

Report 2

Progress in the implementation of recommendations and changes in policies, processes and systems that support 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

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Message from the Commissioner for Equal Opportunity

It has been just over 18 months since South Australia Police (SAPOL) established Project Equitas to implement the recommendations of the Equal Opportunity Commission's *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police*. Project Equitas is due to conclude in March 2019, and I commend the work the team has undertaken in that short time to set the groundwork in place for SAPOL to become a diverse and inclusive organisation.

This report looks at changes in policy, processes and systems that are underway at SAPOL in order to advance gender equality. These changes are important, but they are not the 'be-all and end-all' step in a cultural-change venture. The next report will focus on the capacity and willingness of SAPOL employees to embrace these new policies, processes and systems, and to promote their use.

That said, however, there are two systemic changes covered in this report that have the potential to create the necessary 'hearts and minds shift' about what it means to work at SAPOL and how its work is done.

Firstly, the newly-established Diversity and Inclusion Branch and the overhauled complaint-handling process now prioritises early intervention on complaints and is designed to take a victim-centred approach. So far this bears the hallmarks of being a fair, confidential, accessible, transparent and efficient process. If used correctly, these changes have the potential to rebuild employee trust in SAPOL's ability to address grievances, including discrimination and harassment.

Secondly, the seismic shift in the organisation's approach to flexible working arrangements will hopefully demonstrate to SAPOL employees that their work is valued, no matter how, or where, that work is done. The last and very critical part of the flexible working arrangements policy piece is the *Remote Access Business Case*. The latter will enable a clearer picture of the organisation's technological capacity to support employees who wish to work more flexibly.

It has also been good to see a small positive shift in the composition of the SAPOL workforce towards greater gender parity, particularly at the Inspector level among sworn officers. We will continue to watch SAPOL's progress on an annual basis, using the Key Performance Indicators set by the Workplace Gender Equality Agency as a guide.

Once again, I commend SAPOL and the Project Equitas Team for their work to date, and look forward to seeing what I am sure will be the very positive impact this has on the culture of SAPOL over time.

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:

- > Commissioner of Police Grant Stevens
- > Assistant Commissioner Bryan Fahy and the Project Equitas Team
- > Members of SAPOL's Executive Leadership Team
- > Members of the Diversity and Inclusion Branch

The EOC Monitoring Team:

Lucy Schapel (Manager, Strategic Projects)

Alice Mazzola (Project Officer - Monitoring and Evaluation)

with guidance from:

- > Lucy Cirocco, Senior Manager – Strategic Partnerships, Equal Opportunity Commission
- > Dr Niki Vincent, Commissioner for Equal Opportunity.

Supporting your Wellbeing

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.

Women's Safety Services SA Domestic Violence Crisis Line: 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.

Women's Domestic Violence Court Assistance Service a legal service to assist victims of domestic or family violence. Tel. 1800 246 642

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](http://www qlife.org.au).

Working Women's Centre SA: information, support, advice and advocacy services to women on work-related issues. Tel. (08) 8410 6499 or 1800 652 697 for regional callers. 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.

The Equal Opportunity Commission's Restorative Engagement Program is available to current and former SAPOL employees (who were employed by SAPOL after February 2007) who wish to voluntarily share their personal accounts of sex discrimination, sexual harassment and/or predatory behaviour in a safe, confidential environment. The program provides the opportunity for employees to have their experiences acknowledged by a senior leader from SAPOL, and to contribute to ongoing change within SAPOL to address these issues. You can find out more by contacting the EOC on 08 8207 1977 or RestorativeEngagement@sa.gov.au.

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* (the EOC's 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

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. The Commissioner of Police accepted all recommendations 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

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 will prepare a total of six reports which are designed to be regular, informative and constructive, with a focus on continuous improvement for the best possible outcome in terms of cultural change.

This is the second report to SAPOL from the EOC Monitoring Team. The first report entitled *Report 1: Progress in the Implementation of Recommendations and Setting the Foundations for Cultural Change* was released publicly in January 2018.

This report provides an update on the progress in the implementation of the recommendations, as well as a 'snapshot' of how SAPOL is tracking against key metric indicators of change originally identified in the Independent Review, which were drawn from the Workplace Gender Equality Agency (WGEA)'s Gender Equality Roadmap.

Section 3 of this report provides a detailed evaluation of the policies, processes and systems that SAPOL have introduced that contribute to a culture of diversity and inclusion within the workforce, with particular reference to gender equality. The evaluation involved an assessment of key documents including, but not limited to, management proposal papers, drafted and gazetted policy documents and recommendation closure reports. The desk analysis of these documents was supported by 23 consultation meetings with members of the Project Equitas Team and members of the Executive Leadership Team.

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

Section 1: Progress in the Implementation of Recommendations

As of September 2018, 20 recommendations have been fully implemented, 14 number are underway and 4 are in the planning stages. The EOC Monitoring Team has identified some key risks to the implementation of the recommendations which include:

- > The proposal paper *Remote Access Business Case* was due in mid-2018 and is still pending. Without an understanding of the organisation's capacity for remote access to information technology infrastructure, SAPOL is prevented from maximising a broader flexible working strategy across the organisation.
- > The implementation of some recommendations will result in new data collection and reporting responsibilities. For example, SAPOL will now be reporting against the *Gender Equality Action Plan 2018-2020* (recommendation 4), a new exit management strategy (recommendation 20), the demand and uptake of flexible working arrangements (recommendation 26), as well as individual and service area performance against gender equality key performance indicators (recommendation 7). These are new reporting requirements in addition to existing requirements, and will warrant additional time and resources which service areas may not have the capacity to provide.
- > Consultations highlighted that the organisational 'If Not, Why Not' approach to flexible working arrangements has been challenging in some services areas more than others, taking into consideration specialist work roles and functions.

Section 2: SAPOL at a Glance

The 'SAPOL at a Glance' data indicates there have been small but notable shifts towards gender parity across the workforce, and particularly at the Inspector level. It is early days for the Flexible Work Team, but there has been interest from both women and men to take up flexible work arrangements on an ongoing basis. Complaints of sex discrimination, sexual harassment and predatory behaviour increased significantly in 2017, and have levelled in the first half of 2018. Longer-term analysis will indicate whether reforms to the complaints process have encouraged more people to come forward and report misconduct. 93% of the workforce (active and inactive) have received training about respectful behaviour, and preventing and responding to sex discrimination and sexual harassment.

Section 3: Changes in Policy, Processes and Systems - Key Findings

For this report, the Monitoring Team mapped a total 29 recommendations (out of a possible 38) from the EOC's Independent Review which involve a policy, process or system change. The Team then identified primary recommendations for evaluation based on their alignment with the WGEA Gender Equality

Diagnostic Tool’s key focus areas³ and therefore significance in the process of driving cultural change towards gender equality. The remaining recommendations were analysed in reduced depth as supporting policy, process and system changes to influence cultural change.

The purpose of the analysis was to determine whether new or amended policies, processes or systems adequately address the intent of the EOC’s Independent Review recommendations. The EOC Monitoring Team rated all 29 policy, process and/or system recommendations according to the following categories:

Recommendation intent met	The policy, process or system is established, and it adequately responds to the intent of the recommendation, as outlined in the EOC Independent Review.
On track to meet recommendation intent	The policy, process or system is yet to be finalised, but it adequately responds to the intent of the recommendation, as outlined in the EOC Independent Review.
Too early to assess	The policy, process or system has not yet been planned, or the plan has not been signed off by SAPOL Executive.
Recommendation intent not met	The policy, process or system is established, but it does not adequately respond to the intent of the recommendation, as outlined in the EOC Independent Review.

The analysis found that there are 20 policy, process and/or system recommendations which meet, or are on track to meet, the original intent of the recommendation as outlined in the EOC’s Independent Review. The 9 remaining recommendations are not yet developed enough to determine whether they meet the original intent. (A summary of the findings can be found at Appendix I - Overview of Changes in Policy, Process and System).

Summary of Key Considerations

On the basis of the findings of this report, the EOC is providing the following points for SAPOL to consider in order to enhance the efforts of Project Equitas for the best possible project outcomes.

Report 1: Key Consideration 1

The Project Equitas Team encourage discussion among the ELT regarding flexible work options that are achievable, if any, for specialist roles that traditionally are considered to be roles that cannot be adapted for flexible working arrangements.

³ Workplace Gender Equality Agency (WGEA) *Gender Strategy Toolkit* Pg 17-18.

https://www.wgea.gov.au/sites/default/files/Gender_Strategy_Toolkit.pdf

Report 2: Key Consideration 2

The ELT and the newly-established People Program Board decide on what data will assist them to make executive decisions that drive diversity and inclusion in the workplace, and formalise these requirements as a reporting plan in agreement with the Human Resources Service Area.

Report 2: Key Consideration 3

SAPOL set tangible and quantified goals/targets within gender equality Key Performance Indicators for business areas.

Report 2: Key Consideration 4

SAPOL develop a reporting schedule that integrates all new reporting requirements arising from the EOC recommendations to ensure reporting is manageable and streamlined with existing reporting requirements, and can be effectively used to inform SAPOL leadership about the impact of change and areas of concern.

Report 2: Key Consideration 5

- (a) SAPOL set targets for the promotion of sworn employees along the promotional pathway before the Inspector Qualification Program.
- (b) SAPOL introduce targets for unsworn women along promotional pathways.

Report 2: Key Consideration 6

HRMB/the Diversity and Inclusion Branch ensure that managers and supervisors/human resources consultants have access to guidance/support to assist them in conducting the face-to-face exit interview if requested by an exiting SAPOL employee, for example the 'Difficult Conversations in the Workplace' training unit.

Report 2: Key Consideration 7

The EOC work with SAPOL to provide additional options for separating employees to be open about the reasons they are leaving SAPOL.

Conclusion

SAPOL are on track to deliver policy, process and system changes that support gender equality and safety for women in the workplace. Since January 2018 there have been some achievements to note, particularly around the revitalisation and promotion of flexible work arrangements and the complete restructure of the internal complaints process. These are two policy, process and/or system reforms which are likely to shift the hearts and minds of SAPOL employees in the long term, and contribute significantly to a positive cultural change towards greater gender equality.

The successful implementation of a new or revised policy, process or system does not immediately equate to successful cultural change. New policies, processes and systems serve as a framework to guide a desired change, but that framework needs to be supported by the capacity and willingness of staff to utilise it and adopt it as standard business practice. This capacity and willingness will be the focus of analysis for the next report in early 2019.

Introduction

In 2016 the Commissioner of the South Australia Police (SAPOL) engaged the South Australian 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.⁴ 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'.⁵ In early 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 the Project Equitas Team members, 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.

⁴ Equal Opportunity of South Australia (2016) Pg. xiii

⁵ Ibid Pg. iv

This is the second report to SAPOL from the EOC Monitoring Team. The first report entitled *Report 1: Progress in the Implementation of Recommendations and Setting the Foundations for Cultural Change* was released publicly in January 2018.

The purpose of the second report is to provide an update on the implementation of the recommendations, and an assessment of the policies, processes and systems that SAPOL have enacted that support cultural change towards greater gender equality. It is important to note that this report is not assessing cultural change - further analysis of evidence of cultural change will be provided in subsequent reports once the recommendations have been finalised and embedded as part of SAPOL's business operations.

About the EOC Monitoring Project

The EOC was commissioned to independently 'monitor the implementation of these recommendations and the resultant change in culture on a bi-annual basis' shortly after the EOC Independent Review was released. The EOC Monitoring Team was established with the recruitment of two specialist Monitoring and Evaluation practitioners (one Full Time Equivalent position in total) in May 2017.

The EOC's Approach

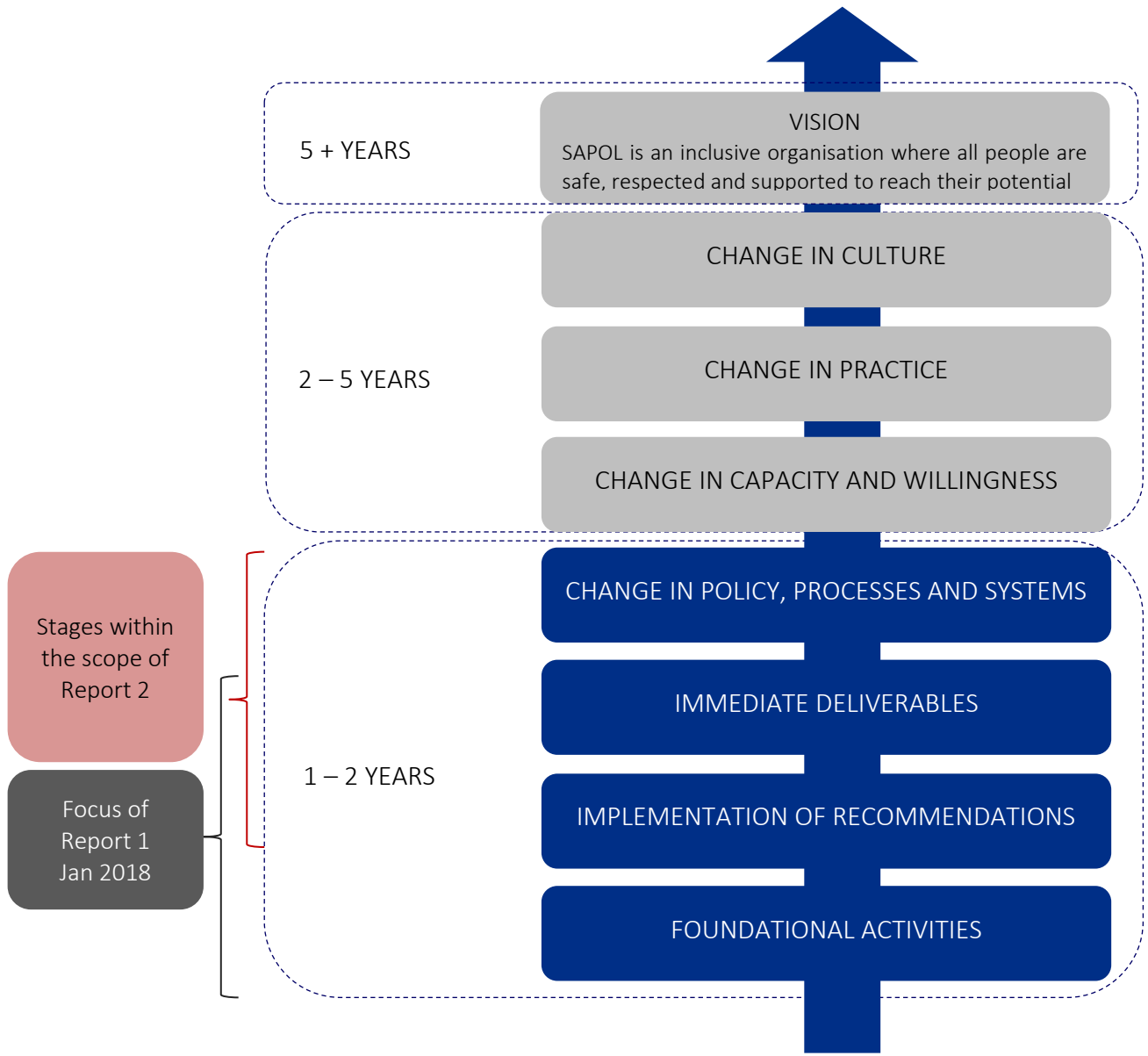
The monitoring, evaluation and reporting activities of the EOC Monitoring Team are a continuous cycle of observation rather than as a single, static event. The Team will provide a total of six reports between January 2018 and May 2020. The regularity, as well as a specifically-defined evaluation focus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

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 therefore developed so that each report will provide a specific analysis of the change expected at that point in time (refer Figures 1 and 2).

Figure 1: Evaluation and Reporting Schedule for the EOC 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 (with particular reference to gender equality).
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 (with particular reference to gender equality).
	April	Report 3: Capacity and willingness for cultural change		Evidence of receptiveness of SAPOL staff to concepts around diversity and inclusion (with particular reference to gender equality).
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 (with particular reference to gender equality)
	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

Figure 2: A Summary of the Program Logic Model for SAPOL's Cultural Change Effort



About Report 1: Setting the Foundation for Cultural Change

The first report provided an overview of SAPOL's progress in the implementation of the recommendations of the EOC's Independent Review as of January 2018. It also provided 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. Implementation of the key immediate actions for cultural change:

The key immediate activities defined for the purpose of the first report were:

- > 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.

Report 2: Structure and Methodology

Overview and Structure

Section 1 of this report will provide an overview of SAPOL's practical progress in the implementation of the 38 recommendations of the EOC's Independent Review, as of September 2018.

Section 2 will provide metrics as to how SAPOL is tracking against key indicators of change originally identified in the Independent Review, which were drawn from the Workplace Gender Equality Agency (WGEA)'s Gender Equality Roadmap. These metrics will be provided annually (every second report) for the purpose of comparison. Section 3 will provide an evaluation of the policies, processes and systems that SAPOL has introduced that contribute to a culture of diversity and inclusion, with particular reference to gender equality.

Methodology

For this report, the Monitoring Team mapped recommendations from the EOC's Independent Review which involve a policy, process or system change. The Team then identified primary recommendations for

evaluation based on their alignment with the WGEA Gender Equality Diagnostic Tool's key focus areas⁶ and therefore significance in the process of driving cultural change towards gender equality.

Figure 3: Recommendations from the EOC's Independent Review in Primary Focus for this Report

Work Stream	Recommendation Number and Topic	
Workforce Management	12	Review of standards for promotion
	13	Target for promotion of women
	14	Talent ID program
	18	Reinvigoration of performance management system
Training and Development	22	Rolling three-year training plan - focus on developing people management and performance management
	23	Targets for women in training
	24	Training opportunities for employees on extended leave
	25	Review of training delivery methodologies
Flexible Workplace Cultures	26	All-roles flex approach
	28	Technology and facilities to support flexible workplace culture
Dispute Resolution and Complaints	30	New Complaints Resolution Unit

A number of additional recommendations are analysed in reduced depth as supporting policy, process and system changes to influence cultural change.

The team conducted a desk analysis of documents relevant to each recommendation including, but not limited to, management proposal papers, draft and gazetted policy documents, and Recommendation Closure Reports. Analysis was supported with 23 consultation meetings with members of the Project Equitas Team and members of the Executive Leadership Team. The purpose of the analysis was to determine whether new or amended policies, processes or systems adequately address the intent of the EOC's Independent Review recommendations.

⁶ Workplace Gender Equality Agency (WGEA) *Gender Strategy Toolkit* Pg 17-18.

https://www.wgea.gov.au/sites/default/files/Gender_Strategy_Toolkit.pdf

The following assessment categories have been used in this report.

Recommendation intent met	The policy, process or system is established, and it adequately responds to the intent of the recommendation, as outlined in the EOC Independent Review.
On track to meet recommendation intent	The policy, process or system is yet to be finalised, but it adequately responds to the intent of the recommendation, as outlined in the EOC Independent Review.
Too early to assess	The policy, process or system has not yet been planned, or the plan has not been signed off by SAPOL Executive.
Recommendation intent not met	The policy, process or system is established, but it does not adequately respond to the intent of the recommendation, as outlined in the EOC Independent Review.






Limitations



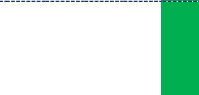




- > At the time of writing this report, not all the recommendations in focus for analysis had been implemented. Consequently, the EOC Monitoring Team was not able to complete an assessment of whether the new or amended policy, process or system adequately responds to the intent of the recommendation. Where implementation is underway, the EOC Monitoring Team endeavoured to assess available documentation and consult with the relevant Project Equitas Team member/s to gain an understanding of the agreed direction, completed activities and planned activities to assess if it is on track to meet the recommendation intent. The policies, processes and systems that were unable to be assessed as part of this report will be discussed at a later date as part of future reporting (refer to Figure 2).
- > Access to training and development data was limited, in particular data related to training/courses that contribute to an employee's career progression. The EOC Monitoring Team is working with SAPOL to understand the relevant training/courses to inform future data requests and reports.
- > The findings of the external review of the Human Resources Management Branch was not available to the EOC Monitoring Team in time to inform a detailed analysis of proposed policy, process and system changes. This external review will be made available to inform future reports.
- > The successful implementation of a new or revised policy, process or system does not equate to successful cultural change. New policies, processes and systems serve as a framework to guide a desired change, but that framework needs to be supported by the capacity and willingness of staff to utilise it and adopt it as standard business practice. Future analysis and reporting will focus on this embedding of structural changes and will provide more substantial evidence of what effects they are having on the organisation's workplace culture (refer to Figure 2).

Section 1: Progress in the Implementation of Recommendations



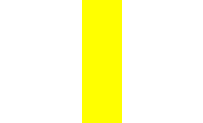
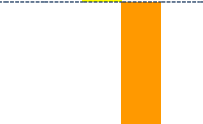
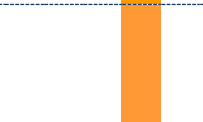



This section provides a summary of the status of implementation of each of the 38 recommendations of the EOC’s Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in SAPOL. Where relevant, supporting notes are provided to highlight progress and potential challenges in the implementation of a recommendation. This summary follows on from the status update provided in the first report, and notes where no further activity has taken place on a recommendation.

It is important to note that this section serves only as a status update of SAPOL’s activities, and does not necessarily signal a successful change in culture. Further analysis of evidence of cultural change will be provided in subsequent reports (refer to Figure 2) once these recommendations have been finalised and embedded as part of SAPOL’s business operations.



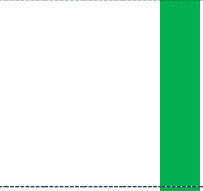

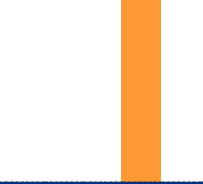

KEY FOR IMPLEMENTATION STATUS	
	Implementation completed: activity to implement the intention of recommendation is completed
	Implementation underway: activity underway to implement the intention of recommendation
	Planning underway: research/planning underway to inform scope of activity required to 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)		Recommendation completed (6 January 2017). Pledge signed by all ELT members and communicated across SAPOL - no further activity to report in the implementation of this recommendation.
2 Restorative Engagement Project		Recommendation completed (21 April 2017). The REP service has transitioned into the EOC's Conciliation Team and is available upon request - no further activity to report in the implementation of this recommendation.
3 SAFE Space		Recommendation completed (6 March 2017). SAFE Space promoted across SAPOL on an ongoing basis - no further activity to report in the implementation of this recommendation.
Leadership		
4 Development of a Gender Equality Strategy		Gender Equality Action Plan 2018-2020 developed and launched (8 December 2017) and is one of the key areas of the new Diversity and Inclusion Strategy 2018-2020. No further activity to report in the implementation of this recommendation.
5 Leadership Professional Development programs		A total of 190 leaders (124 sworn and 66 unsworn) participated across 9 sessions which concluded on 29 November 2017. Key content will be included as part of the Diversity and Inclusion Training Delivery Plan (recommendation 22) to ensure ongoing development and reinforcement of the business case for gender equality - no further activity to report in the implementation of this recommendation.
6 Leadership performance feedback		Implemented with ELT in 2017. An internal evaluation identified that this process is not financially feasible to apply across the SAPOL management structure. SAPOL is currently investigating feasible options to apply across the senior leadership group (Inspectors and ASO7's and above) of approximately 230 employees.
7 Gender equality incorporated into business planning		Gender specific KPIs will be included in SAPOLs Corporate Business Plan 2018-2020 and Services will be required to report on the KPIs at disaggregated levels (such as gender, rank/level, workplace, employment status) by Areas and Branches. In addition, Services will be required to complete a Service Business Plan which includes how they are going to contribute (through specific activities) to the Gender Equality Action Plan (GEAP). Once plans are finalised, reporting will occur quarterly.

RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
8 Gender equality KPIs for leadership		A gender equality focused performance requirement will be incorporated into existing executive contracts at the time of their next performance review. The requirement will be part of all future new executive level contracts.
9 Appoint leadership on gender equality		Recommendation completed (22 March 2017) - no further activity to report in the implementation of this recommendation.
10 Communications and engagement plan		Recommendation completed with the finalisation of a plan on 26 June 2017. Communications about Project Equitas activities will continue to be monitored and analysed as activities are being implemented.
11 Gender equality advisory group		The establishment of the overarching Diversity and Inclusion Advisory Group is near completion - this Group will be responsible for driving the terms of reference, membership and format of the Gender Equality Advisory Group.
Workforce Management		
12 Review of standards for promotion		Planning completed and proposals prepared for consideration in September. Possible dependency on the implementation of recommendation 16.
13 Targets for the promotion of women		Target of 33% female applicants for the Inspector Qualifications Program has been set (based on 2016/17 workforce data – to be reviewed annually to reflect the gender composition of the workforce). This target has already been incorporated into the Terms of Reference of the Inspector Qualifications Program Board.
14 Talent ID program		Planning underway. Engagement sessions across SAPOL are underway in September seeking input on opportunities and ideas to improve Talent Identification processes. Aiming to initiate implementation in late 2018.
15 Handover process for management of employees		The handover procedure has been made mandatory through its inclusion in two General Orders; Occupational Health and Safety and Performance Management. A guide has been developed for a handover process between managers and supervisors. Additional training will be delivered in November 2018 in support of the change.

RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
16 External review of Human Resources		External professional services firm undertook the review (April - August 2018) and the final report is being discussed internally.
17 Review of conflict of interest policy		Amendments were made to General Order <i>Human Resource Management, Diversity and Inclusion</i> , including definition and impact of predatory behaviour, definitions of appropriate and inappropriate workplace relationships and cautionary statement to raise awareness of potential conflicts arising from intimate/familial relationships between supervisors and direct staff. The updated General Order was gazetted 18 July 2018, and reference to the new definitions is highlighted in diversity and inclusion training for all SAPOL staff.
18 Reinvigoration of performance management system		Planning underway. Engagement sessions across SAPOL are underway in September seeking input on opportunities and ideas to improve performance management processes. Aiming to initiate implementation in late 2018.
19 Review of equipment to ensure practicality for women		SAPOL has undertaken changes in order to ensure gendered considerations are applied for both uniform and operational equipment. Next step is to update relevant General Orders to ensure current practice is documented to ensure ongoing application.
20 New exit management strategy		The strategy, comprising the initial separations form, online exit survey (optional) and checklist for the return of equipment, has been rolled out. Reporting to ELT with a summary of findings aiming to initiate end of September 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		Two mandatory online modules for all employees and the module for supervisors have been reviewed, rewritten and rolled out. An update to include flexible work is underway. Training is to be undertaken by all staff biennially.
22 Rolling three-year training plan - focus on developing people management and performance management		Implementation underway - key products will be an overarching Diversity and Inclusion (D&I) Training Delivery Plan supported by the D&I Foundation Training Document and D&I Training Suite. Aiming to roll out in late 2018.
23 Targets for women in training		Target of 36% (based on 2017/18 workforce data) is set in the D&I Foundation Training Document (product of recommendation 22).

RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
24 Training opportunities for employees on extended leave		The Long Term Absence Course syllabus has been reviewed and updated with content relevant to EOC Independent Review and resulting cultural change management activities - no further activity to report in the implementation of this recommendation. Opportunities for continued training and development will be managed through the 'Stay in Touch' policy (recommendation 29).
25 Review of training delivery methodologies		Reviewed and informing the D&I Foundation Training Document (product of recommendation 23) which sets out the philosophy, strategy, methodology and mandatory content for diversity and inclusion topics.
Flexible Workplace Cultures		
26 All-roles flex approach		Working Flexibly in SAPOL principles issued across the organisation in February 2018 and updated General Orders issued May 2018. A flexible work team has been established in HR to support the roll out of the new approach. 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		Funding secured and recruitment plan adjusted to enable backfilling of inactive sworn employees. The filling of a balancing FTE as a precursor to a flexible work arrangements application being approved has been removed through the new flexible work arrangements application process (under recommendation 26).
28 Technology and facilities to support flexible workplace culture		Remote Access Business Case near completion which will inform the next steps. SAPOL has identified 10 work sites across the state where there is an opportunity to establish designated facilities that support breastfeeding. Four of these sites now have facilities available while the remaining six are currently being established. A maternity uniform has been designed and will be available from late 2019.
29 'Stay in Touch' policy		Planning for this recommendation (incorporates employees on extended leave from recommendation 24) is underway and has included consultation with employees on maternity leave. Dependency on the findings of the Remote Access Business Case (recommendation 28) to inform next steps.

RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
Dispute Resolution and Complaints		
30 New Complaints Resolution Unit		A new unit, the Diversity and Inclusion Branch, was launched 18 July.
31 Confidential complaints management tool		The Diversity and Inclusion Branch is now using IAPRO as a confidential complaints management tool.
32 Training of complaint resolution unit staff and others		Staff from the Police Disciplinary Tribunal were trained by the EOC (15 December 2017). Diversity and Inclusion Branch members have undertaken training as part of SAPOL mandatory training. The Commissioner for Equal Opportunity will be speaking on sexual harassment and related issues at the annual Judicial Development Day in early November 2018.
33 Task Force to investigate allegations of sexual misconduct		Task Force Portus established (3 February 2017) and now incorporated into the Diversity and Inclusion Branch (Recommendation 30) as the Investigations Unit.
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' has been incorporated into the Exit Management Strategy (recommendation 20) and managers can now record if a separating employee has resigned while under investigation.
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.

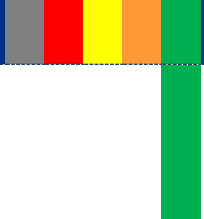


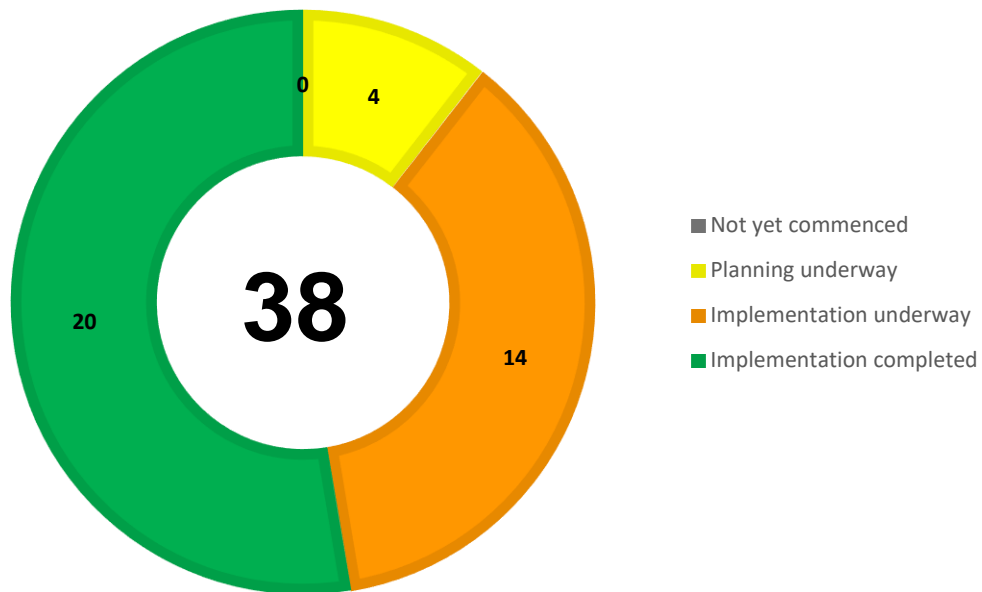
RECOMMENDATION	PROGRESS	COMMENT/ DELIVERABLES
36 Training in domestic violence intervention		Training delivered (June - July 2018) to all employees and also an additional component for those with management responsibilities. Training introduced the new employee guidelines (as per recommendation 35). Training participants will be surveyed 3 to 6 months post-training to inform any improvements (if needed) for future training.
37 Review of the roles and responsibilities of Equity Contact Officers		A management proposal for this activity has been approved. Next steps involve working with the Diversity and Inclusion Branch to undertake an expression of interest process, selections, awareness raising activities and updating of associated General Orders.
38 Confidential cultural surveys		Recommendation completed - first Pulse Survey disseminated 2 November & repeated on a quarterly basis. No further activity to report in the implementation of this recommendation.

Figure 4: Summary of the Implementation Status of the 38 Recommendations of the EOC's Independent Review



Key Risks to Implementation

There are some key risks to the satisfactory implementation of all 38 recommendations. These risks include:

- > The proposal paper *Remote Access Business Case* was due in mid-2018 and is still pending. Without an understanding of the organisation's capacity for remote access to information technology infrastructure, SAPOL is prevented from maximising a broader flexible working strategy across the organisation.
- > The implementation of some recommendations will result in new data collection and reporting responsibilities. For example, SAPOL will now be reporting against the *Gender Equality Action Plan 2018-2020* (recommendation 4), a new exit management strategy (recommendation 20), the demand and uptake of flexible working arrangements (recommendation 26), as well as individual and Service Area performance against gender equality key performance indicators (recommendation 7). These are new reporting requirements in addition to existing requirements, and will warrant additional time and resources which service areas may not have the capacity to provide.
- > Consultations highlighted that the organisational 'If Not, Why Not' approach to flexible working arrangements has been challenging in some services areas more than others, taking into consideration specialist work roles and functions.

Report 2: Key Consideration 1

The Project Equitas Team encourage discussion among the ELT regarding flexible work options that are achievable, if any, for specialist roles that traditionally are considered to be roles that cannot be adapted for flexible working arrangements.

Follow up from the Last Report

The EOC Monitoring Team's first report raised some points for the Project Equitas Team to consider as they continue to implement the recommendations. During the preparation of this current report, the EOC Monitoring Team noted instances where SAPOL have acted upon advice provided in Report 1.

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.

Action:

As a number of recommendations are being completed, in most cases Project Equitas team members are returning to their substantive roles without being replaced by new personnel. Some members working in focus areas have, however, had their contracts extended to coincide with the Project end date ensuring a level of project continuity.

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.

Action:

The Project Equitas Team has been mindful in the timing of messaging around developments in other areas of the organisation. For example, communication was minimised at the time of the official launch of the new District Policing Model in July 2018. Disciplinary outcomes have been communicated to the SAPOL workforce as part of project updates.

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.

Action:

Project Equitas communications to the SAPOL workforce has referred back to the Corporate Pulse Survey and the fact that the survey results have influenced ELT decisions and Project Equitas actions. For example, in the Commissioner of Police blog where he announced the new 'If Not, Why Not' approach to working flexibly he acknowledged the importance of workforce feedback, via the Pulse Survey and employee engagement sessions, in defining this new approach.

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.

Action:

The newly established Diversity and Inclusion Branch has developed and released a 'Respectful Behaviours' guideline across SAPOL which outlines appropriate and inappropriate behaviours in the workplace.

Key Consideration 5:

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

Action:

The Diversity and Inclusion Branch has recruited new personnel with professional conflict resolution skills and the capacity to address, within reason, resistance to the desired change. The Branch will also be able to recommend external interventions where necessary.

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.

Action:

A number of ELT members report to have communicated to their Service Areas about issues pertinent to Project Equitas, and have been consulting with members of the Project Equitas Team and with each other to ensure that messaging is appropriate and consistent.

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.

Action:

The Project Equitas Team has provided a completion and handover report to the Human Resources Service Area with guidance about reporting requirements.

Executive Leadership Team Sponsoring Change

The EOC Monitoring Team noted in the first report that the Executive Leadership Team (ELT) has a strategic role to play in the cultural change process by both driving and modelling respectful behaviours that value gender equality.

During the preparation of this report, the Team consulted with a 'sample' of the ELT (six of 11 members) to see how they are individually sponsoring changes to policies, processes and systems that drive the cultural change in their supervisory areas.

This consultation provided evidence of positive action on behalf of the ELT members, such as:

- Early engagement with Project Equitas about policy, process or system development before they are officially handed over to that service area for ongoing implementation.
- Supporting managers and supervisors in the application of new policies, processes or systems, and authorising amendments to other policies, processes and systems to better accommodate the change.
- Commencing initiatives to improve gender parity in their Service Area.

Developments to note

Organisational Reform and a New Governance Model

SAPOL has been implementing an organisational reform project since late 2015 which drives structural change in three areas; people, operations and technology.

In November 2017, the Commissioner of Police determined that new governance arrangements would be put in place within SAPOL with respect to the oversight and management of significant projects. The new governance model is aligned with SAPOL's strategic direction and the three drivers of reform; People, Operations; and Technology.

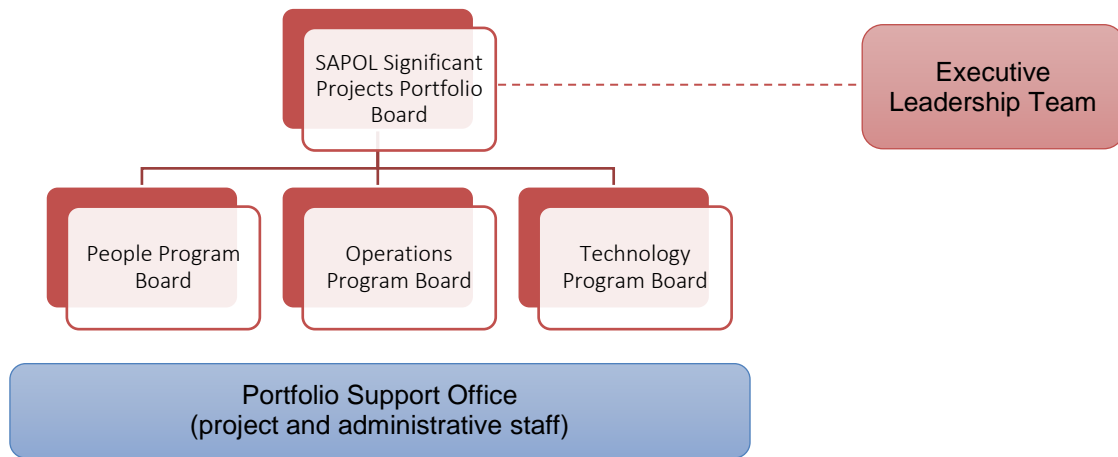
The new governance arrangements include the establishment of four Boards (see Figure 5):

- > SAPOL Significant Projects Portfolio Board (SSPPB);
- > Operations Program Board;
- > People Program Board; and
- > Technology Program Board.

These Boards are supported by a Portfolio Support Office, which provides portfolio and project management services.

The mandate of the SSPPB is to provide strategic oversight of significant projects, which includes allocating resources, monitoring progress and risk/issue management. Each Program Board is tasked with detailed oversight of projects by theme. All board members are also members of the Executive Leadership Team (ELT), and the SSPPB is chaired by the Deputy Commissioner of Police. Each Board provides status reports to the SSPPB, and issues can be raised with the ELT at monthly strategic meetings.

Figure 5: SAPOL's New Governance Structure to Manage Significant Projects



The District Policing Model

In July 2018, SAPOL introduced the District Policing Model to metropolitan Adelaide and the preceding Local Service Area model was dissolved. This new model divides metropolitan police services into four districts (Northern, Eastern, Southern and Western) and is expected to create larger and more flexible workgroups that are supported by more centralised operational functions. The model intends to allow SAPOL to “better focus on protecting victims of crime and reassuring the broader community.”⁷

Moving from the Local Service Area model to the District Policing Model has been another large-scale organisational change project underway at the same time as Project Equitas which has necessitated a range of additional policy, process and system changes within the organisation.

⁷ SAPOL (2018) *District Policing: a more visible, responsive police service for metropolitan Adelaide* https://www.police.sa.gov.au/_data/assets/pdf_file/0004/365503/Organisational-Reform-District-Policing-Model.pdf.

Section 2: SAPOL at a Glance - June 2018

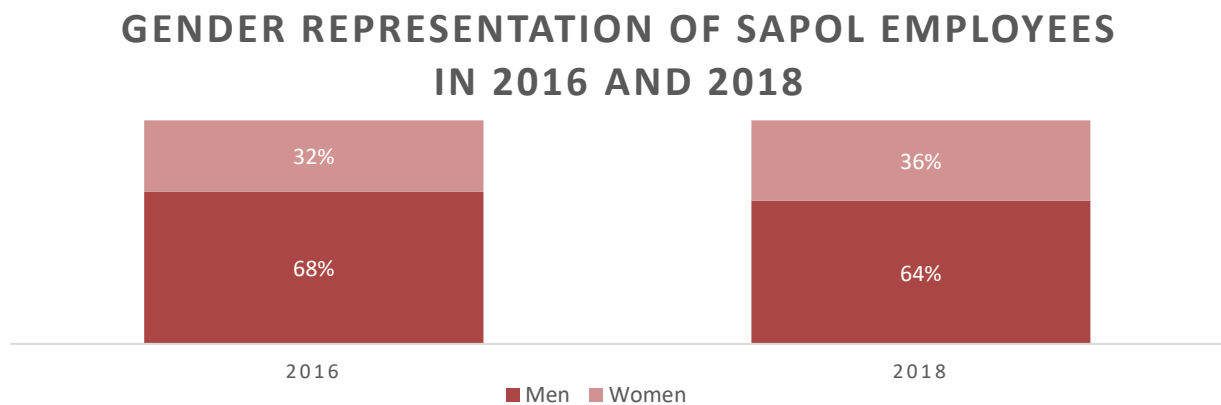
The data for this section was provided by SAPOL via the Project Equitas Team and is derived from the SAPOL HR records system. This data will be continually collected, evaluated and reported on an annual basis by the EOC Monitoring Team.

Where possible, data has been compared to data which appears in the EOC's Independent Review which was captured on 30 June 2016 unless stated otherwise.⁸ Where comparable data is not available, data in this section provides a baseline for future analysis.

Women in the Workforce

As of June 2018, SAPOL had 6,248 employees on record.⁹ Women comprise 36% of all SAPOL employees, representing a 4% increase from 2016.¹⁰

Figure 6: Gender Representation of SAPOL Employees in 2016 and 2018



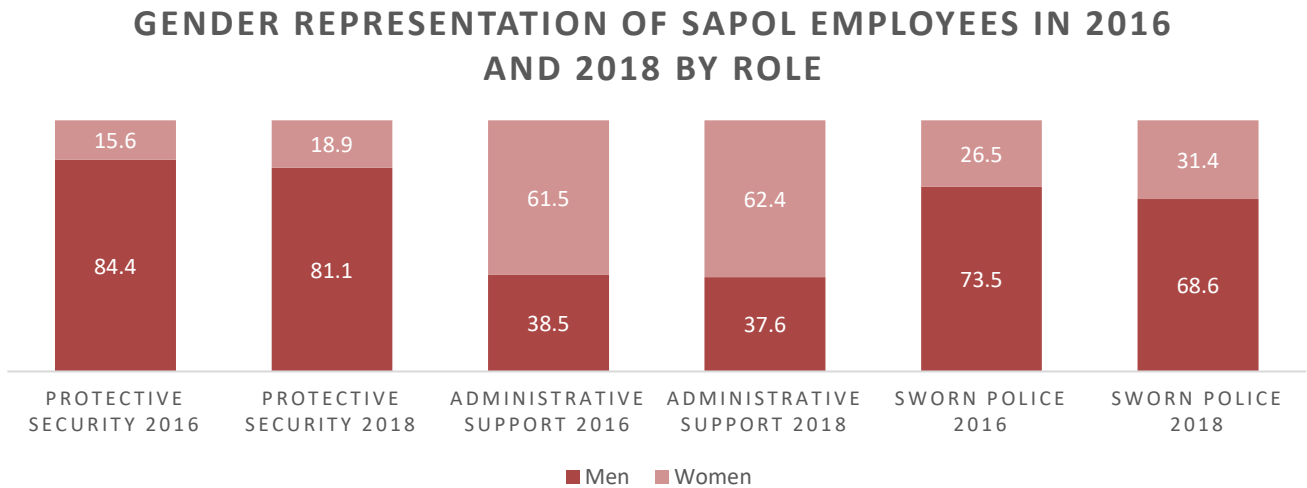
Female SAPOL employees continue to be overrepresented in unsworn administrative or support roles and underrepresented in sworn roles, however there has been improvement in gender parity since June 2016 among Protective Security and sworn employees.

⁸ Equal Opportunity Commission (2016) Pg. 140.

⁹ Both active employees and those on leave without pay. The headcount does not include casual unsworn employees (47) or unsworn Police Tribunal or Firearm Review Committee members.

¹⁰ 2016 SAPOL workforce data was recorded in Full Time Equivalent (FTE) as opposed to head count as in the 2018 workforce data. For this reason, comparison is based on percentages of total workforce.

Figure 7: Gender Representation of SAPOL Employees in 2016 and 2018 by Role



At the Service Area level, female sworn employees are overrepresented (when compared to the overall SAPOL female sworn employee representation of 31%) in the Human Resources and Business Service Area (44.9% and 40%) and underrepresented in State Operations Service Area (24.5%), Crime Service Area (27.0%) and Security and Emergency Management Service Area (29.8%).

Figure 8: Female Representation at SAPOL by Service Area

Service Area	Sworn (31% representation overall)	Unsworn (58% representation overall)
Business Service	40.0%	56.4%
Crime Service	27.0%	68.9%
Governance and Capability Service	33.3%	78.3%
Human Resources Service	44.9%	78.9%
Information Systems and Technology Service	30.6%	21.3%
Metropolitan Operations Service	33.3%	79.0%
Operations Support Service	35.5%	67.9%
Security and Emergency Management Service	29.8%	44.6%
State Operations Service	24.5%	59.6%

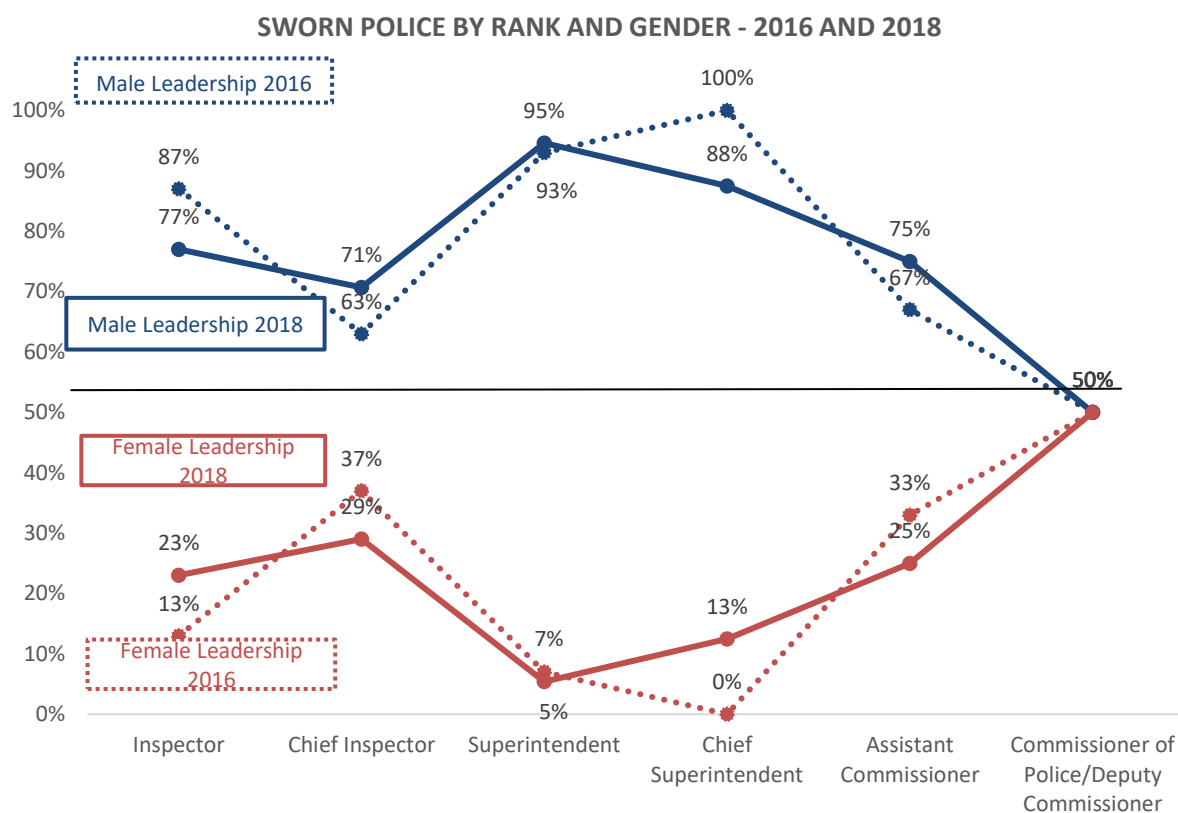
Female unsworn employees are overrepresented in Metropolitan Operations Service Area (79%) and underrepresented in Information Systems and Technology (IS and T) (21.3%).

In terms of leadership at SAPOL, women continue to be underrepresented at senior levels, but there has been improvement in gender parity among the organisation’s 157 commissioned officers¹¹. Female representation has increased from 16.9% to 20.4% since 2016. Among the 76 unsworn leadership roles, 35.5% were held by women in June 2018.

¹¹ The rank of Inspector and higher.

For sworn leaders, when disaggregated to rank, female representation has increased at the Inspector level (increasing from 13% to 23% or 8 officers to 14 officers) and at the Chief Superintendent level (0% to 13% or 0 officers to 1 officer) since 2016.

Figure 9: Sworn Police by Rank and Gender - 2016 and 2018



Female representation has decreased at the Chief Inspector level from 38% to 23% and 33% to 25% at the Assistant Commissioner level.

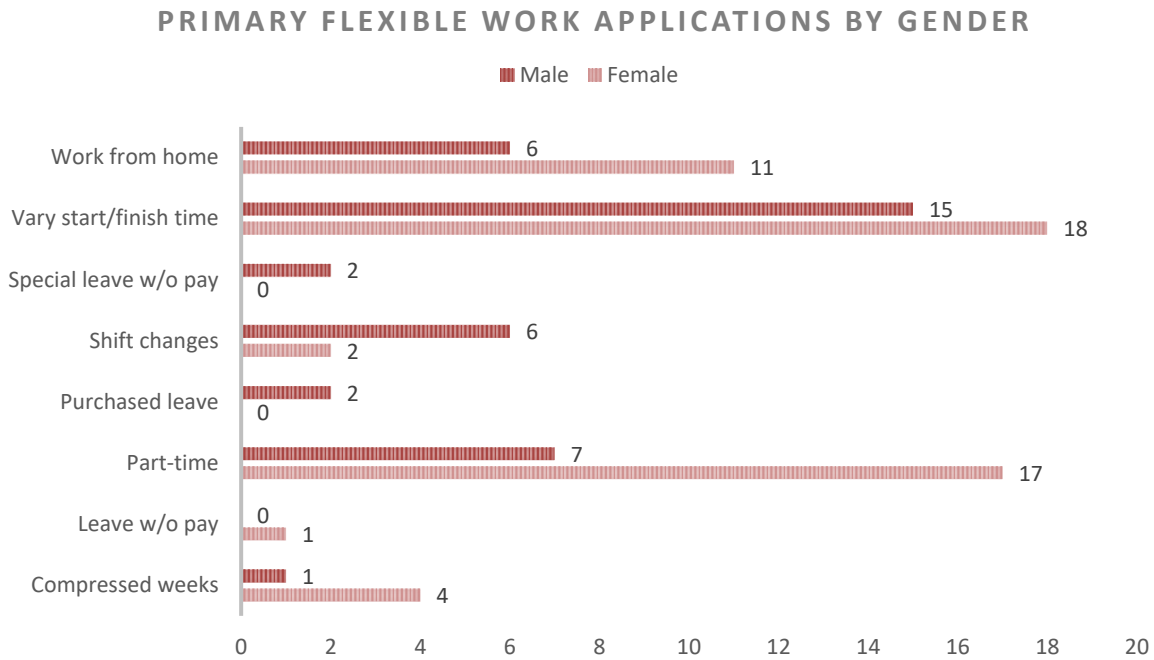
Access to Flexible Working Arrangements

The Flexible Work Team was launched within SAPOL’s Human Resources Service Area on 23 May 2018, and from this point began collecting more detailed data about the application for, and uptake of, flexible work arrangements. The Flexible Work Team processes applications for arrangements which are to be in place for longer than 28 days, shorter arrangements are managed at the local level and data around these arrangements is not presently captured.

There were 92 applications for flexible work arrangements between 23 May and 30 June 2018 inclusive. As of 17 July 2018, just over half of the applications had been approved.

An ongoing variation to hours was the most commonly requested form of flexible working arrangement, followed by part-time work and working from home. Men were less commonly requesting part-time work, but more commonly requesting shift changes (see Figure 10).

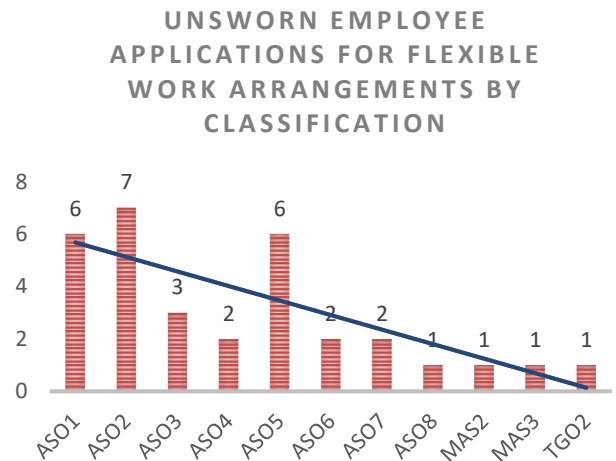
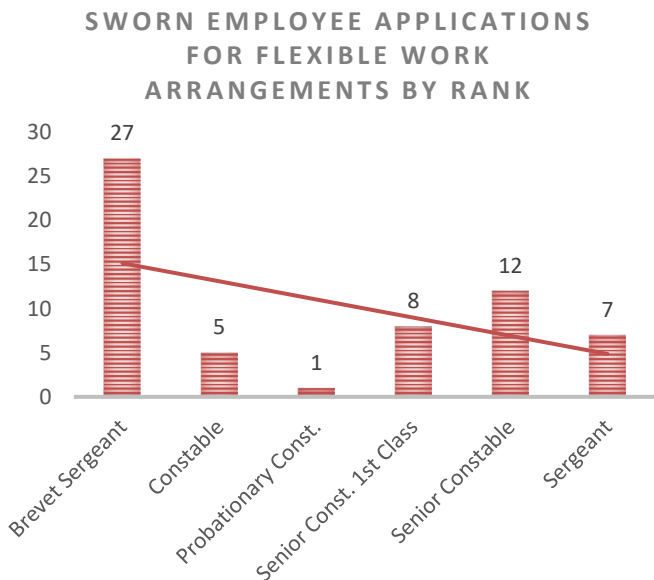
Figure 10: Primary Flexible Work Applications by Gender



58% of applications were lodged by female employees. For both sworn and unsworn SAPOL employees, generally those working at more junior levels were more likely to be applying for flexible working arrangements.

Figure 11: Sworn Employee Applications for Flexible Work Arrangements by Rank

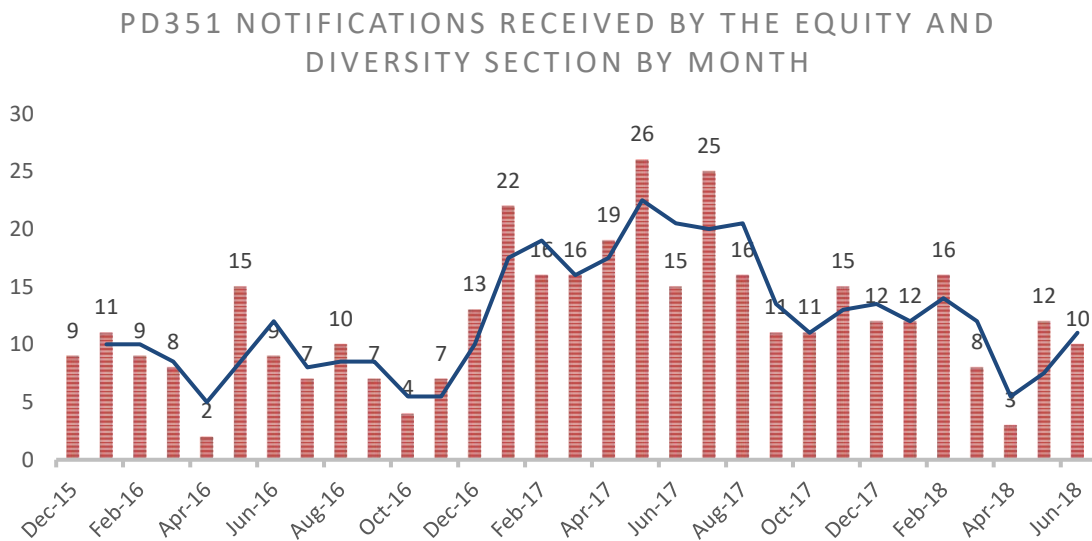
Figure 12: Unsworn Employee Applications for Flexible Work Arrangements by Classification



Respectful Workplace Behaviour

A PD351 - Notification of workplace discrimination, harassment or bullying is a complaint lodged ‘whenever an employee is aware of unreasonable or unlawful behaviour that is creating a risk to health and safety of an employee.’¹² A PD351 notification can be submitted by a third party, or anonymously. In 2016 (and before the release of the EOC’s Independent Review) SAPOL’s Equity and Diversity Section received an average of 8 formal notifications per month. There was a notable increase in reporting after the Review which continued throughout 2017 with an average of 17 notifications per month, peaking in May 2017 with 26 notifications, In the first half of 2018, there has been an average of 10 notifications per month (see Figure 13).

Figure 13: PD351 Notifications Received by the Equity and Diversity Section by Month

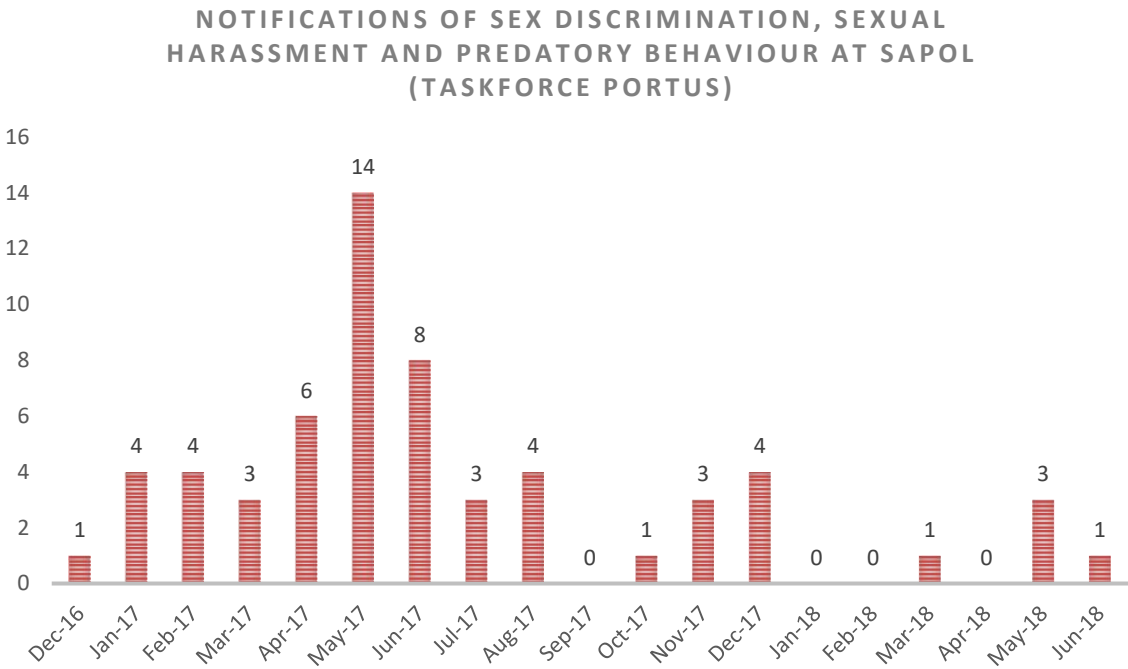


As recommended by the EOC, SAPOL established ‘Taskforce Portus’ in February 2017 as an interim investigative team to receive and investigate allegations of sex discrimination, sexual harassment and predatory behaviour where the behaviour occurred since the release of the EOC’s Independent Review. From that point, any notifications of that nature received by the Equity and Diversity Section were directed to Taskforce Portus. Between December 2016 and June 2018, the Equity and Diversity Section/Taskforce Portus received 60 cases to investigate (see Figure 14) which included;

- > 52 cases related to sexual harassment
- > 1 case of sex discrimination
- > 7 cases of predatory behaviour.

¹² General Order 8420 - Human Resource Management, Equity and Diversity (November 2017).

Figure 14: Notifications of Sex Discrimination, Sexual Harassment and Predatory Behaviour at SAPOL (Taskforce Portus)



There was an upsurge of cases referred to Taskforce Portus between April and June 2017, which coincided with the Project Equitas Team’s face-to-face staff engagement sessions about the findings of the Review, projects underway and options for SAPOL staff to report current inappropriate behaviour. Notifications of sex discrimination, sexual harassment and predatory behaviour have since levelled off to an average of 1-2 cases per month.

The definition of predatory behaviour has been defined and formalised in a new version of General Order 8420 - *Human Resources Management, Diversity and Inclusion* (issued and communicated across SAPOL on 18 July 2018).

Employee Wellbeing

The immediate actions recommended by the EOC’s Independent Review included establishing a Restorative Engagement Project, whereby those who have been previously affected by sex discrimination, sexual harassment and predatory behaviour could safely tell their story and seek acknowledgement and an apology. The Restorative Engagement Program was launched in June 2017, and to date 13 SAPOL employees have participated.

The EOC also recommended that a new externally-provided SAFE Space which staff could access directly for confidential support should they be affected by sex discrimination, sexual harassment and/or predatory behaviour. This service was established immediately after the release of the EOC’s Independent Review, and between December 2016 and June 2018, 19 people have accessed the service.

Training and Development

SAPOL has revised how it delivers training about sex discrimination, sexual harassment and predatory behaviour. All SAPOL staff are now required to undertake Diversity and Inclusion training online which is designed to ensure that all employees have access to information to enhance or reinforce their awareness of sex discrimination and sexual harassment, among other diversity and inclusion issues. There are two different module levels; one for all staff and a second for those at the supervisor/manager level.

Since the revision of diversity and inclusion training in January 2017:

- > 5,859 employees (or 93.8% of the current total workforce) have completed training about the prevention of sex discrimination and sexual harassment.
- > 1,427 employees have completed the sex discrimination and sexual harassment training at the supervisor/manager level.

Section 3: Changes in Policy, Processes and Systems that Support Cultural Change

3.1 Leadership

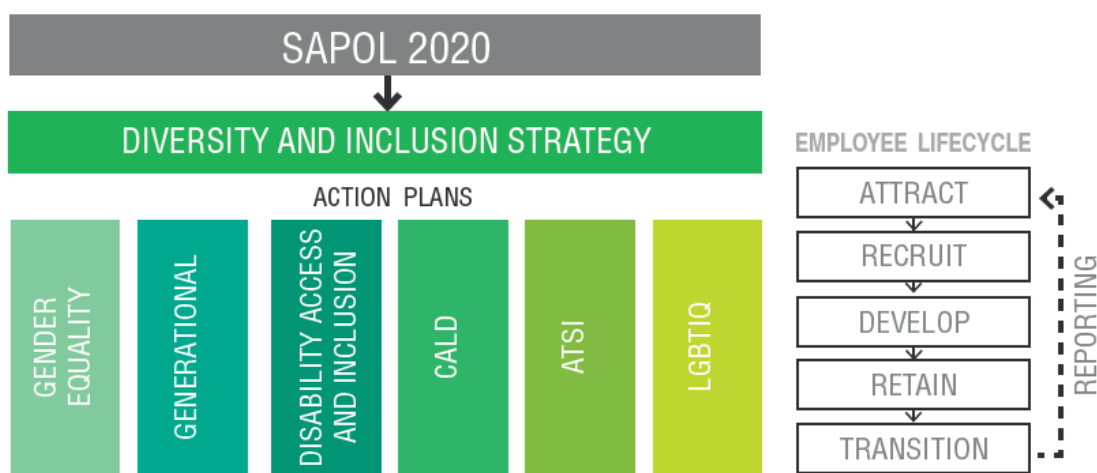
SAPOL is in the process of establishing a high-level Diversity and Inclusion governance framework to oversee ongoing diversity and inclusion initiatives within the organisation. This framework is an arrangement of new strategies, advisory groups (such as the Diversity and Inclusion Advisory Group and Gender Equality Advisory Group) and reporting systems which feed up to the organisation’s leadership in order to inform the direction of the organisation’s cultural transition.

The EOC’s Independent Review focused on gender equality and women’s safety in the workplace, but SAPOL is pursuing a broader program of cultural change to become “a diverse and inclusive organisation where all people are safe, respected and supported to reach their potential.”

Policy

A centrepiece of SAPOL’s cultural change work is the Diversity and Inclusion Strategy, which incorporates a Gender Equality Action Plan as a subsidiary piece of work.¹³

Figure 15: A Summary of SAPOL’s Diversity and Inclusion Strategy and Action Plans



The Strategy and Action Plan form two policy pieces which together respond to **Recommendation 4**: to develop a gender equality strategy utilising the Workplace Gender Equality Agency (WGEA)’s Gender Strategy Toolkit and Roadmap. SAPOL have met the intent of the recommendation in developing a strategic document to guide SAPOL’s transformation to becoming a workplace that supports and values gender equality, and by drawing on best practice resources provided by WGEA.

¹³ A detailed account of how the Gender Equality Action Plan was developed can be found in Report 1.

The Gender Equality Action Plan sets out 59 indicators of success across six focus areas, data which is to be collected by the Human Resources and Governance and Capability Services Areas, Information Systems and Technology, and in some cases, all SAPOL managers. It was noted that to date, there has been no data collected to inform the Gender Equality Action Plan.

Recommendation 4: Recommendation intent met

Report 2: Key Consideration 2

The ELT and the newly-established People Program Board decide on what data will assist them to make executive decisions that drive diversity and inclusion in the workplace, and formalise these requirements as a reporting plan in agreement with the Human Resources Service Area.

Systems of Governance

The EOC Independent Review recommended that SAPOL form a Gender Equality Advisory Group with both male and female participants and with appropriate funding, such that key staff across the organisation provide advice to the Commissioner on strategies, policies and communications (**Recommendation 11**). The intent of the recommendation was to create an opportunity for SAPOL leaders to obtain constructive consultation around policy, processes and communication with a gender equality lens, and to draw on the experience and influence of SAPOL staff.

SAPOL is in the process of establishing a Diversity and Inclusion Advisory Group (DIAG), and intends to set up a subsidiary Gender Equality Advisory Group (GEAG).

The DIAG is mandated to “provide high level expert advice and guidance to the Commissioner of Police on SAPOL’s diversity and inclusion strategies, policies and communication.” The Group is chaired by the Assistant Commissioner - Human Resources Service, and includes advisory members that are SAPOL employees, as well as external advisors/experts. The DIAG is mandated to ensure that the actions in the Diversity and Inclusion Strategy (and action plans) are implemented, managed and reported.

The People Program Board has endorsed a draft terms of reference for the Gender Equality Advisory Group which is yet to be formed. The newly-established DIAG will drive the set-up of the Advisory Group (such as format, terms of reference and membership) at the DIAG’s first meeting. As the activity to implement the GEAG is in its early stages and the dependency on the DIAG’s direction, it cannot be fully reviewed as to whether it meets the intent of Recommendation 11 at this time.

The GEAG will be superseding the Women’s Focus Group (WFG) which was established in 2004 and historically had an important role in providing grassroots advice to the ELT on matters related to sex discrimination and sexual harassment. In recent years, the WFG has been largely inactive and their influence within the organisation has declined. Specific measures are being put in place to ensure that GEAG membership is merit-based, representative of the organisation and gender-balanced. The GEAG is tasked

to ensure that the Gender Equality Action Plan is implemented and reported. The Group will report on their progress to the Manager of the new Diversity and Inclusion Branch, who in turn reports progress to the DIAG.

Recommendation 11: Too early to assess

Monitoring, Evaluation and Reporting Systems

The EOC Independent Review recommended that SAPOL adopt mechanisms to drive and track gender equality initiatives within divisional areas/service areas (**Recommendation 7**) by establishing Key Performance Indicators (KPIs) in business plans, and for all SAPOL leaders (**Recommendation 8**).

The intent of both recommendations is to ensure that gender equality activities are linked and embedded in day-to-day business and become standard practice. KPIs in business plans and executive performance agreements ensure that the leadership cohort are held accountable to drive cultural change, and reporting on the KPIs allows the ELT to monitor areas of achievement and areas for concern. For the broader workforce, the inclusion of KPIs signals a commitment to greater leadership accountability to becoming a gender equitable organisation.

Consultation with both the ELT and Governance and Capability Service Area has identified that SAPOL's Corporate Business Plan 2018-2020 will strive to have a diverse workforce that is 'confident, capable, innovative and flexible.' To achieve this SAPOL has identified strategic priorities which include:

- > Positive cultural change for an inclusive, respectful and safe work environment
- > Health and wellbeing of all staff
- > Flexible working arrangements
- > Talent Management Framework and Individual Performance Management
- > Strategic Workforce Planning Capability
- > Implementation of the Gender Equality Action Plan.
- > SAPOL service areas are required to document how they intend to contribute to the strategic priorities and the Gender Equality Action Plan through specific activities, and report quarterly against the following KPIs: Percentage of SAPOL employees formally applying and accessing flexible working arrangements;
- > Number of women as a percentage participating in vocational and developmental training; and
- > Number of women as a percentage of the total selected for promotional positions.

The Project Equitas Team has offered their support to service areas to meet this requirement. The 2018-2020 Corporate Business Plan is anticipated to be finalised late 2018.

Recommendation 7: On track to meet recommendation intent

When the EOC recommended that SAPOL adopt KPIs for business areas there was no explicit direction around the setting of targets within those KPIs. However, it would be beneficial for SAPOL to set tangible, quantified goals as it monitors its own performance, and to review them annually. These targets/goals should

be specific, measurable, attainable, relevant and time-specific or 'SMART' targets to better inform SAPOL leadership about how the organisation is tracking against its overarching vision for greater gender equality.

Report 2: Key Consideration 3

SAPOL set tangible and quantified goals/targets within gender equality Key Performance Indicators for business areas.

At the individual level, the ELT has agreed to incorporate a diversity and inclusion component into executive contracts at the time of their next performance review. The requirement will be part of all future new executive level contracts.

The ELT members' performance will be measured against their ability to "effectively contribute to developing a more confident, capable, diverse and inclusive workforce".

Recommendation 8: On track to meet recommendation intent

Taking a Results-based Learning Approach

SAPOL intends to review the value of KPI reporting as part of Service Area business plans, and commitments to the Gender Equality Action Plan, and determine whether any amendments need to be made to the KPIs or resources to ensure that reporting is occurring.

While there is the intention to fulfil the reporting requirements set by the newly-introduced KPIs in the Corporate Business Plan, this process should be formalised and actioned by setting a reporting schedule. This schedule should also take into account other reporting responsibilities that will arise from the implementation of other recommendations. This is to ensure that all new forms of reporting are manageable, integrated into other lines of business reporting, and useful for SAPOL leadership to make executive decisions about the workforce.

Report 2: Key Consideration 4

SAPOL develop a reporting schedule that integrates all new reporting requirements arising from the EOC recommendations to ensure reporting is manageable and streamlined with existing reporting requirements, and can be effectively used to inform SAPOL leadership about the impact of change and areas of concern.

3.2 Workforce Management

Two areas of policy, process or system reform in the workforce management portfolio that were identified as being significant drivers of the cultural change process were those associated with promotion and the talent pipeline (**Recommendations 12¹⁴, 13¹⁵ and 14¹⁶**), and the reinvigoration of the performance management system (**Recommendation 18**). These two systemic areas are central to gender equality because they address equal access to employment and development opportunities for women. If addressed effectively, their long-term outcome will be greater gender parity at the highest levels of the organisation.

Promotions and the Talent Pipeline

The EOC Independent Review found that SAPOL job descriptions needed to be reviewed for unconscious bias to ensure only the required skills and experience to perform the role were included. To address this, the EOC recommended that SAPOL review all standards and promotional requirements to ensure they are related to the actual capabilities required for performing a role, including:

- (a) undertaking an unconscious bias check to evaluate historic concepts of merit and skills/characteristics in all role descriptions and processes related to selections and promotions. Position descriptions for roles involving staff supervision should be rewritten to include a strong emphasis on people-management and leadership skills.
- (b) moving to advertising key roles for a fixed term, with applicants demonstrating capability, interest, skills and suitability for the role. Progression points between ranks should be based on demonstrated skill, not time in the role. Acting management opportunities (for longer than a month) should also be advertised through a formal, but brief, Expression of Interest process.
- (c) prior to promoting to Officer level and above, undertake a comprehensive review of a person's performance and skills (consideration should be given to 360 degree review), and review the history of complaints against the applicant, particularly considering multiple complaints and/or serious complaints.
- (d) implementing trials for selecting candidates for promotions including the use of an independent assessment centre, blind recruitment and a panel comprised of 50 per cent external members with human resources expertise. Consideration could also be given to investigating impediments to a pool assessment process (**Recommendation 12**).

¹⁴ Recommendation 12 - Review all standards and promotional requirements to ensure they are related to the actual capabilities required for performing a role.

¹⁵ Recommendation 13 - Set targets for women at promotion and development pathways in line with the proportion of women in the organisation.

¹⁶ Recommendation 14 - Develop a talent identification program to ready staff for promotion, including developing lower level administrative/specialist support staff.

The Project Equitas Team has been undertaking research and planning to inform the Management Proposal for this recommendation which is being considered by the People Board in September 2018.

Recommendation 12: Too early to assess

SAPOL was advised by the EOC to introduce targets for women along promotion and development pathways which were proportionate to the number of women in the organisation (**Recommendation 13**). The intent of the recommendation was to form one part of a strategy to build ‘a robust, gender-diverse pipeline in all areas’ to ensure sustainable gender equality in the organisation. Targets are a way to draw attention to the risk of bias in selection processes for promotion and development opportunities.

SAPOL has set a target of 33% female applicants in Officer Development courses. This target is currently being applied by the Inspector Qualification Program (IQP) Board and is formalised in their Terms of Reference. A 33% target is higher than the proportion of female sworn staff in the organisation (31%), and is therefore also a ‘stretch’ or aspirational target.

Looking at the 2017 Inspector Qualification Program process, 23.5% of applicants to the program were female, 37.5% of participants in the program were female and 36.4% of those who passed the program were female. The 2018 IQP selection process was underway at the time of writing this report.

A continuous improvement approach is being taken in the application of the target. For example, if the target is not met for an Officer Development course, the IQP Board is required to review marketing campaigns and communications around the Program for possible gender bias, and look for ways to encourage greater participation among female employees such as female-only courses.

Recommendation 13: On track to meet recommendation intent

While a target has been set for the Inspector Qualification program, SAPOL needs to develop targets for women along the sworn promotional pathway at levels lower than the rank of Inspector. This will enable SAPOL to proactively monitor the representation of women at earlier stages along the talent pipeline to redress any structural or cultural barriers to progression leading into the rank of Inspector, which is considered a gateway to senior management roles.

It is important for SAPOL to also develop targets that focus on unsworn female employees. Together the targets for sworn and unsworn employees would contribute to greater gender parity overall in the SAPOL workforce, and would also address the Senior Management Council’s ‘Gender Equality in Leadership (GEiL) Strategy’ for the South Australian Public Sector.

Report 2: Key Consideration 5

- (a) SAPOL set targets for the promotion of sworn employees along the promotional pathway before the Inspector Qualification Program.
- (b) SAPOL introduce targets for unsworn women along promotional pathways.

The EOC recommended that SAPOL develop a talent identification program (with a mentoring program and role shadowing) to ready staff for promotion, including developing lower level administrative/specialist support staff (**Recommendation 14**). The intent of the recommendation was to provide a process to identify individuals with specific talents and develop them with structured training (such as shadowing, mentoring and acting opportunities) so that individuals with the appropriate skill-set, expertise and passion can fulfil specific roles.

Planning for this recommendation commenced in August 2018, in parallel with the reinvigoration of the performance management system (**Recommendation 18**) because of operational links between the two areas of work.

Recommendation 14: Too early to assess

Performance Management

The EOC recommended that SAPOL reinvigorate the performance management system so that all staff have up-to-date performance management plans and quarterly meetings about their performance with health and wellbeing issues included in these discussions.

The intent of the recommendation was to ensure the performance management system operates as a vehicle for providing support and identifying development opportunities for all employees, regardless of their personal or professional circumstances. It is also intended as a way in which managers and supervisors can monitor and manage performance concerns.

Planning for this recommendation commenced in August 2018, in parallel with the talent identification program (**Recommendation 14**) because of operational links between the two areas of work.

Recommendation 18: Too early to assess

Supporting Policy, Process and System Changes

There are a number of additional recommendations that Project Equitas are currently implementing as part of the workforce management portfolio that have a supporting function to the two areas outlined above.

For example, the development of a new, structured handover process for management/supervisory positions (**Recommendation 15**) is intended to ensure that poor behaviour of people in a team continues to be appropriately managed by an incoming manager or supervisor via a guided discussion.

The new policy has been written and is now mandatory due to its inclusion in two General Orders; Occupational Health and Safety, as well as Performance Management. The handover procedure operates

as a non-prescriptive conversation guide for managers and supervisors to have between each other when handing over a role for a period of three months or more. It replaces a handover procedure that was heavily focused on the handover of operational infrastructure and case work, as opposed to personnel matters. The Project Equitas Team sees the handover process primarily as a tool to monitor and manage behaviours at a team, group or workplace level with an emphasis on employee wellbeing, as opposed to the management of their performance. It is designed so that managers can better understand employee behaviour, which can then be managed through a separate individual performance management process if necessary. This addresses the intent of the recommendation (for continuity in the management of behaviour), but also adapts it in a positive way by giving greater consideration to the wellbeing of staff and a team. All SAPOL managers and supervisors were introduced to the new policy in mid-2018 and will undertake mandatory training sessions in late 2018. This training will be incorporated into the SAPOL corporate training and development cycle.

Recommendation 15: Recommendation intent met

Another EOC recommendation that was intended to assist managers and supervisors to better identify and manage inappropriate behaviour, was the review of the conflict of interest policy/code to ensure that it covers the need to be aware of potential conflicts arising from intimate/familial relationships between supervisors and their direct staff (**Recommendation 17**). The intent of the recommendation was to ensure that existing policy adequately cautioned staff about the risks of predatory behaviour.

The most relevant policy document that incorporates conduct between employees is SAPOL *General Order 8420 - Human Resource Management, Diversity and Inclusion*. The Project Equitas Team consulted internal stakeholders such as the Internal Investigations Section (IIS), and the Anti-Corruption Branch, and other policing jurisdictions, particularly Victoria Police. The General Order was revised to include:

- > Definitions of appropriate and inappropriate workplace relationships;
- > The definition of predatory behaviour, and an outline of its impact;
- > A cautionary statement to raise awareness of potential conflicts arising from intimate/familial relationships between supervisors and direct staff, highlighting the obligation for employees to self-manage and, for supervisors/managers (when aware) to address matters where such relationships may adversely impact on SAPOL service delivery.

It has been acknowledged that it is not possible to address every situation through the General Order, but rather provide a level of guidance to enable SAPOL employees to self-manage perceived or real conflicts of interest in their personal relationships. This allows for autonomy, promoting confidence in staff and respect for individual right to privacy.

The revised General Order was gazetted on 18 July 2018 and awareness was further raised by an email to all SAPOL employees outlining the changes to the General Order. The information will also be incorporated into the biennial training plan (Recommendation 21) for ongoing reinforcement. The General Order will be reviewed by June 2021, unless there is a critical issue that highlights the need to review earlier.

Recommendation 17:

Recommendation intent met

Another supporting piece of work has been the commissioning of an external review of the services provided by Human Resources (**Recommendation 16**). The intent of the recommendation was to identify ways to make SAPOL's human resources practices more contemporary in order to maximise the effectiveness of the workforce. SAPOL were also advised to consider an HR business partner model to improve mechanisms for people and performance management.

This recommendation was previously assigned to the Organisational Reform Project - a separate but complementary project underway at SAPOL. Due to the interdependency between this recommendation and others within the scope of Project Equitas, the responsibility for the implementation of the review was re-assigned to Project Equitas in early 2018.

SAPOL commissioned an external professional services firm to conduct a review and recommend improvements to the services, structures and procedures of the Human Resources Management Branch (HRMB). The review was to include reviewing and identifying opportunities to enhance the manner in which HRMB is structured based on 'best practice' from state/national research, including an analysis of, and recommendations regarding, the required structure, resources and skills mix to maintain effective and efficient human resources services to the SAPOL community.

The review has been completed and a draft report of the findings has been provided to SAPOL in August 2018, which were being discussed internally at the time of writing this report.

The report of the review findings will inform the development of an implementation plan which will fall under the responsibility of the SAPOL People Board. The newly established Portfolio Support Office has been tasked with the implementation of the recommendations of the review.

Recommendation 16:

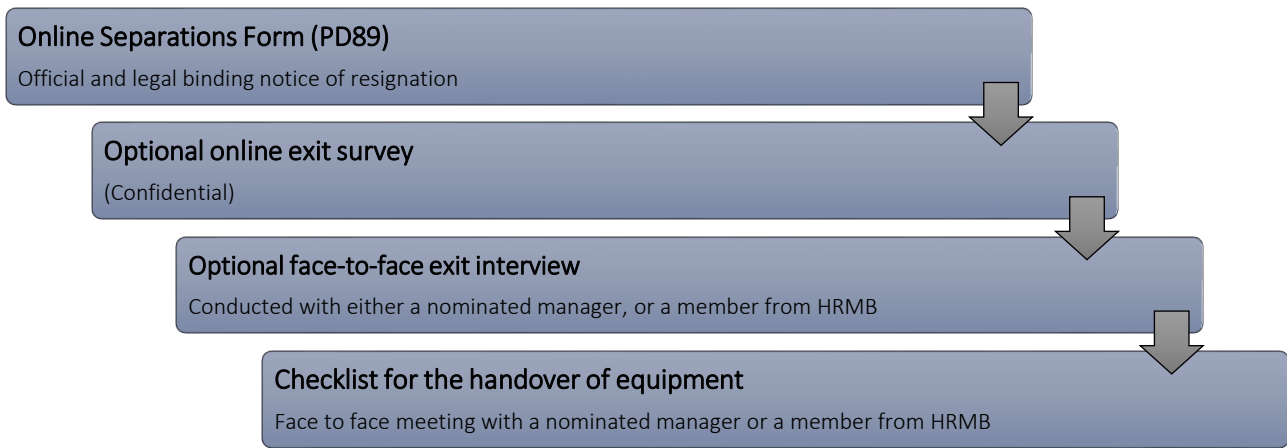
Recommendation intent met

It is acknowledged that commissioning an independent review of the HRMB alone does not constitute a change in policy, process or system which will eventually effect cultural change. Further analysis will be required in future monitoring reports (refer to Figure 2) to see how changes brought about by the Review will have an effect on SAPOL's workplace culture.

Another policy, process or system piece which supports the cultural change process is the development of a new exit management strategy through which existing staff can provide feedback about their experiences in working with SAPOL and their reasons for leaving (**Recommendation 20**). The intent of the recommendation was to enable employees to provide feedback on their experiences, which can be used to inform future workforce management strategies and target problem areas.

A new strategy was been established and rolled out in August 2018 and comprises three parts (see Figure 16).

Figure 16: SAPOL's New Exit Management Strategy



The new strategy is more staged, can take place mostly online, and offers greater opportunity and options to provide feedback about individual experiences of working at SAPOL. The Online Separations Form (PD89) prompts employees to complete an optional online exit survey, which in turn prompts employees to consider the option of having a face-to-face exit interview with a manager of their choosing, or a member of the HRMB. This can be combined with the final stage of an employee's exit, which is a checklist for the handover of equipment.

The new system also has a greater focus on staff retention. For example, when an employee is completing the initial PD89 form, they will be prompted to consider their options for flexible working arrangements. While a lack of access to flexible working arrangements is not the only driver for employees to exit, it was identified as an area for improvement in the EOC Independent Review. More recently, the March-April 2018 Corporate Pulse Survey revealed that 24% of the respondents had considered leaving in the last 12 months because of a lack of flexibility – this result is higher than the November 2017 survey result of nearly 21% for the same question.

Overall, the new strategy has a greater focus on employee wellbeing, diversity and inclusion issues, which is anticipated to yield useful data about workplace culture for the Separations Team in the Human Resources Service Area. Employees are now required to state a reason for resignation, which is data that will potentially allow the identification of problematic hotspots in the organisation, and promote corrective action at the leadership level. The first report to the People Board is anticipated for late September/October 2018.

The new online exit survey makes reference to third party counselling services available such as Employee Assistance Programs, Lifeline and Beyond Blue, and this is more mindful of employee wellbeing. SAPOL and the EOC have agreed that it will also make reference to the Restorative Engagement Program should employees wish to approach the EOC independently to discuss experiences of sex discrimination, sexual harassment and/or predatory behaviour.

The strategy is currently in a transitional phase which will allow for minor adjustments before full implementation in late 2018. HR consultants are yet to undergo training to use the process. For example, the

HR consultants will have the capacity to advise employees to consider all options, and to follow-up the electronic prompt in the initial PD89 form in order to refer them to the Flexible Work Team if relevant.

It was noted that there are no firm plans for support to be provided for managers and supervisors to conduct the optional face-to-face exit interviews. It would be beneficial to provide simple conversation guidance for managers and supervisors (and HR consultants) about how to conduct that stage of the process, or to ensure they are linked into existing resources to assist them with having these conversations.

Recommendation 20: Recommendation intent met

Report 2: Key Consideration 6

HRMB/the Diversity and Inclusion Branch ensure that managers and supervisors/human resources consultants have access to guidance/support to assist them in conducting the face-to-face exit interview if requested by an employee separating from SAPOL, for example the 'Difficulty Conversations in the Workplace' training unit.

While the new Exit Management Strategy provides multiple opportunities and channels for employees to provide reason/s for separating from SAPOL, a barrier to participating or being open about the reason for separation can be a lack of trust about how the feedback will be used, and/or if there will be negative consequences. As a result, it may take time for SAPOL to see separating employees fully participating in the new Strategy, and creating meaningful data about why employees are leaving SAPOL in order to identify and address problem areas.

Report 2: Key Consideration 7

The EOC work with SAPOL to provide additional options for separating employees to be open about the reasons they are leaving SAPOL.

A final policy, process or system change recommended by the EOC was a review of equipment to ensure that there are practical and suitable options for all women, with the intention of enhancing physical working conditions for women.

The review undertaken by the Project Equitas Team found that initiatives are underway to ensure that equipment is suitable to fit a range of physical frames for both men and women. SAPOL is currently trialling a Load Bearing Anti-Ballistic Vest which will be evaluated based on comfort and suitability for both men and women among other safety factors.

Based on the review of equipment, the Project Equitas Team recommended specific changes to relevant General Orders are amended to move to a more dynamic and gender balanced decision-making model around procurement of uniform and operational equipment items. These recommendations were approved by the People Program Board and the changes to the General Orders are underway. These General Orders are relevant for the Uniform Review Committee, Operational Safety Portfolio and Procurement Section.

3.3 Training and Development

Training represents a critical component in enhancing the capacity and willingness of SAPOL employees to advance a cultural change program towards gender equality. This will be an area of focus in the EOC's next monitoring report. However it should be noted that there are some policy, process and system changes that are being put in place currently by SAPOL to ensure that future training has optimal learning outcomes.

Conduct and People Management

The EOC recommended that SAPOL devise a new rolling three-year training delivery plan with a focus on developing people and performance management skills to enable the appropriate prevention and management of sex discrimination, sexual harassment and other negative behaviours (**Recommendation 22**). The rolling plan was to include biennial training for all staff on sex discrimination and sexual harassment, unconscious bias and bystander responsibilities. Supervisors were to receive additional training in identifying and responding appropriately to sexual harassment and sex discrimination, as well as some modules to better understand and accommodate flexible working arrangements (**Recommendation 21**).

The intent of these two recommendations was to acknowledge the critical role that training plays in changing the attitudes and behaviours of staff and to address gaps in SAPOL's training curricular, particularly in areas of people management.

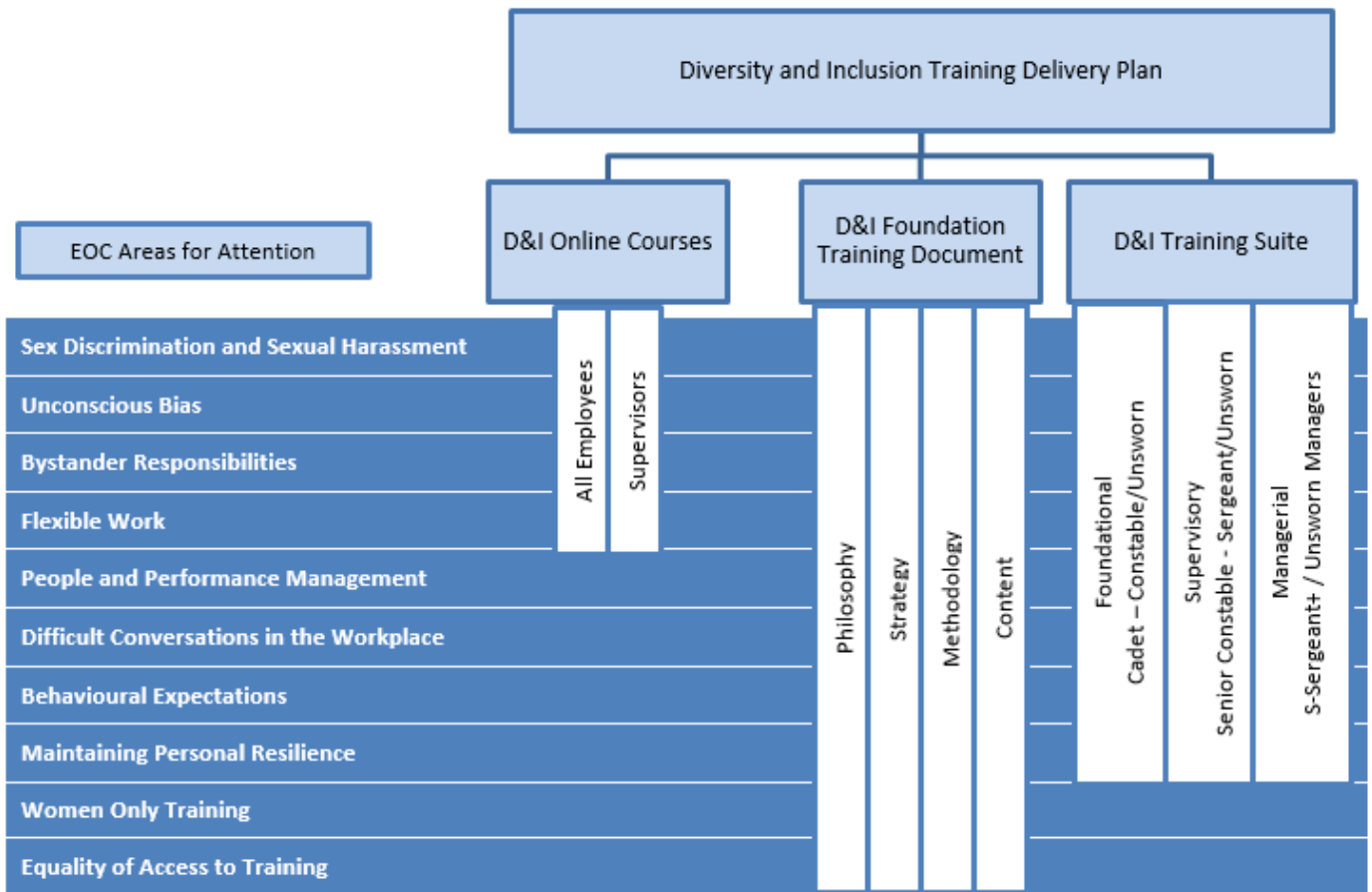
Project Equitas have proposed a restructure of all equity and diversity training and identified ten 'areas for attention'; eight of which relate to training content, while the remaining two (women-only training and equality of access to training) relate to methodology or delivery.

The proposal acknowledges that the eight areas for attention "are currently addressed with SAPOL to varying degrees across the existing training framework. Despite this, there is no assurance of consistency of content or standard."

The overarching strategy for the new training framework is a Diversity and Inclusion Training Delivery Plan, which is designed to ensure that content around the eight areas of attention will be delivered with consistency to all SAPOL employees.

The Training Delivery Plan is supported by a Diversity and Inclusion Foundation Training Document, which sets the structure for how the eight areas for attention are to be addressed. The Foundation document sets out the philosophy, strategy, methodology and mandatory content for each of the eight topics within scope.

Figure 17: The Diversity and Inclusion Training Delivery Plan



In line with the Foundation Training Document, Project Equitas is developing a Diversity and Inclusion Training Resource Suite which is a series of resources to support trainers to deliver content around each of the eight areas for attention. The resources are designed to be reference documents rather than prescriptive lesson plans, and they set out the learning objectives, learning outcomes and assessment criteria, while allowing a level of flexibility for each trainer to adapt the content to the context in which it is being delivered. The guidelines are adapted according to three levels of seniority; general employee, supervisor and manager, in order for the content to be most relevant to an individual’s role. There are 24 individual units of training which form the Diversity and Inclusion Training Resource Suite (see Figure 18).

Figure 18: Learning Outcomes for the Diversity and Inclusion Training Resource Suite relevant to Role and Responsibilities

Areas for attention in training	Learning outcomes by level of seniority		
	Employee	Supervisor	Manager
Sex Discrimination and Sexual Harassment	Behave respectfully and adhere to SAPOL's Sexual Harassment and Sex Discrimination Policies	Prevent and Respond to incidents of Sexual Harassment and Sex Discrimination	Promote and Manage strategies to prevent Sex Discrimination and Sexual Harassment
Unconscious Bias	Recognise the effect of unconscious bias in the workplace	Address unconscious bias in workplace decision making	Manage a diverse and inclusive workplace where decisions are fair and unbiased
Bystander Responsibilities	Take appropriate bystander action	Foster an environment that supports Bystander action	Manage an environment where Bystander Action is encouraged and supported
Flexible Work	Negotiate a flexible work arrangement in accordance with General Orders	Managing and flexible work arrangements	Flexible workplaces
People and Performance Management	Manage own behaviour and influence the behaviours of others	Model ethical behaviour and improve employee performance	Ensure standards of behaviour and performance are set and maintained
Difficult Conversations in the Workplace	Resolve workplace issues with conversation	Conduct difficult conversations with employees	Improve communication in the workplace
Behavioural Expectations	Treat other employees with respect and fairness	Provide a safe work environment that enables employees to carry out their work responsibilities free of negative workplace behaviours	Monitor the work environment to ensure that high standards of respectful behaviour are observed
Maintaining Personal Resilience	Develop and maintaining the personal resilience required for the safe performance of their work functions	Provide a workplace conducive to employees maintaining their personal resilience, health and wellbeing	Manage a workplace where employee resilience, health and wellbeing can be maintained

All 24 units of training are designed to be delivered across three methodologies; face-to-face, online and as independent learning options (any training arrangement where the time and location is at the participant's discretion).

It is anticipated that these topics will be delivered on a recurring basis across a broad variety of promotional courses, starting at the cadet level for sworn staff. All SAPOL employees will be required to complete online training in sex discrimination and sexual harassment, unconscious bias, bystander responsibilities and flexible work as part of their induction, and then on a recurring, biennial basis as part of training requirements.

There are risks associated with delivery because the current model allows all trainers across a range of disciplines to access and adapt the content according to the context of the courses that they provide, but there is likely to be varying levels of knowledge, understanding and enthusiasm for the course content. Additionally, as with all e-learning, there is a risk that uptake or engagement with online content will be low. There is an acknowledgement that e-learning is not a suitable format for training as a result of a complaint/mediation.

As such, the Project Equitas Team will hand over the Training Delivery Plan to the newly-established Diversity and Inclusion Branch who will be responsible for the continuous, biennial review of training programs. Diversity and Inclusion training will be reviewed and evaluated as per SAPOL's training review and evaluation process which includes:

- > Collecting and analysing student and instructor feedback;
- > Collecting and analysing manager/supervisor feedback; and
- > Analysis of relevant diversity and inclusion patterns/trends in the workplace.

Recommendations 21 and 22:

Recommendation intent met

Access to Training Opportunities

A number of the EOC's recommendations were intended to increase access to training in order to ensure greater equality of opportunity for all SAPOL staff, regardless of their professional or personal circumstances. Two recommendations to this effect are **Recommendation 24** (create opportunities for training for members on extended leave to continue their development and facilitate their reintegration into the workforce) and **Recommendation 25** (review training delivery methodologies to ensure training is more accessible to those working flexibly and with responsibilities outside of work.) Both recommendations intended to increase access to training for SAPOL staff who are juggling work and commitments outside work, and for those who live/work in rural areas.

SAPOL's new Foundation Training Document supports the 'Stay in Touch' policy and will promote training to be offered across the three methodologies (face-to-face, online and independent learning) to enhance accessibility to training.

The technical infrastructure required to facilitate remote access to SAPOL systems is currently subject to a separate business case under development by the Information Systems and Technology Service Area. This business case also covers technology to support flexible working arrangements and the 'Stay in Touch' program. The *Remote Access Business Case* was due to be finalised in mid-2018 but is now due to be available in September 2018.

Project Equitas and Learning Development Services (who are responsible for developing and delivering corporate training) are also exploring an expression of interest system for training, which would put the onus on training organisers to contact individuals, including those on extended leave, who wouldn't receive notifications about training courses via email.

Another recommendation which aims to increase equity in access to training and development opportunities is **Recommendation 23** (set targets for women for training in line with the proportion of women in the organisation.) The intent of the recommendation ties in closely with the revisions of standards for promotion, and setting up a talent identification program, ensuring that there is greater gender equity in the organisational talent pipeline.

The Foundation Training Document outlines targets for women in training, which is currently set to 36% which is proportionate to the representation of all women in the organisation (sworn and unsworn). The target for women in training is also reflected in the Gender Equality Action Plan 2018-2020 with the indicator of 'the number of applications for training approved by gender proportionate to the number of women in the organisation'. To date, reporting against the action plan has not yet commenced.

The agreed approach to the target, as outlined in the Foundation Training Document, is that if female representation falls below 36% in the application for a particular course, the advertising procedures will be reviewed with consideration of negative gender bias. Similarly, if female representation in the final selection of candidates for training falls below 36%, the selection process will be reviewed with consideration of negative gender bias and whether amendments are required to attract women.

3.4 Flexible Workplace Cultures

One of the largest pieces of reform that Project Equitas is currently implementing is access to flexible working arrangements (**Recommendation 26**). According to WGEA, research and experience indicates that organisations who embrace and provide equitable access to flexibility benefit through talent attraction and retention, engagement, productivity and agility.¹⁷ Women are disproportionately impacted by a lack of family-friendly policies and practices because they comprise the majority of primary carers in the Australian workforce and therefore bear the burden of managing work and family demands concurrently.

Policy and Process

Flexible working arrangements were available to SAPOL employees prior to the EOC's Independent Review, but the wording of policy was discouraging, procedures were onerous, approval was generally for short time periods and flexible work was generally disapproved of in the workplace culture.

The intent of recommendation 26 (which was for SAPOL to adopt an 'all-roles flex' approach across all operational and leadership areas, normalising flexible work for all staff regardless of gender or level) was to

¹⁷ WGEA *Gender Strategy Toolkit* Pg. 31.

enhance the accessibility of flexible working arrangements by making the process widely available to all employees, simpler, less prescriptive and open to negotiation. The EOC recommended that SAPOL review systems for the application for flexible work arrangements to reduce delays in decisions, identify valid reasons for the rejection of applications, and remove the onus from employees to find solutions to overcome barriers preventing them working flexibly (such as finding another person to share a position). It was also recommended that SAPOL promote flexible working arrangements to all employees, regardless of their gender or seniority, so that flexibility is normalised for all.

The Project Equitas Team initiated this piece of work by engaging members of the ELT in a workshop facilitated by an external professional services firm. The purpose of the workshop was to discuss flexible working arrangements in the specific context of SAPOL as a workplace, and to identify both barriers and opportunities for flexible work in the organisation, and the role of leadership in driving it. Rather than pursue 'All Roles Flex' as per the EOC's recommendation, SAPOL chose to communicate their approach with 'If Not – Why Not' which took into account specific risks and concerns that flexible working would be applied indiscriminately to all roles without due consideration for both the individual and organisational requirement. A central policy piece that was developed was *Working Flexibly in SAPOL*, a principles document with a set of guidelines to adapt flexible working arrangements to SAPOL's unique operational and personnel needs.

SAPOL has re-written policies to make flexible work simpler, less prescriptive and open to negotiation. A new General Order – *Human Resources Management, Flexible Working Arrangements* is an overarching policy document with a series of supplementary orders to cover each form of flexible working arrangement. The latter includes:

- > Compressed weeks
- > Flexitime
- > Leave without pay
- > Part-time work
- > Personal flexibility agreement
- > Purchased leave
- > Shift changes
- > Special leave without pay
- > Variation to start/finish time
- > Working from home
- > Working remotely.

The General Order states that SAPOL actively supports flexible working arrangements, and that employees should not be required to make a case to access such arrangements. The starting position is a presumption that all roles can be undertaken more flexibly and that flexible arrangements can be applied to a role unless a manager or supervisor can demonstrate otherwise. Not all roles can adopt all forms of flexible work, and this is clearly stated in the General Orders. However, managers and supervisors are encouraged to think creatively about how to support employees to work flexibly.

The application process for flexible working arrangements is also clearly stated in the General Order documents, with reference to roles and responsibilities of parties to advance the application. The requirement to state a reason when applying for flexible work arrangements has been removed from the application

process in most cases.¹⁸ Additionally, the onus on the applicant to 'balance' a part-time work application by finding a candidate to 'job share' no longer applies (**Recommendation 27**).

SAPOL has also extended the six-month minimum time limit of flexible working arrangements to 12 months, unless a shorter period is requested by the employee. Applicants are also able to return to their previous full time equivalent at the end of the agreement (if organisational restructuring or similar has occurred the applicant will at least maintain their previous position if not previous role).

SAPOL's General Orders are freely available to employees for official use. SAPOL's disclosure policies allow for external parties to see SAPOL General Orders, but a process must be followed in order to comply with privacy principles. A SAPOL employee is free to discuss their own individual agreement or circumstances with any person.

As per the new policies, approval for applications for flexible work have been devolved to area/branch managers, or to a lower-level manager, depending on the kind of flexible work being sought. The newly-formed Flexible Work Team ratifies the approved request and performs a quality assurance role, including ensuring it complies with organisational, industrial and legislative requirements. This team also operates as a contact point for employees to enquire about flexible work arrangements. They are also tasked with providing advice and support to managers and supervisors to apply flexible work policies which align with organisational, industrial and legislative requirements, maintain data about the demand and uptake of flexible work arrangements, and reporting back to SAPOL leadership.

Should an application be refused, the application is escalated upwards to the head of employee's respective service area (an Assistant Commissioner/Director). If an arrangement is still not able to be accommodated, the application is reviewed by the Flexible Work Team to determine whether the request can be accommodated elsewhere in the organisation. If not, the matter is ultimately reviewed by the Assistant Commissioner of the Human Resources Service Area.

As recommended by the EOC, SAPOL is actively encouraging men and senior staff to take up flexible work arrangements. The *Working Flexibly in SAPOL* document includes case studies of men taking advantage of flexible working arrangements. There has also been key messaging about men's flexibility options in engagement and training programs, as well as in the Commissioner for Police's blog. Messaging has focused on challenging stigma around part-time work and perceptions that is only utilised by women with caring responsibilities. Messaging has highlighted the variety of flexible work options beyond part-time work. Currently there is one male commissioned officer working part-time.

Recommendation 26:

Recommendation intent met

¹⁸ A reason is required for applications for Special Leave Without Pay where an employee intends to undertake secondary employment.

Efforts to Make Flexible Work a Reality at SAPOL

To supplement the new policy framework for flexible work, the Project Equitas Team has made significant efforts to raise awareness and engage employees to make the policy 'real' and meaningful for all employees.

Project Equitas invested significant time and effort into consultation with the workforce in the development of the 'Working Flexibly in SAPOL' principles document via workshops with managers and supervisors and focus groups with a cross-section of the SAPOL workforce.

Project Equitas employed a range of different media to communicate the shift in policy position, including the Commissioner's blog, the Police Gazette, and the SAPOL 'Police Connect' intranet web page. A specific intranet page for flexible work was developed and included a case for change, case studies, a toolkit with a conversation guide for both supervisors and employees in order to make the policy change.

The communications strategy for flexible work arrangements was also supported with voluntary employee engagement sessions, and mandatory training for supervisors and managers. These sessions were delivered face-to-face and tailored to the audience and their role within flexible working arrangements. For example, an external provider delivered training to all senior leaders which focused on how to manage flexible teams, and how to adopt the 'If Not, Why Not' approach in their areas. The voluntary engagement sessions were held for interested employees to understand the application process and the principles of the 'If Not, Why Not' approach.

Taking a Results-based Learning Approach

The Flexible Work Team is collecting and managing flexible work-related data to set flexible work performance indicators (including reasons for rejection) and they will report to the ELT on a quarterly basis. This reporting can be used to monitor the uptake of flexible work and identify areas for improvement as they work towards the normalisation of flexible working arrangements. Policies for flexible working arrangements are reviewed every three years.

Currently the data captured refers only to flexible work arrangements which are in place for longer than 28 days, because shorter arrangements are accessible on a more informal basis with the approval of a local manager. These arrangements are known anecdotally within SAPOL, and not formally recorded. SAPOL is investigating methods to capture this data via electronic timesheet software to fully capture the full spectrum of flexible work uptake occurring within SAPOL.

Systems Supporting Flexible Work

In order to facilitate flexible work policies, the EOC recommended that SAPOL invest in technology, facilities and equipment to support flexible work arrangements, the return-to-work process and the needs of pregnant women and staff on extended leave in the organisation (**Recommendation 28**). Due to the broad scope of this recommendation, the responsibility for each component has been divided between different Project Equitas teams to be addressed individually.

In terms of technology, it was recommended that appropriate secure infrastructure, such as mobile devices and remote access be provided to facilitate employees working flexibly and support a 'Stay in Touch' program (**Recommendation 29**). This component is being addressed by SAPOL's Information Systems and Technology (IS&T) Service Area who are currently preparing the *Remote Access Business Case*.

Another technology component recommended by the EOC, was a demand-based rostering system. Due to the recent roll-out of the new District Policing Model (launched in July 2018) and associated changes to roles and work locations, no planning has taken place for this activity to date. Planning will commence once this transition is complete and there is relative stability in current rostering.

Specific facilities recommended by the EOC were private and clean areas for expressing breast milk and fridges or freezers for the cold storage of breast milk at work sites where required. SAPOL has identified 10 work sites across the state where there is an opportunity to establish designated facilities that support breastfeeding, but also to accommodate prayer, meditation and other wellness activities. Four of these sites now have facilities available while the remaining six are currently being established.

For other locations where designated facilities are not available, it is the manager's responsibility to ensure a room is available that meets the minimum requirements outlined in the *General Order Human resource management, General HR management, Pregnant employee and lactation breaks*. These same requirements have been used in the setting up of the 10 locations already mentioned and will be incorporated into any future construction or development of SAPOL work sites.

SAPOL was also recommended to review equipment that supports flexible or altered working arrangements, specifically the provision of uniforms for pregnant women. A maternity uniform option has been designed and will be available upon request from the end of 2019. The uniform incorporates adjusted trousers and shirt and the choice of a jumper or a cardigan. Pregnant employees can choose the maternity uniform, or they can receive a fixed payment for the purchase of plain clothes to complete their duties. Once the uniform is available, the option will be included in the relevant General Order, accompanied by communications to all staff via email. The Executive Uniform Committee, are flexible to 'tweaking' the uniform design based on user feedback, for example sizing and minor adjustments, to ensure comfort, professionalism and economic feasibility are balanced.

Recommendation 28a (Demand-based rostering system)	Too early to assess
Recommendation 28b (Facilities for breastfeeding)	Recommendation intent met
Recommendation 28c (Maternity uniforms)	On track to meet recommendation intent
Recommendation 28d (Access to secure infrastructure)	Too early to assess

Additional Supporting Policies, Processes and Systems

Additional policy, process or system changes that support the uptake of flexible working arrangements are the backfilling of staff on maternity leave, the advertisement of part-time roles and the removal of the responsibility of the employee to 'balance' their FTE when applying for part-time work (**Recommendation 27**).

At the time of the 2016 EOC's Independent Review, the backfilling of employees on unpaid maternity leave for absences for less than one year only occurred where there was a position identified as critical for core service delivery. Any backfilling for a critical role was at the expense of a position elsewhere in SAPOL. This approach was taken as a budget management strategy, and up to fifty positions were not backfilled.

SAPOL has since worked with Government and the Police Association of SA to secure funding for, and the acceleration of, recruitment to reach a cap of 4,713 Full Time Equivalent sworn police officers – this program is widely known as Recruit 313. SAPOL secured the funding and has adjusted the organisational recruitment plan so that backfilling of inactive staff (including those on unpaid maternity leave) is possible, and this policy is now active for sworn roles.

With regard to advertising part-time roles, SAPOL now publicly advertises roles with a flexibility statement that highlights that it promotes flexible ways of working including part-time and invites applicants to discuss the flexible working arrangements for roles.

Recommendation 27:

Recommendation intent met

The EOC recommended that SAPOL develop a 'stay in touch' policy in line with the recommendations of the Fair Work Ombudsman's *Best Practice Guide for Parental Leave* (**Recommendation 29**). With such a policy in place, employees going on extended leave could opt to stay in contact and abreast of relevant organisational news and updates, plus training and development or recruitment opportunities. As a result, the re-integration of the employee back into the workplace may be smoother and SAPOL's talent may be enhanced.

Project Equitas are currently planning for the implementation of this recommendation, and consulting both internally and externally about how best to adopt such a policy. The Team consulted with SAPOL employees who are currently on parental leave, as well as exploring technological support options with the Information Systems and Technology Service Area (IS and T). The Team has also been looking to other organisations for ideas on best practice.

The revitalisation of a 'Stay in Touch' policy is largely dependent on the capacity of infrastructure, which will be outlined in detail in IS and T's *Remote Access Business Case* (due to be finalised in September 2018) and provide direction for the extent of access that can be achieved.

Project Equitas have identified some risks associated with the implementation of the 'Stay in Touch' Policy. Some systemic challenges include the need to balance remote access while protecting sensitive data and information, and to overcome some minor information technology glitches when recording employee absences. There is also an associated mindset shift that needs to occur among managers and supervisors

to support this policy (i.e. they need to trust their employees to maintain professionalism and confidentiality while accessing SAPOL information from home). Some managers and supervisors will need convincing of the value of the policy, and to understand the importance of maintaining a connection to the workplace while on extended leave. These risks can be partly mitigated through training and engagement activities, which are planned to be incorporated in the future implementation of this recommendation.

Recommendation 29:

Too early to assess

3.5 Dispute Resolution and Complaints

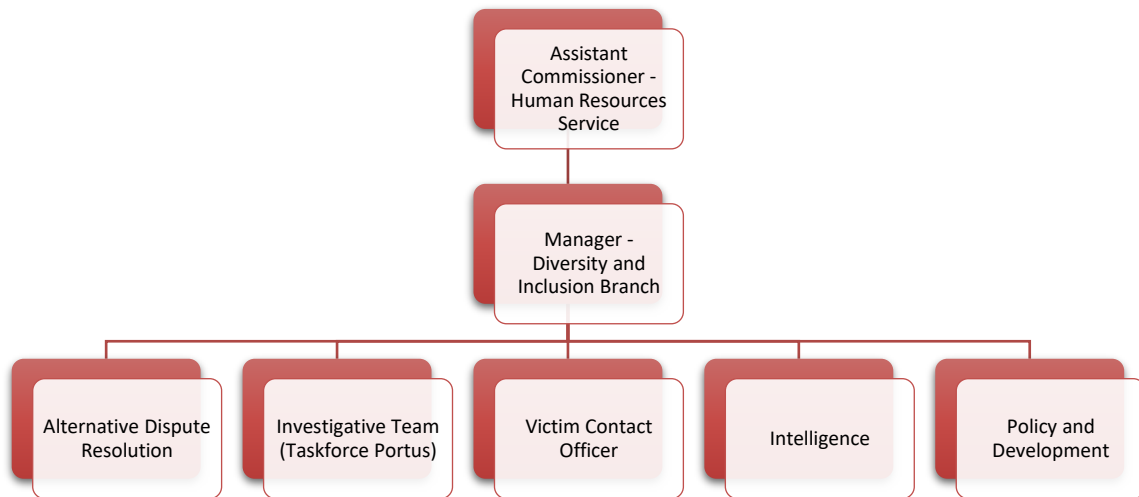
Another significant policy, process and system that Project Equitas is implementing is the complete restructure of how equity and diversity complaints are resolved. The EOC recommended that SAPOL establish a new and streamlined internal complaints resolution unit that reports directly to an Assistant Commissioner (**Recommendation 30**). The EOC also specified that the unit should utilise a new, confidential complaints management tool (**Recommendation 31**). The intent of these two recommendations combined was to establish an internal complaints process that is characterised by fairness, confidentiality, accessibility, transparency and efficiency; the criteria set as good practice by the Australian Human Rights Commission's guidelines for internal complaints processes. The EOC highlighted specific problems in the existing system to address:

- > Mistrust of the complaints and dispute resolution system, including the time taken to resolve complaints;
- > The overly legalistic and adversarial process;
- > Too much paper work/form/process-based;
- > Complainants having to tell their stories many times;
- > Failure to keep the parties informed through the process;
- > A lack of independence when matters are referred to management for review;
- > A lack of confidentiality;
- > A lack of continuity;
- > Negative treatment of or outcomes for complainants (including a culture of ostracisation and victimisation);
- > A perception of a failure to hold perpetrators to account (with perpetrators often avoiding appropriate penalties by being moved or even promoted).

Diversity and Inclusion Branch

On 18 July 2018, SAPOL's new Diversity and Inclusion Branch commenced operations, replacing the functions of the former Equity and Diversity section. SAPOL reallocated resources in order to expand the section from two Full Time Equivalent (FTE) roles to a total of 15 FTE, which now includes a small team of trained, professional mediators. This significant reallocation and professionalisation of resources demonstrates a commitment to improving the dispute resolution and complaints system to address instances of harassment and bullying within the organisation.

Figure 19: The Diversity and Inclusion Branch



The Branch Manager, also a professional mediator and recruited from outside of SAPOL, reports directly to the Assistant Commissioner for Human Resources Service. They are the only unsworn head of a Branch across the organisation, which differentiates the branch from the rest of SAPOL’s operational areas. The Branch is geographically located in a separate building for greater independence and greater confidentiality. The launch of the new Branch has been supported by the Diversity and Inclusion strategy, amended General Order and new procedural policies. There are new Standard Operating Procedures and specific Branch policies around confidentiality and conflict of interest which have been designed to ensure consistency and continuity in service delivery.

Defining Disrespectful Behaviour

The Branch has supplemented SAPOL General Orders with a *Respectful Behaviours Guideline* which defines what constitutes respectful and disrespectful behaviour in the context of the SAPOL workplace. Linked to this, the Project Equitas Team has added and defined predatory behaviour to the same General Order. These two policy changes are important because they establish and explicitly communicate expectations around employee behaviour which has not been previously captured in SAPOL policy beyond serious breaches outlined in the *Police Complaints and Discipline Regulations 2017*. These Guidelines are supported by revised Diversity and Inclusion online training modules.

The Complaints Process

The new Branch continues to receive all PD351 notifications (notification of workplace discrimination, harassment or bullying), but now not necessarily via a PD351 form; notifications can be raised both formally and informally. PD351 notifications can also be submitted anonymously, by a third party, including family members of the SAPOL employee experiencing discrimination, harassment or bullying.

Notifications are collectively assessed in an allocation meeting, where the case is discussed, allocated for action and recorded into IAPRO, a confidential online complaints management system. Allocation meetings

occur daily, and contact is established with the complainant within 24 hours of the notification being allocated. IAPRO sets out a list of tasks to be undertaken to manage the file and contains all pertinent information for the case to be followed up, and prompts a Victim Contact Officer to contact complainants to provide updates as the case progresses, and up to six weeks after the case has concluded.

Notifications are actioned depending on the severity of the allegation. The new Branch works according to the principle of early intervention with a victim-centred approach, where complaints are resolved through mediation and/or training led by the Alternative Dispute Resolution Team. In cases where there is a breach of the *Police Complaints and Discipline Regulations 2017 (SA)*, the *Code of Conduct for South Australian Public Sector Employees* and/or another unlawful act (and where the complainant wishes for the matter to be pursued formally) the Investigative Team investigates the complaint, in some cases in coordination with Internal Investigation Services (IIS) and the Office for Public Integrity (OPI) depending on the severity of the allegation. Should the allegation be of a criminal nature, the complaint is forwarded directly to IIS.

The new complaints system has been designed to address the concerns highlighted by the EOC's Independent Review. To build trust in the system, the entire complaints process has been centralised within the Diversity and Inclusion Branch, and is no longer devolved back to the Local Service Area management for resolution. The process is outlined in detail on SAPOL's intranet page for greater transparency about the process, and the Diversity and Inclusion Branch operate a 'call centre' for anyone to make enquiries about the process (anonymously if preferred). This will be supported by awareness sessions at various locations in October and November 2018.

The 'tiered' approach of allocation with a focus on early intervention and alternative dispute resolution means that the process is now less legalistic and adversarial. The centralised complaints system in IAPRO is now paperless - the PD351 is the only remaining form and is optional for a complainant as it can be filled by a member of the Diversity and Inclusion Branch on their behalf. A victim need only to tell their story once as comprehensive and confidential records are maintained in IAPRO for future reference. Confidentiality is ensured a number of different ways. In addition to the separation of the physical location and the centralisation of the complaints system, there are confidentiality and conflict of interest policies for the Branch, and members sign an undertaking to adhere to these policies annually. IAPRO is confidential and partitioned so that IIS only have access to certain Diversity and Inclusion Branch case files, and vice versa.

Managers who are involved in the investigation of a complaint deal directly with the Diversity and Inclusion Branch, and are explicitly cautioned about the ramifications should a complainant be victimised. Complainants and respondents may be transferred as a result of a complaint, and this is organised by the Diversity and Inclusion Branch and relevant managers, with notifications about the changes on a 'need to know' basis.

The Diversity and Inclusion Branch has an Intelligence Analyst who maintains and analyses data relating to PD351 notifications. De-identified statistics are provided to the Assistant Commissioner for Human Resources Services quarterly. The Analyst is also able to use statistics to identify 'hot spots' of bullying or misconduct. The Quarterly reporting to the Assistant Commissioner for Human Resources Services aligns

with the Diversity and Inclusion Strategy, which will report on the Branch's efforts to drive the Strategy's objectives within SAPOL.

De-identified data about the outcomes of PD351 investigations has been included in Project Equitas update emails to all SAPOL staff, and it is anticipated that the Diversity and Inclusion Branch will continue to publish outcomes.

Recommendation 30: Recommendation intent met

Recommendation 31: Recommendation intent met

Taking a Results-based Learning Approach

The workings of the new Diversity and Inclusion Branch are going to be reviewed after 12 months of operation. The Branch is also collecting feedback from complainants about their experiences of the process for continual improvement.

Taskforce Portus

Taskforce Portus was established in February 2017 as an interim investigation team to specifically follow up on complaints of sex discrimination, sexual harassment and predatory behaviour raised in the EOC's Independent Review and where complainants had indicated that they wanted a matter pursued. (**Recommendation 33**).

The Taskforce has now been absorbed into the Diversity and Inclusion Branch as the Investigation Team to investigate low to mid-level notifications which can be resolved through mediation and do not lead to a formal punitive measure.

The presence of an investigative arm for conduct that does not necessarily result in punitive action has been contentious, with the concern that it undermines fairness in the process. SAPOL leadership will review the investigative team's presence in the Diversity and Inclusion Branch after 12 months of operation.

Recommendation 33: Recommendation intent met

Consistent Disciplinary Processes

The EOC recommended that the disciplinary processes and penalties for poor behaviour are reviewed and for SAPOL to consider revising classifications for end of service to include 'resigned under investigation' in cases within remit of this Review (**Recommendation 34**). The intent was to have processes in place that result in consistent disciplinary outcomes for all SAPOL employees regardless of whether they are sworn or non-sworn. Being able to keep a record if an employee has separated while under investigation of sexual misconduct.

In September 2017, a new legislative scheme governed by the *Police Complaints and Discipline Act 2016* was introduced for making and the management of complaints about SAPOL sworn employees. This new scheme was the result of a review by the Independent Commissioner Against Corruption (ICAC) at the request of the former Attorney-General. The findings of the ICAC *Review of Legislative Scheme governing complaints about public administration* combined with the findings of the EOC's Independent Review adequately review SAPOL's disciplinary processes and penalties for poor behaviour.

With the new legislative scheme and the establishment of the Diversity and Inclusion (D and I) Branch, SAPOL is now in a position where it can take timely managerial action to resolve complaints internally. With internal complaints being centralised within the D and I Branch it ensures there is a consistent process applied to all complaints, regardless if parties involved are sworn and/or non-sworn. Also, the D and I Branch is committed to early intervention, which sees them drawing on mediation skills and working with the parties to understand the impact of inappropriate behaviour and correcting behaviour. This results in matters being resolved efficiently internally without disciplinary outcomes.

In terms of revising classifications for end of service to include 'resigned under investigation' in cases within remit of the EOC Independent Review, SAPOL has incorporated into the Exit Management Strategy an opportunity for the manager to record if the employee separating has resigned while under investigation. This will be beneficial for SAPOL's internal use, in particular when assessing future re-employment.

Recommendation 34 (review disciplinary and penalty processes component):

Recommendation intent met

Recommendation 34 ('resigned under investigation' component):

Too early to assess

3.6 Wellbeing and Support Services

Mechanisms to Ensure Safety and Confidentiality of Alleged Victims of Domestic Violence

The EOC recommended that SAPOL establish mechanisms to ensure the safety and confidentiality of alleged victims of domestic violence and their alleged perpetrators when both work for SAPOL (**Recommendation 35**). The intent behind this recommendation was to provide greater support for domestic violence victims in the workplace, particularly where both parties to the violence work within the same organisation.

In November 2017, SAPOL released a guideline entitled *Family and Domestic Violence Involving SAPOL Employees* which applies to all SAPOL work sites and all employees, contractors, sub-contractors and volunteers. All employees were made aware of the new guideline via a distribution list email at the time of its inception, and there is a link to the guideline on the SAPOL intranet.

The guideline serves as a toolkit on how to implement the SAPOL General Order - *Domestic Abuse*. It includes a Workplace Safety Plan template and a conversation guide for managers and supervisors to better support victims of domestic violence.

The introduction of the guideline has been supported by training for all SAPOL employees and those with management responsibilities (**Recommendation 36**) which was provided in mid-2018. This course content has also been adapted to be an online course which will be incorporated into a number learning programs (such as 'Getting Started in your Position' for unsworn managers, the Constable Development Program, Orientation for Managers/Supervisors and the Sergeants Course for sworn managers) on an ongoing basis as a required component.

Participants of the mid-2018 training will once again have an opportunity to participate in an evaluation activity (late 2018/early 2019) to provide feedback about the training which will be used to inform any amendments to the course content.

The guidelines are scheduled for review by the Family and Domestic Violence Branch in November 2019.

Recommendation 35:

Recommendation intent met

Diversity and Inclusion Representatives

The EOC recommended that SAPOL review the roles and responsibilities of Equity Contact Officers (ECOs) (**Recommendation 37**). The intent of the recommendation was to enhance the range of support mechanisms for staff wellbeing by refining and strengthening the ECO role to ensure those that are in the role are credible, respected and adequately trained.

Planning and preparation has been underway for the implementation of this recommendation, and the ECO role is being reconceptualised and renamed Diversity and Inclusion Representative. The restructuring of the ECO cohort began in August 2018.

The Project Equitas Team consulted with the former Equity and Diversity Section and members of the 'Have Your Say' focus group to better understand the expectations of SAPOL employees of ECOs, and current

gaps in their responsibilities. The Team also consulted other policing jurisdictions, emergency services and public sector organisations about best practice models, including Tasmania Police, Victoria Police, the Northern Territory Police, Fire and Emergency Services, New Zealand Police and the Australian Capital Territory Chief Minister, Treasury and Economic Development Directorate.

Anticipated key changes to the program include:

- > A more clearly defined role and purpose of a Diversity and Inclusion Representative, with greater emphasis on support to staff and the promotion of appropriate behaviour.
- > An expression of interest and selection process that outlines particular skills and attributes to more accurately portray the Program's expectations of those in the role.
- > Better information about how to contact Diversity and Inclusion Representatives via a new intranet page and by referral from the Diversity and Inclusion Branch.
- > A better clarification of the relationship between Diversity and Inclusion Representatives and Managers and Supervisors in a given team or section.
- > Including performance reviews for Diversity and Inclusion Representatives after three years of tenure.
- > The regulation of training for Diversity and Inclusion Representatives which includes an introductory full-day training session, and annual refresher training.

Updates to the roles and responsibilities of the Diversity and Inclusion Representative will be formalised in a revised General Order, which will be followed by the merit-based recruitment of a new cohort. Current ECOs will be required to re-apply for the position of Diversity and Inclusion Representative, and will be selected based on specified skills and attributes.

It is anticipated that the current cohort of approximately 150 ECOs will be reduced to 50 to 70 Diversity and Inclusion Representatives. While this diminishes the ratio of Representatives to other staff, SAPOL have prioritised the distribution of Representatives to ensure adequate accessibility for all SAPOL employees.

The Diversity and Inclusion Representative Program will be reviewed after 12 months of operation to determine areas for improvement, and whether numbers of Diversity and Inclusion Representatives should be increased or decreased.

Recommendation 37:

On track to meet recommendation intent

Corporate Pulse Survey

The EOC recommended that SAPOL monitor staff perspectives of organisational responses to sexual harassment, sex discrimination and wellbeing through monthly, confidential cultural surveys with findings reviewed quarterly by ELT (**Recommendation 38**). The intent of the recommendation was to enable SAPOL leadership to be proactive in managing workforce issues that relate to the health and wellbeing of employees.

SAPOL developed a Corporate Pulse Survey, which to date has been deployed three times (November 2017, March 2018 and August 2018). The Survey is implemented quarterly as opposed to monthly in order to mitigate the risk of survey fatigue.

The Corporate Pulse Survey allows employees to confidentially share their personal perspectives on equity and diversity issues. Key topics include:

- > Confidence levels in SAPOL's ability to be inclusive and diverse
- > Perceptions of fairness in employment selections and promotions
- > Perceptions of access to training opportunities and the demand for new opportunities
- > Interest in flexible working arrangements and perceptions of accessibility and feasibility of such arrangements.
- > Perceptions of the effectiveness of the complaints resolution system.

SAPOL also uses the Corporate Pulse Survey to capture feedback about workplace culture more broadly by including questions about relationships with a person's supervisor and manager, and current levels of job satisfaction. There is an opportunity for survey participants to provide free text feedback on matters that are important to them.

The Executive Leadership Team (ELT) has started using variance reporting to monitor feedback from the SAPOL workforce. Findings from the survey assist the ELT to prioritise which key issues and concerns of the workforce to actively address.

Response rates for the survey are likely to fluctuate and will be influenced by competing organisational priorities occurring at a given time. Those employing the survey will need to be mindful of this when using survey results and findings to justify actions that will affect the broader workforce.

Recommendation 38:

Recommendation intent met

Conclusion

Project Equitas is still on track with the practical implementation of 20 recommendations completed, another 14 in the process of being delivered and 4 in the planning stages.

Since January 2018 there have been some achievements to note, particularly around the revitalisation and promotion of flexible work arrangements and the complete restructure of the internal complaints process. These are two policy, process and/or system reforms which are likely to shift the hearts and minds of SAPOL employees in the long term, and contribute significantly to a positive cultural change towards greater gender equality.

Consultations for this report highlighted some risks to implementation which once again relate to the capacity of service areas to permanently adopt Project Equitas initiatives as 'business as usual'. This time the EOC Monitoring Team refers particularly to new data collection and reporting responsibilities, and how those responsibilities will be integrated into existing reporting lines. There are also, once again, concerns about IT infrastructure which will support the implementation of flexible working arrangements, and the 'Stay in Touch' policy.

The 'SAPOL at a Glance' data indicates there have been small but notable shifts towards gender parity across the workforce, and particularly at the Inspector level. It is early days for the Flexible Work Team, but there has been interest from both women and men to take up flexible work arrangements on an ongoing basis. Complaints of sex discrimination, sexual harassment and predatory behaviour increased significantly in 2017, and have levelled in the first half of 2018. Longer-term analysis will indicate whether reforms to the complaints process have encouraged more people to come forward and report misconduct. 93% of the workforce (active and inactive) have received training about respectful behaviour, and preventing and responding to sex discrimination and sexual harassment.

The detailed analysis section of this report focused on 29 of the total 38 recommendations which centre on a change in policy, process or system, and assessed them according to how adequately they meet the original intent of the recommendation, as outlined in the EOC's Independent Review. The majority of those recommendations meet, or are on track to meet, the original intent of the recommendation (see Appendix I: Overview of Changes in Policy, Process and System). The EOC has provided SAPOL with some points for their consideration to enhance the efforts of Project Equitas for the best possible project outcomes.

The successful implementation of a new or revised policy, process or system does not immediately equate to successful cultural change. New policies, processes and systems serve as a framework to guide a desired change, but that framework needs to be supported by the capacity and willingness of staff to utilise it and adopt it as standard business practice. This capacity and willingness will be the focus of analysis for the next report in early 2019.

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Appendix I Overview of Changes in Policy, Process and System

Leadership	4: Gender Equality Strategy	7: Gender equality in business planning	8: Gender equality KPIs for leadership	11: Gender equality advisory group					
Workforce Management	15: Handover process for the management of employees	16: External review of Human Resources	17: Review of the conflict of interest policy	20: Exit management strategy for employees	13: Targets for the promotion of women	19: Review of Equipment	12: Review of standards for promotion	14: Talent ID program	18: Reinvigoration of performance management system
Training and Development	21: Biennial training	22: Rolling three-year training plan	23: Targets for women in training	24: Training opportunities for staff on extended leave	25: Review of training methodologies				
Flexible Workplace Cultures	26: All roles flex approach	27: Funding of backfilling employees on maternity leave	28: Technology and facilities to support flexible workplace culture	a) Facilities for breastfeeding	c) Demand-based rostering	29: 'Stay in touch' policy			
				b) Maternity uniforms	d) Remote access				
Dispute Resolution and Complaints	30: New complaints unit	31: Confidential complaints management tool	33: Taskforce to investigate allegations of sexual misconduct	34: Review of disciplinary and penalty processes and revision of classifications	Review of disciplinary processes				
					Revision of classifications				
Wellbeing and Support Services	35: Mechanisms to ensure safety of employees experiencing domestic violence	38: Confidential cultural surveys	37: Review roles and responsibilities of Equity Contact Officers						

Recommendation intent met
 Recommendation on track for intent to be met
 Too early for assessment