recruitment

- size of pool of people ready for recruitment
- work experience
- school based traineeships and apprenticeships
- applications
- recruitment
- selection
- traineeships for site, departments and teams
- apprenticeships for site, departments and teams.

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## LEGAL AND OTHER REQUIREMENTS

Examples of other planning requirements are:

- records of systems, procedures, practices and employment levels
- processes that encourage contractors to participate in the operation's Indigenous employment initiatives
- closure plans that include Indigenous employment considerations.

## OBJECTIVES AND TARGETS

Companies should establish, implement and maintain records of Indigenous employment objectives and targets that reflect the commitments of their Indigenous Employment policies and Agreements. In achieving objectives and targets the company should establish a process that:

- ensures key stakeholders, including Indigenous groups are involved in setting targets
- designates responsibility for achieving targets
- identifies a time frame for completion
- establishes appropriate measures of performance.

## COMMUNICATION

Examples of formal communication channels:

- STEP reports
- Corporate Leaders reports
- reports to Traditional Owners that are part of Agreement requirements
- community visits
- site monthly reporting.

Informal communication channels include:

- weekly newsletters
- personnel performance conversations
- managers meetings
- site notice boards.

## MONITORING AND MEASUREMENT

### What are appropriate measures?

Measures that effectively capture the information needed for setting targets and objectives include a mix of current indicators, historical data and lead indicators.

**Current indicators** include:

- number of Indigenous employees
- their gender and age
- number of local v. other Indigenous employees
- number of Indigenous employees in each role type, namely:
  - trainees
  - apprentices
  - operators/semi-skilled
  - trades
  - clerical/administrative
  - supervisor
  - technical

- graduate
- professional
- specialist
- superintendent
- manager
- executive
- Number of Indigenous employees in each position type
  - permanent, part time, contractors etc
- Indigenous turnover rates.

### Historical indicators

- track current performance in current indicators over time.

### Lead indicators

- identify potential employees for the site. These include:
- Records of school, TAFE and University performance and attendance.

## CORRECTIVE AND PREVENTATIVE ACTIONS

As part of an Indigenous employment management system, it is important to establish a procedure for managing instances of non-conformity or non-compliance. Examples of matters that need to be reported are:

- incidents of non-conformance or non-compliance with company policy
- issues identified in the risk register
- community complaints and expectations
- the outcomes of corrective or preventative actions
- reviewing the effectiveness of corrective and preventative measures.

## MANAGEMENT REVIEW

Examples of inputs for the management review:

- progress reports relating to Indigenous Employment management plans and programs
- results of internal audits and assessments of compliance with legislation, corporate policies, ILUAs and Community Standards
- communications from external stakeholders, including complaints
- status of corrective and preventative actions
- follow-up actions taken after a previous management review
- identification of external changes that may influence company policies related to Indigenous employment.



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