Report 1

Progress in the implementation of recommendations and the foundations for cultural change

September 2018

Independent Review into Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police

Government of South Australia
Equal Opportunity Commission

Contents

Message From the Commissioner for Equal Opportunity

It's been almost 14 months since the Equal Opportunity Commission (EOC) announced its findings following the Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police.

Since our report was issued, workplace sexual harassment has taken centre stage. Hollywood revelations and the ensuing weekly headlines have fast-tracked these problems to the top of the agenda for companies across the world, and this is likely to continue in 2018. And rightly so: recent figures released by the Australian Bureau of Statistics in 2017 show more than half of all women (52%) have experienced some form of sexual harassment by men in their lifetime.

We know the problems exists across all industries, but it's more common in male-dominated workforces which suggests we need to do more as a society to address the damaging cultural beliefs and stereotypes around the role of women to reduce the incidence of this behaviour.

At SAPOL our research found sex discrimination and sexual harassment of women – and anyone else that didn't fit the white 'macho' male stereotype - was endemic.

Sexual harassment and sex discrimination has significant mental and physical health impacts – and they perpetuate gender inequality in terms of participation, achieving leadership positions and pay gaps. These problems are now finally being recognised as very serious workplace health and safety issues.

It's hoped increased media attention will provide the courage for more victims to speak out without fear. Reporting sexual harassment and sex discrimination in the workplace should be no different to speaking up about any other issue that impacts people's health and wellbeing at work. It's also a duty of care for employers to address these issues quickly.

Implementation of the 38 recommendations in the EOC's Independent Review will enable SAPOL to evolve a workplace culture where gender equality is simply part of how business is done. It will also ensure that when people make a complaint about harassment or discrimination, their voice will be heard loud and clear. In the past year, under the leadership of Commissioner Stevens and the SAPOL Executive Leadership Team, the foundations have been set to achieve this change.

I'm pleased that many of the EOC's recommendations have already been implemented, with many others in development. This has been supported by a suite of key work to 'glue' the recommendations together to ensure transformational and sustainable change is created, rather than this process becoming just a 'tick the box' exercise.

It is essential that during this challenging change program, Commissioner Stevens and all other SAPOL leaders present a united front and role-model the changed attitudes and behaviours required to make the new SAPOL culture a reality. By setting the vision and pace of change, and engaging SAPOL employees in this change they are well on the way to developing an effective and sustainable cultural change program.

Any organisation embarking on a major cultural change journey knows this is a complex process, requiring a consistent approach and effort to change procedures, processes and systems, as well as changing the way people think and act - their attitudes and behaviours. There will be those who fear the change, some who will actively resist it, and many who will just become weary of it. However, it is essential that SAPOL continues to show leadership and unwavering commitment to ensuring that the significant workplace health and safety issues uncovered by our review become rare, or non-existent.

Dr Niki Vincent

Commissioner for Equal Opportunity (SA)

January 2018

Acknowledgements

The Equal Opportunity Commission of South Australia (the EOC) would like to acknowledge those who were important to the development of this report. This includes:

- The SAPOL employees who participated in the interviews. We appreciate your time and willingness to reflect and share your experiences and insights.
- The focus group participants and engagement session facilitators who completed the EOC's online survey *Leadership and Cultural change: Towards Gender Equality in SAPOL* . The honest and constructive feedback you provided has been extremely useful in raising some key considerations for SAPOL leadership in directing cultural change.
- The Project Equitas Team who facilitated access to data and the extensive suite of documents we required. The team members were generous with their time, knowledge and cooperation.
- The many SAPOL employees who prepared background information and collated data - we acknowledge this was often a manual process and greatly appreciate your time and persistence.

From the EOC, we would like to thank our Manager, Lucy Cirocco, and the Equal Opportunity Commissioner, Dr Niki Vincent, for their guidance and feedback to finalise this report - your vision and insight was key to a meaningful and relevant report.

The EOC SAPOL Monitoring Project Team:

Lucy Schapel (Manager, Strategic Projects)

Alice Mazzola (Project Officer - Monitoring and Evaluation

Supporting Your Wellbeing

Some people may find reading this report distressing. If this is the case for you then the following services are available to support you:

For Every Reader

Beyondblue: a support service for depression and anxiety. Tel. 1300 224 636.

Yarrow Place: a service for anyone who has been sexually assaulted. Tel. (08) 8226 8777 or 1800 817 421 (country callers).

1800 Respect: a counselling helpline, information and support service for sexual assault or domestic and family violence. Tel. 1800 737 732.

Domestic Violence and Aboriginal Family Violence Gateway Service: a service offering telephone counselling and information 24/7: Tel. 1800 800 098.

Lifeline: a 24-hour crisis support and suicide prevention phone service. Tel. 13 11 14.

MensLine Australia: a telephone and online counselling service for men with family and relationship concerns. Tel. 1300 789 978 or visit mensline.org.au

South Australia's Victim Support Service: a free confidential helpline for adult victims of crime, witnesses, their families and friends across South Australia. Tel. 1800 842 846 or email helpdesk@victimsa.org.

Q life: a counselling and referral service for people who identify as LGBTIQ. Tel. 1800 184 527 or access the online chat service at www.qlife.org.au.

Working Women's Centre: information, support, advice and advocacy services to women on work-related issues. Tel. 1800 652 697 or email wwc@wwc.org.au (Monday, Wednesday-Friday 9am to 5pm).

For SAPOL Employees

SAPOL Employee Assistance Program (EAP) is an external professional counselling service delivered by psychologists and offering short-term support for work-related and personal problems. It is a confidential service that is available to all SAPOL employees and immediate family members for up to six sessions.

The EAP can be accessed by direct contact (self-referral) through **Converge International** on the dedicated SAPOL access number. Tel. 1300 469 327.

SAFE SPACE is an external and independent free service providing confidential advice and support 24/7 to SAPOL employees who have experienced or are experiencing sex discrimination, sexual harassment or predatory behaviour. The service can also be used by immediate family, witnesses and supervisors. Tel. 1300 727 656

Executive Summary

In 2016 the Commissioner of the South Australian Police (SAPOL) engaged the Equal Opportunity Commission (EOC) to undertake an Independent Review into the nature and extent of sex discrimination, sexual harassment and predatory behaviour within SAPOL. The *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police* was released on 12 December 2016. It found that 'negative attitudes to women, or indeed anyone who does not fit the traditional white, masculine, male mould' were widespread.

The Review made 38 recommendations to promote equal opportunity, diversity and inclusion, as well as address sex discrimination, sexual harassment and predatory behaviour in SAPOL. SAPOL's Commissioner accepted all recommendations without equivocation, and has since established 'Project Equitas' - a team dedicated to their implementation.

The EOC was subsequently commissioned to provide **independent oversight of SAPOL's progress in the implementation of the EOC's Independent Review's recommendations, and to measure the impact of the changes on the culture of the workplace.** The EOC has taken a consultative approach and has involved SAPOL's leadership and the Project Equitas Team in the design and development of a three-year Monitoring, Evaluation and Reporting strategy. The reports produced as a result of the strategy are designed to be regular, informative and constructive, with a focus on continuous improvement for the best possible outcome.

Organisational cultural change is challenging. It requires leadership, time, commitment and extensive planning. The EOC SAPOL Monitoring Project Team acknowledges that cultural change is a long-term process, and that change will need to continue beyond its project timeframe. With this in mind, a significant part of the monitoring project will be assisting SAPOL to establish systems to continue to monitor and evaluate change internally into the future. Cultural change at SAPOL is also occurring in stages, so the most effective method for evaluation is one that reflects this gradual process, and focuses only on evaluating change that is expected at a given point in the cultural change effort.

This report is the first of six and provides an overview of SAPOL's progress in the implementation of the recommendations of the EOC's Independent Review as of January 2018. It also provides a greater depth of analysis in regard to the extent that SAPOL has set a foundation for positive cultural change, looking specifically at:

1. Leadership in Cultural Change :

> The governance structures, strategies and communications that have been set up and endorsed by SAPOL leadership as part of the 'change management' process.

> Leadership in the change process, including understanding and communicating SAPOL's vision, understanding and engaging with stakeholders in the change process, and role-modelling the desired change.

2. Key Immediate Actions for Cultural Change:

The key immediate activities are defined for the purpose of this report as:

> The formal acknowledgement and apology to SAPOL employees for harm caused by sex discrimination and sexual harassment;

> The Restorative Engagement Project;

> SAFE Space;

> Task Force Portus;

> The Gender Equality Action Plan.

The quantitative and qualitative data which underpins the analysis provided in this report was gathered from both existing SAPOL sources and from the EOC's independent online survey *Leadership and Cultural change: Towards Gender Equality in SAPOL,* as well as interviews with some of SAPOL's senior leadership.

Overall Key Achievements

In the first 12 months of Project Equitas, SAPOL has some key achievements to note:

- Immediately upon the release of the EOC's Independent Review, the Project Equitas Team took a comprehensive and inclusive approach to communication and engagement with the SAPOL workforce on the relevant issues. As a result, 73% of the entire SAPOL workforce were involved in face-to-face engagement sessions on the topics of the EOC Independent Review, with the remainder receiving information across a range of other mediums.

- SAPOL has gone beyond the EOC's recommendation of developing a gender equality strategy by developing and releasing a broader Diversity and Inclusion Strategy, thereby expanding the scope to consider the safety and welfare of all employees across a wide range of issues such as cultural background, age, disability and sexual orientation.

- The Project Equitas Team have reconfigured the language around flexible working arrangements to better suit the expectations of the workforce and to enable more constructive and relevant conversations about flexible work.

- There has been a general upward trend in the number of complaints relating to workplace discrimination, harassment or bullying since the EOC's Independent Review was first released. This suggests an increased level of confidence among SAPOL staff to identify and report inappropriate behaviour as a result of these engagement efforts.

Overall Key Risks to Implementation

The overview of the progress in the implementation of the 38 recommendations highlighted a number of key risks for SAPOL to consider:

- Responsibility for the implementation of recommendations 16 and 18 has been placed under a separate Organisational Reform Project. A delay or challenge in the implementation of these

crucial recommendations may affect the delivery and/or effectiveness of other interventions within Project Equitas.

- There are questions as to the capacity of the Human Resources Service (as it currently exists) to fulfil the role and responsibilities designated by both Project Equitas and the Organisational Reform Project once both change projects have concluded.

- There is an element of dependency on information technology budget and capabilities for some recommendations, which may limit the ability of SAPOL to achieve the desired flexible workplace culture.

Leadership in Cultural Change – Key Findings

According to leading change management experts, there are two aspects of the cultural change process that should be considered individually. Change management refers to the processes, mechanisms and tools through which an organisation achieves a desired change. Alternatively, change leadership is the ability to manage, lead and enable the process of change.

SAPOL has established a formal structure for change management, with experienced executive leadership, a sizeable dedicated team and a range of project management documents and tools in place. As noted above, communications about the Project and associated issues have been comprehensive and disseminated to SAPOL staff across a range of channels. The Project Equitas Team monitor the successes of their activities and identify areas for improvement. The EOC has noted some key considerations for improvement on the issue of change management.

Key Consideration 1:

SAPOL leadership introduce new staff to Project Equitas in a staged process, ensuring a thorough handover is conducted with exiting staff. In the recruitment of new team members, a concerted effort should be made to attract a diverse range of backgrounds, views and skills, including equalising the gender representation in the team.

Key Consideration 2:

The Project Equitas Team review communication tactics and use those that differentiate, and link (where necessary) the different topics covered in the scope of the EOC's Independent Review. We suggest that disciplinary outcomes are communicated (without identifying details of parties involved) to demonstrate that inappropriate behaviour is being treated seriously.

In terms of change leadership, SAPOL leadership (the Executive Leadership Team) have generally demonstrated a commitment to, and understanding of, the need for cultural change within the organisation. SAPOL's vision for change has been clearly articulated across the organisation by SAPOL leadership and Project Equitas. The engagement activities of the Commissioner and Deputy Commissioner of Police have been extensive and well-received and there is a demand for further, direct engagement from the ELT on these issues.

There is a strong expectation from SAPOL employees for senior leaders (ELT, senior managers and supervisors) to not only understand the need for change, but to role-model the desired behaviours of the cultural change. Overall SAPOL staff have communicated a lack of confidence in their leaders behaving in line with the desired cultural change at present. This is clearly an area that needs focus – otherwise it will undermine the overall change process.

The EOC has noted some key considerations for improvement on the issue of change leadership:

Key Consideration 4:

SAPOL establish a set of clear and practicable expectations for all levels that focus on the 'critical few' high-impact behaviours or actions that facilitate employees to practice the desired cultural change consistently and contribute to the cultural change effort.

Key Consideration 5:

Project Equitas investigate additional training/coaching/counselling options to address deeply entrenched resistance to ensure action can be taken promptly.

Key Consideration 6:

ELT members and senior leaders should take every opportunity to play an active and practical role in the engagement of staff on issues relating to Project Equitas. The ELT should be equipped to provide practical guidance to staff within their sections.

Key Immediate Actions for Cultural Change

The initial formal apology, the Restorative Engagement Program (REP), the establishment of SAFE Space and Task Force Portus and the development of the Gender Equality Action plan are collectively considered 'foundational activities', because they set the trajectory for how SAPOL as an organisation intends to respond to sex discrimination, sexual harassment and predatory behaviour from now on - and how they intend to proactively prevent it. These activities are therefore important to building a level of confidence within the

workforce that allegations of sex discrimination, sexual harassment and predatory behaviour will be taken seriously and handled appropriately.

The REP was established in February 2017 and provided an opportunity for current and former SAPOL employees to voluntarily share their personal accounts of sex discrimination, sexual harassment and predatory behaviour with those in positions of leadership at SAPOL. Feedback from the complainants involved in the REP so far has been overwhelmingly positive. All complainants have reported feeling respected and supported during the process, and that they had achieved what they had hoped to achieve by participating. All complainants who have reported back felt that the SAPOL representative who attended their conference responded meaningfully to their story. The program has subsequently been extended on an 'as needs' basis through the EOC's Conciliation Team.

SAPOL established 'Task Force Portus' as an interim investigative team to receive and investigate allegations of sex discrimination, sexual harassment and predatory behaviour. Between February and December 2017, Task Force Portus had processed a total of 33 reports of sexual harassment, where the behaviour occurred subsequent to the release of the EOC's Independent Review. To date, there has been limited data published as to the outcomes of these investigations, despite a strong demand from the SAPOL workforce for transparency (refer to Key Consideration 2).

Project Equitas have consulted widely to gather employee feedback and models of best practice in the development of a Gender Equality Action Plan (GEAP), which was released as part of the broader Diversity and Inclusion Strategy on 8 December 2017. The Strategy and the Plan will now be translated throughout the organisation via SAPOL's corporate business plans. At this stage, a structured handover process to relevant service areas for the ongoing delivery and management of the GEAP (and the Diversity and Inclusion Strategy as a whole) has not been planned as yet. This is a crucial next step - it is important that these new reporting responsibilities are manageable for those who are required to participate, in order to mitigate the risk of change fatigue.

Key Consideration 7:

Project Equitas Team develop a structured handover process for the Gender Equality Action Plan to the Human Resources Service Area and Governance and Capability Service Area. This includes describing the purpose, expectations of roles and responsibilities and the support that is available. Monitoring of the progress/achievements of the GEAP should be undertaken using the Workplace Gender Equality Agency (WGEA)'s diagnostic tool.

SAPOL are on track in their progress in their implementation of the EOC's recommendations with 13 recommendations fully implemented, 8 underway and 12 in planning. This progress, in combination with a strong focus on the key immediate actions and a sound change management structure in place, sets a positive foundation for cultural change in the organisation. These additional considerations presented by the EOC, particularly in the areas of change leadership, will further enhance the cultural change effort and optimise the subsequent outcomes.

Introduction

In 2016 the Commissioner of the South Australian Police (SAPOL) engaged the Equal Opportunity Commission (EOC) to undertake an Independent Review into the nature and extent of sex discrimination, sexual harassment and predatory behaviour within SAPOL. All current SAPOL staff and those who had departed in the previous 12 months were invited to participate. Almost 2,000 people completed a confidential, online survey and 53 people took part in face-to-face interviews or provided written submissions. Information was sought regarding issues or concerns about what SAPOL staff had seen, heard or experienced, including positive practices and experiences they had witnessed.

The *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police* (the EOC Independent Review) was released on 12 December 2016, and found that 'negative attitudes to women, or indeed anyone who does not fit the traditional white, masculine, male mould' were widespread.[1] Additionally, 36% of SAPOL employees participating in the survey had experienced sexual harassment while employed at SAPOL, and almost half of those had experienced it from a person in a position of seniority. The EOC Independent Review made 38 recommendations to promote equal opportunity, diversity and inclusion, as well as address sex discrimination, sexual harassment and predatory behaviour in SAPOL.

SAPOL's Commissioner accepted the findings of the EOC Independent Review without equivocation, and committed to implementation of each of the recommendations 'in a timely and considered manner where we are able to do so within legislative boundaries'.[2] Early in 2017, SAPOL established *Project Equitas*; a team dedicated to implementing the recommendations of the EOC Independent Review over a two-year period. The team was established based on expressions of interest from both sworn and unsworn employees of SAPOL, under the executive leadership of Assistant Commissioner, Bryan Fahy. The responsibility for the delivery of each of the EOC's 38 recommendations has been divided across two teams, and an experienced, externally-recruited Project Manager has logistical oversight for project delivery.

The EOC was subsequently commissioned to provide **independent oversight of SAPOL's progress in the implementation of the EOC's Independent Review's recommendations, and to measure the impact of the changes on the culture of the workplace.**

This is the first report to SAPOL from the EOC SAPOL Monitoring Project Team. The purpose of this report is to provide an update on the implementation of the recommendations, and an assessment of the extent that SAPOL has set the foundation for cultural change.

About Project Equitas

At the time of the EOC Independent Review's release (December 2016), it was announced that Assistant Commissioner Bryan Fahy would be appointed to lead and guide the implementation of the EOC Independent

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[1] Equal Opportunity of South Australia (2016) *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police* (EOC: Adelaide, SA). Pg xiii
[2] Ibid Pg iv

Review recommendations. A preliminary working group was also established to implement the immediate actions recommended in the report.

In March 2017, a team called 'Project Equitas' was established with the mandate to implement the remaining recommendations until March 2019. As at the end of December 2017, the Project Equitas Team comprised the following roles[3]:

> Project Director

> Senior Project Manager

> Team Leaders (2)

> Communication and Engagement Officer

> Analyst

> Team members (12)

> Administrative Support

Project Equitas' work streams correspond to the chapters of the EOC Independent Review. Each of the six streams (below) have been assigned a Team Leader and team members;

> Leadership

> Workforce management

> Training and development

> Flexible workplace cultures

> Dispute resolution and complaints

> Wellbeing and support services.

Other Complementary Initiatives Underway at SAPOL

Project Equitas is not the only large-scale change project currently underway at SAPOL. There are currently two other projects which, at times, intersect with the intent and activities of Project Equitas.

The Gender Parity Recruitment Strategy

Since December 2015, SAPOL has had a strategy in place to recruit equal numbers of men and women into sworn cadet positions. The purpose of this approach was to enhance gender equity in the organisation, so as to better represent the community it serves. Increasing numbers of female cadets also creates a development 'pipeline' for future female SAPOL leaders.

This recruitment strategy attracted a high level of scrutiny and criticism from within SAPOL. There was an incorrect perception that entry standards had been lowered to permit more women at the expense of men, where in reality recruitment quotas had been doubled. This perception created early barriers to Project Equitas' employee engagement initiatives. The two projects are separately managed, but as a direct result

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[3] Roles outlined for Project Equitas Team excludes members of Task Force Portus

of employee feedback during engagement sessions, Project Equitas produced a gender parity video and 'talking points' to outline the rationale for the gender parity strategy and misconceptions associated with it. It was mandatory for SAPOL managers to show the video and to discuss gender equity with their staff.

Organisational Reform

SAPOL has been undertaking an organisational reform project since October 2015, which has direct links to the objectives of the SAPOL 2020 vision.[4] The project has three core drivers; people, operations, and technology. Proposed changes include enhancing health and wellbeing support services and introducing new recruitment, development and performance management frameworks, as well as a range of operational restructuring and new technology initiatives designed to improve the agility and responsiveness of police services. This project is ongoing and is due to be completed in December 2020.

About the EOC Monitoring Project

As outlined in Chapter 8 of the EOC Independent Review, the EOC was invited to independently 'monitor the implementation of these recommendations and the resultant change in culture on a bi-annual basis'. This arrangement was formalised through an agreement between the Commissioner of Police, Grant Stevens, and the Commissioner for Equal Opportunity, Dr Niki Vincent, shortly after the EOC Independent Review was released. The EOC SAPOL Monitoring Project Team was established with the recruitment of two specialist Monitoring and Evaluation practitioners in May 2017.

The EOC's Approach

The EOC's monitoring, evaluation and reporting approach is focusing on the participation of the intended users and an emphasis on continuous improvement. SAPOL's leadership and the Project Equitas Team are being consulted throughout the monitoring and evaluation process. This approach aims to build capacity within SAPOL for future 'in-house' monitoring and evaluation.

Monitoring, evaluation and reporting activities of the EOC SAPOL Monitoring Project Team are viewed as a continuous cycle of participation rather than as a single, static event. Our team will provide a total of six reports between January 2018 and May 2020. The regularity, as well as a specifically defined evaluation focus for each report, is designed to provide SAPOL with relevant, current and constructive feedback. This feedback can then be used by SAPOL to adjust project activities in order to achieve the best possible outcomes long-term.

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[4] SAPOL (2016) *SAPOL 2020, The Roadmap*
https://www.police.sa.gov.au/__data/assets/pdf_file/0004/212584/SAPOL-2020-2.pdf (accessed 1 November 2017).

The Monitoring and Evaluation Plan 2017-2020

The EOC's SAPOL Monitoring Project is divided into three phases;

Phase 1: May – Sep 2017	Setting up the monitoring, evaluation and reporting system and establishing a reporting schedule.
Phase 2: Sep 2017 – Mar 2020	Monitoring, evaluating and reporting on SAPOL's progress
Phase 3: Mar – May 2020	Closure of the project and the transitioning of monitoring and evaluation activities to SAPOL.

The EOC SAPOL Monitoring Project Team acknowledges that cultural change is a long-term process, and that this will need to continue in SAPOL beyond its project timeframe. With this in mind, a significant goal of the Project (Phase 3) will be assisting SAPOL to establish systems to continue to monitor and evaluate change internally into the future.

Phase 1 of the EOC SAPOL Monitoring Project planned to answer the following questions:

> What is the purpose and scope of the EOC SAPOL Monitoring Project?
> What change is expected to result from the cultural change effort?
> What does the EOC SAPOL Monitoring Project Team need to evaluate?

The key outputs that resulted from the planning phase were:

> A Monitoring, Evaluation and Reporting (MER) Strategy which outlines the purpose, scope, strategies, guiding principles, risks, opportunities and considerations for activities under the EOC Monitoring Project.
> A program logic model (refer to Appendix 1) for the cultural change effort in SAPOL that maps the sequence of changes that SAPOL expects to see over the lifetime of Project Equitas and beyond (summarised in Figure 1).
> An Evaluation and Reporting Schedule for the period 2017-2020 which reflects the progressive stages of the Program Logic Model (summarised in Figure 2).

As cultural change in SAPOL will occur in stages, the most effective method for evaluation is one that reflects this gradual process, and focuses only on evaluating change that is expected at a given point in the cultural change effort. The evaluation and reporting schedule was thus developed so that each report will provide a specific analysis of the change expected at that point in time.

Figure 1: A Summary of the Program Logic Model for SAPOL's Cultural change Effort

5 + YEARS

VISION
SAPOL is an inclusive organisation where all people are safe, respected and supported to reach their potential

2 – 5 YEARS

CHANGE IN CULTURE

CHANGE IN PRACTICE

CHANGE IN CAPACITY AND WILLINGNESS

CHANGE IN POLICY, PROCESSES AND SYSTEMS

1 – 2 YEARS

IMMEDIATE DELIVERABLES

IMPLEMENTATION OF RECOMMENDATIONS

FOUNDATIONAL ACTIVITIES

Stages currently underway and within the scope of this report

Figure 2: Evaluation and Reporting Schedule for the EOC SAPOL Monitoring Project

TIMEFRAME		REPORT TITLE		EVALUATION FOCUS
2020	May	**Handover Report:** EOC Handover Report to SAPOL 2020		A roadmap for the continual, in-house monitoring and evaluation of cultural change in SAPOL.
	March	**Final Report:** Evidence of change in culture	Progress in implementing the 38 recommendations	Evidence of an overall cultural change in SAPOL towards becoming a more diverse and inclusive workplace.
2019	September	**Report 4:** Changes in business practice that support a change in culture		Evidence of change in business practices that support diversity and inclusion.
	April	**Report 3:** Capacity and willingness for cultural change		Evidence of receptiveness of SAPOL staff to concepts around diversity and inclusion.
2018	September	**Report 2:** Changes in policy, processes and systems		Evidence of systemic and procedural changes at SAPOL that contribute to a more diverse and inclusive workplace.
	January	**Report 1** : Setting the foundation for cultural change		The activities undertaken as a priority in order to establish a foundation for long-term cultural change

Current Report Structure And Methodology

Overview and Structure

Section 1 of this first report of the EOC SAPOL Monitoring Project Team provides an overview of SAPOL's progress in the implementation of the 38 recommendations of the EOC's Independent Review as of January 2018. Section 2 will provide in-depth of analysis in regard to the extent the team believes SAPOL has set a foundation for positive cultural change. In this regard, the following areas have been considered:

1. Leadership in Cultural Change

- The governance structures, strategies and communications that have been set up and endorsed by SAPOL leadership as part of the 'change management' process.
- Leadership in the change process, including understanding and communicating SAPOL's vision, understanding and engaging with stakeholders in the change process, and role-modelling the desired change.

2. Key Immediate Actions for Cultural Change

The key immediate activities are defined for the purpose of this report as:

- The formal acknowledgement and apology to SAPOL employees for harm caused by sex discrimination and sexual harassment;
- The Restorative Engagement Project;
- SAFE Space;
- Task Force Portus;
- The Gender Equality Action Plan.

Methodology

To develop this report, the EOC SAPOL Monitoring Project Team approached the analysis in four stages,

Stage 1: Planning the Evaluation
- Development of key evaluation questions
- Identification of signs of success

Stage 2: Data collection
- Interviews with ELT members & Restorative Engagement Program trainees
- Online survey with SAPOL focus group participants and employee engagement faciltators
- Analysis of SAPOL's first 'Corporate Pulse Survey'
- Primary sources (documents) provided by SAPOL

Stage 3: Data analysis
- Initial analysis of existing data
- Initial analysis of interview & EOC online survey data

Stage 4: Final analysis, synthesis & reporting
- Development of preliminary findings
- Draft findings discussed with SAPOL
- Final report presented to SAPOL

summarised below.

Figure 3: The stages in the development of Report 1

Data

The quantitative and qualitative data which underpins the analysis provided in this report was gathered from existing SAPOL sources, and from the EOC's independent online survey *Leadership and Cultural change: Towards Gender Equality in SAPOL,* as well as interviews with some of SAPOL's senior leadership.

Figure 4: Data used to inform this report

Data	Description	Source
Dispute Resolution and Complaints December 2015 – September 2017	Number of: > PD351 complaints submitted to the Equity, Diversity and Volunteers Section by month > Reports to Task Force Portus > Calls to SAFE Space	SAPOL Equity, Diversity and Volunteers Section
Qualitative interviews Conducted October - November 2017	Interviews with members of SAPOL leadership including: > 11 members of the SAPOL Executive Leadership Team > 5 SAPOL employees trained for the Restorative Engagement Program	EOC
EOC online survey - *Leadership and Cultural change: Towards Gender Equality in SAPOL* Conducted October 2017	An online survey (via 'SurveyMonkey') with a specific focus on perceptions of leadership at SAPOL in relation to intent and activities of Project Equitas. An invitation to participate was sent to a group of approximately 230 SAPOL employees with a relationship to Project Equitas, including: > Engagement Session Facilitators > Employees who have volunteered to participate in focus groups on topics relating to Project Equitas The survey received 86 responses - a response rate of 37%.	EOC
SAPOL 'Corporate Pulse Survey' Conducted 2 - 16 November 2017	An online survey conducted by the Project Equitas Team which was sent to the entire active SAPOL workforce (5,975 employees) with the purpose to monitor staff perspectives of organisational to responses to sexual harassment, sex discrimination and wellbeing (recommendation 38 of the EOC's report.) This survey will be repeated by SAPOL on a quarterly basis. The survey received 2,300 responses - a response rate of 38%.	Project Equitas

Limitations

It is important to note some limitations in the data. These are:

> At present, there is very limited data available on human resource matters such as the demand for, and uptake of, flexible work arrangements, promotional opportunities, training opportunities, reasons for long-term leave, and reasons for resignation from SAPOL. The EOC has emphasised to SAPOL the importance that data is collected in these areas to enable future EOC evaluations. The EOC has provided advice on the data that will be important for SAPOL to collect in order to be able to measure organisational change over the long-term.

> Analysis of the views of SAPOL leaders was based on interviews with 11 members of the Executive Leadership Team (ELT) and five employees in senior leadership roles that were trained as part of the

Restorative Engagement Program. Although this is a valid sample size for qualitative research, it is acknowledged that more extensive interviews may have uncovered additional issues.

> The EOC online survey *Leadership and Cultural change: Towards Gender Equality in SAPOL* (the online survey) was sent to approximately 230 SAPOL employees who had voluntarily participated in Project Equitas' Employee Engagement Pool and/or had facilitated engagement sessions about Project Equitas. Their involvement in activities of Project Equitas means that their views may not reflect those of SAPOL staff more generally. The decision to restrict the survey to this smaller sample of SAPOL employees was made to mitigate the risk of survey fatigue due to the concurrent release of SAPOL's Corporate Pulse Survey throughout the wider workforce.

Section 1: Progress in the Implementation of Recommendations

This section provides a summary of the status of implementation of each of the 38 recommendations of the EOC's Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the SA Police. Where relevant, supporting notes are provided to highlight progress and potential challenges in the implementation of a recommendation.

KEY FOR IMPLEMENTATION STATUS
Implementation completed: activity to implement the intention of recommendation is completed
Implementation underway: activity underway to implement the intention of recommendation
Planning underway: research/planning underway to inform scope of activity required to implement intention of recommendation
Potential risk or challenge
Not yet commenced

RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
Immediate Action		
1	Statement of apology from the Executive Leadership Team (ELT)		Pledge signed by all ELT members and communicated across SAPOL (6 January 2017). Pledge on display in foyer at Police Headquarters.
2	Restorative Engagement Project		Restorative Engagement Project established (21 April 2017) and delivered as a separate program until 29 December 2017 - 15 conferences undertaken. The REP service has now been transitioned into the EOC's Conciliation Team and is available upon request.
3	SAFE Space		SAFE Space established (6 March 2017) and promoted across SAPOL via video, posters and Commissioner of Police communications.
Leadership		
4	Development of a Gender Equality Strategy		Gender Equality Action Plan (GEAP) and Diversity and Inclusion Strategy launched (8 December 2017).
5	Leadership Professional Development programs		Delivery of leadership shadow sessions for ranks/levels Inspector to Chief Inspector and ASO7 and above completed (29 November 2017) - 190 leaders (124 sworn and 66 unsworn) participated across 9 sessions. Evaluation is underway investigating the value of incorporating leadership shadow training within wider training approaches across the organisation.
6	Leadership performance feedback		Implemented with ELT. An evaluation of this approach is planned in order to identify feasibility and options for its application across organisation . Possible dependency on recommendation 18 which is being delivered by the Organisational Review Project.
7	Gender equality incorporated into business planning		Actions have been developed through the GEAP (link to recommendation 4) which also includes indicators of success and responsibility. It is anticipated the KPIs from the GEAP will be implemented and monitored from 1st July 2018 in alignment with corporate and strategic planning schedules. Implementation of the actions has commenced and progress will be reviewed annually by the ELT based on business reporting.

RECOMMENDATION		PROGRESS	COMMENT/ DELIVERABLES
8	Gender equality KPIs for leadership	(orange)	Draft KPIs developed and will be submitted to ELT in early 2018. It is anticipated the KPIs will be implemented and be monitored from 1st July 2018 in alignment with corporate and strategic planning schedules.
9	Appoint leadership on gender equality	(green)	A/C Fahy appointed (22 March 2017) and a project team established to implement the 38 recommendations.
10	Communications and engagement plan	(green)	Employee Engagement and Communication Strategy developed and approved (26 June 2017). A Communications and Engagement Officer with experience working on cultural change projects is a member of the project team.
11	Gender equality advisory group	(yellow)	Planning approach for this recommendation is underway with implementation scheduled for mid-2018.
Workforce Management			
12	Review of standards for promotion	(red/yellow)	Planning for this recommendation is underway. Possible dependency on recommendation 16 and 18 which is being delivered by the Organisational Review Project.
13	Targets for the promotion of women	(grey)	Aiming to initiate planning mid-2018.
14	Talent ID program	(yellow)	Planning for this recommendation is underway. Aiming to initiate implementation late 2018.
15	Handover process for management of employees	(yellow)	Planning for this recommendation is underway. Aiming to initiate implementation mid-2018.
16	External review of Human Resources	(grey/red)	This recommendation is currently assigned to the Organisational Review Project. This recommendation needs to be completed to better understand the service area's capacity to take on any new functions created by the implementation of other recommendations. .
17	Review of conflict of interest policy	(orange)	There is ELT agreement on changes that will be made and implementation is underway.
18	Reinvigoration of performance management system	(grey/red)	This recommendation is currently assigned to the Organisational Review Project.
19	Review of equipment to ensure practicality for women	(grey)	Aiming to initiate planning by February 2018.

	RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
20	New exit management strategy	🟧 (orange)	Aiming to complete implementation by March 2018.
	Training and Development		
21	Biennial training on sexual harassment, sex discrimination and predatory behaviour; unconscious bias; bystanders responsibilities; (for supervisors) understanding and accommodating flexible work	🟩 (green)	Two online modules for all employees and the module for supervisors reviewed and rewritten. The first round of compulsory training occurred in the second half of 2017 with completion rates of approximately 93% and 76% for all employees and supervisors respectively. Training for supervisors focusing on understanding and accommodation of flexible work which is being managed in recommendation 26.
22	Rolling three-year training plan - focus on developing people management and performance management	🟨 (yellow)	Planning for this recommendation is underway. Aiming to initiate implementation mid-2018.
23	Targets for women in training	⬜ (grey)	Aiming to initiate planning by March 2018.
24	Training opportunities for employees on extended leave	🟩 (green)	Policies and processes for reintegrating sworn and unsworn employees back into workforce following extended leave reviewed and updated, and Long Term Absence Courses with content relevant to the EOC Review Report. Opportunities for continued development will be managed through the 'Stay in Touch' policy (recommendation 29).
25	Review of training delivery methodologies	🟨 (yellow)	Planning for this recommendation is underway including a review of video conferencing options.
	Flexible Workplace Cultures		
26	All-roles flex approach	🟨 (yellow)	Planning for this recommendation is underway including the development of a set of principles to guide implementation of a flexible approach to work. Aiming to initiate implementation early 2018. This recommendation has dependencies regarding the prioritisation of an IT budget and capability to provide technology that supports a flexible workplace culture (recommendation 28).
27	Funding the backfilling of employees on maternity leave	🟨 (yellow)	Planning for this recommendation is underway.

RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
28 Technology and facilities to support flexible workplace culture	🟥	Planning for this recommendation is underway. Linked to 'All-roles flex approach' (recommendation 26) - the rostering system and secure infrastructure aspects of this recommendation will be managed through recommendation 26. This recommendation has dependencies on prioritisation in IT budget and capability to provide technology that supports a flexible workplace culture.
29 'Stay in Touch' policy	🟨	Planning for this recommendation is underway, including consultation with employees on maternity leave. Aiming to initiate implementation mid-2018. This recommendation has dependencies regarding the prioritisation IT budget and capability to provide technology that supports a flexible workplace culture (link to recommendation 28).
Dispute Resolution and Complaints		
30 New Complaints Resolution Unit	🟧	Planning for this recommendation is completed and a transitional model with appropriate resources for new unit has been approved. Implementation to commence early 2018.
31 Confidential complaints management tool	🟩	A confidential complaints management tool has been developed by expanding the use of an existing information system. The tool will become fully operational within the new Complaints Resolution Unit (recommendation 30) once initiated.
32 Training of complaint resolution unit staff and others	🟧	Training of the Complaints Resolution Team to be undertaken when the new unit (recommendation 30) is established. Staff from the Police Disciplinary Tribunal were trained by the EOC (15 December 2017). Training for the magistrates of the Tribunal to be delivered by the Commissioner for Equal Opportunity by November 2018.
33 Task Force to investigate allegations of sexual misconduct	🟩	Task Force Portus established (3 February 2017). Task Force Portus will be incorporated within the complaints resolution unit as the investigative arm (recommendation 30).
34 Review of disciplinary processes and revision of classifications for end of service	🟧	Existing processes not reviewed due to legislative amendment, which included revised disciplinary processes and penalties. The aspect of revising classifications for end of service to include 'resigned under investigation' will be managed in recommendation 20.
Wellbeing and Support Services		
35 Mechanisms to ensure safety of employees experiencing domestic violence	🟩	Employee guidelines developed and released to coincide with White Ribbon Day (25 November 2017) - communicated across SAPOL via email, intranet announcement and the Police Gazette.

	RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
36	Training in domestic violence intervention		Planning for this recommendation is completed. Aiming to implement training by May 2018.
37	Review of the roles and responsibilities of Equity Contact Officers		Planning for this recommendation is underway, including the consideration of links with existing activities, roles and synergies with the mental health program currently underway in SAPOL.
38	Confidential cultural surveys		First Pulse survey disseminated (2 November 2017) with a 38% response rate and results communicated across SAPOL via email and intranet announcement. Surveying will continue quarterly.

Figure 5: Summary of the implementation status of the 38 recommendations of the EOC's Independent Review

Legend:
- Not yet commenced
- Planning underway
- Implementation underway
- Implementation completed

Chart values: 5, 12, 8, 13. Center: **38**
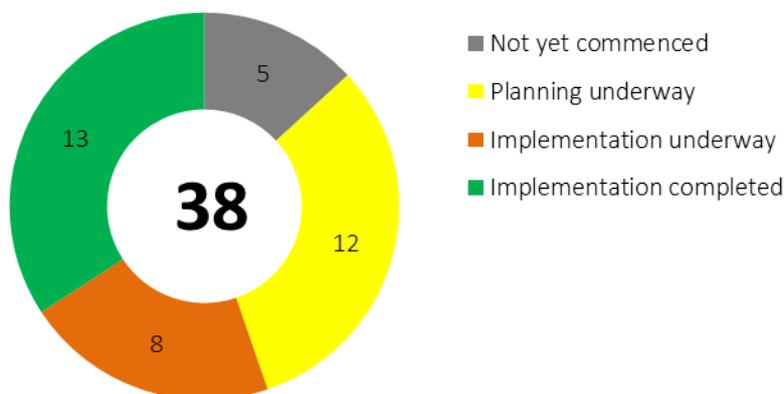
Key Achievements

There have been a number of important achievements in the first 12 months of the Project Equitas Team, which are summarised below:

Early Communication and Engagement in the Change Process

SAPOL was ready to communicate change immediately after the EOC's Independent Review was released on 12 December 2016. The Executive Leadership Team (ELT) briefed officers and managers on the day of the release, who in turn briefed supervisors and all employees within days. Shortly thereafter, all SAPOL employees received a hard copy of a specially-prepared *Quick Guide for Staff*, a briefing document outlining the EOC's findings, and the SAPOL Executive's commitment to change.

From 14 December 2016 and continuing over the following three months, the Commissioner and Deputy Commissioner of Police visited all work locations to discuss the EOC's Independent Review and its findings directly with over 1,800 employees across the state. Face-to-face discussions were supplemented with features on *Police Connect* (the SAPOL intranet noticeboard) the Commissioner's online blog, an article in SAPOL's magazine *Blueprint*, emails to all staff and targeted seminars and emails to senior officers and managers.

In the first half of 2017, the Project Equitas Team delivered a series of employee engagement sessions to discuss and reflect on sex discrimination, sexual harassment and predatory behaviour in SAPOL. The sessions were divided according to lower and higher ranks or government classifications in order to facilitate more open and honest discussion between peers. The reach of these sessions was high, with 190 facilitated sessions across the state for 4,033 lower level employees, and an additional 12 sessions for 422 employees who were Senior Sergeants/ASO6 and above. An additional 70 SAPOL employees in varying positions and roles were trained as facilitators to deliver these sessions. A positive step in de-centralising communication about the need for change and establishing a network of informal 'champions for change' across the organisation. Overall, approximately 73% of the SAPOL workforce were involved in face-to-face engagement sessions on the topics covered by the EOC's Independent Review. As such, the Project Equitas Team took

a comprehensive and inclusive approach to communication and engagement in the crucial, early stages of the project.

Diversity and Inclusion Strategy

SAPOL has gone beyond the EOC's recommendation of developing a gender equality strategy by expanding the scope to include consideration of the safety and welfare of all employees through a Diversity and Inclusion Strategy. The Strategy now advocates the equal treatment of employees regardless of gender, age, disability, sexual orientation and cultural and linguistic background (with particular reference to Aboriginal and Torres Strait Islander employees). Two action plans have already been released as part of the Diversity and Inclusion Strategy; the *Gender Equality Action Plan* (which will be discussed later in this report) and the *Disability Access and inclusion Plan*. Four more action plans will be developed in 2018.

Flexible Working Arrangements

The ELT and the Project Equitas Team have decided to shift the language about flexible working arrangements from 'all roles flex' to 'if not, why not' after consultations with SAPOL staff. This shift acknowledges that there may be occasions where not every type of flexible work option is achievable for every role. Instead, importance is placed on the consideration of individual roles and an openness to implementing flexible arrangements where possible. SAPOL believes this shift will enable more constructive conversations about flexible work in the organisation.

The Project Equitas Team has consulted widely across South Australian government to identify current practice according to the Premier's Future Flexibility directive. The Project Equitas Team is now in the process of developing a set of principles to guide managers and supervisors in the application of flexible work, and as a basis for discussion in areas of the organisation where there is still concern about resistance to flexible working arrangements.

Increased Reporting of Sex Discrimination, Sexual Harassment and Predatory Behaviour

There has been a general upward trend in the number of complaints relating to workplace discrimination, harassment or bullying to SAPOL's Equity, Diversity and Volunteers Section (EDVS) since the EOC's Independent Review was first released. Formally termed a PD351, this type of complaint incorporates alleged misconduct including sexual harassment, sex discrimination and predatory behaviour.

Figure 6: the number of PD351 complaints received by SAPOL by month, December 2015 – October 2017

Number of PD351 complaints received by SAPOL by month
December 2015 - October 2017
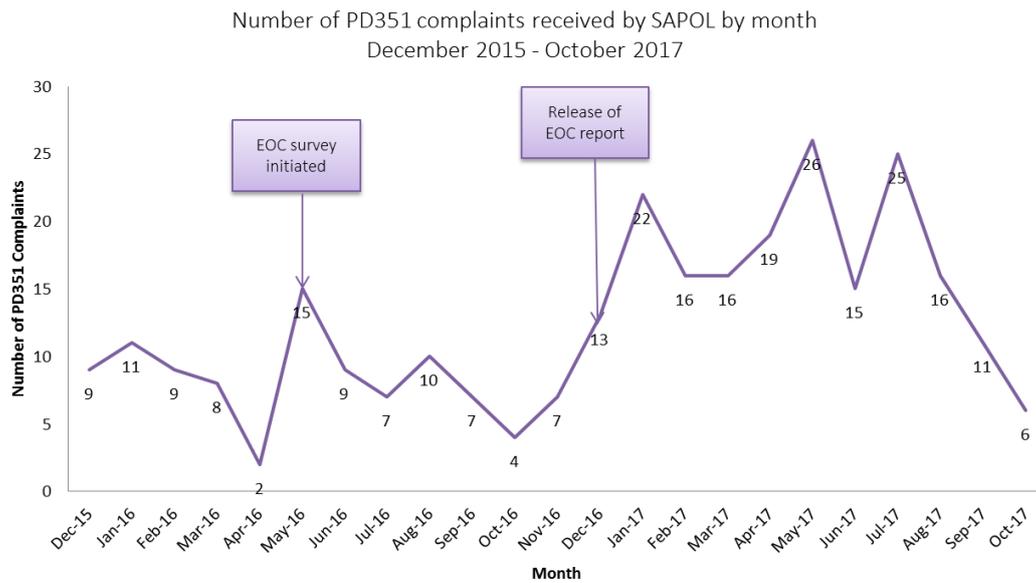
The upward trends since the first release of the Review tend to align with the Project Equitas Team's face-to-face engagement sessions which took place between March and June 2017, which suggests an increased level of confidence among SAPOL staff to identify and report inappropriate behaviour as a result of these engagement efforts.

The Project Equitas Team are in the process of establishing a new complaints resolution unit (recommendation 30) and have established a model for the unit's operations. It is important that this unit is operating and functioning effectively in order to meet the expectations of staff who now have increased confidence to lodge complaints.

Key Risks to Implementation

The overview of the progress in the implementation of the 38 recommendations highlighted a number of key risks for SAPOL to monitor closely. These risks include:

> The timing for initiating a number of recommendations and/or the effectiveness of their impact may be constrained by the interdependency with recommendations 16 and 18 which are currently assigned to the Organisational Reform Project.

> Recommendation 16 (an external review of the Human Resources Service Area) will provide an overview as to whether the service area has the capacity to take on many of the new functions that the implementation of other recommendations will create. Without a clear picture as to the capacity of the service area, there is a risk of challenges around transitioning these key functions to 'business as usual' upon the conclusion of Project Equitas, which would potentially impact the achievement of long term organisational cultural change.

> The implementation of flexible work policies and practices will rely on appropriate information technology (IT) infrastructure being in place, with staff capability to utilise it. Without this infrastructure, there is a risk that a flexible approach to working will not be developed at SAPOL as intended. It is

therefore necessary that the ELT prioritise the allocation of resources towards IT infrastructure to support this recommendation.

Section 2: Setting Foundations for Cultural Change

About Cultural Change

Organisational cultural change is generally very challenging, and requires leadership commitment, time, planning and effective implementation[5]. Experts have found that only about half of transformation initiatives accomplish and sustain their goals. This is largely due to 'change fatigue', the inability to make major change last, or a lack of employee engagement at all levels.[6]

Change fatigue refers to the physical and psychological responses that occur when a person feels burdened by change, feels neither excitement nor optimism about the change, and has the feeling that a workplace has become one unending change initiative with "staff spending an increasing proportion of their time reacting to change instead of getting the job done."[7] Change fatigue is not to be confused with change resistance, which usually manifests in questioning the need for change, or challenging the likelihood of a change succeeding.

The risk of change fatigue might prompt an organisation to deliberately slow the pace, or dilute the messaging around the need for change in order to mitigate employee alienation. However, gender discrimination, sexual harassment and predatory behaviour have very serious workplace health and safety consequences and must be treated in the same way as any other workplace health, safety and wellbeing issue. The message should not be diluted.

About Cultural Change in SAPOL

The EOC Independent Review found that to become a gender equitable workplace, SAPOL would need to embark on a cultural change effort led by an influential Project Director and a project team, supported by a communication and engagement plan. It went on to outline what is involved in leading cultural change and emphasised that it was important that SAPOL resist the urge to 'leap into action'.[8]

The EOC Independent Review anticipated that there would be 'difficult and painful adjustments'[9], and the majority of those interviewed for the current report acknowledged that the change project has been challenging, and that it will take time to achieve sustainable change.

"…this is a journey that will have ups and downs on it…we never thought it was going to be easy, but we always knew it would be worthwhile…"

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[5] Heathfield, S.M. (2017) 'How to Change and Transform Your Company Culture' *The Balance* https://www.thebalance.com/how-to-change-your-culture-1918810 (accessed 16 December 2017).

[6] Aguirre, D., von Post, R. and Alpern, M. (2013) *Culture's role in enabling organizational change* (Strategy&: San Francisco, United States).

[7] Fitzell, J. (2014) 'Change Fatigue' *Professionals Australia* http://www.professionalsaustralia.org.au/blog/change-fatigue/ (accessed 18 October 2017).

[8] Equal Opportunity of South Australia Op. Cit. Pg 37.

[9] Ibid Pg 37.

"…all our gender equity type programs are good, it's how we sell it… have we sold it well? Probably not, but we're starting to get there, it will take years to happen…if you look at the history of SAPOL it has been a male-dominated organisation that adopted [women] and gradually allowed them to do things but still maintain that male dominated type culture - changing that is the hard part."

"[Changing the culture] gives us a really healthy future…it's not going to happen if we don't remain vigilant and constant, because I have a fear that within a very short time we will revert back to what has been…if it's not embedded."

"…you can't stop, this has to be continual cultural change, I think it's going to take a long time though…"

"This is not a sprint... it's better to be more measured and achieve cultural change that's sustainable [rather] than cultural change that appears to be done and then find out it's only a veneer."

In addition, a number of interviewees noted SAPOL's existing way of achieving outcomes through transactional change, a methodology whereby tasks are assigned and completed according to benchmarks and time schedules. This management style is typical for organisations engaged in 'critical incident management,' however, this approach does not lend itself to effective long-term cultural or transformational change. The latter requires a focus on people, particularly team building, empowerment of employees, alignment of individual-organisational goals and culture building to motivate individuals to embrace the change for the better[10].

"SAPOL is very good at transactional type change, like [the] organisational reform project. That is just how we do things… I don't think in my years of being in the organisation we've actually undertaken cultural change."

The EOC sees it as essential that SAPOL leadership continues to lead and navigate the pathway to cultural change over the long term, with a strong focus on the rationale, and how it links to SAPOL's existing values and strengths.

Leadership in Cultural Change

According to change management consultancy Kotter International, there are two aspects of leadership in the cultural change process that should be considered individually; change management and change leadership.[11]

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[10] Management Study Guide (2017)'Transactional vs Transformational Leadership Change Management' https://www.managementstudyguide.com/transactional-versus-transformational-leadership-in-change-management.htm (accessed 16 December 2017)

[11] Kotter International (2011) 'Change Management vs Change Leadership – What's the Difference?' *Forbes* https://www.forbes.com/sites/johnkotter/2011/07/12/change-management-vs-change-leadership-whats-the-difference/#13e3cd654cc6) 12 July 2011 (accessed 29 November 2017).

Change management refers to the 'processes, mechanisms and tools' through which an organisation achieves a desired change. Alternatively, change leadership is the 'ability to manage, lead and enable the process of change'.

In the case of SAPOL, change management includes setting aside dedicated resources for Project Equitas and establishing mechanisms to ensure that the Project can deliver intended results. Change leadership, however, involves the articulation of SAPOL's vision, and mobilising others to see their role within that vision in order to make the change happen.

Leadership at SAPOL

SAPOL has two parallel leadership hierarchies; sworn police are classified by rank, while unsworn roles are classified according to the South Australian public service classification system.

There are no defined parameters as to what constitutes 'leadership' at SAPOL, as the organisation incorporates a broad range of operations which are divided between service areas, branches and units of varying sizes each with a distinctive leadership structure. For the purpose of this report, the EOC has defined leadership in the sworn hierarchy to be the rank of Inspector and higher, and for the unsworn hierarchy it is the classification of Administrative Services Officer (ASO) 7 and higher. The EOC SAPOL Monitoring Project Team acknowledge, however, that the responsibility of leadership does not correlate directly to rank or classification, and in many cases individuals of lower rank and classification have a managerial or supervisory role over others in their teams.

Figure 7: Number of SAPOL staff in positions of leadership – sworn and unsworn

	SWORN POLICE LEADERSHIP	NUMBER OF POSITIONS
ELT	Commissioner	1
	Deputy Commissioner	1
	Assistant Commissioner	8
	Chief Superintendent	8
	Superintendent	38
	Chief Inspector	37
	Inspector	55
	TOTAL	**148**

UNSWORN LEADERSHIP	NUMBER OF POSITIONS
⊞ **Director (L1 SAES)**	2
Executive (L2 SAES)	1
Manager Administrative Services	12
Administrative Services Officer (ASO7 and ASO8)	50
TOTAL	**65**

The Executive Leadership Team (ELT) is made up of the Commissioner and Deputy Commissioner of Police, and 10 individuals in the position of Assistant Commissioner (sworn) or Director (unsworn) who each have executive oversight over a specific service area.

Change Management

SAPOL has established a structure for change management, with an experienced executive leading the process, as per the EOC's recommendation (recommendation 9). In the early stages of the Project, SAPOL also sought advice from an external consultant to assist in the development of a strategy document for change management. This has created a framework for how the project is implemented and communicated.

Governance for Change

There is no prescribed governance model for a cultural change project, and organisations need to find a model that suits the context in which they are working. However, the basic features of a governance model for change management often includes the following roles (or similar):

A Change Sponsor - a leader that has ultimate responsibility for the change and for building commitment for that change, particularly from other leaders across the organisation.

A Steering Committee - a group that provides overall oversight for the change process, and influences the direction change will take.

A Change Agent – a leader that has responsibility for managing the overall, day-to-day change management process and the implementation of associated activities.

Work Stream Owners – individuals that have responsibility to deliver set and distinct groups of activities to contribute to the project as a whole[12].

Two common mistakes that leaders make in cultural change efforts are:

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[12] Queensland Government, Change Management Best Practices Guide, Five (5) key factors common to success in managing organisational change', http://lgnsw.org.au/files/imce-uploads/361/change-management-best-practice-guide-QLD_0.pdf (accessed 1 December 2017)

1. Not allocating adequate resources for change – cultural change requires human resources with particular skill sets, as well as the appropriate commitment of capital, not only for the life of the project but also until the desired outcome is achieved.

2. Setting unrealistic timelines – there is a need to plan thoughtfully and determine realistic timeframes, especially when there are multiple initiatives underway[13].

Summary of EOC Findings

SAPOL's governance structure for the change process appears to be as follows:

Figure 8: SAPOL's governance structure for change

The ELT, which includes the Commissioner of Police and the Assistant Commissioner/Project Director of Project Equitas, is ultimately responsible for decision-making in all matters relating to Project Equitas. The Project Equitas Team members regularly produce briefing papers which are discussed, reviewed and approved by the ELT during weekly meetings. The Project Equitas Team also reports to the ELT on a monthly basis.

SAPOL has allocated significant resources towards Project Equitas with 21 staff in total. Specialised staff, including the Project Manager and the Communication and Engagement Officer, have been recruited to ensure that there are appropriate levels of expertise in the change management effort. The remaining roles have been filled by existing SAPOL employees from a broad range of operational and administrative backgrounds. All Project Equitas Team members are dedicated to Project Equitas, and are not expected to fulfil other work roles.

The EOC SAPOL Monitoring Team believes that there is a resourcing risk with the proposed changeover of all Project Equitas staff on an annual basis. While it may be considered important to extend opportunities for other SAPOL staff to be involved, the EOC advises that SAPOL stagger the recruitment of new staff and

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[13] Ackerman Anderson and Anderson, ;'Ten Common Mistakes in Leading Transformation', Change Leaders Network http://changeleadersnetwork.com/free-resources/ten-common-mistakes-in-leading-transformation (accessed 1 December 2017)

commit to retaining a core group within the Project Equitas Team in order to maintain a high level of intellectual capital, consistency and collective knowledge.

When new staff are recruited into the Project Equitas Team, consideration should be given to appropriate levels of diversity in order to benefit from a range of views and experiences. Since the program began, the gender breakdown within the team has been skewed in favour of women (with 15 female team members to 6 male team members). Gender equity within the team has improved as the project has progressed, but there is an inherent risk that a predominantly female team within Project Equitas will inaccurately convey the change process as a 'women's issue'.

Key Consideration 1:

SAPOL leadership introduce new staff to Project Equitas in a staged process, ensuring a thorough handover is conducted with exiting staff. In the recruitment of new team members, a concerted effort should be made to attract a diverse range of backgrounds, views and skills, including equalising the gender representation in the team.

The timeframe for the implementation of Project Equitas is two years (starting from the release of the EOC's Independent Review in December 2016). While Project Equitas can be viewed as an enabler for a longer-term cultural change, some concerns were raised in interviews about the feasibility of fully implementing all planned activities within this timeframe. Concerns were raised about the technical aspects of change management, in particular the time it would take to develop policies, amend processes and appropriately up-skill users to follow these processes.

Others interviewed were not so concerned about the two-year timeframe, on the basis that there is a need to respond quickly because of the intended impact on people's wellbeing, particularly around:

> Policies that support flexible working options that then allow employees to balance commitments and/or priorities outside of work.

> A complaints and dispute system that manages complaints effectively, confidentially and in a timely manner so that employees feel respected and safe.

Strategy

An external consultant assisted the ELT in the development of a Business Engagement Plan for the management of the cultural change process. This high-level document was prepared by the external consultant based on in-depth consultations with SAPOL senior leadership, and was then handed over for implementation. A suite of project tools were developed from this Plan, including:

A Project Management Plan which clarifies the project scope, timelines, key milestones, major products/deliverables, resourcing, risk management and controls.

A Project Schedule which outlines the sequence of actions and their associated responsibilities by recommendation. This is a dynamic document being reviewed regularly to capture unexpected changes, and to note flow-on effects to other work areas.

A Risk Register provides an overview of any risks associated with particular recommendations with corresponding mitigation actions. The risk register is reviewed regularly by the Project Equitas Team and updated appropriately.

The Project Equitas Team is also learning from the experiences of other organisations to inform strategy and methodology. To date they have:

> Hosted a session with the Workplace Gender Equality Agency (WGEA) to identify key elements for the SAPOL Gender Equality Action Plan and overarching Diversity and Inclusion and Strategy.

> Held meetings with other State Government Departments, for example consulting the Department of Environment, Water and Natural Resources to discuss their approach to flexible work arrangements.

Just as the Project Equitas Team is willing to learn from other organisations, the Project Equitas Team has been contacted by other jurisdictions and agencies (e.g. Queensland Police, Victoria , Western Australia Police and the Department of Planning, Transport and Infrastructure) to learn from the Project Equitas Team's progress, achievements and learnings. The key areas of interest have been:

> Initiating a review focusing on equal opportunity;

> Employee engagement and communications during a change project;

> Implementation of the change project, its work streams and evaluations of work stream activities;

> Surveying employees;

> Diversity and Inclusion Strategy and Gender Equality Action Plan.

Communicating Change

Communication is a key tool to engage employees in the cultural change management process. A deliberate plan for determining who needs to understand the 'what', 'why', 'when' and 'how' of the change is required to engage and convince the workforce. The optimal time to strategically plan change communication is in the early planning stage of the cultural change effort. This planning is required to reflect the needs and complexity of the cultural change effort and will consist of a range of communication tools varying in formality and structure. The plan for change communication should be considered a dynamic document and subject to regular review[14].

There is no one best way to communicate change – it needs to be tailored to each organisation's culture and circumstances. Nevertheless, key elements common to successful communication approaches are:

> Clearly communicate the change vision and do it early;

> Outline the benefits and impacts of the change effort;

> Leaders actively communicate positively throughout the change effort;

> Use multiple channels to communicate the change message;

> Provide opportunities for dialogue;

> Repeat change messages often;

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[14] Queensland Government, Op. Cit.

> Monitor and measure the effectiveness of communications[15].

According to Heathfield[16] communication is one of the toughest activities in organisations - no organisation exists in which employees are completely happy with the level and/or type of communication. Heathfield goes on to say that 'you cannot over-communicate' during organisational change and that every executive who has led a successful change management effort expresses the need for over communicating during a change and makes this statement in retrospect. The key element is that the content of communication is significant and substantial[17].

Summary of EOC Findings

The Project Equitas Team developed an Employee Engagement and Communication Strategy (as per recommendation 10 in the EOC Independent Review) which was informed by guidance provided by the external consultant in the early stages of project planning. This document outlines objectives, guiding principles and key messaging for Project Equitas.

Project Equitas is communicating with stakeholders via multiple channels. As outlined earlier in the 'Key Achievements' section, there was a particularly strong focus on communicating the need for change in the early stages of the Project. Since that time, the Project Equitas Team have made a concerted effort to maintain regular communication with SAPOL employees, outlining what is happening and why, and what was done and why it mattered, including:

> Emails that may be sent to all employees or a targeted cohort with information updates and/or invitations to participate in upcoming Project Equitas activities.
> Quarterly updates that provide a general update on activity, how the implementation of the recommendations is tracking and the key next steps.
> A site on the SAPOL intranet for employees to access background information and archive of the shared information, which is developing as a resource library for staff.
> Print medium (for example Police Connect, Police gazette, posters, cards, flyers) to increase awareness of particular activities and to make announcements.
> Conducting a Senior Officers Day to run through the tool kit of information for them to disseminate to their teams and units.

One notable change in messaging is a shift in the rationale for why cultural change is being pursued. In the early stages of the Project, there was frequent reference to the EOC's Independent Review and its findings. Making reference to the evidence of a problem of sex discrimination, sexual harassment and predatory behaviour was valid at that time. However, as the Project has progressed, repeated reference to these inappropriate behaviours and the EOC report undermined SAPOL's ownership of the cultural change effort.

[15] Ibid.

[16] Heathfield S.M., (June 2017) 'Communication in Change Management', *The Balance,* https://www.thebalance.com/communication-in-change-management-1917805 (accessed 6 December 2017).

[17] Fenson S., 2000, '10 Tips for Communicating Change', *Inc.* https://www.inc.com/articles/2000/06/19312.html (accessed 6 December 2017).

One senior leader remarked that, unlike previous change initiatives, this change effort was initiated voluntarily by SAPOL, and there is therefore a greater initial investment from ELT from the start. Messaging around this point has changed significantly over time, with references to the EOC now being minimal in both internal and external communications. The change of the Project's branding from the 'Equal Opportunity Commission Review Implementation Team' to 'Project Equitas' is also an example of messaging the ownership of the change process.

In terms of the receptiveness to communication regarding Project Equitas and the EOC's Independent Review, SAPOL employees best recall the SAPOL Commissioner's video and blog about the issue. SAPOL's Corporate Pulse Survey found that 57.1% of respondents had read or watched the SAPOL Commissioner's blog, closely followed by participation in the face-to-face engagement sessions, reading the critical communications strategy and reading the *Quick Guide for Staff.* The EOC's Online Survey also provided qualitative feedback on the communication to date, which reiterated that the use of video blogging (with ELT members) is a popular way to receive key messages about Project Equitas activities, and associated expectations of employees. Other key themes from the commentary about the communication approach included:

> Project Equitas messaging via email can be lost among emails relating to day-to-day operations, other change projects that are underway (for example those associated with the Organisational Reform project), broader information from SAPOL and other government or associated agencies.

> Generally, there is a strong demand for face-to-face communication as an alternative to emails and printed documents.

> There is a strong demand for the communication of outcomes and consequences of investigations into alleged misconduct, in relation to sex discrimination, sexual harassment and predatory behaviour, to signal that SAPOL leadership is now taking allegations and investigations seriously and change is occurring.

In interviews, senior leaders acknowledged the importance of communication to the cultural change effort. A number of interviewees expressed concerns that in the early stages of the Project there was conflation between the activities of Project Equitas and the Gender Parity Recruitment Scheme, and confusion about the relationship between issues appearing in the EOC's Independent Review. One interviewee also gave the example of the conflation of flexible work and predatory behaviour.

Managers are making decisions about voluntary flexible work based on policy… those decisions have been made because they're following a policy that a Commissioner has signed off on. Sometimes you have a decision when you say…I can't do that, it's outside of the policy, which upsets people. [That issue] being bunched in with predatory behaviour…there was a fair bit of negativity about this. A lot of anger. This is two different things."

"…we've brought our organisation together and told them that certain behaviours are not appropriate…however the way we have done it I think can be done better. We've [said] that it isn't appropriate to not support our people around sexual harassment and bullying and those sorts of things…what we've done in that same group of messaging we've also spoken around part time employment and creating a workforce which is flexible. In our communications it's almost been if you haven't as a manager…supported flexibility or part time employment, that you're somehow are a person who supports sexual harassment."

There is evidence that the relationship between flexible work, gender parity and sex discrimination on one hand, and sexual harassment and predatory behaviour on the other has not been entirely clear, and may require further clarification in future communication campaigns.

A number of senior leaders interviewed also saw the communication of disciplinary processes as a way to build confidence in the cultural change process. It was suggested that the use of de-identified 'case studies' to inform employees of unacceptable behaviours and their consequences, based on real-life examples, could have a powerful impact in supporting the cultural change process.

Key Consideration 2:

The Project Equitas Team review communication tactics and use those that differentiate, and link (where necessary) the different topics covered in the scope of the EOC's Independent Review. We suggest that disciplinary outcomes are communicated (without identifying details of parties involved) to demonstrate that inappropriate behaviour is being treated seriously.

Monitoring and Evaluation

The EOC has been tasked with monitoring and evaluating the overall effectiveness of Project Equitas in mobilising cultural change at the macro level. However, in accordance with standard project management practice, the Project Equitas Team is responsible to ensure the quality and effectiveness of day-to-day activities on the micro level. It is common for projects to deviate from the original plan, and therefore it is necessary for there to be processes to track, review and orchestrate the progress and performance of a project; identify areas in which changes to the plan are required; and initiate the corresponding changes' for the improvement of project outcomes. [18]

Summary of EOC Findings

The Project Equitas Team monitor and evaluate the effectiveness of the activities they are delivering through participant feedback and tracking levels of engagement.

The Team has good record-keeping systems to monitor Project Equitas' results. For instance, levels of outreach are demonstrated by participation rates in engagement or training initiatives, levels of interest in the Project Equitas intranet page, and response rates to the recent Corporate Pulse Survey (as per recommendation 38 of the EOC's Independent Review).

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[18] Project Management Institute (2013) *A Guide to the Project Management Body of Knowledge (PMBOK Guide), Fifth Edition,* Project Management Institute: Pennsylvania US.

The Project Equitas Team conducted a rigorous evaluation process during employee engagement sessions by gathering extensive feedback from facilitators using an online survey. The feedback from the delivery of these sessions informed the Project Equitas Team of a common 'blocker' in the engagement process which was the Gender Parity Recruitment Strategy. This feedback led to the development of a short video which dispelled common misconceptions about this strategy.

The Project Equitas Team also hosts focus groups in metropolitan and regional sites to discuss their perceptions and experiences of a broad range of topics relating to the EOC's Independent Review recommendations. In the early stages of the Project the purpose of these focus groups was broadly consultative, however, these groups have more recently served as valuable feedback channels for the development of the Diversity and Inclusion Strategy and will continue to be engaged in the development of other recommended activities as the Project progresses.

Notwithstanding the successful engagement channels established above, it is essential that the Project Equitas Team look to the entire SAPOL workforce for feedback on new initiatives. The Corporate Pulse Survey was initiated on 2 November 2017 and provided useful insight into general sentiments across the organisation. Any new activities such as training, new systems and processes etc. should be tested by the general population of SAPOL with opportunities to provide feedback for the purpose of continual improvement.

> **Key Consideration 3:**
>
> The ELT highlight that any changes/improvements made to initiatives are the result of employee feedback, for example, through the Corporate Pulse Survey.

Change Leadership

Change leadership requires leaders within the organisation to champion and drive the cultural change effort. In order to do this, leaders need to understand and believe in their own role within that vision, be willing to actively engage with staff about the change, to respond to any misgivings about the change process, and to help people understand why it is important. Leaders need to understand and fulfil the expectations of their employees in terms of role modelling the change and making change happen in all areas they influence or control[19].

Vision

The starting point for successful change is having a clear vision about the scope and intended impact of change on the organisation, how it relates to existing strategy, and expectations of each individual's role within that change.

Indicators of clarity and meaning in SAPOL's vision for cultural change would be:

- The change is perceived as relevant because it aligns to the organisation's existing vision; and

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[19] Queensland Government Op. Cit.

- Employees understand their role in the change and the impact it will potentially have on them personally and at an organisational level.

Summary of EOC Findings

As noted previously, at the time of the release of the EOC's Independent Review, SAPOL set out on a comprehensive and inclusive communication and engagement strategy to communicate the following:

- The findings of the EOC's Independent Review;
- What needed to change;
- SAPOL leadership's commitment to change; and
- The need for all SAPOL employees to reflect on their own behaviour.

In addition to communications mentioned previously such as the site visits, engagement sessions, broad coverage in SAPOL media and the *Quick Guide for Staff,* the Project also coordinated key messaging from SAPOL leadership. The *Quick Guide for Staff* was accompanied by a letter from the SAPOL Commissioner which expressed his personal commitment to positive change, drew on the SAPOL values to reinforce that all SAPOL employees are accountable and highlighted the expectation that all SAPOL employees would commit to making SAPOL a workplace free from sex discrimination, sexual harassment and predatory behaviour.

After this original set of communication activities, Project Equitas developed a *Case for Change* document to provide clarity about the change process. This document includes a vision for Project Equitas, which is "to enhance SAPOL an inclusive organisation where all people are safe, respected and supported to reach their potential". This vision was first developed with the ELT, and disseminated through the organisation via the *Case for Change* document. The Project Equitas vision has since appeared in part or in full across a broad range of communications and activities.

The Project Equitas vision has also been consistently linked to SAPOL's overarching vision which is to be "a visible, responsive police service for all South Australians." This link was communicated clearly in the *Case for Change* document where the two visions are deliberately linked as a cause and effect concept.

In interviews with SAPOL senior leadership, people were clear in their understanding of SAPOL's vision for cultural change. They believed that the change had relevance and meaning for them individually. Across the group, frequent comments were made about SAPOL benefitting from a more cohesive workplace where people are valued and taken care of. The desire for SAPOL to be an 'employer of choice' and for its workforce to be more reflective of the community was also mentioned frequently.

> *"Over the last 10 to 15 years, organisationally we have focused on systems and process and performance at the expense of human resource or people issues…I think we've lost a bit of the focus towards how we treat our people and particularly around that inclusiveness and respect."*

On an individual level, some spoke of their own experiences of being victims of sex discrimination and/or sexual harassment and their desire for others not to experience the same. Some stated that they would not want to see their own daughters being subjected to such disrespectful behaviour. Cumulatively, these

comments reflect a combination of personal and organisational drivers, and this forms a good basis for leading the cultural change effort towards the vision put forward by Project Equitas.

The vast majority of the EOC's online survey respondents indicated that the need for change has been clearly articulated across SAPOL with 88% agreeing or strongly agreeing. With regard to whether the need for change has been understood by peers and colleagues in SAPOL, 64% agreed or strongly agreed, 18% were indecisive and 17% disagreed. Furthermore, the majority of online survey respondents indicated that their peers and colleagues were supportive of change (57%), but 16% disagreed or strongly disagreed and 27% were undecided.

SAPOL's Executive Leadership Team (ELT) appear to understand SAPOL's vision and the rationale for change and have clearly articulated the need for change across the organisation. However, there is still the perception among some SAPOL staff that their peers and colleagues are having difficulty in understanding the vision, or identifying their own role within that vision.

Understanding the Leadership Role

For any organisation undertaking cultural change, there is a need for leaders to proactively anticipate fear of change, and be sensitive to the expectations that employees have of them in the cultural change process.

In a hierarchical organisation like SAPOL, there is a 'chain' of influence starting from the top with the Commissioner of Police. SAPOL has been exploring this influence as part of the Chief Executive Women's Leadership Shadow program (as per recommendation 5 of the EOC Independent Review).
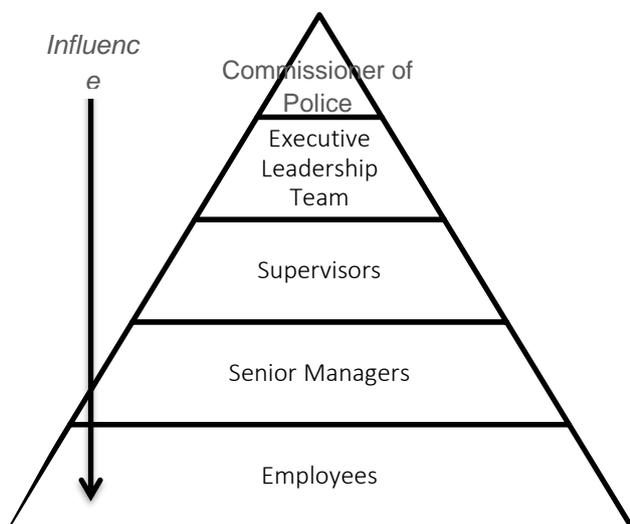
Figure 9: Hierarchy of influence at SAPOL
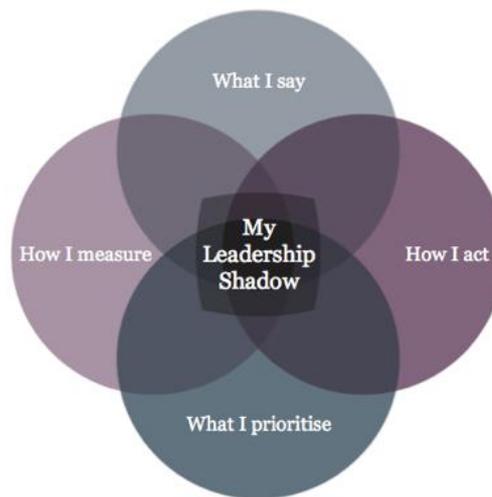
Figure 10: The Chief Executive Women's Leadership Shadow Program – 'My

An extensive commitment is required of the leaders to ensure a successful cultural change. Change can be unsettling for employees, and they often look to the leaders for support and direction. Leaders play a key role in promoting and sustaining the drive for the change. Sometimes they may need to coach other leaders and develop and communicate a shared sense of the way forward[20].

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[20] Ibid.

Summary of EOC Findings

The Commissioner's open letter, the *Quick Guide for Staff* and the site visits around the state by the Commissioner and Deputy Commissioner of Police discussed what was expected of employees in terms of behavioural change. However, it would be beneficial for each and every SAPOL employee to have guidance, in explicit terms about what is expected of them in order to contribute to the cultural change effort now that it is underway and the 'what' and 'how' of changes are better understood. This 'statement of expectations' could take many forms such as a charter or a pledge, but should focus on the 'critical few' high-impact behaviours or actions that are expected to be enacted by each employee. Focusing on only a few behaviours or actions that connect with the vision will ensure employees are not overwhelmed with change and will reinforce that culture is much more a matter of action than words. [21]

A number of interviewees gave examples of how they are promoting and driving a positive cultural change in their day to day role, such as:

> Working with the Project Equitas Team to progress the training and development-related recommendations;

> Exploring approaches to attract more women to male-dominated areas of SAPOL; and

> Creating opportunities for regional employees to be involved in Project Equitas activities and focus groups.

Key Consideration 4:

SAPOL establish a set of clear and practicable expectations for all levels that focus on the 'critical few' high-impact behaviours or actions that facilitate employees to practice the desired cultural change consistently and contribute to the cultural change effort.

Role Modelling

It is critical that change leaders themselves model the behaviour change that they are looking to see in the workforce. Successful cultural change is strongly correlated with how well leaders model it.[22] The ability for leaders to role model appropriate behaviours will depend on whether they know and understand the organisation's expectations of them in regards to actions and behaviours (key consideration 4.)

Summary of EOC Findings

SAPOL's Corporate Pulse Survey found that there were mixed perceptions of whether leaders were demonstrating or role modelling a positive culture where all are valued for their diversity and treated equally. Only 37.7% agreed or strongly agreed that SAPOL leaders were modelling the required behaviours, 38.6% disagreed and 23.7% were unsure. However, when referring to the respondent's immediate supervisor/manager, there was a more positive result with 69.1% agreeing or strongly agreeing that their

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[21] Katzenbach, Oelschlegel and Thomas (2016) '10 Principles of Organizational Culture' *Strategy + Business* https://www.strategy-business.com/article/10-Principles-of-Organizational-Culture?gko=71d2f (accessed 25 January 2018).

[22] Ackerman Anderson and Anderson, Op. Cit.

supervisor/manager demonstrated their commitment to diversity and inclusion through their behaviours and actions.

Respondents to the EOC's online survey were asked what they thought were the most important actions and behaviours they would expect to see at the varying levels of leadership in order to effect cultural change in SAPOL, and to what extent these behaviours have been demonstrated. The findings are summarised in the table below.

Figure 11: Findings of the EOC's Online Survey – Expectations of leadership in terms of role modelling positive cultural change:

	EXECUTIVE LEADERSHIP TEAM	SENIOR MANAGERS	SUPERVISORS
Question 1: What are the three most common expected actions/behaviours?	1. Visibly endorsing Project Equitas activities 2. Being mindful of their own behaviour in their treatment of other staff in day to day interactions 3. Calling out or intervening in disrespectful/inappropriate behaviour	1. Being mindful of their own behaviour in their treatment of other staff in day to day interactions 2. Expressing an openness to discuss diversity and inclusion and/or gender equality 3. Calling out or intervening in disrespectful/inappropriate behaviour	1. Expressing an openness to discuss diversity and inclusion and/or gender equality 2. Being mindful of their own behaviour in their treatment of other staff in day to day interactions 3. Calling out or intervening in disrespectful/inappropriate behaviour
Question 2: Are these actions/behaviours being exhibited?	• All and most actions or behaviours: 55% • Some actions or behaviours: 31% • None of the actions or behaviours: 14%	• All and most actions or behaviours: 39% • Some actions or behaviours: 46% • None of the actions or behaviours: 15%	• All and most actions or behaviours: 39% • Some actions or behaviours: 45% • None of the actions or behaviours: 16%
Question 3: What are the three most important behaviours/actions that the ELT should focus on?	• Call out or punish bad behaviour (and communicate it) at all ranks/levels • Change own behaviour to lead by example • Communicate directly with lower level staff		

Overall these results indicate substantial lack of confidence in SAPOL leaders acting or behaving in line with the desired cultural change. In commentary provided, respondents expressed a desire specifically for supervisors and senior managers to step up and model the required behaviours.

"Some supervisors still don't understand that they must disapprove of disrespectful behaviour and comments within the workplace. They seem to think they are beyond reproach and what they so or do is still ok."

> *"I think that the ELT have made sufficient statements, it's now up to Senior Managers and Supervisors to model, endorse and implement."*

The divergence between the findings of the EOC's online survey and SAPOL's Corporate Pulse Survey in respect to satisfaction with supervisors and senior managers role-modelling cultural change might be explained by each survey's sampling method. Since those who were surveyed by the EOC have voluntarily been involved in Project Equitas activities to date, they might have higher expectations of the actions and behaviour of SAPOL leadership when compared to the general SAPOL workforce who may have less detailed knowledge of the subject matter.

Senior leaders interviewed for the purpose of this report all saw that it was part of their role in the change process to model appropriate behaviours, but there was a diverse understanding of what that behaviour was. Common themes were:

> Using and encouraging inclusive language[23];
> Exploring development opportunities for women;
> Participating in disciplinary processes and ensuring there are consequences for sex discrimination and/or sexual harassment;
> Participating in processes (formal and informal) that facilitate discussions between ELT members and the junior employees in their portfolio;
> Being approachable and encouraging people to ask questions and raise concerns or issues about wellbeing, the SAPOL culture or other employee concerns;
> Working with the Project Equitas Team to progress the training and development related recommendations.
> Exploring approaches to attract more women to male dominated areas within SAPOL.
> Creating opportunities for regional employees to be involved in Project Equitas activities and focus groups.

These understandings of the appropriate behaviours and actions to model are all valid, but clear and practicable expectations according to an individual's role would be an additional, supportive tool for leaders to better understand their specific role in the change process.

In terms of 'calling out' bad behaviour, interviewees acknowledged that they had an important role in personally disrupting or intervening in inappropriate behaviour:

> *"If something happens in your presence, you are the most senior person in that room, the effect you have if you don't say anything or if you do say something, how you do say it, what you do"* .

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[23]Language that is free form words, phrases or tones that reflect prejudiced, stereotyped or discriminatory views of a particular people or groups. From Tasmania Department of Education (2012) 'Guidelines for Inclusive Language' https://documentcentre.education.tas.gov.au/Documents/Guidelines-for-Inclusive-Language.pdf (accessed 20 December 2017)

> *"… if you are…condoning it (inappropriate comments/behaviour), you're a part of it, and it's everybody's job to now call out this behaviour."*

However, many commented that they had not had the opportunity because staff rarely exhibit poor behaviour in their presence, which indicates a level of insulation from the culture in action at lower ranks and levels. There is a need for senior leaders to make a concerted effort to engage with middle managers and lower level staff to get a fuller picture of the organisational culture, and to support middle managers to elevate issues of concern where appropriate.

Understanding the Stakeholders

To be effective change leaders, SAPOL leaders must understand the concerns of those they are attempting to influence. People may be disengaged or resistant to cultural change for a number of reasons including denial, self-interest or fear of the unknown. If these are identified and understood, it is possible to plan for the mitigation of resistance as an obstacle in the cultural change effort[24].

Summary of EOC Findings

During the development of the Business Engagement Plan, the external consultant facilitated a Change Readiness Assessment with the ELT and the Project Equitas Team. This assessment assisted the Project Equitas Team to understand resistance factors, change enablers and identify tactics to progress culture transformation.

The Project Equitas Team have acknowledged their role in mitigating the risks associated with change resistance, and are responding accordingly. Indications include:

- Framing communications by dispelling of myths and misconceptions – for instance, a video dispelling common misconceptions around the Gender Parity Recruitment Strategy.
- Adjusting communications around flexible work from 'all roles flex' to 'if not, why not' to respond to concerns raised by managers and supervisors.
- Engaging early and openly on the Diversity and Inclusion Strategy to proactively address the concerns of employees.

Comments from SAPOL employees captured in the EOC online survey indicated that management-level employees are perceived as resisting and undermining the cultural change effort.

> *"It is absolutely imperative that management at all levels embrace and promote the case for change within SAPOL. It is my view that there is a desire for change within the organisation, however the 'blockers' to this change are management. Management need to model flexible work themselves and actively seek out opportunities to implement flexible working arrangements in their workplaces."*

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[24] Queensland Government, Op. Cit.

> *"We don't speak of this cultural change in our department -- our Director or our managers don't even mention them [it]."*

> *"Change will only occur if the Senior Management teams are fully supportive of it, not merely paying lip service to it, and some appear to be undoing the hard work being attempted to implement change by allowing their own prehistoric views to permeate into the workplace."*

> *"I appreciate what SAPOL is trying to achieve and ELT have been very supportive of [Project] Equitas however other Senior Managers need to step up. The still male-dominated culture of senior leaders does not assist with a cultural change… and this needs to be addressed."*

Similarly, a common message in interviews with senior leaders was that the management level (i.e. around the level of Senior Sergeant and Inspector for sworn staff and ASO6 and ASO7 for non-sworn staff) is critical for successful cultural change as these people are directly managing the majority of the workforce. A number of the interviewees mentioned that the managers are currently in a challenging position, particularly in relation to facilitating flexible work arrangements without policies in place to support them at this stage (these are being developed).

The ELT and Project Equitas Team will need to simultaneously focus on the development of policies and tools that support the cultural change effort whilst promoting the mind-set shift towards flexibility in SAPOL. While, some may be concerned that thinking 'flexibly' will lead to inconsistent decision making across SAPOL, it is possible to have policies and tools that guide consistent decision-making based on the function of the role in question. In the next section (Engaging Stakeholders) there is an example of how a SAPOL senior leader is 'coaching' middle managers to enhance their ability to think 'flexibly'.

The Project Equitas Team have done well to mitigate some of the risks of change resistance among stakeholders within SAPOL. The Business Engagement Plan outlines the varied levels of resistance (low to deeply entrenched) that it can be displayed in passive and active forms and potential responses to manage resistance to change. As the cultural change effort proceeds, SAPOL may be required to provide additional coaching/counselling to address deeply entrenched resistance (what Kegan and Lahey refer to as a 'immunity to change'[25]). Engagement with Chief Executive Women through the Leadership Shadow Training Program (as per recommendation 5 of the EOC Independent Review) will provide constructive guidance in this area with the focus on strategies for promoting change among those who are the most resistant. To date, approximately 190 SAPOL senior leaders (ASO7 and above/Inspector to Chief Inspector) have participated in workshops with Chief Executive Women.

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[25] Kegan and Lahey (2001) 'The Real Reason People Won't Change' *Harvard Business Review https://hbr.org/2001/11/the-real-reason-people-wont-change* (accessed 1 December 2017).

Engaging Stakeholders

Change leaders need to create opportunities for employees to have a two-way dialogue about the change process in order to voice their concerns, contribute to project activities and to have a level of individual participation in the change process[26].

Summary of EOC Findings

The Project Equitas Team has created several channels for two-way communication with the SAPOL workforce. Some examples of these channels are:

- Voluntary focus groups to provide feedback on topics of their choosing;
- Working groups to provide advice, guidance and information based on practical experience to inform the design and implementation of recommendations
- The Project Equitas email inbox;
- Opportunities to work in the Project Equitas Team.

Through these engagement activities, Project Equitas is aiming to learn from employees and their experiences, to build trust, and to create a system of transparency in decision-making as to how recommendations are to be implemented. These inclusive principles are an important step ensuring that there is employee ownership of the cultural change process.

In terms of direct leadership engagement, the SAPOL Commissioner and Deputy Commissioner were heavily involved in employee engagement sessions around the State which provided the opportunity for employees to ask questions directly of senior leadership. The Commissioner of Police and the Commissioner for Equal Opportunity also addressed officers and senior managers about cultural change at the Senior Leaders Day in July 2017 and the Security and Emergency Management Service (SEMS) Management Group planning day in August 2017.

The EOC's online survey, however, indicated that there was a demand for greater engagement directly with SAPOL leadership, and particularly the ELT.

"It is more important for everyone to be seen to be leading by example and an open willingness to discuss and continue the conversations."

"The Commissioner of Police should have a stronger role in engagement – not just informing."

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[26] Ackerman Anderson and Anderson, Op. Cit.

"There has been a significant lack of leadership in this issue. Specifically, organized leadership other than some talking points in a COP video. It is not filtering down to the front line in a clearly detailed way, why we are doing it, what we are doing, the reasons for change and the way forward, and as such, there is limited engagement from the staff body."

"Limited visibility of leadership doing this and communicating it - it may be happening but if so then not being communicated wider as to the activities they are doing. ELT in particular are quiet."

Senior leaders, especially ELT, can be extremely influential in reassuring and supporting those under their supervision through the change process simply by providing practical advice. One interviewee described how they had been working directly with managers under their supervision to address concerns about flexible work arrangements. By taking the time and talking through individual flexible work applications and providing practical advice, many of the concerns were addressed. It is important that the ELT and other senior leaders are seen to be supportive, not just by verbally endorsing Project Equitas activities, but by providing guidance through the change process.

Some interviewees in senior leadership positions raised that they wanted to, or had already initiated informal, two-way communications with employees in their management areas. Some of their ideas included:

> Initiating a 'cascading' conversation down through the levels, where a senior level employee talks with the level junior and so on, about the cultural change effort aiming to have a real conversation to change views if needed

> Upcoming meetings with managers to identify what their role is in the cultural change effort, how they can contribute to effectively implementing the intent of the cultural change effort and how to translate it to make it relevant to employees.

At the middle-management level, the SAPOL Corporate Pulse Survey found that generally SAPOL employees felt they could talk openly with their immediate supervisors or managers about concerns relating to diversity and inclusion, with 74% agreeing or strongly agreeing with this statement. Nevertheless, one in four SAPOL employees are unsure or disinclined to discuss these issues with their immediate supervisor or manager.

Replicating these kinds of engagement strategies will both demonstrate that senior leaders are actively leading in the change process and have a concern for the welfare of the staff in their management areas. Providing lower-level staff with additional avenues to raise a concern informally will also mitigate the challenges faced by employees who do not feel comfortable discussing issues of diversity and inclusion with their immediate supervisor or manager.

Key Consideration 6:

ELT members and senior leaders should take every opportunity to play an active and practical role in the engagement of staff on issues relating to Project Equitas. The ELT should be equipped to provide practical guidance to staff within their sections.

Key Immediate Actions

The EOC Independent Review made three recommendations for immediate action:

1. Publishing a statement endorsed by the ELT that acknowledges that sexual harassment and sex discrimination is unacceptable and apologises for the significant distress caused to victims and bystanders;
2. Establishing a Restorative Engagement Program; and
3. Establishing a new externally-provided SAFE SPACE service which staff can access directly for confidential unlimited support.

These actions were critical because they are centred around the welfare of victims who have experienced sex discrimination, sexual harassment and predatory behaviour. All were implemented by SAPOL immediately following the release of the EOC Independent Review.

The Commissioner of Police formally apologised in an open letter and on his blog to anyone who had been the victim of, or experienced, any inappropriate behaviour. The members of the ELT signed a pledge supporting the Commissioner's apology and making a commitment to implement the changes outlined in the EOC Independent Review.

An additional recommendation that aims to ensure the welfare of victims is Recommendation 33 – to establish a taskforce to investigate allegations of sexual misconduct that emerged as a result of the EOC's Independent Review. SAPOL established 'Task Force Portus' early in 2017.

These actions, together with the preparation of a Gender Equality Action plan, are collectively to be considered 'foundational activities', because they set the trajectory for how SAPOL as an organisation intends to respond sex discrimination, sexual harassment and predatory behaviour going forward, and how they intend to proactively prevent it. These activities are therefore important to building a level of confidence within workforce that allegations of sex discrimination, sexual harassment and predatory behaviour will be taken seriously.

The Restorative Engagement Program

Background to the Restorative Engagement Program

The EOC's Independent Review found that a fundamental foundation for change was SAPOL's leaders' ability to 'engage in listening deeply to the stories' of employees who had experienced sex discrimination, sexual harassment and/or predatory behaviour. Feedback from participants in the EOC's Independent Review's survey had highlighted that the 'acknowledgement that these behaviours were unacceptable and caused distress' would be appreciated by those who had experienced it, and could contribute to the 'hearts and mind' shift needed to instigate and sustain cultural change at SAPOL.

The Restorative Engagement Program (REP) was established as an independent program within the EOC, with procedures separate from the EOC's legislatively mandated complaint mechanisms.

The primary purpose of the REP is to provide current and former employees of SAPOL (employed within the last 10 years) with an opportunity to voluntarily share their personal accounts of sex discrimination, sexual harassment and/or predatory behaviour and its effect on their lives, while also providing SAPOL representatives with the opportunity to acknowledge that harm and to respond meaningfully. The process does not engage with, or investigate, the alleged perpetrators. It solely draws on the values of restorative, transformative and narrative mediation practice.[27]

The timeframe for the REP was extended from 7 months to 10 months (February 2017 to end December 2017) which includes REP start up, implementation and closure.

SAPOL has since agreed to transition the REP to the EOC's conciliation team to provide an ongoing service as required.

Preparatory Stages of the Restorative Engagement Program

Training

Between 3 May and 9 June 2017, the REP team conducted five training sessions for 18 SAPOL senior leaders to prepare them to participate in REP conferences with complainants. The group included all 10 members of the ELT, with an additional 8 members of SAPOL who are in positions of leadership. The objective of the training was to develop the group's capacity to:

> be present, open and actively listen to complainants during conferences;
> understand their role and parameters within the overall REP process;
> initiate behavioural change which positively influences organisational culture.

An additional purpose of the training was to evaluate the capacity and readiness of the SAPOL representatives to participate in the REP, including determining any further support and coaching needs they may have had to optimise their role in the process.

As a result of the training, the SAPOL representatives reported an increase in self-assessed confidence in their skills to participate, with all reporting they felt 'quite confident' (73%) or 'very confident' (27%) to participate. The EOC's REP team also observed that there was strong evidence of learning integration, with many constructive behaviours observed in the SAPOL representatives.

Engagement

During the preparation phase, both SAPOL and the EOC REP team communicated the Program widely throughout SAPOL and in the wider community. The purpose of promoting the Program in the public sphere was to encourage former employees to come forward and share their experiences of sexual harassment, sex discrimination and/or predatory behaviour.

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[27] The transformative approach to mediation does not seek resolution of the immediate problem, but rather, seeks the empowerment and mutual recognition of the parties involved. The narrative approach to mediation encourages parties to tell their personal story of the conflict and reach agreement through an understanding of the other's story. See Rooney, G. (2017) *The Profound Apology* (SSRN) and Baruch Bush, R, and Folger, J. (2004) *The Promise of Mediation, The Transformative Approach to Conflict* (Jossey-Bass).

A letter from Commissioner for Equal Opportunity, Dr Niki Vincent, about the REP was distributed to all SAPOL employees by email. In addition to this, the REP team reached 287 SAPOL employees through face-to-face engagements sessions at 14 sites across the state, and the program was featured on a variety of internal SAPOL media, including a letter and article in the PASA journal, SAPOL's 'Police Connect' intranet site and on social media. The REP was also featured in the Advertiser, on Radio Adelaide, and publicised on EOC social media channels.

The REP team have received and responded to 28 enquiries relating to the Program to date, 23 of which were included in the scope of the Program (the remaining five enquiries related to cases of bullying and did not meet the Program eligibility of sex discrimination, sexual harassment or predatory behaviour).

Restorative Engagement Program Conferences

All complainants who presented themselves as part of the REP program were women, and the grounds for the complaint were evenly divided between sexual harassment and sex discrimination. The majority of the complainants were current employees of SAPOL.

Feedback from the complainants involved in the REP so far has been overwhelmingly positive. All complainants have reported feeling respected and supported during the process, and that they had achieved what they had hoped to achieve by participating. All complainants felt that the SAPOL representative who attended their conference responded meaningfully to their story.

There is potential the REP process is facilitating change by raising practical suggestions from participants for the attention of SAPOL leadership around cultural change. SAPOL representatives have agreed to take suggestions back to the ELT for discussion and possible implementation. Broad examples of these suggestions are:

> Supervisor/manager training to enhance people management skills;
> Specific amendments to policies, procedures and role responsibilities within the new complaints resolution unit;
> The prioritisation of mental health support, particularly for those who have left SAPOL.

SAFE SPACE

SAPOL commissioned the existing Employee Assistance Program (EAP) provider Converge International to provide the additional SAFE SPACE service, which was established and active in March 2017. The services offered by SAFE SPACE include:

> Ensuring the immediate safety/wellbeing of the victim;

> Providing telephone or face-to-face sessions with skilled [counselling] specialists;

> Providing advice and advocacy on options including support and redress;

> Enabling the victim to report workplace harm informally and confidentially if they choose to do so;

> Providing advice and support to victims on making a formal complaint to SAPOL if they choose to do so.

Services are free, and available 24 hours a day, seven days a week to all employees and immediate family by telephone.

SAFE SPACE services have been widely publicised throughout SAPOL:

> The services featured as a cover article in the 3rd issue of *The South Australia Police Gazette* (February 2017), as well as in an article of the first issue of *Blueprint Magazine* (May 2017).

> A3 posters were distributed to all worksites and a video featuring Commissioner of Police Grant Stevens and representatives from Converge International promoting the service was also uploaded to the SAPOL intranet site *Police Connect.*

> Importantly, a link to SAFE SPACE is permanently placed on the homepage of the *Police Connect* site, meaning that details of the service are highly accessible for all SAPOL staff at only one click away from first login to SAPOL systems.

As at 13 November 2017, SAFE SPACE had responded to 13 calls since it was established.

Task Force Portus

As part of the wider review of SAPOL's dispute resolution and complaints system, the EOC Independent Review recommended that SAPOL establish a taskforce to investigate allegations of sex discrimination, sexual harassment and predatory behaviour within SAPOL that had emerged as a result of the EOC Independent Review, and where complainants had indicated that they wanted a matter pursued.

Task Force Portus was established in February 2017 and was seen as a key step in establishing a level of confidence with victims that the organisation would appropriately act upon incidents of sex discrimination, sexual harassment and predatory behaviour.

Portus is described as 'an interim investigative initiative which comprises a group of specialist investigators from various fields who are charged with receiving and investigating allegations of unacceptable behaviour'.[28] Portus emphasises confidentiality and impartiality throughout the investigative process.

Between February and December 2017, Task Force Portus had processed a total of 33 reports of sexual harassment, where the behaviour occurred since the release of the EOC's Independent Review.

Comments from SAPOL employees provided via the survey highlighted that limited data has been published about the outcomes of investigations to date. This has resulted in the perception that Portus is not acting quickly enough (or at all) to address allegations of sex discrimination and/or sexual harassment. There is a clear demand for transparency about the investigations, and particularly the outcomes for perpetrators in those investigations (refer to Key Consideration 2).

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[28] SAPOL (2017) 'Equal to the Task' *Blueprint* Issue 1: 2017 (SAPOL: Adelaide) Pg 25.

Gender Equality Action Plan

Background to the Gender Equality Action Plan

The EOC's Independent Review recommended that SAPOL develop and adopt a Gender Equality Strategy in order to 'guide effort, investment and initiatives' designed specifically to ensure equality of opportunity for women in SAPOL's workforce. The EOC Independent Review specifically referred to the national Workplace Gender Equality Agency (WGEA)'s *Gender Strategy Toolkit*[29] and roadmap as guiding documents to ensure that the strategy would be developed in line with national best practice.

A gender equality plan had already been in place at SAPOL as a result of the Spargo Report[30] published in 1998. In April 2016, and prior to the release of the EOC's Review, SAPOL leadership were in the process of reviewing the existing gender equality plan which was largely inactive at that point. Based on internal research into best practice, SAPOL leadership considered the option to expand the existing plan to encompass broader equal opportunity issues and to address other grounds for discrimination, including age, culture background, caring responsibilities, disability, sexual orientation and socio-economic background, as well as gender. This was in an effort to make the strategy more inclusive and to minimise the risk of the new strategy being sidelined as a 'women's issue'. There was also a policy gap in the inclusion of other groups, including lesbian, gay, transgender, intersex and queer (LGBTIQ) employees and those from cultural, linguistic or religious minorities.

So as not to dilute the original intent of the EOC's recommendation around a gender equality strategy, SAPOL prepared the *Gender Equality Action Plan 2018-2020* (GEAP), which sits alongside five other action plans each with a particular focus:

> Generational Action Plan

> Disability Action Plan

> Culturally and Linguistically Diverse (CALD) Communities Action Plan

> Aboriginal and Torres Strait Islander Action Plan

> Lesbian, Gay, Bisexual, Transgender, Intersex and Queer (LGBTIQ) Action Plan.

Each Action Plan identifies priority actions for the organisation to achieve in order to ensure the equality of opportunity for diverse communities in the attraction, recruitment, development, retention and transition of employees during their time at SAPOL, as well as actions to report back to leadership on progress in this area. The Diversity and Inclusion Strategy and the GEAP was released by SAPOL on 8 December 2017.

Developing the Gender Equality Action Plan (GEAP) 2018-2020

Based on existing research, the Project Equitas Team drafted the new GEAP early in 2017. The Project Equitas Team consulted with SAPOL employees about the Diversity and Inclusion Strategy through voluntary 'have your say' focus groups. Approximately 120 SAPOL employees in positions up to the rank of

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[29] Workplace Gender Equality Agency (2016) *Gender Equality Toolkit* (WGEA: Sydney)
https://www.wgea.gov.au/sites/default/files/Gender_Strategy_Toolkit.pdf (Accessed 9 November 2017).
[30] Spargo, K. (1998) *Equity and Diversity in the South Australia Police: Report and Recommendations.* (Ryan Spargo: Kent Town, SA).

Superintendent and ASO7 registered their interest to provide input into the Strategy (including the GEAP). The group represented a broad cross-section of the organisation in terms of gender, sworn and unsworn positions and rank/classification. The Project Equitas Team also consulted with SAPOL Employee Engagement Facilitators for their input. The consultations were designed to generate discussion and to capture feedback about outcomes SAPOL employees would like to see as a result of the Strategy and the GEAP. The information captured was used to inform the actions and key performance indicators outlined within the plan.

SAPOL have also incorporated the tools and methodologies of Workplace Gender Equality Agency (WGEA), as recommended by the EOC. In June 2017, the Project Equitas Team and the Commissioner for Equal Opportunity, Dr Niki Vincent, jointly met with WGEA Director Libby Lyons during her visit to South Australia. This led to a subsequent day-long workshop with SAPOL in July 2017. During this workshop, the Project Equitas Team presented SAPOL's draft Diversity and Inclusion Strategy, and worked together with WGEA and EOC representatives to identify gaps and incorporate WGEA's advice to strengthen the Strategy.

During focus groups with SAPOL employees, the Project Equitas Staff also used the WGEA Diagnostic Tool to prompt discussion about where employees felt SAPOL was along WGEA's Gender Equality Roadmap, resulting in a self-assessment score between the second 'programmatic' and third 'strategic' stages.

The result of consultations with both SAPOL employees and with WGEA has been approximately 40 key performance indicators (KPIs) divided among the six key areas identified in the Diversity and Inclusion Strategy (attraction, recruitment, development, retention, transition and reporting). The responsibility for acting upon these tasks and reporting back to SAPOL leadership rests mostly with the Human Resource Service Area and the Governance and Capability Service Area, with some responsibilities resting with all SAPOL managers. Indicators for the GEAP will also be included in all executive performance agreements for senior leadership roles.

Next Steps for the Gender Equality Action Plan

The actions of the plan will be translated throughout the organisation by being incorporated into SAPOL's corporate business plans. Each Service Area will be required to report quarterly to the Governance and Capability Service Area against key performance indicators set out in the plan, along with existing KPIs.

During consultation with the Project Equitas Team on the GEAP, it became apparent that a structured handover process to relevant departments for the ongoing delivery and management of the GEAP (and the Diversity and Inclusion Strategy as a whole) has not been planned as yet.

It is important that these new reporting responsibilities are manageable for those who are required to participate, in order to mitigate the risk of change fatigue. The new reporting system needs to be carefully communicated with reference to purpose and links to the SAPOL 2020 vision. Where possible, indicators should focus on the most critical changes SAPOL leadership want to see.

Key Consideration 7:

Project Equitas Team develop a structured handover process for the Gender Equality Action Plan to the Human Resources Service Area and Governance and Capability Service Area. This includes describing the purpose, expectations of roles and responsibilities and support available. [31] Monitoring of the progress/achievements of the GEAP should be undertaken using the WGEA diagnostic tool. Communication around the plan should be consultative, and any concerns about the feasibility of reporting should be reviewed and addressed where necessary.

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[31] The developed structured handover process can be used for future handovers of other recommendations to service areas as 'business as usual'.

Conclusion

The delivery of the cultural change effort through Project Equitas is on track with the implementation of 13 recommendations completed, 8 underway, planning being undertaken for 12, and 5 yet to commence. The progress that SAPOL has made in the first 12 months can be attributed to the formal change management structures that have been put in place to support implementation. A clear governance structure, a designated team, a comprehensive communications plan and a focus on continuous improvement have contributed a number of key achievements to date.

The EOC SAPOL Monitoring Project Team has noted some potential risks to future implementation, some of which relate to interdependencies with the Organisational Reform Project. Other risks relate to the capacity of service areas to become 'owners' of Project Equitas initiatives once the project has concluded, and when those initiatives have transferred to become 'business as usual'. Additionally, the under-resourcing of necessary IT infrastructure to support flexible work arrangements being adopted universally across SAPOL has been identified as a risk area.

In terms of leadership, the ELT have demonstrated a commitment and understanding of the need for cultural change, and the vision for change has been clearly articulated across the organisation by both SAPOL leadership and Project Equitas. SAPOL now needs to prioritise support to those in leadership positions so that they can role-model the actions and behaviours associated with the vision for cultural change. Part of this is stating clearly what those expectations are, and also providing the tools to engage with their staff, identify and effectively support and manage resistant team members. The ELT, with their significant influence in the organisation, should be at the forefront of this effort.

SAPOL should be commended for their efforts in implementing the key immediate actions highlighted by the EOC's Independent Review. These actions were critical because they are centred on the welfare of victims of sex discrimination, sexual harassment and predatory behaviour, which are of utmost priority. These 'foundation' activities also signal to the workforce how the organisation intends to respond to sex discrimination, sexual harassment and predatory behaviour going forward, and how they intend to proactively prevent it. This signal would be enhanced by greater transparency around the outcomes of disciplinary processes so that SAPOL employees better understand what inappropriate behaviours look like, what the consequences are and whether the consequences are being enforced

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Appendix 1: Program Logic Model for the Cultural change Effort at SAPOL

Vision

A visible responsive police service for all South Australians

Assume an inclusive organisation where all people are safe, respected and supported to reach their potential improves SAPOL's performance & community

SAPOL is an inclusive organisation where all people are safe, respected and supported to reach their

Assume gender related development interventions & activities integrated into existing management & leadership development programs; gender diverse pipeline in all areas of SAPOL; employees are encouraged to

SAPOL is an employer of choice, with the best people attracted, recruited, developed, retained & transitioned at all levels

Assume SAPOL is planning & managing for its current & future workforce; SAPOL is identifying, attracting, developing, mobilising, fully utilising & retaining female & male talent at all levels; staff are empowered to realise their potential & to maximise their contribution to SAPOL & team; staff are fairly recognised & rewarded; a merit based, bias free & transparent system for promotions

Outcomes - change in Culture

Over time the collective outcomes contribute to the

[Culture] SAPOL has a diverse, inclusive & equitable

Practices

[Practices] All employees have equal access to training & development opportunities. Talent is fully leveraged, irrespective of gender, & all staff are trained in skills that enable them to contribute to a safe workplace that values

[Practices] Flexible working arrangements are valued, normalised & equitably accessible to men

[Practices] All employees have access to trusted, specialist wellbeing services to support them

Assume a merit based & transparent system to decide selection for training & development opportunities; training & development delivery approaches are

Assume managers have capability & confidence to manage flex teams; infrastructure in place to support flex work

Assume staff feel supported by leaders/managers; managers have knowledge & confidence to provide

Capacity & willingness

[Capacity & Willingness] SAPOL leaders have the necessary capability, confidence & commitment to enhance a culture of diversity & inclusiveness that is free from sexual harassment, sex discrimination and predatory behaviour

[Policy/Process/System] Processes & channels to resolve workplace gender equality, SD, SH & PB grievances, complaints & disputes are accessible, transparent, trusted, fair,

Assume leaders/managers understand the need for change & benefits for individuals & the organisation; staff understand the impact sex discrimination & sexual harassment on the individual & organisation; staff are

Policy/Process/System

[Policy/Process/System] Policies, procedures & technology support implementation of flexible working

Assume there are consequences for perpetrators; managers are holding perpetrators accountable; victims & perpetrators are supported during & post

Assume SAPOL has planned & resourced (budget, capacity & capability) for the Project Equitas foundation to transition to business as usual management &

Assume SAPOL (at individual & organisational level) is willing to change culture, values & practices to align

As a result of the influencing activities & their outputs change in SAPOL is expected over time

Project Equitas sets the foundations for a more inclusive organisation by delivering the required policy, structural & process changes aimed at eliminating sex discrimination, sexual harassment &

Outputs/Deliverables

As a result of the influencing activities a suite of outputs are

- CoP letter of apology & blog
- CoP Statement/ELT Pledge
- Restorative Engagement Program
- Gender Equality Strategy/Action Plan (& Business case)
- Leadership shadow (or similar) training
- Gender Equality Advisory Group
- ELT feedback process e.g. 360'
Gender equality metrics (Exec Performance Agreements)
- Annual Business Plans

- Standards & promotion requirements reviewed
- Targets for female promotion & development pathways
- Talent ID program to ready staff for promotion
- New structured handover process for mgmt./supervisory positions
- External review of services of HR
- Conflicts of Interest policy reviewed
- Performance Mgmt system reinvigorated
- Equipment reviewed
- New exit mgmt. strategy

- Biennial training (all staff - SD, SH, unconscious bias, bystander responsibilities; supervisors - ID & respond to SH & SD, understanding & accommodating flexible work)
- Rolling 3 year training delivery plan
- Targets for women for training
- Opportunities for training for staff on extended leave
- Training delivery reviewed to enhance accessibility

- All Roles Flex approach adopted across op & leadership areas
- Back fill of maternity leave funded
- Tech, facilities & equip to support flex work, return to work, needs of pregnant staff, staff on extended leave
- Stay in Touch policy

- New streamlined Complaints Resolution Unit
- Confidential complaints mgmt. tool
- Training on SH, SD, unconscious bias for Police Disciplinary Tribunal, Police Review Tribunal & Complaints Resolution Unit
- Task Force to investigate sexual assault & sexual misconduct within SAPOL
- Disciplinary process & penalties for poor behaviour

- SAFE Space established (external provider)
- mechanisms established to ensure safety & confidentiality of alleged DV victims & their alleged perpetrator when both work for SAPOL
- Mgrs & staff trained in DV intervention inc risk audits & safety planning
- ECOs roles & responsibilities reviewed
- Monitor staff perspectives of organisational responses to SH, SD and wellbeing monitored

Influencing Activities

As a result of the foundational activities Project Equitas is

Leadership
Recommendations 1 – 11

Workforce Management
Recommendations

Training & Development
Recommendations

Flexible Workplace Arrangements
Recommendations 26 -

Dispute Resolution & Complaints
Recommendations 30 -

Wellbeing & Support Services
Recommendations 35 -

Assume Leaders/Managers are role modelling the vision ; Managers are communicating & supporting campaigns around diversity & inclusion

Foundational

Commitment from leadership to enact EOC recommendations / Focus Groups/pulse surveys to get employee feedback / Communications campaigns around diversity & inclusion (inc gender

SAPOL Values: Service Integrity Courage Leadership Collaboration Respect

SAPOL Leadership Charter