

Report 3

Progress in the implementation of recommendations and assessment of capacity and willingness to support cultural change

May 2019

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

The Equal Opportunity Commission's *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police* was released over 2 years ago in December 2016. SAPOL's Project Equitas has continued to implement the EOC's 38 recommendations and transition the associated policy, process or system to business operations with 25 recommendations completed and the remaining 13 well underway.

We have had a role in monitoring the implementation of the recommendations and our reporting schedule has had an initial evaluation focus on the practical implementation of recommendations and we are now moving the focus to the influence that SAPOL initiatives are having on the workforce and organisation.

From our previous two reports we have found that SAPOL leadership committed to a vision for change and engaged employees in the change with dedicated communication and engagement activities. Key foundation actions that were centred on the welfare of victims of sex discrimination, sexual harassment and predatory behaviour were implemented early. New or revised policy, processes or systems have been implemented to guide the desired change, including the establishment of the Diversity and Inclusion Branch and the revitalisation and promotion of flexible working arrangements (FWA's). This demonstrates that SAPOL's leadership and the Project Equitas team are investing time, energy and resources in the change process.

This report covers our assessment of SAPOL supervisors and managers capacity and willingness to support cultural change. In addition, the capacity of SAPOL's Diversity and Inclusion Branch to fulfil its purpose and objectives was assessed. Their roles use and apply the new or updated policies and processes, integrating them into 'business as usual'. The workforce looks to the supervisors and managers to set the tone, see action on what is important, and assist them to step into change.

We found that the overall capacity and willingness of supervisors and managers to support cultural change is adequate. Similarly, the capacity of the Diversity and Inclusion Branch is also adequate. There are challenges to capacity that need to be addressed with follow-up action to maintain momentum, in particular enhancing confidence to challenge and report inappropriate behaviour of employees who are sworn or of a higher classification/rank. I am not surprised by this, as SAPOL is an organisation that operates in a command and control structure. However, I anticipate SAPOL will see this as an opportunity to expand their leadership styles to support and promote employees to enact their organisational values, especially integrity.

I'm pleased that many of the recommendations have been actioned and that SAPOL leadership has continued to show direction and commitment through the complex culture change stages. Cultural change is often a long slow process and requires consistency and persistence. I always encourage organisations to recognise their change champions or enablers who help to make the change real in the workplace.

As the Project Equitas team enters its closing phase, I strongly encourage SAPOL leadership and management to reflect on their commitment and responsibility to the cultural change initiative to ensure they

can perform their role in cultural change effectively and efficiently without this team in place. If there are any reservations, then I urge the continued utilisation of the skills and expertise within the Project Equitas team to ensure the effort and investment by SAPOL is optimised now and into the future.

We are looking forward to closing out our monitoring work with SAPOL and producing our final report in December 2019.

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
- > Assistant Commissioner Linda Fellows
- > Sally Woolford, Courtney Jonson and Inspector Steven Anderson (Project Equitas project management team members)
- > Project Equitas delivery team members
- > Members of SAPOL's Executive Leadership Team
- > Members of the Diversity and Inclusion Branch
- > Survey respondents

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

Supporting your Wellbeing

For Every Reader:

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

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

Equal Opportunity Commission: to discuss or make a complaint of discrimination, sexual harassment or victimisation contact the EOC on (08) 8207 1977 or 1800 188 163. You can find out more on the EOC website www.eoc.sa.gov.au.

Equal Opportunity Commission Legal Advice Service: the service is available to anyone and provides advice on discrimination matters, the complaints process and how to lodge a complaint. The Legal Advice Service can also assist members of the public in preparing their documentation to lodge a complaint. For more information visit <https://adelaide.edu.au/free-legal-clinics/equal-opportunity-commission-legal-advice-service> or to make an appointment contact (08) 8207 1977 or email eoclas@adelaide.edu.au.

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.

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).

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.

Women's Safety Services SA Domestic Violence Crisis Line: a service offering telephone counselling and information 24/7. Tel. 1800 800 098.

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).

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

For SAPOL Employees:

SAPOL Employee Assistance Program (EAP): 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: 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: 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.

The SAPOL Exit Survey: comprises the EOC's contact details if an employee wishes to share their experience of working for SAPOL for the purpose of the EOC Monitoring Project. This information also highlights that contact can be made with the EOC to lodge a complaint and/or explore the Restorative Engagement Program.

Executive Summary

In 2016 the Commissioner of the South Australia 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 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 widespread¹. The prevalence of sexual harassment was completely unacceptable.

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 Independent Review’s recommendations, and to measure the extent of cultural change in the workplace. The EOC will prepare a total of four public reports spanning May 2017 to December 2019, 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 third report for SAPOL from the EOC Monitoring team and follows:

- *Report 1: Progress in the Implementation of Recommendations and Setting the Foundations for Cultural Change* (released publicly in January 2018); and
- *Report 2: Progress in the Implementation of Recommendations and changes in policies, processes and systems that support cultural change* (released publicly in September 2018).

As the EOC Monitoring team progresses through its reporting schedule, the evaluation focus is shifting from the practical implementation of recommendations to the influence that SAPOL initiatives are having on the workforce and organisation.

This report provides an update on the progress in the implementation of the recommendations and an assessment of SAPOL’s supervisors and managers capacity and willingness to support cultural change. The report also assesses the capacity of the Diversity and Inclusion Branch to fulfil its purpose and objectives.

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

Capacity and willingness (or reinforcement if it already exists) is essential during a cultural change process. With new or updated skills/competencies, policies/processes/systems or initiatives rolling out, it is important that people understand the 'why and need' for the process and engage in the change by knowing 'what' to do and 'how' to do it.

The Project Equitas team has been responsible for implementing the recommendations from the EOC Independent Review. The intent of a number of these recommendations has been to develop or update policies, processes or systems in order to make gender equality 'sustainable' in the organisation (as per the Workplace Gender Equality Agency Toolkit 'gender equality roadmap'³). Another suite of recommendations focus on training with the intent of driving cultural change through increasing/reinforcing the understanding of key gender equality topics that align attitudes and values (through behaviours) with those of SAPOL and society. The overall intent is to build the capability, confidence and commitment to gender equality in leaders and the workforce.

This third evaluation report involved surveying a cohort of SAPOL employees who have supervisory or managerial roles and members of the Diversity and Inclusion Branch. The response rate was 37% and 71% respectively. The surveying activity was complemented by consulting with the Project Equitas team to gain a background of capacity-building and communication activities that have been implemented to support their cultural change initiatives.

Having capacity and willingness to contribute to the cultural change effort (based on EOC recommendations) does not immediately equate to successful cultural change. Adequate capacity and willingness serves as a foundation for effective utilisation and adoption of Project Equitas initiatives as standard business practice. This practice impacts employees experience of workplace culture and along with perception of organisational culture, contributes to cultural change (this will be the focus of analysis for the next report in December 2019).

Section 1: Progress in the Implementation of Recommendations

As of April 2019, 25 recommendations have been fully implemented and 13 are underway. The EOC Monitoring team has identified a risk to the *review of standards for promotion* (**Recommendation 12**). A lengthy implementation time is required to allow for extensive consultation. It will be important for SAPOL to communicate with the workforce in a timely manner with meaningful information to maintain engagement.

Section 2: Assessment of Capacity - Key Findings

Supervisors and managers interface between SAPOL leadership and the workforce and in doing so translate the strategic direction into day-to-day practice. This day-to-day practice influences the experiences of the

³ Workplace Gender Equality Agency (WGEA) Gender Strategy Toolkit Pg 11

workforce and therefore the success of Project Equitas initiatives, and SAPOLs cultural change effort. It is important that supervisors and managers have capacity to contribute to the cultural change.

The capacity of supervisors and managers was investigated under four themes:

Understanding and modelling appropriate behaviour

The results indicate that SAPOL supervisors and managers capacity in understanding and modelling appropriate behaviour is **adequate**. The majority of respondents reported they have an understanding of appropriate and inappropriate behaviour and placing a focus on the importance for appropriate behaviour in the workplace. A number of respondents highlighted that appropriate behaviour in the workplace has always been important to them. While respondents indicated that there is sufficient information available to support understanding of what is appropriate and inappropriate behaviour in the workplace, it was suggested that the provision of de-identified case studies would be beneficial to support them in their practice

Challenging and reporting inappropriate behaviour

Results indicate that the supervisors and managers capacity in challenging and reporting inappropriate behaviour is **less than adequate**. SAPOL will need to place particular **focus on enhancing confidence to challenge and report inappropriate behaviour** by those who are sworn or of a higher classification/rank.

Supporting, promoting and enacting new policies and processes

The results indicate that SAPOL supervisors and managers capacity in supporting, promoting and enacting new policies and processes is **adequate**. While the capacity has been assessed as adequate, managing teams with members accessing FWAs can be challenging. **Support from Human Resources Service** would be useful to **work through the challenges and contribute to maintaining the momentum of working flexibly in SAPOL**.

Managing people effectively

Results indicate that supervisors and managers capacity in managing people effectively is **adequate with challenges**. The challenges that surfaced during this investigation are being worked on by the Project Equitas team, namely re-invigorating the performance management system. In addition, it is important that supervisors and managers are supported, if required, by the Human Resources Service to ensure that their time/effort spent on performance management is not to the detriment of other team members. Such **support from Human Resources Service will maintain momentum for SAPOL to manage employees effectively**.

Section 3: Assessment of Willingness - Key Findings

The EOC Monitoring team investigated the willingness of supervisors and managers to support cultural change by investigating the elements of *accepting* the need for change and the *desire to engage* in change.

The team tested the importance placed on understanding what is appropriate and inappropriate behaviour in the workplace and challenging inappropriate behaviour. Further testing was undertaken by investigating the

importance placed on a number of key Project Equitas initiatives. Respondents placed importance on these behaviours and initiatives indicating an *acceptance* of the need for change.

This *acceptance* of the need for change was reinforced when respondents outlined their understanding of the benefits of Project Equitas Initiatives for SAPOL or its employees. The results indicated that the vast majority of the respondents see the change in a positive light.

When investigating the *desire to engage* element, the EOC Monitoring team found that the respondents considered a set of tasks related to Project Equitas initiatives part of their every-day role. There were examples that demonstrated respondents are *engaging* in the change and taking action to make the change a part of business as usual, in particular improving gender equity and normalising working flexibly in SAPOL.

The results indicate that the supervisors and managers willingness to support the cultural change is **adequate**.

Section 4: Capacity of the Diversity and Inclusion Branch - Key Findings

The new Diversity and Inclusion Branch (launched July 2018) is critical in integrating the initiatives of Project Equitas into 'business as usual' and has a key role in promoting and facilitating SAPOL's desired cultural change. The branch plays a significant role in ensuring organisational practices within SAPOL uphold SAPOL's values, that personal behaviours fall into line with those organisational practices and support the goals for diversity and inclusion set out in the '*Diversity and Inclusion Strategy 2018-2020*' (developed by Project Equitas and launched in December 2017). This role is reflected in the branch's purpose and objectives. It is important that the branch has the capacity to fulfil its purpose and objectives as its members interface with the workforce, influencing their experience of Project Equitas initiatives and SAPOL culture.

Results from the Diversity and Inclusion Branch indicate that members capacity to fulfil its purpose and objectives is **adequate**. While the capacity has been assessed as adequate, **follow-up action is required to maintain momentum**. It is important that the branch members are confident to perform their role, especially given they interact with employees, who may be vulnerable or under stress.

Summary of Key Considerations for Report 3

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.

Key Consideration 1

SAPOL review the completion status for the mandatory online diversity and inclusion training courses/modules to ensure all employees are up to date.

Key Consideration 2

SAPOL develop strategies to enhance employees confidence to challenge/call out or report inappropriate behaviour, in particular of employees who are sworn or of a higher classification/rank.

Key Consideration 3

As suggested in the EOC's first report, disciplinary outcomes are communicated (without identifying details of parties involved) to demonstrate that inappropriate behaviour is being treated seriously.

Key Consideration 4

SAPOL's Human Resources Service provide support to supervisors and managers with regards to managing flexible teams and seek feedback on any gaps in support and ways forward.

Key Consideration 5

Project Equitas engage supervisors and managers in the finalisation and roll out of the revised performance management system (recommendation 18) to enhance transition to business operations and up-take.

Key Consideration 6

SAPOL's Diversity and Inclusion Branch Manager

- Review the training status of branch members to ensure all have been trained (formally or informally) in the impact of sex discrimination and sexual harassment (including predatory behaviour) on an individual and at the organisational level;
- Incorporate the topic of 'confidence to perform their role' with branch members during Individual Performance Management discussions to identify development needs; and
- Review training, tools and supports for existing and new branch members to maintain and enhance the branch's capacity moving forward.

Key Consideration 7

In order to identify what is working well and ways to achieve the purpose and objectives of the branch, SAPOL's Diversity and Inclusion Branch Manager along with branch members review its current approaches to:

- Supporting SAPOL employees to complete the necessary steps of the notification (internal complaints) procedure; and
- Preventing workplace conflict through education initiatives (training, information sessions, formal and informal coaching).

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 widespread⁴. 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 heard from numerous survey respondents and interviewees describe the SAPOL culture as a boys club⁵. The EOC Independent Review made 38 recommendations to promote equal opportunity, address sex discrimination, sexual harassment (including predatory behaviour) and put SAPOL on a pathway to becoming an organisation with a sustainable culture of gender equality (drawing on the WGEA Toolkit 'gender equality roadmap'⁶).

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'⁷. In early 2017, SAPOL established *Project Equitas*, a team dedicated to implementing the recommendations of the EOC Independent Review, under the executive leadership of Assistant Commissioner Bryan Fahy. The team was established based on expressions of interest from both sworn and unsworn employees of SAPOL. The responsibility for the delivery of each of the EOC's 38 recommendations was divided across the Project Equitas team members, and an experienced, externally-recruited Project Manager has logistical oversight for project delivery.

While the EOC Independent Review was undertaken using a gender equality scope, SAPOL has expanded the scope to diversity and inclusion more generally. SAPOL is aiming to be a diverse and inclusive organisation where all people are safe, respected and supported to reach their potential⁸.

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

⁵ Ibid Pg. xii

⁶ Workplace Gender Equality Agency (WGEA) Gender Strategy Toolkit Pg. 11

⁷ Ibid Pg. iv

⁸ SAPOL Diversity and Inclusion Strategy 2018-2020; Pg. 2

In May 2017, the EOC was subsequently commissioned to provide independent oversight of SAPOL's progress in the implementation of the EOC Independent Review's recommendations, and to measure the extent of cultural change in the workplace.

This is the EOC's third review report. Its purpose is to provide an update on the implementation of the recommendations, and report on the adequacy of the capacity and willingness of supervisors and managers to support the cultural change effort required (based on EOC recommendations). In addition, this report covers our assessment of the capacity of the Diversity and Inclusion Branch to achieve its purpose and objectives.

It is important to note that this report does not cover cultural change per se. Further analysis of evidence of cultural change will be provided in the final report (due December 2019) when most of the EOC recommendations are expected to be completed and the resulting products transitioned to SAPOL's business operations.

About the EOC Monitoring Project

The monitoring, evaluation and reporting activities of the EOC Monitoring team are based on a continuous cycle rather than as a single, static event. During project planning in 2017, the EOC planned to prepare 5 public evaluation reports with reports 4 and 5 focusing on practice change and cultural change respectively. It has been decided, in consultation with SAPOL, to consolidate these two reports with the aim of minimising confusion between change in practice and culture and simplifying data analysis.

The regularity, as well as a specifically-defined evaluation focus for each public 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).

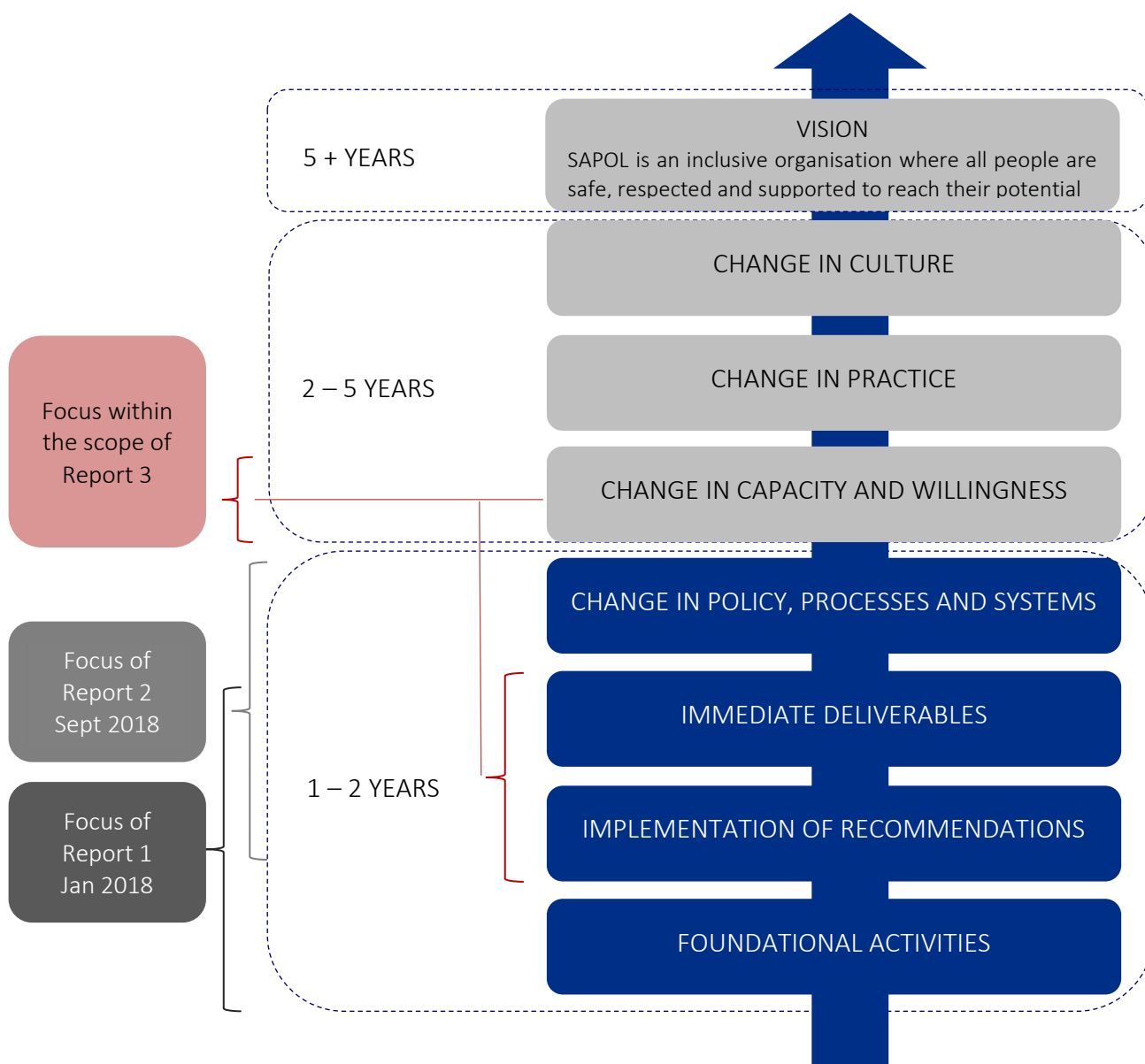
A summary of the completed public reports and up-coming public reporting is presented in Appendix A.

Figure 1: Evaluation and reporting schedule for the EOC Monitoring Project

TIMEFRAME		REPORT TITLE	EVALUATION FOCUS	
2020	February	Handover Report: EOC Handover Report to SAPOL 2020 (<i>internal report</i>)	A roadmap for the continual, in-house monitoring and evaluation of cultural change in SAPOL.	
2019	December	Final Report: Changes in business practice and evidence of change in culture	Progress in implementing the 38 recommendations	Evidence of change in business practices that support diversity and inclusion (with particular reference to gender equality) and overall cultural change in SAPOL towards becoming a more diverse and inclusive workplace (with particular reference to gender equality).
	May ⁹	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

⁹ The timeframe for Report 3 has changed from April 2019 to May 2019

Figure 2: Summary of the program logic model for SAPOL's cultural change effort



Focus for Report 3

SAPOL's supervisors, managers and Diversity and Inclusion Branch are critical for integrating the initiatives of Project Equitas into sustainable 'business as usual' and thus have a key role in promoting and facilitating SAPOL's desired cultural change. It is important that these cohorts have the capacity and willingness to effectively contribute to the cultural change process, in particular:

- The new Diversity and Inclusion Branch (launched July 2018) ensuring practices within SAPOL uphold SAPOL's organisational values, that personal behaviours fall into line with those practices and support the goals for diversity and inclusion set out in the '*Diversity and Inclusion Strategy 2018-2020*' (developed by Project Equitas and launched in December 2017). The branch interfaces with the workforce independently from, but in parallel with, supervisors and managers.
- Supervisors and managers interface between SAPOL leadership and the workforce and in doing so translate the strategic direction into day-to-day practice. This day-to-day practice influences the experiences of the workforce and therefore the success of Project Equitas initiatives, and SAPOL's cultural change effort. Analysis of the experiences of the workforce and cultural change will be provided in Report 4 (refer Figure 2).

Why focus on capacity and willingness to support cultural change

The EOC Independent Review noted that SAPOL needed to embark on a major change project in order to become a gender equitable workplace and that it can only be sustainably resolved through changes in people's hearts and minds¹⁰. This concept of change was incorporated into the program logic model¹¹ as a change in capacity and willingness.

A change in capacity and willingness (or reinforcement if it already exists) is essential during cultural change. With new or updated skills/competencies, policies/processes/systems or initiatives rolling out, it is important that people understand the 'why and need' for the process and engage in the change by knowing 'what' to do and 'how' to do it.

Project Equitas has been responsible for implementing the recommendations from the EOC Independent Review. The intent of a number of these recommendations has been to develop or update policies, processes or systems in order to become a 'sustainable' gender equality organisation (as on the WGEA Toolkit 'gender equality roadmap'¹²). Another suite of recommendations focus on training with the intent of driving cultural

¹⁰ 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 36-37

¹¹ During the EOC Monitoring team's planning phase (May to September 2017) a program logic model was developed that maps the sequence of changes that SAPOL expects to see over the lifetime of Project Equitas and beyond. The program logic model is an appendix to the EOC's *Report 1 Progress in the Implementation of Recommendations and Setting the Foundations for Cultural Change (2018)*

¹² Workplace Gender Equality Agency (WGEA) Gender Strategy Toolkit Pg. 11

change through increasing/reinforcing the understanding of key gender equality topics that align attitudes and values (through behaviours) with those of SAPOL and society. The overall intent is to build the capability, confidence and commitment to gender equality of leaders through what they say, how they act and what they prioritise.

For the purpose of Report 3, capacity and willingness are defined as:

- **Capacity** refers to the appropriate knowledge, skills and confidence, as well as sufficient infrastructure or technical tools to undertake required tasks.
- **Willingness** refers to accepting and understanding why change is required and actively engaging in the change.

Recommendations in scope

The EOC Independent Review made 38 recommendations, 12 of these are relevant for the scope of this report. These particular recommendations have been identified as they relate to supervisors and managers and the Diversity and Inclusion Branch having the capacity and willingness to implement Project Equitas products or deliverables. The recommendations in scope are outlined in Table 1 and have been grouped into four broad themes which have been used in Section 2 where the EOC's findings are discussed.

Table 1: Recommendations in scope

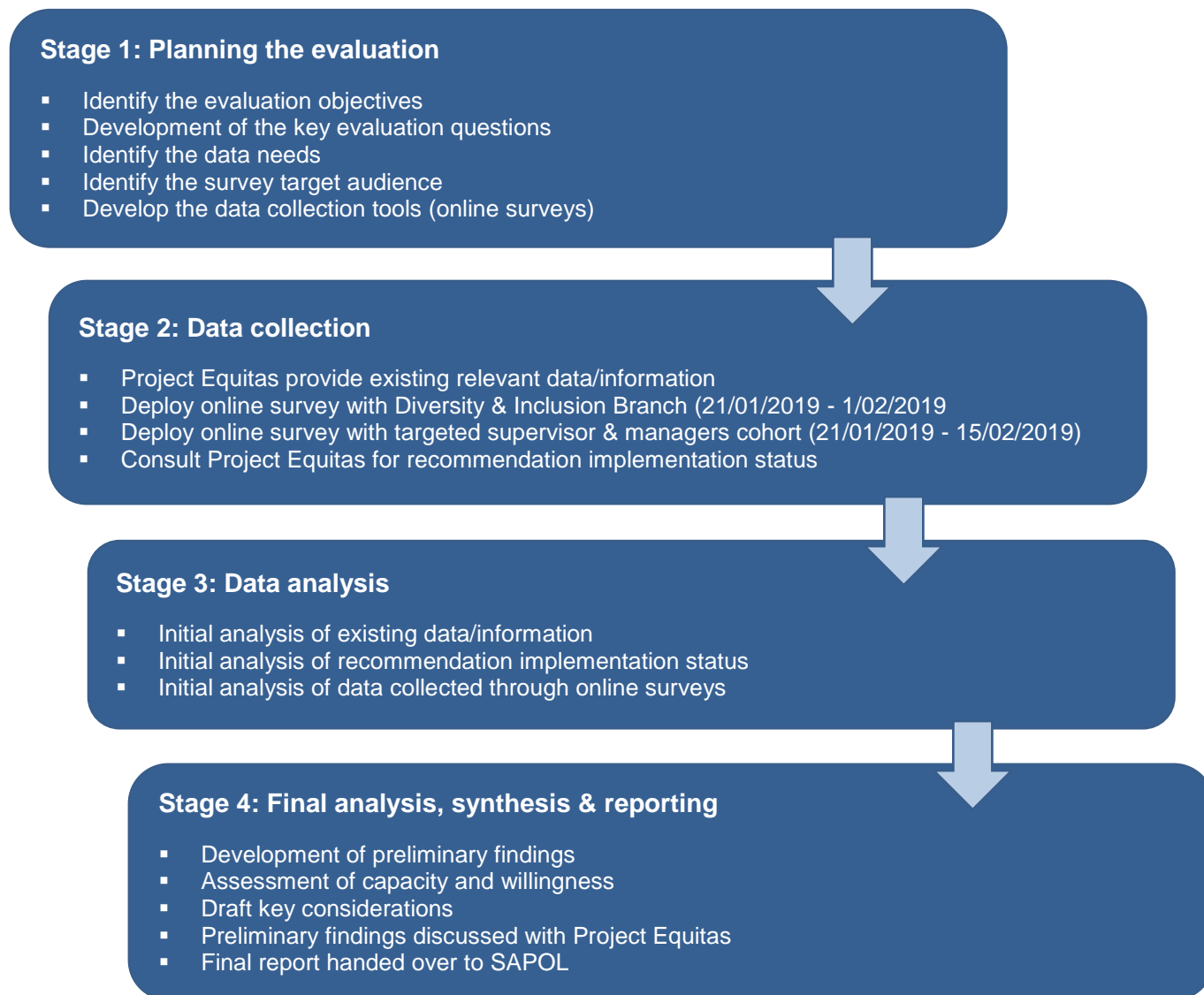
Broad Theme	Recommendation Number and Topic
1. Understanding and Modelling Appropriate Behaviour	21(a) Biennial training about respectful behaviours, unconscious bias and bystander responsibilities 17 Re-examining the conflict of interest policy in regard to intimate/familial relationships between supervisors and direct staff
2. Challenging and Reporting Inappropriate Behaviour	21(b) (i) Biennial training (for supervisors) about identifying and responding appropriately to sexual harassment and sex discrimination and understanding and accommodating flexible work 30 New Complaints Unit
3. Supporting, Promoting and Enacting New Policies and Processes	21 (b) (ii) Training in understanding and accommodating flexible work 26 Flexible working arrangements (including 28(d) technical equipment to support flexible working arrangements) 29 'Stay in Touch' policy 35 Mechanisms to ensure the safety and confidentiality of alleged victims of domestic violence and perpetrators when both work at SAPOL (includes 36 Training in domestic violence intervention) 37 Equity Contact Officers
4. Managing People Effectively	5 Leadership Shadow Program 6 Leadership performance feedback tool 18 Reinvigorating the performance management system 22 Training delivery plan with a focus on developing people management and performance management skills

Methodology and structure

Report development stages

In developing this report, the EOC Monitoring Project team took a four-stage approach, starting with planning for the evaluation through to final analysis, synthesis and reporting – these stages, along with their key steps, are presented below in Figure 3.

Figure 3: The stages in the development of Report 3



Identifying the target audience for the surveys

The identification of the 14 members of the Diversity and Inclusion Branch was straightforward as these employees (and their roles) have been allocated specifically to the branch. The identification of supervisors and managers was more complex as ranks or classification levels in SAPOL do not necessarily translate to a supervisor or manager role.

The EOC Monitoring team defined supervisors and managers as those SAPOL employees who were considered to have an implementation role in the following initiatives:

- Conflict of interest (Recommendation 17)
- Performance management system (Recommendation 18)
- Working flexibly in SAPOL (including technical equipment to support flexible working arrangements) (Recommendation 26 and 28(d))
- Stay in touch policy (Recommendation 29)
- Diversity and Inclusion Branch (Recommendation 30)
- *'Family and Domestic Violence involving SAPOL Employees Guidelines'* (including relevant training) (Recommendation 35 and 36)
- Diversity and Inclusion Representatives Network (Recommendation 37).

In addition, the EOC Monitoring team considered it important to include those employees who had been invited and/or participated in the leadership development-based recommendations (Recommendation 5: Leadership Shadow Program and Recommendation 6: Leadership performance feedback tool).

As Project Equitas had previously identified employees for the above initiatives based on their associated implementation or leadership role, the EOC Monitoring team collaborated with Project Equitas to use the same invitation list when deploying the online survey for the 297 supervisors and managers.

About the data collection tools

A key aspect for the data collection stage was the implementation of two online surveys, one being designed for engaging members of the Diversity and Inclusion Branch and the second for supervisors and managers.

The aim of the survey for the Diversity and Inclusion Branch was to test their own perception of capacity to fulfil the branch purpose and objectives and identify opportunities for improvement.

The survey for the cohort of supervisors and managers was broader and aimed to test perception of their capacity and willingness in the four broad themes areas as well as their perception of access to resources/skill development to perform their role in the cultural change effort.

The online surveys were emailed (by Project Equitas) to the Diversity and Inclusion Branch members and the cohort of supervisors and managers. The response rates were:

- Diversity and Inclusion Branch: 71% (10 of the 14 members participated in the online survey)

- Cohort of supervisors and managers: 37% (110 of the 297 invited supervisors and managers participated in the online survey).

A note regarding data analysis

Quantitative survey responses were removed from calculating result proportions only where respondents indicated that an associated question did not apply to them because they did not have direct reports, or a task was not relevant to their role. The removal of these responses ensured analysis used only data relevant to the question intent.

Relevant data analysis results have been presented in the report and it is important to note that percentages may not add up to 100% as they are rounded to the nearest percent.

Assessment

Capacity and willingness were assessed using the categories of either adequate or less than adequate. Supporting commentary is used alongside the assessment, where relevant, to highlight challenges or areas for improvement/reinforcement to maintain momentum.

Limitations to the evaluation

While every effort has been made by the EOC Monitoring team to deliver a rigorous approach to the evaluation, there are a number of limitations that need to be noted.

- It is likely that some SAPOL supervisors or managers were not invited to participate in the online survey as they did not hold their role at the time Project Equitas coordinated the delivery of specific training/information sessions related to the EOC Independent Review recommendations (i.e. Leadership Shadow training in November 2017; Flexible Working Arrangements face-to-face training in June-August 2018; '*Family and Domestic Violence involving SAPOL Employees Guidelines*' training in July-September 2018) and therefore were not involved in these Project Equitas activities. While this is not optimal for being able to provide an all-inclusive representation of SAPOL supervisors and managers capacity and willingness to support cultural change, the number of individuals is likely to only minimally influence the findings.
- According to Data Analysis Australia¹³ the response rate of a survey is a measure of how many people approached actually completed the survey. For those who do participate in surveys, often they come from a particular viewpoint. It is usually assumed that the higher the response rate the more likely the results are representative of the population, provided the sampling is appropriate in the first place and that people who do not respond are roughly the same in their opinions as the people who do respond.

¹³ Data Analysis Australia, Response Rates

- At the time of writing this report, not all the recommendations in focus for analysis had been implemented (i.e. Recommendations 5, 6, 18, 22, 28(d), 29). Consequently, the EOC Monitoring team was not able to evaluate capacity and willingness for the report scope (refer to Table 1). These recommendations, in particular their intended impact on the culture, will be discussed as part of the final report or in the EOC Monitoring Team's Handover Report to SAPOL in February 2020 (refer to Figure 1).
- While capacity-building activities aim to facilitate participants confidence to manage situations, roles and tasks, learning and development can sometimes negatively impact participants confidence about their ability to perform. Some participants may realise they know less than the other participants or discover there is much more they don't know about a particular area than they first realised^{14,15}. This highlights the importance of seeking feedback from participants post-capacity building activity in order to address future activities.
- The perception of the supervisors, managers and Diversity and Inclusion Branch's own capacity and willingness does not equate to practice. Future analysis and reporting will focus on evidence of the application or practice of structural changes (e.g. policies, processes and systems) and enhanced/reinforced capacity and willingness to investigate the effects they are having on the organisation's workplace culture.

Structure of Report 3

Section 1 of this report provides an overview of SAPOL's practical progress in the implementation of the 38 recommendations of the EOC Independent Review, as at April 2019.

Section 2 provides an evaluation of the capacity of supervisors and managers to support the SAPOL cultural change effort via:

- Understanding and modelling appropriate behaviour;
- Challenging and reporting inappropriate behaviour;
- Supporting, promoting and enacting new policies and processes initiated by Project Equitas; and
- Managing people effectively.

A background of capacity-building activities and communications for these initiatives is also provided.

Section 3 assesses the willingness of supervisors and managers to support the SAPOL cultural change effort by investigating the elements of accepting the need for change and desire to engage in change.

¹⁴ Skills You Need, Building Confidence

¹⁵ Sufi S. and et al (2018)






Section 4 focuses on the Diversity and Inclusion Branch and provides an evaluation of their capacity and confidence to fulfil its purpose and objectives. Similar to section 2, a background of capacity-building and communication activities relevant for the branch is provided.

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 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 second 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 Report 4 (refer to Figure 2) once these recommendations have been finalised and handed over to SAPOL's business operations.

The status summary highlights that the implementation of 25 recommendations has been completed and implementation is underway for the remaining 13. A potential risk or challenge has been identified for the review of standards for promotion (**Recommendation 12**).

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

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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 ' <i>Diversity and Inclusion Strategy 2018-2020</i> '. 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 tool Implemented with ELT in 2017. To meet the intent of this recommendation and provide opportunities for leadership development across the management structure, SAPOL has approved the development of a leadership feedback tool. The tool is currently being developed and once available, will be open to use by those on Phase 3 of the Inspector's Qualification Program, and those who are of or above the classification of AS07 or rank of Inspector to aid their development as leaders. It is anticipated to be available for use by end June 2019.
7		Gender equality incorporated into business planning SAPOLs Corporate Business Plan 2018-2020 includes gender specific KPIs. Services report on the KPIs at disaggregated levels (such as gender, rank/level, workplace, employment status) by areas and branches. In addition, each Service has developed a Service Business Plan which includes how they are going to contribute (through specific activities) to the Gender Equality Action

RECOMMENDATION		PROGRESS	COMMENT / DELIVERABLES
			Plan (GEAP). Services report quarterly on progress for KPIs and activities – reporting will be initiated by June 2019.
8	Gender equality KPIs for leadership		KPIs have been incorporated into the Corporate Business Plan 2018-2020 (recommendation 7) and progress reporting is part of the Business Plan reporting cycle (recommendation 7) – reporting will be initiated by June 2019. All existing executive contracts include an equality focused performance requirement. 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 overarching group for the Diversity and Inclusion Advisory Group (DIAG) had their first meeting on 16 January 2019. The DIAG is the group that oversees the Gender Equality Advisory Group (GEAG) and is responsible for driving the terms of reference, membership and format of the GEAG. Registrations of interest to become a GEAG member (including the Chair) have been sought from staff with the selection process to be completed by the end of April. The aim is to have the first GEAG meeting by the end of May 2019.
Workforce Management			
12	Review of standards for promotion		SAPOL is currently undertaking a review of the selections and promotions framework – this includes consideration of pool selection processes and promotion after specialist courses. A review into Selection Advisory Committee (SAC) processes and guidelines has been conducted for promotional selections and Position Information Documents (PIDs). Implementation is currently underway to make changes including: streamlining selection processes such as changes to the SAC guidelines, SAC summary report and instructions to applicants; incorporating specific ‘people management and development’ criteria to the service conditions of PIDs; the development of a PID review process to ensure that PIDs are contemporary, accurate and meaningful; and development of unconscious bias training. As this recommendation impacts the majority of the workforce, an extensive consultation period is required to gain legal advice and input from employees and Police Association South Australia. It will be important to communicate in a timely manner with meaningful information to maintain workforce engagement during implementation to support effective roll out of the resulting outputs.

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13 Targets for the promotion of women

An existing target of 1/3 for the Inspector Qualifications Program is currently in place (incorporated into the ToR of the Inspector Qualifications Program Board). A consultation paper is currently underway regarding the setting and application of targets organisationally wide. Consultation (e.g. with workforce, PASA) to be undertaken to ensure purpose and application is clear.

14 Talent ID program

Implementation is underway via two approaches:

- Development of a talent identification program that is a robust, fair and transparent talent identification program free from nepotism that will allow employees to ready themselves for promotion/career development. The program will assist in identifying employees that are engaged with the organisation, and have the aspiration and ability needed to be successful leaders in delivering SAPOL's outcomes and moving the organisation forward. The program is currently under development but has some reliance on Individual performance Management systems (linked to recommendation 18).
- Implementation of an internal mentoring program available to all SAPOL employees to assist individuals with their career development objectives, by being supported and challenged by a mentor. The pilot program will run for 12 months and will initially consist of 20 pairings, with five of the mentees paired up with external mentors.

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 and information has been incorporated into the 2018 corporate training cycle (as a once off) for all employees. Moving forward induction processes will include handover process information. No further activity to report in the implementation of this recommendation

16 External review of Human Resources

External professional services firm undertook the review (April - August 2018) and SAPOL are implementing the recommendations. A project is being separately established to coordinate the implementation of the recommendations in conjunction with other business improvement opportunities.

17 Review of conflict of interest policy

Updated General Order '*Diversity and Inclusion*' gazetted 18 July 2018. Includes 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. No further activity to report in the implementation of this recommendation.

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18 Reininvigoration of performance management system

A review of the Individual Performance Management (IPM) process and systems has been conducted and approval made for a new process and interim technical system to be implemented.

The new process will ensure it is focused toward promoting a holistic, meaningful and purposeful discussion between employee and manager/supervisor through a continuous process which will ensure development of the individual whilst incorporating performance improvement and expectation of workplace behaviours.

The implementation of the new process and system is being planned with training (linked to recommendation 22) during June-August and system roll out in July.

19 Review of equipment to ensure practicality for women

SAPOL has reviewed equipment and undertaken changes in order to ensure gendered considerations are applied for both uniform and operational equipment. The General Order 'Operational Safety Equipment' gazetted in February. The General Order relating to uniforms is to be updated.

20 New exit management strategy

The strategy, comprising the initial separations form, online exit survey (optional) and checklist for the return of equipment, was rolled out in July 2018. Human Resource Management Branch report quarterly to ELT with a summary of trends, issues and recommendations for continuous improvement.

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. No further activity to report in the implementation of this recommendation.

22 Rolling three-year training plan - focus on developing people management and performance management

Rolling three-year training plan completed and comprises an overarching Diversity and Inclusion (D&I) Training Delivery Plan supported by the D&I Foundation Training Document and D&I Training Suite. The D&I Training Delivery Plan will be integrated into existing training modules or inform new training. The D&I Foundation Training Document incorporates training delivery methodologies (recommendation 25). Aiming to roll out the D&I Training Delivery Plan in mid-2019. The roll out of Respectful Behaviours training and Having Difficult Conversations training (both face-to-face) is scheduled for mid-2019.

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23 Targets for women in training

Commentary regarding targets for women in training is outlined in the D&I Foundation Training Document (product of recommendation 22). This target is being managed in conjunction with recommendation 13.

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. Opportunities for continued training and development will be managed through the 'Stay in Touch' policy (recommendation 29). No further activity to report in the implementation of this recommendation.

25 Review of training delivery methodologies

Reviewed and informed the D&I Foundation Training Document (product of recommendation 22). All eight areas for attention for training (as highlighted in the EOC Independent Review) are designed to be delivered across three methodologies – face-to-face, online and independent learning option – for general employee, supervisor and manager.

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. The Flexible Work team based in the Human Resources Service is responsible for ongoing support of employees, the review and monitoring of flexible work applications and reporting to ELT. Training and awareness-raising sessions have been delivered to support the roll out of the new approach. No further activity to report in the implementation of this recommendation.

27 Funding the backfilling of employees on maternity leave

Funding secured and recruitment plan adjusted to enable backfilling of inactive sworn employees. No further activity to report in the implementation of this recommendation.

28 Technology and facilities to support flexible workplace culture

Remote Access Business Case completed and IS&T changes scheduled to be completed by July 2019 (based on provisional funding). SAPOL has established Wellness Rooms in range of work sites across the state, which can be used for breastfeeding or expressing breastmilk. Awareness-raising regarding the Wellness Rooms was communicated across SAPOL in late January 2019. A maternity uniform has been designed and will be available in late 2019.

29 'Stay in Touch' policy

Activity underway and ready to progress to completion with the Information Systems & Technology (IS&T) changes scheduled to be completed by July 2019 (linked to recommendation 28).

Dispute Resolution and Complaints

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30 New Complaints Resolution Unit

A new unit, the Diversity and Inclusion Branch, was launched 18 July. Since this time, 138 reports have been received (as at 18/4/2019) with 80 allocated for Alternative Dispute Resolution (managed using ADR methods including conflict coaching, mediation, training and 1-on-1 conversations); 30 allocated for inquiry by the Investigation Unit; 11 conduct investigations allocated to the Investigations Unit (linked to recommendation 33); 6 matters were locally resolved; 2 matters referred to IIS and 9 matters recorded under preceding Equity and Diversity Unit. No further activity to report in the implementation of this recommendation.

31 Confidential complaints management tool

The Diversity and Inclusion Branch is using IAPro (a Professional Standards software used internationally by public safety organisations) as a confidential complaints management tool. Information for matters are stored for future reference ensuring victims/complainants only need to share details once. Confidentiality is ensured through the physical location of the complaints management tool being separate from general worksites and the system being 'partitioned' only to those professionally involved from the Diversity and Inclusion Branch. Branch staff annually sign an undertaking to their confidentiality and conflict of interest policies. No further activity to report in the implementation of this recommendation.

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 presented to the SA Judiciary on sexual harassment and gender inequality at its annual Judicial Development Day (2 November 2018). No further activity to report in the implementation of this recommendation.

33 Task Force to investigate allegations of sexual misconduct

Task Force Portus established (3 February 2017) and since 18 July 2018 incorporated into the Diversity and Inclusion Branch (linked to recommendation 30) as the Investigations Unit. Since 18 July 2018, 11 conduct matters have been allocated to the Unit. As a result, two employees moved to different workplaces; two local administration orders issued; one matter filed for no further action; three matters awaiting adjudication; and three matters under investigation. No further activity to report in the implementation of this recommendation.

34 Review of disciplinary processes an revision of classifications for end of service

Existing processes not reviewed due to legislative amendment, which included revised disciplinary processes and penalties. The '*Exit Management Strategy*' (recommendation 20) enables an employee who has 'resigned under investigation' to be recorded. The Misconduct/Termination Register (Office of the Commissioner for Public Sector Employment) also enables agencies to check if former SA public sector employees have been dismissed on the grounds of misconduct and/or resigned during a misconduct investigation.

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Wellbeing and Support Services

35	Mechanisms to ensure safety of employees experiencing domestic violence	█	Employee guidelines developed and were released to coincide with White Ribbon Day (25 November 2017). No further activity to report in the implementation of this recommendation.
36	Training in domestic violence intervention	█	Training delivered (June - July 2018) to all employees and also an additional component for those with management responsibilities. No further activity to report at this time in the implementation of this recommendation.
37	Review of the roles and responsibilities of Equity Contact Officers	█	Expression of interest process for interested employees undertaken November 2018 and selections and probity checks undertaken by D&I Branch. Selected applicants (approx. 75) undertook training in December 2018-January 2019. On 1 st January 2019 the previous Equity Contact Officer role ceased and the Diversity and Inclusion Representatives (D&I Reps) role commenced. Guidelines for the D&I Rep role developed and relevant Gender Order updated and gazetted. Awareness-raising about the new D&I Reps network included email to all employees, intranet announcement and contact list accessible on intranet.
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.

Follow up from Report 2

The EOC Monitoring team's second 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 2.

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.

Action:

The Commissioner of Police's position is that the 'If Not, Why Not' approach applies to all positions across SAPOL, i.e. no specialist positions are exempt. It is agreed that there may be difficulties applying the approach, but each request for a flexible working arrangement needs to be assessed on feasibility. The developed request process will be followed to ensure all requests are assessed consistently. The process states that if a request is declined by the local manager, the request then goes to the Service Head for consideration, and if declined again, it then goes to the Assistant Commissioner Human Resources for final determination.

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 Human Resources Service Area.

Action:

Project Equitas has developed various report templates when working with Human Resources Service and the Diversity and Inclusion Branch (particularly in relation to the Gender Equality Action Plan) to ensure reporting (and associated data) informs decision making. These new templates have been integrated into existing reporting processes to help keep reporting manageable. Infographics have been developed that provide an analytical approach to decision-making specifically targeted at flexible work arrangements and staff exit management.

As Project Equitas initiatives and associated reporting requirements are handed over to business as usual, the relevant forum for reporting is the Executive Leadership Team (ELT), rather than the project management forum of the People Program Board (as specified in this key consideration from Report 2) .

Report 2: Key Consideration 3:

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

Action:

SAPOL's Gender Equality Action Plan and Corporate Business Plan (approved but yet to be released at the time of preparing this report) sets broad parameters in regard to gender equality across the organisation. These broad parameters are the overarching framework for the key performance indicators (as per Recommendation 7) included in the Corporate Business Plan. The key performance indicators will be cascaded through the SAPOL structure.

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.

Action:

Project Equitas has been mindful of additional reporting requirements resulting from its initiatives. When recommendations are handed over to business operations, the associated reporting requirements are included. Project Equitas is working with the business owner to harness current reporting processes and avoid duplication.

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.

Action:

(a) The implementation of the recommendations associated with setting targets for women in training and for promotional pathways (Recommendations 13 and 23 respectively) are underway. As part of the implementation, a 'Consultation' paper is being developed to use as an engagement tool across SAPOL.

(b) SAPOL has reviewed ASO classifications (1 and 2) resulting in a classification change for some positions. Given that unsworn employees have to apply for positions (as do employees in other State government departments), rather than promoting from within as for sworn employees, the focus is on enabling equal access to training and development, and mentoring opportunities.

Report 2: Key Consideration 6:

HRMB/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.

Action:

Supervisors will be receiving training on 'Difficult Conversations in the Workplace' in mid-2019 as part of the roll out for the new performance management system. All entry level employees (cadets/recruits/trainees and probationary constables) that leave the organisation have a face-to-face interview with a trained member from the Diversity and Inclusion Branch. The findings and trends from these interviews are reported for continual improvement.

Report 3: Key Consideration 7:

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

Action:

The exit survey component of the '*Exit Management Strategy*' now includes information on how exiting staff can contact the Equal Opportunity Commission to share their experience of working at SAPOL. Since the inclusion of the EOC's information, one SAPOL employee who initiated the exit process has made contact with the EOC.

Developments to note

Transition and closure of Project Equitas

During April 2019, Project Equitas transitioned into the Human Resources (HR) Service to facilitate embedding initiatives into business as usual. The Project Equitas team will report to Assistant Commissioner Human Resources Service, who will then report on Project Equitas matters to the SAPOL People Program Board and the Executive Leadership Team (ELT), as appropriate.

Looking ahead in 2019, a number of roles within the Project Equitas team will not continue and it is anticipated that the project will close in December. For any organisation undertaking a change process, this can be a concerning time as project management/implementation knowledge and expertise is reduced. In addition, the commitment of leadership and management could be tested with the ongoing responsibility for the effective operation and maintenance of engagement activities and policies/processes to support the desired culture.

Implementation of recommendations from Human Resources review

As a result of the external review of the services, structure and procedures of the Human Resource Management Branch, as per **Recommendation 16**, SAPOL are implementing the associated recommendations. Given that this report has findings related to supervisor/manager support needs for people and performance management, the EOC Monitoring team advises that the Human Resources Service cross-checks these findings with the HR-related recommendations to find opportunities to integrate improvement actions.

Section 2: Capacity to support cultural change

The EOC Monitoring team investigated the capacity of supervisors and managers under the four broad themes of:

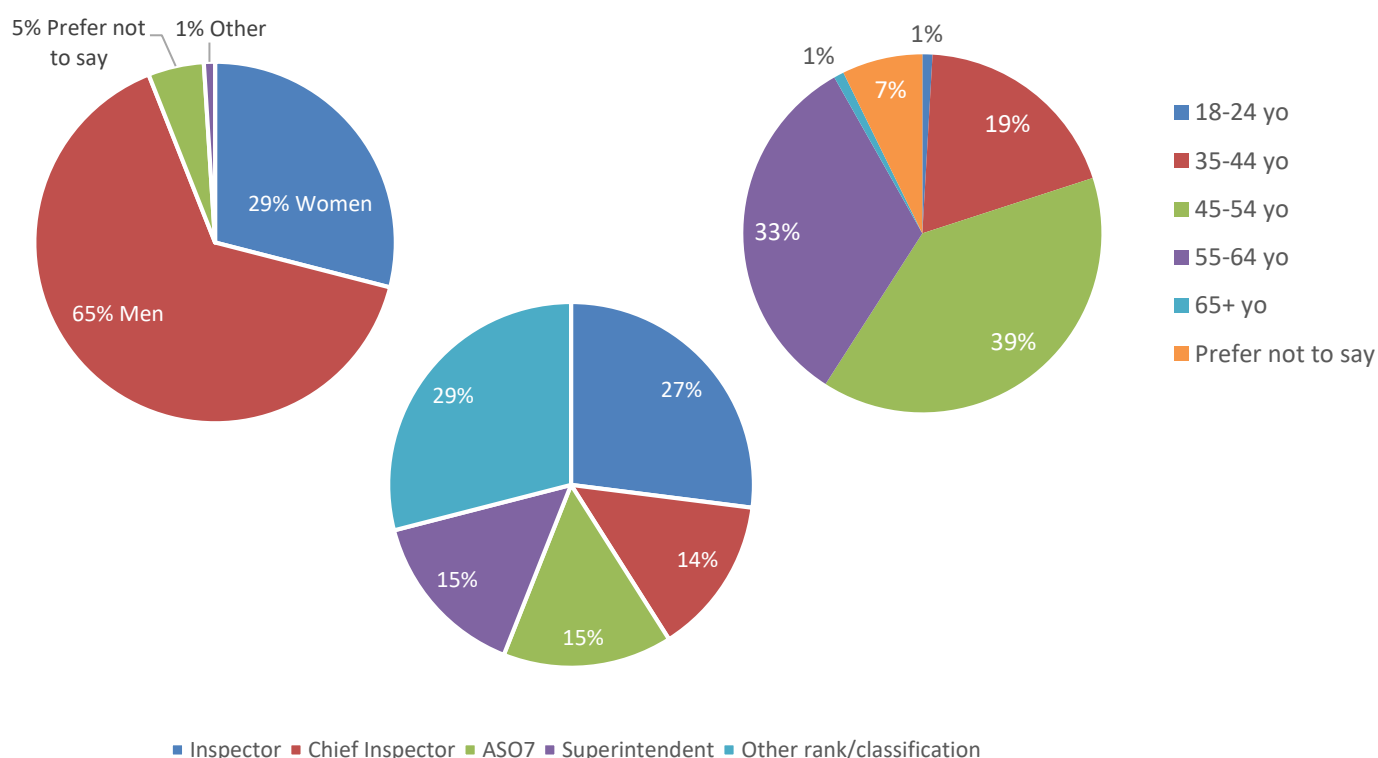
1. Understanding and modelling appropriate behaviour;
2. Challenging and reporting inappropriate behaviour;
3. Supporting, promoting and enacting new policies and processes initiated by Project Equitas; and
4. Managing people effectively.

The recommendations relevant for these broad themes were previously outlined in Table 1.

Data was collected through an online survey with a 37% response rate, which according to Fryrear¹⁶ is a reasonable response for an internal survey. Of those who participated the majority were:

- Men (65%);
- Aged 45+ years old (73%);
- Working full time (96%); and
- Inspectors, ASO7's and Superintendents (57%)¹⁷.

A profile of the respondent's gender, age and rank/classification is presented below.



¹⁶ Fryrear A., What's a Good Survey Response Rate?

¹⁷ A breakdown summary of the respondents rank/classification is provided in Appendix B.

Understanding and modelling appropriate behaviour

The EOC Independent Review noted there is a need for SAPOL leaders and managers to become role models for gender equality, along with a requirement to enhance their understanding of the issues, how and what they say, what they do, and what they prioritise is critical to improving organisational performance, including equality¹⁸.

Key Project Equitas initiatives that support supervisors and managers understanding of the issues and their role in modelling appropriate behaviour are:

- 21(a) Biennial training about respectful behaviours, unconscious bias and bystander responsibilities; and
- 17 Re-examining the '*Conflict of Interest*' policy in regard to intimate/familial relationships between supervisors and direct staff.

A summary of capacity building and communication activities delivered by Project Equitas to complement these initiatives follows.

Capacity building and communications

Recommendation 21(a): Biennial training - respectful behaviours, unconscious bias and bystander responsibilities

- Reviewed online training courses available for all employees. Two modules were rolled out in the second half of 2017:
 - > Module 1: overview of equity and diversity, examples of unconscious bias and impacts in the workplace.
 - > Module 2: Information about what actions can be taken when inappropriate behaviour occurs in the workplace, bystander responsibilities, how to report or respond to the behaviour.
- Additional online training specific for supervisors and managers, that is generally scenario-based, was also rolled out in the second half of 2017, and focuses on:
 - > difference between 'ordinary conflict' and 'inappropriate behaviour';
 - > courses of action and navigating grievance procedures;
 - > victimisation, legal responsibilities, managerial responsibilities; and
 - > the role of Diversity and Inclusion Representatives (formally Equity Contact Officers).
- The online training courses must be completed every two years - for the training cycle in the second half of 2017, nearly 94% of all employees completed Modules 1 and 2 (as referred to above). The completion rate for those registered to undertake supervisors and managers online training was 76%¹⁹.

¹⁸ 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 40

¹⁹ SA Police Project Equitas Closure Report - Recommendation 21, Pg 2

Recommendation 17: Conflict of interest issue

- Prior to Project Equitas, conflicts as part of intimate and familial relationships were not clearly addressed and predatory behaviour was not addressed at all²⁰.
- General Order 8420 '*Human Resource Management, Diversity and Inclusion*' was amended to include the definition of predatory behaviour and outline its potential impact. Definitions of appropriate and inappropriate workplace relationships were also included, as well as a cautionary statement to raise awareness of potential conflicts arising from intimate/familial relationships between supervisors and direct staff. The latter highlights the obligation for employees to self-manage, which includes consulting with their direct manager to consider performance management aspects of the professional relationship. There may be occasions where the supervisor or manager, where aware, will have to address matters where such relationships adversely impact on SAPOL service delivery or welfare^{21,22}.
- The amended General Order was gazetted in mid-July 2018 and communicated across the organisation via email outlining the changes.
- In addition, commentary about intimate/familial relationships is included as a topic in the biennial training discussed in relation to Recommendation 21.

EOC findings

SAPOL supervisors and managers have an important role in encouraging respectful behaviour through role modelling and enhancing/reinforcing awareness of what constitutes appropriate and inappropriate behaviour. In terms of information about what constitutes appropriate and inappropriate behaviour in the workplace, 86% of respondents either strongly agreed or agreed that there was a sufficient level of this type of information available to them in their workplace.

For effective role modelling, it is important that supervisors and managers have an understanding themselves of these types of behaviours and place a focus on the importance for appropriate behaviour in the workplace. The majority (75%) of the respondents strongly agreed or agreed that the focus on the importance of appropriate behaviour in the workplace has increased since the start of Project Equitas. A common theme from the respondents free-text comments highlighted that appropriate behaviour in the workplace has always been important to them, even before Project Equitas.

It appears from the comments of supervisors and managers that while there may have been an understanding of appropriate behaviour in the workplace, a 'spin-off' benefit of the Project Equitas activity has been to reinforce this.

²⁰ SA Police Project Equitas Closure Report - Recommendation 17, Pg 2

²¹ SA Police Project Equitas Closure Report - Recommendation 17, Pg 2

²² SA Police, General Order, Human resource management, 'Diversity and Inclusion'

“...prior to Project Equitas and the release of the EOC report I had clear standards about workplace behaviour and professionalism. However the outcomes from Project Equitas has provided validity to my values (and enhanced them) and credibility to those I lead.” Survey Respondent

The majority of respondents (77% in either strong agreement or agreement) indicated that SAPOL has provided sufficient information and support to supervisors and managers to help them promote appropriate behaviours. It was noted that the completion rates for the online training courses that focus on diversity and inclusion (Recommendation 21) was less than 100%. These courses are to be completed every two years and are a tool to promote respectful behaviours, provide examples of unconscious bias and highlight bystander responsibilities. It is important that all employees complete these training courses.

A number of respondents highlighted that de-identified examples/case studies of issues/complaints with an outline of the behaviours, management actions taken and the consequences/outcomes for employees would be beneficial. These case studies could be a supportive tool to reinforce or refresh what respectful versus disrespectful behaviour actually looks like in the workplace with their team or individuals. This issue is discussed further in the next section.

The EOC Independent Review found that almost half of the staff who were targets or victims of sexual harassment indicated they experienced the behaviour from a person in a position senior to them²³. This led to the EOC recommending SAPOL re-examine their conflict of interest policy/code. SAPOL now has an amended General Order that supervisors and managers are responsible for applying and managing in their respective teams.

Most survey respondents indicated that they feel confident (92% very confident/confident/ moderately confident) to manage a conflict of interest within their team arising from an intimate or familial relationship.

Summary of assessment

The results indicate that SAPOL supervisors and managers capacity in understanding and modelling appropriate behaviour is **adequate**. The majority of respondents reported they have an understanding of appropriate and inappropriate behaviour and placing a focus on the importance for appropriate behaviour in the workplace. A number of respondents highlighted that appropriate behaviour in the workplace has always been important to them. While respondents indicated that there is sufficient information available to support understanding of what is appropriate and inappropriate behaviour in the workplace, it was suggested that the provision of de-identified case studies would be beneficial to support them in their practice.

²³ 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 23

Key Consideration 1

SAPOL review the completion status for the mandatory online diversity and inclusion training courses/modules to ensure all employees are up to date.

Challenging and reporting inappropriate behaviour

Organisational and cultural barriers²⁴ were uncovered in the EOC Independent Review that impacted SAPOL employees intervening when inappropriate behaviour was occurring or when making formal complaints. These barriers included lack of confidentiality and the following fears:

- Negative consequences for one's reputation or career;
- Nothing would be done or make a difference; and/or
- Being victimised as a result of making a complaint.

This finding led to the EOC recommending training that covers bystander intervention, as well as the establishment of a new Complaints Resolution Unit. Project Equitas have implemented both of these recommendations.

The Project Equitas team coordinated or facilitated the delivery of capacity-building and communication activities which are outlined below.

Capacity-building and communications

Recommendation 21: Biennial training - respectful behaviours, unconscious bias and bystander responsibilities

See section *Understanding and modelling appropriate behaviour - Capacity-building and communications* (pg 38).

Recommendation 30: New complaints unit

- All SAPOL employees were emailed regarding the launch of the new Diversity and Inclusion (D&I) Branch on 18 July 2018, which included a link to the relevant General Order and D&I Branch intranet site.
- Content for the D&I Branch intranet site (which can be accessed by all employees) includes:
 - > Branch team introduction
 - > information on the notification process
 - > links to the relevant General Order
 - > links to key policies or similar for the branch (e.g. 'Confidentiality Policy', 'Conflict of Interest Policy', 'Respectful Workplace Behaviour Guidelines', 'Workplace Values and Behaviours Framework')

²⁴ 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 30; 106

- > links to referral resources, facts sheets (e.g. mediation, conflict coaching) and information sheets (e.g. “Gossip”, “Tips for Preventing and Managing Conflict”, etc).
- SAPOL employees can access Quarterly Updates via the branch’s intranet site.
- The Branch Manager was interviewed by the Commissioner of Police (September 2018) as part of SAPOL’s “Conversation with...” series which was used to introduce the D&I Branch to all employees (the video of the interview can be accessed via the SAPOL intranet).
- In October 2018, the Branch Manager used a speaking opportunity at a supervisor’s conference to introduce the D&I Branch.
- Since November 2018, the D&I Branch has delivered face to face engagement sessions across regional and metropolitan worksites. These session’s overview the branch’s structure, the notification process, the ‘*Respectful Workplace Behaviour Guidelines*’ and provide an opportunity for questions and answers. These face to face engagement sessions are continuing.

EOC findings

Calling out inappropriate behaviour

The majority (66%) of respondents agreed (either strong agreement or agreement) that SAPOL has provided sufficient information and support about how to challenge/call out inappropriate behaviour among peers or those more senior. The bulk of the remaining respondents were spread across neither agree or disagree (17%) and disagreed (either strongly disagreed or disagreed) (14%).

The EOC Monitoring team tested the confidence of the respondents to challenge/call out inappropriate behaviour of those who are:

- Peers (similar classification/rank);
- At a higher classification/rank;
- Sworn employees; and
- Non-sworn employees.

The results (refer to Figure 4 on page 44) indicate that this is an area for improvement for SAPOL. In particular, there is a need to increase the confidence to challenge/call out inappropriate behaviour from employees who are sworn or of a higher classification/rank. Confidence levels were highest for challenging/calling out inappropriate behaviour of non-sworn employees (95%) and peers (93%). There was a drop in confidence levels (84%) when challenging/calling out inappropriate behaviour of sworn employees. Confidence levels of the respondents were lowest (62%) for challenging/calling out inappropriate behaviour of those who are at a higher classification/rank.

“...taking appropriate action [and] calling out inappropriate behaviour of those more senior would send a very strong message and build confidence.” Survey Respondent

Interestingly, a similar finding was found when looking at SAPOL's results for the 2018 'I Work For SA – Your Voice Survey' by the Office of the Commissioner for Public Sector Employment. This survey found that 44% of the SAPOL participants strongly agreed/agreed that they thought it was safe to speak up and challenge the way things were done in their organisation²⁵. While this question is broader than the EOC Monitoring teams recent survey it does point to a perception of not being able to speak up in SAPOL.

Respondents to our survey provided feedback on options to develop their confidence in challenging/calling out inappropriate behaviour. The preferred development options were coaching and information sessions, followed by face-to-face/interactive training. Online training was the least preferred option. It was suggested that skill development could be incorporated into management development programs, as well as providing 'refresher' training from time to time.

Reporting inappropriate behaviour

The formal procedure for reporting inappropriate behaviour involves submitting a PD351 form to the Diversity and Inclusion Branch. This procedure can be used if an employee has experienced or witnessed inappropriate behaviour. Seventy percent of the respondents were very familiar or somewhat familiar with the reporting procedure of the new branch. The remaining respondents were not very familiar (25%), or not at all familiar/not sure (5%). Respondents indicated that the SAPOL intranet had been the most helpful way to obtain information about how to report inappropriate behaviours (56%), followed by the '*Diversity and Inclusion*' General Order (45%). A number of respondents did find SAPOL online training helpful (36%). In addition, respondents mentioned that direct contact with the branch to seek clarification or advice has also been beneficial regarding understanding the reporting procedure.

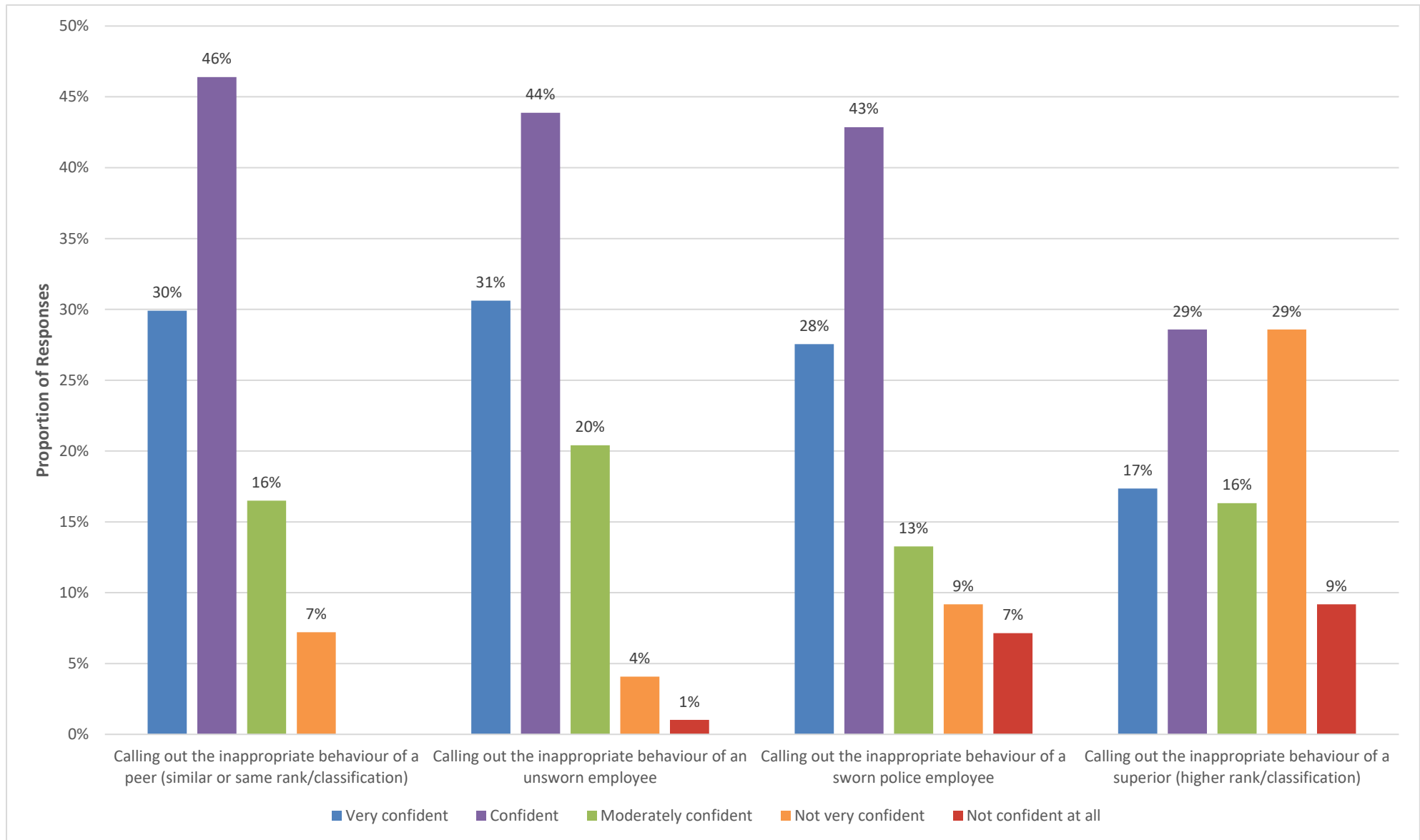
The EOC Monitoring team tested confidence to formally report inappropriate behaviour of those who were:

- Peers (similar classification/rank);
- At a higher classification/rank;
- Sworn employees; and
- Non-sworn employees.

The results are presented in Figure 5 (see page 46) and as would be expected, the trend mirrors the confidence to call out inappropriate behaviour. Confidence was lowest when reporting those at a higher classification/rank and sworn employees. Enhancing confidence levels to report inappropriate behaviour of employees who are sworn or of a higher classification/rank is an area for improvement for SAPOL.

²⁵ SAPOL, Your Voice Survey: SAPOL Results – A Snapshot

Figure 4: Confidence to challenge/call out inappropriate behaviour



It is interesting to note that confidence levels for *reporting inappropriate behaviour* of sworn employees and employees of a higher classification/rank are higher than for *challenging/call out inappropriate behaviour* of these same cohorts. This indicates that employees prefer to manage situations of inappropriate behaviour of those more senior to them privately through the D&I Branch rather than directly with the perpetrator, supported by the following comments from survey respondents.

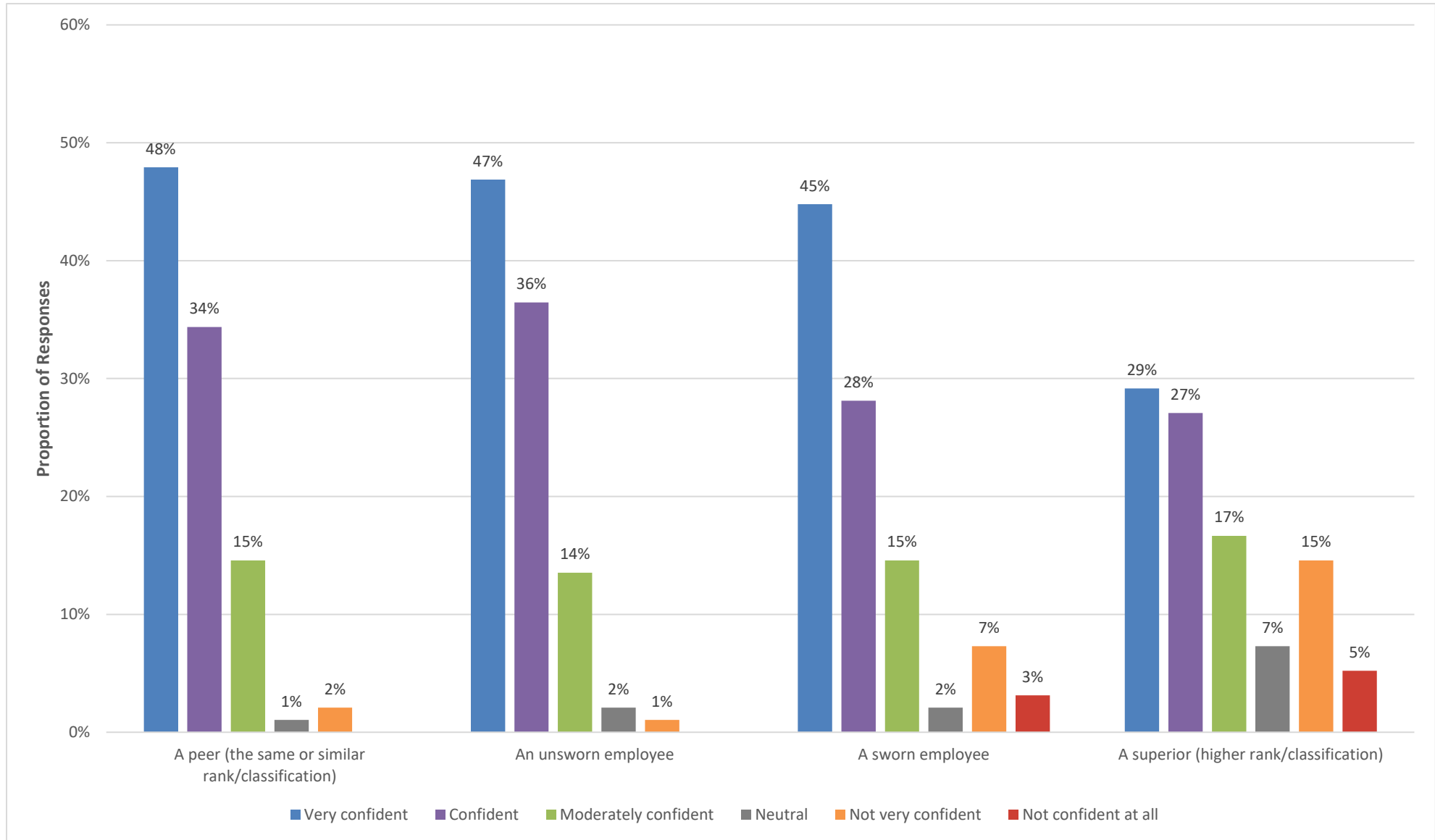
“For me I think it is a cultural thing that I always experienced throughout my career in that if you reported someone senior to you, you would always be 'marked' afterwards. I think that perception is slowly changing - but very slowly and the majority of people are still afraid that if they 'stick their necks out' they will be chopped off with little consequences for the person they reported.”

“...Acting [on inappropriate behaviour] in the past has only caused me grief, therefore it would have to be an enormous step for me to report inappropriate behaviour, particularly when I hear senior SAPOL leaders continue to write off behaviour and fail to act.”

“Being an unsworn member...I would still not be confident reporting inappropriate behaviour of a superior officer or sworn member who is at a high rank.”

“We have to get away from [that reporting a senior member] will be "career destroying" perception. I think we have a long way to go before anyone would have the confidence (at officer level) to make a report and not be concerned about the ramifications. In saying that, I know it has happened and the member was supported but we all knew it was a risk.”

Figure 5: Confidence to formally report inappropriate behaviour



A number of respondents shared personal experiences or perceptions that influenced their confidence in the reporting process. These included employees who acted inappropriately being 'rewarded' through promotion or acting in higher positions even when reports have been made against them, with either no follow-up/action or obvious action taken to address the inappropriate behaviour.

The example of poorly behaved employees being 'rewarded' through promotion or acting in higher positions was raised in the EOC Independent Review²⁶ and SAPOL was advised to undertake a comprehensive review of a person's performance, skills and complaint history as part of promotional requirements (**Recommendation 12(c)**). Project Equitas activity is underway to implement this recommendation and address such experiences in the future.

Respondents indicated that key factors in enhancing confidence in reporting inappropriate behaviour are:

- A strictly confidential reporting process;
- A work culture that has zero tolerance towards inappropriate behaviour; and
- Support from superiors to report.

Given that 31% of respondents either strongly disagreed/disagreed or neither agreed or disagreed that SAPOL has provided sufficient information and support about how to challenge/call out inappropriate behaviour among peers or those more senior, lower confidence levels for reporting inappropriate behaviour are not surprising.

The previously suggested case studies could help enhance confidence in both challenging/calling out and reporting inappropriate behaviour as they can demonstrate that SAPOL is taking action and that there are consequences. In addition, they could be used by supervisors and managers to support discussions with team members to aid the understanding of appropriate and inappropriate behaviour more generally.

The EOC Monitoring team noted that Project Equitas periodically communicated a statistical activity and outcomes summary for Task Force Portus (now known as the Investigations Unit in the Diversity and Inclusion Branch) on a quarterly basis. The last update of this kind, across SAPOL, was in July 2018.

In January 2019, the Diversity and Inclusion Branch provided an update via their intranet page, which included the number of notifications received during the second quarter and how many were dealt with by alternative dispute resolution (ADR), together with some of the ADR methods used in managing the notifications

Whilst, this internal data has not been presented as case studies, it is the starting point for developing case studies.

²⁶ 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 56; 57

Summary of assessment

Results indicate that the supervisors and managers capacity in challenging and reporting inappropriate behaviour is **less than adequate**. SAPOL will need to place particular focus on enhancing confidence to challenge and report inappropriate behaviour by those who are sworn or of a higher classification/rank.

Key Consideration 2

SAPOL develop strategies to enhance employees confidence to challenge/call out or report inappropriate behaviour, in particular of employees who are sworn or of a higher classification/rank.

Key Consideration 3

As suggested in the EOC's first report, disciplinary outcomes are communicated (without identifying details of parties involved) to demonstrate that inappropriate behaviour is being treated seriously.

Supporting, promoting and enacting new policies and processes

The importance of having middle managers on-board with, and helping to drive, the cultural change process in SAPOL was noted in the EOC Independent Review as critical for successful change²⁷. Project Equitas has implemented a number of new/reviewed policies and processes that affect all employees. Supervisors and managers need to demonstrate their support in active and observable ways, in order to influence other employees through the change process.

Outlined below is a summary of capacity building and communication activities that the Project Equitas team coordinated or facilitated to complement their initiatives.

Capacity-building and communications

Recommendation 21(b)(ii): Biennial training - understanding and accommodating flexible work

The Project Equitas team integrated training focused on understanding and accommodating flexible work into the implementation of Recommendation 26 (below).

Recommendation 26: Flexible working arrangements

The flexible working arrangements reform in SAPOL has been a key initiative for Project Equitas. They identified that in order to achieve a significant and sustainable shift towards the acceptance of flexible working

²⁷ 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 xiv

arrangements (FWAs) a multi-pronged approach to engagement was required. This approach comprised communications and capacity-building activities including:

- Announcement regarding 'Working Flexibly in SAPOL' on SAPOL intranet homepage (February 2018)
- FWA dedicated page on the SAPOL intranet;
- Development of '*Working Flexibly in SAPOL*' principles document and toolkit, communicated across the organisation via email (February 2018-May 2018 plus ongoing updates from the Flexible Working Arrangements team with flexible work opportunities and case studies) and made accessible on the SAPOL intranet. The toolkit includes:
 - > Case for change
 - > Four-step process for employees and managers to facilitate discussions
 - > FAQs
 - > Case Studies
 - > Conversation Guide
 - > Information sheets for the types of flexible work arrangements (FWAs)
- A full day workshop for Senior Sergeant/ASO6 and above exploring the concerns for implementing FWAs and seeking feedback about 'Working Flexibly in SAPOL.'
- Formation of Flexible Working Arrangements (FWA) team in the Human Resources Service
- Commissioner's blog on 'Working Flexibly in SAPOL' (February 2018) (available for all employees via the SAPOL intranet)
- Email to all employees highlighting 'International Flexible Working Day' (6 June 2018)
- Guest speaker Rachel Ranton (Westpac) at a Senior Leaders Day discussing flexibility and its relationship with the organisation's Diversity and Inclusion initiatives

The Project Equitas team designed information and training sessions (links to Recommendation 21(b)(ii)) to influence capability and confidence, as follows:

- 18 (voluntary) information sessions for all employees
 - > Conducted between May – July 2018
 - > Delivered in country and metropolitan locations
 - > Delivered by Project Equitas team member and member from the FWA team
 - > Topics included: SAPOL's '*If Not, Why Not*' policy position; overview of the FWA request process; and role of the Flexible Working Arrangements team.
 - > 454 participants.
- 9 training session for managers
 - > Conducted between June – August 2018
 - > Delivered at Police Headquarters, Sea Squadron and Police Academy
 - > Delivered by external trainer/facilitator
 - > Session aims included: enhancing capability to manage flexible teams; enhancing confidence to adopt the '*If Not, Why Not*' approach
 - > 209 participants (including 3 via remote access technology).

- Online training course for supervisors
 - > Conducted between May – July 2018 as part of corporate training cycle
 - > Course content developed in collaboration with the Human Resources Development Branch
 - > Course to be undertaken every two years
 - > Topics included: Role and responsibilities under the 'If Not, Why Not' approach ; enhance confidence to manage FWA requests.

Recommendation 28 (d): Technology to support flexible work

- Development of a business case has been undertaken internally.
- Changes to SAPOL Information Systems and Technology (IS&T) are scheduled to be completed by July 2019 – these changes will lead to the provision of secure infrastructure, such as mobile devices and remote access, to facilitate employees working flexibly.
- Not specifically included in this report as implementation has not been completed. Feedback regarding technology to support flexible work has been noted where relevant in this report.

Recommendation 29: Stay in touch policy

- Not implemented as dependent on changes to SAPOL's IS&T (linked to Recommendation 28 (d)).
- Not included in this report as implementation has not been completed.

Recommendation 35: Mechanisms to ensure the safety and confidentiality of victims of DV and perpetrators; and 36: Training staff and managers in DV intervention

- As part of White Ribbon Workplace Accreditation, all sworn and public sector SAPOL employees completed the first two modules of 'Preventing Violence Against Women' e-learning package. The third module was mandatory for Officers of Police (Inspector and above) and ASO7 and above.
 - > Conducted in August 2016 (prior to Project Equitas)
 - > e-learning package developed by the EOC.
- Development of Guidelines and communicated across the organisation via email and made accessible on the SAPOL Family and Domestic Violence intranet page.
- Information sessions were delivered for all employees and mandatory (face-to-face) sessions for supervisors and managers
 - > Conducted between July – September 2018
 - > Delivered by Training and Development Coordinators
 - > Key topics covered included
 - Identifying family and domestic violence (FDV) in the workplace
 - Responding to a disclosure of FDV in the workplace
 - Employee responsibilities in preventing, recognising, disclosing and reporting FDV in the workplace
 - Managers/supervisors' responsibilities in preventing and managing risks of safety to employees affected by DV, including risk assessment, safety planning and confidentiality.

- Content from the mandatory face-to-face sessions has been converted into online training content which will be integrated into online induction courses for non-sworn employees as well as orientation for supervisors/managers, the Constable development program and the Sergeant course.

Recommendation 37: Equity Contact Officers (now referred to as Diversity & Inclusion Representatives as a result of reform work)

- Guidelines about the Diversity and Inclusion Representative (D&I Rep) role are accessible on the D&I Branch's site on the SAPOL intranet (all employees were emailed the link in September 2018). They outline the:
 - > D&I Rep role, skills and attributes required, and what is not within their role
 - > role of Diversity and Inclusion Branch, supervisors and managers; and
 - > number of D&I Reps.
- SAPOL employees invited (via email in November) to apply to become a D&I Rep through an expression of interest (Eoi) process.
- Eoi process completed with supporting assessment process to identify successful representatives (November 2018).
- The relevant General Order has been updated, gazetted (13 February 2019) and announced on the SAPOL intranet.
- The role of D&I Reps is covered in biennial training for supervisors (link to Recommendation 21).
- Mandatory training provided to 69 D&I Reps between December 2018 – January 2019 and another six D&I Reps to be trained by the end of June 2019.
- D&I Reps will undertake 'refresher' training annually.
- Email across the organisation in early January 2019 notifying staff that the D&I reps replace the previous Equity Contact Officer (ECO) role.

EOC findings

Flexible working arrangements

Implementing flexible working arrangements (**Recommendation 26**) has been one of the largest pieces of reform by Project Equitas. To supplement the new policy framework for flexible work, significant effort has been made to raise awareness and engage employees to make the policy 'real' and meaningful. 100% of survey respondents indicated that they were aware of SAPOL's 'If Not, Why Not' approach for flexible working arrangements (FWAs). In addition, almost 90% had applied the updated General Order '*Flexible Working Arrangements*' either for themselves or for team members.

Respondents reported high levels of confidence (see Figure 6) to discuss FWA options with their direct reports, promote the benefits of FWAs and manage a team with members accessing FWAs (99%, 98% and 97% very confident/confident/moderately confident respectively).

Supporting commentary from survey respondents indicated that managing FWA requests and/or teams with members using FWAs has added challenges for supervisors/managers, for example:

- Applying a personal approach to facilitate FWA requests in a time poor working environment or where there is a geographical spread of team members;
- Juggling FWA requests within a 24/7 service environment and a full time equivalent cap for sworn personnel;
- Applicants considering they are ‘entitled’ to FWAs; and
- Limited technology and/or equipment to support working flexibly (link to **Recommendation 28 (d)**).

With 63% of respondents strongly agreeing or agreeing that enough support has been provided in relation to managing a team with members accessing FWAs, they believe that support from Human Resources Service would be the most useful option to work through these challenges and maintain momentum for working flexibly in SAPOL.

It was noted that equipment resourcing and Information Services and Technology (IS&T) restrictions make it difficult to manage a team accessing FWAs. There is action underway (**Recommendation 28(d)**) that is working to address this difficulty through the provision of appropriate secure infrastructure to facilitate employees working flexibly.

Despite these challenges, respondents were generally positive about the impact of FWAs on employee wellbeing and SAPOLs future.

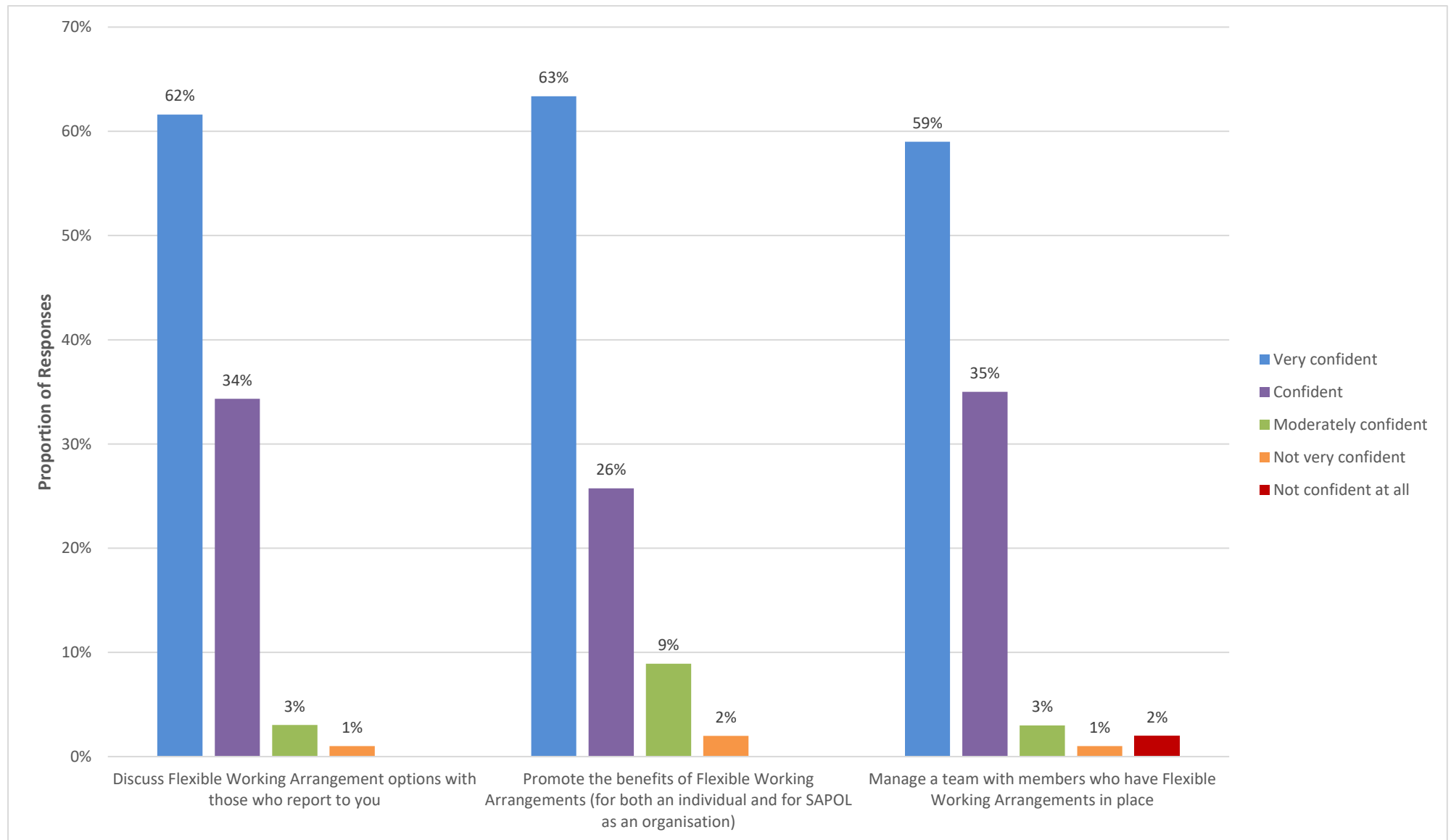
“FWA is the way forward within SAPOL for many reasons as members try to achieve work life balance... there is no let up from the new and many stress related issues SAPOL members are facing. FWA is sometimes the only avenue that we as managers can utilise to relieve that stress for them” Survey Respondent

It was noted that there is an expectation on SAPOL leadership to role-model working flexibly. This expectation is supported by the Workplace Gender Equality Agency²⁸ and considered to be key to normalising working flexibly.

“...there is a lack of support and role modelling around flexible work from leaders. This means flexible work is not normalized...All the leaders are men and they do not work flexibly and role-model the behaviours required to enable it.” Survey Respondent

²⁸ Workplace Gender Equality Agency (WGEA) Gender Strategy Toolkit Pg 31

Figure 6: Confidence to discuss and implement Flexible Working Arrangements



Guidelines for family and domestic violence involving SAPOL employees

The EOC recommended that SAPOL provide greater support for domestic violence victims in the workplace, particularly where both parties to the violence work within the same organisation (**Recommendation 35**). In response SAPOL have developed and released the *'Family and Domestic Violence Involving SAPOL Employees Guidelines'*.

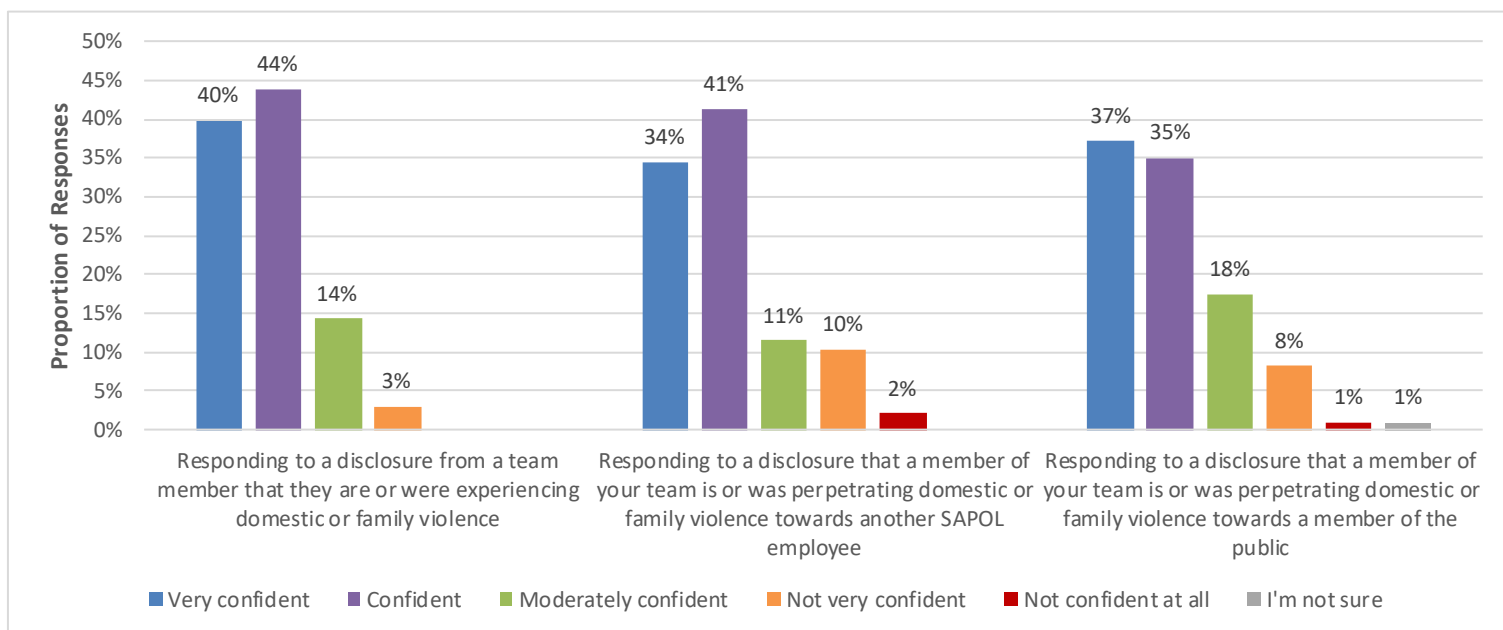
A number of awareness-raising and training activities have been delivered and 91% of respondents were aware of the Guidelines with the remainder either not aware or not sure (4% and 5% respectively). The main ways respondents became aware of the Guidelines was through a cross-organisation email, corporate training and announcement on the SAPOL intranet. A number of respondents noted that they have drawn on and applied the Guidelines to support employees.

It is important that supervisors and managers are confident to respond appropriately to any disclosures of family and domestic violence. The EOC Monitoring team tested confidence to respond under three scenarios of a disclosure from a team member that is or was:

1. Experiencing domestic or family violence;
2. Perpetrating domestic or family violence towards another SAPOL employee; and
3. Perpetrating domestic or family violence towards a member of the public.

As can be seen in Figure 7, confidence was highest for scenario's 1 and 3 at 98% and 90% respectively. With regard to responding to the scenario of a team member perpetrating domestic or family violence towards another SAPOL employee, 86% of respondents reported they were either very confident; confident; or moderately confident to respond.

Figure 7: Confidence to respond to domestic or family violence involving SAPOL employees



Diversity and Inclusion representatives

The Diversity and Inclusion Representatives (D&I Reps) network was launched in early 2019 and is linked to EOC **Recommendation 37** (replaces Equity Contact Officers).

Eighty-four percent were aware of this relatively new network, 15% were not aware and 1% were not sure. The most common ways respondents became aware of the network were through a cross-organisation email or announcement on the SAPOL intranet. A number of respondents noted that they became aware through an information session from the Diversity and Inclusion Branch and the video interview with the Commissioner of Police (September 2018).

Summary of assessment

The results indicate that SAPOL supervisors and managers capacity in supporting, promoting and enacting new policies and processes is **adequate**. While the capacity has been assessed as adequate, managing teams with members accessing FWAs can be challenging. **Support from Human Resources Service** would be useful to **work through the challenges and contribute to maintaining the momentum of working flexibly in SAPOL**.

Key Consideration 4

SAPOL's Human Resources Service provide support to supervisors and managers with regards to managing flexible teams and seek feedback on any gaps in support and ways forward.

Managing people effectively

People management skills in supervisory/managerial roles are critical. The EOC Independent Review found these skills were often lacking in SAPOL leaders and recommended that this be addressed through leadership development.

Outlined below is a summary of capacity-building and communication activities that the Project Equitas team coordinated or facilitated to complement their initiatives.

Capacity-building and communications

Recommendation 5: Leadership shadow program

- The 'Leadership Shadow' program developed by Chief Executive Women and Male Champions of Change aims to assist leaders to become a champion of diversity and inclusion. It comprises the four elements of what we say, how we act, what we prioritise and how we measure, which together determine what gets done²⁹. The program identifies practical actions leaders can take to optimise their own leadership shadow and create their own gender equality action plan.
- 9 training sessions (3 hours per session) delivered
 - > Target audience was employees in ASO7/Inspector roles and above
 - > 192 participants (214 employees identified to participate)
 - > Session format involved open forum discussions and interactive activities.
- Training evaluation forms were completed by 164 participants (85% response rate)
 - > 70% of respondents agreed that the workshop helped them to reflect on the impact of their leadership
 - > 95% strongly agreed/agreed that their leadership shadow could be enhanced
 - > 86% strongly agreed/agreed that the Personal Leadership Shadow Action Plan would be a useful tool to focus their leadership efforts
 - > 78% strongly agreed/agreed that the Leadership Shadow model would enable them to become a better leader of gender diversity (21% neutral; 1% disagreed).

Recommendation 6: Leadership performance feedback tool

- 360° leadership feedback exercise implemented by an external contractor with SAPOL Executive Leadership Team (ELT) in 2017. This provided a benchmark for the ELT members.
- ELT have been undergoing ongoing leadership development with the external contractor as part of the 360° leadership feedback program.
- Members of ELT will again undergo a 360° feedback exercise in June 2019, which will be compared to their November 2017 results, as part of this program.

²⁹ Chief Executive Women, Your Leadership Shadow

- The ELT members discuss their outcomes and progress with the Commissioner of Police during performance discussions.
- An internal evaluation identified that implementing a 360° feedback tool is not financially feasible to apply across the entire SAPOL management structure.
- The Project Equitas team sought input from employees for alternative options for leadership development within a budget envelope.
- A leadership feedback tool has been approved and is in the design stage with an external contractor.
- Once the tool is ready for implementation, SAPOL is planning to email the senior leader cohort seeking expressions of interest. Background information about the leadership feedback tool will be provided on the SAPOL intranet, along with frequently asked questions, an information sheet and user guide.

Recommendation 18: Reinvigorate the performance management system

- Design of the new performance management system is underway and roll out scheduled for June 2019. Feedback regarding the existing performance management system (referred to as Individual Performance Management or IPM) has been noted in this report where relevant.

Recommendation 22: Development of a three-year rolling training development plan

- Not included in this report as implementation has not been completed.

EOC findings

A key component of SAPOL supervisor and manager roles includes undertaking face-to-face performance reviews, discussing career progression and addressing poor performance with staff. It is important that supervisors and managers are confident in these capacities.

To support leadership development skills for supervisors and managers, about 190 SAPOL employees participated in Leadership Shadow training (**Recommendation 5**). The EOC Monitoring team investigated the usefulness of this training through its online survey. Results show that 35% of respondents participated in the Leadership Shadow Program. Of these respondents 76% found the training moderately/very useful.

“It was invaluable. I have used the discussions and learnings from this program to assist in mentoring and developing others in recognising their 'shadow' and change some behaviours” Survey Respondent

For the remaining 24 % of the online survey respondents who did not find the training useful, the feedback focussed on:

- More time being needed for the topics to have an impact;
- Training content not adding value to existing knowledge; and
- Not understanding how to apply or having the opportunity to apply the learnings.

SAPOL will be incorporating key concepts of the Leadership Shadow training into the Diversity and Inclusion Training Delivery Plan (**Recommendation 22**) by the end of 2019 to ensure ongoing development and reinforcement.

Figure 8 shows that the confidence of SAPOL supervisors and managers is generally high in the following areas:

- Addressing poor performance (94%);
- Undertaking face-to-face performance reviews (97%); and
- Discussing career progression (99%).

However Figure 9 shows that only 44% of respondents strongly agreed/agreed that SAPOL has provided enough support to address *poor performance*, 66% strongly agreed/agreed that there is sufficient information and support to *manage employees who behave inappropriately* and 58% strongly agreed/agreed that SAPOL has provided enough support to discuss *career progression* with their direct reports.

Supporting comments from respondents noted that confidence has been achieved primarily through experience.

“...When I was first undertaking supervisory duties in the early 2000's there was minimal training on this. Since then and undertaking IQP from 2010 onwards there has been a much greater emphasis on this. Having said that, my skillset has developed as a result of experience.”

“Skillset is achieved only through experience...”

“The years of experience that I have has helped build the confidence that I have. The recent emphasis and ... supports simply reinforce this.”

Figure 8: Confidence to undertake aspects of talent and performance management

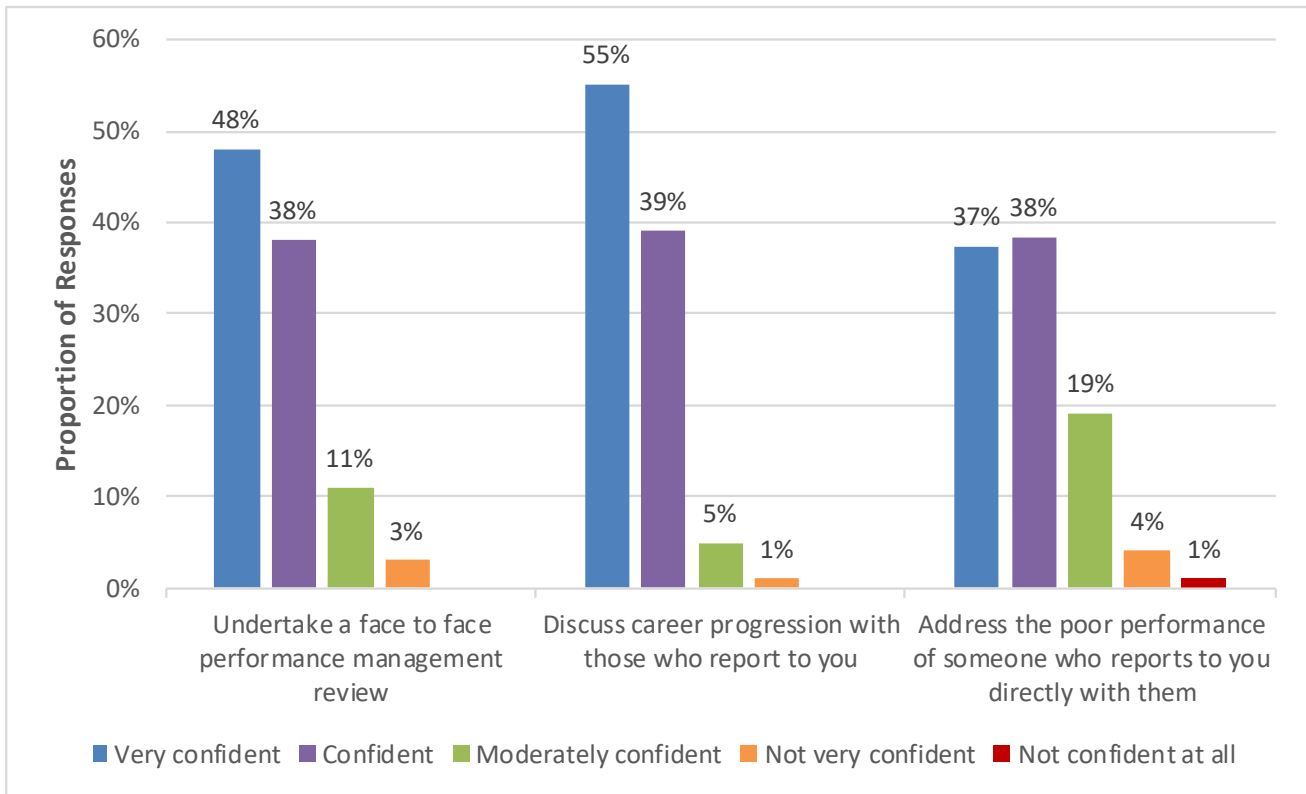
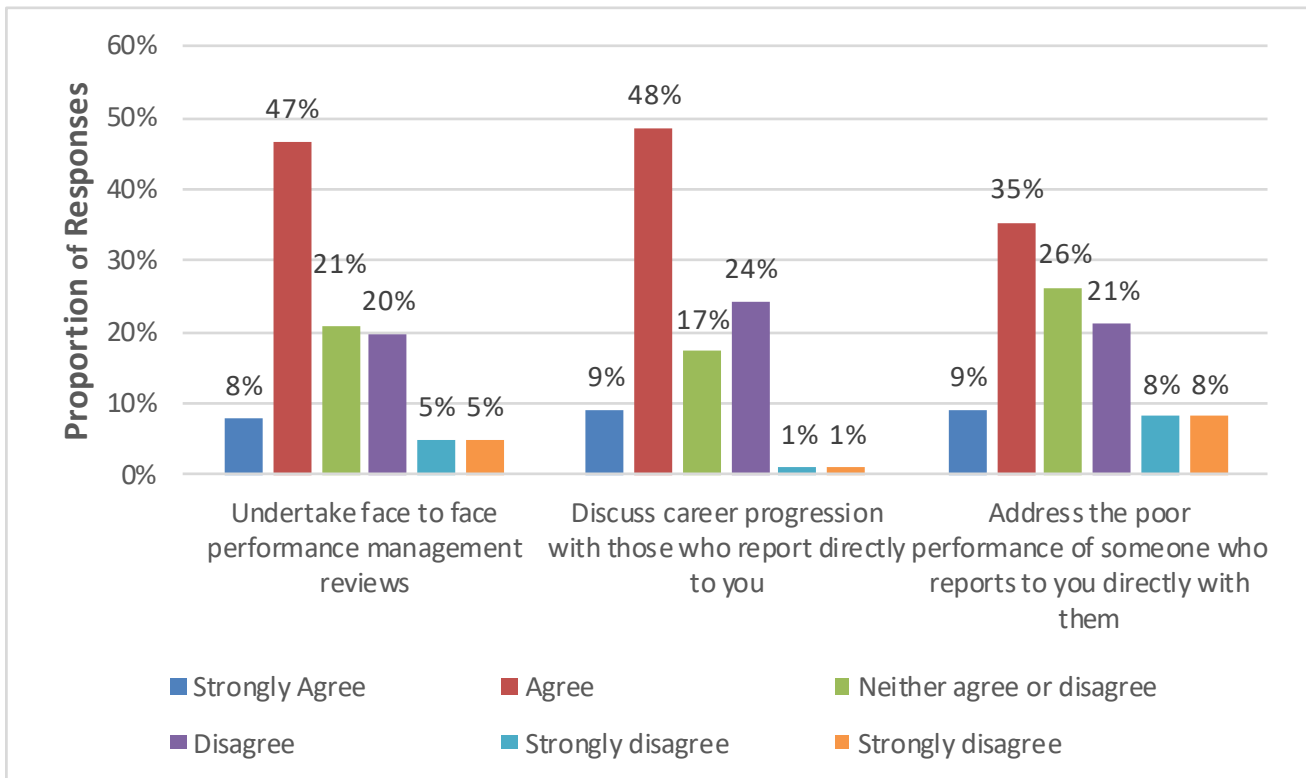


Figure 9: Provision of support to undertake talent and performance management tasks



Despite most respondents indicating they are confident to address the poor performance of their direct reports, feedback indicated that it can be challenging to manage or address under the existing performance management processes/systems. Work is underway by the Project Equitas team to revise the performance management system (as per **Recommendation 18**).

“...performance management is thru the IPM process and is long winded, drawn out and even if a PLAP³⁰ is instigated, then it takes 6 months - 2 years to have the improvement assessed - then members only have to do minimum to get off the PLAP etc - and then revert to the old habits and the process starts again ----- and then the supervisor gets accused of bullying etc... and investigated Performance measuring and performance improvement is near impossible via systems...only by personality and persuasion.” Survey Respondent

“...time consuming to manage poor performers...” Survey Respondent

“The IPM process is inefficient and has not worked effectively for years.” Survey Respondent

“ At times, I have seen poor performance being resolved by moving the person into another environment and not dealing with the situation at hand. Better processes need to be developed for management to follow.” Survey Respondent

“Distinct lack of training in performance management processes. Yes there is a G.O. No coaching program in place, nor any training offered in how to effectively manage people.” Survey Respondent

“The performance management system is extremely time consuming and unwieldy. There is limited scope to manage poor performers. Those that actually wish to learn and improve can be supported but those that are either incompetent or "just taking the money" require large amounts of time, effort and negative energy to manage. I would assume that most people attempt to manage these within these limitations as they acknowledge that it is better to spend quality time on quality people.” Survey Respondent

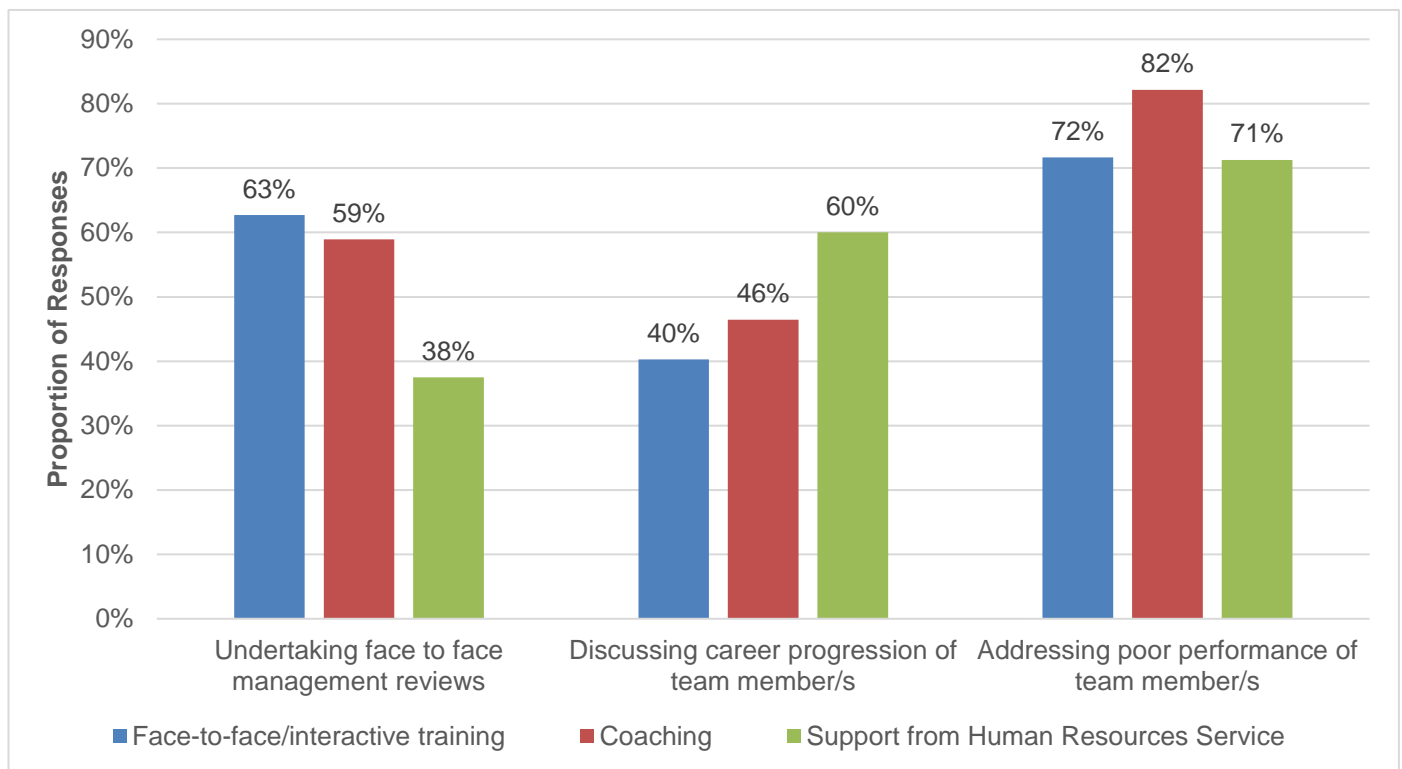
“The IPM program is difficult and complicates performance management.” Survey Respondent

³⁰ PLAP: Performance learning action plan

“It is certainly well known that performance management is managed very differently across the organisation.”
 Survey Respondent

Respondents also provided feedback on options to enhance their capacity to undertake these people-management tasks and addressing poor performance received a high rate of feedback. Respondents indicated coaching was the preferred option to enhance their capacity to address poor performance. The capacity-building option of support from Human Resources Service rated highly for both discussing career progression and addressing poor performance, indicating this Service area needs to continue supporting supervisors and managers to facilitate effective people management within SAPOL.

Figure 10: Options to enhance capacity to undertake people management tasks



Note for Figure 10: Respondents could select more than one option

Over the next few months, SAPOL is rolling out face-to-face training (as part of **Recommendation 22**) that focuses on ‘Respectful Behaviours’ and ‘Having Difficult Conversations’, to contribute to effective people management. This training will also support the work to re-invigorate the performance management system (**Recommendation 18**).

During 2017-18, SAPOL commissioned an external contractor to conduct a review and recommend improvements to the services, structures and procedures of the Human Resource Management Branch. This work was in response to **Recommendation 16** (external review of Human Resources Service). The review was completed in mid-2018 and SAPOL are in the process of implementing the HR-related recommendations.

Summary of assessment

Results indicate that supervisors and managers capacity in managing people effectively is **adequate with challenges**. The challenges that surfaced during this investigation are being worked on by the Project Equitas team, namely re-invigorating the performance management system. In addition, it is important that supervisors and managers are supported, if required, by the Human Resources Service to ensure that their time/effort spent on performance management is not to the detriment of other team members. Such **support from Human Resources Service will maintain momentum for SAPOL to manage employees effectively**.

Key Consideration 5

Project Equitas engage supervisors and managers in the finalisation and roll out of the revised performance management system (recommendation 18) to enhance transition to business operations and up-take.

Section 3: Willingness to support cultural change

This section will focus on the emotional buy-in to the change process of supervisors and managers (willingness). This is an essential factor in any cultural change effort.

To understand the willingness to support cultural change of SAPOLs supervisors and managers, the EOC Monitoring team investigated the elements of **accepting** the need for change and **desire to engage** in change.

The EOC Independent Review recommended SAPOL provide training to all employees on sex discrimination, sexual harassment, what constitutes acceptable behaviour and bystanders' responsibilities (**Recommendation 21(a)**). The training was considered to be an important factor in changing attitudes and behaviours. This recommendation has been implemented by SAPOL as part of their training cycle.

The importance that employees place on understanding what is appropriate and inappropriate behaviour in the workplace and challenging inappropriate behaviour is considered by the EOC Monitoring team to be a reflection on their **acceptance** of the need for change. The results (refer to Figure 11) indicate that the vast majority of respondents accept the need for change in the following areas:

- 100% strongly agreed/agreed it is important that employees understand what is appropriate and inappropriate behaviour in the workplace.
- 99% of respondents strongly agreed/agreed it is important that all employees understand they have a role in challenging inappropriate behaviour.
- 97% of respondents strongly agreed/agreed it is important that employees understand they will be supported when challenging inappropriate behaviour.

The data (refer Figure 12) indicated that the vast majority of the respondents see key Project Equitas initiatives in a positive light. For example,

- 82% strongly agreed/agreed it is important that SAPOL has the 'If Not, Why Not' approach to flexible working arrangements for all employees.
- 96% either strongly agreed/agreed it is important that SAPOL has the '*Family and Domestic Violence Involving SAPOL Employees Guidelines*' for all employees.
- 89% strongly agreed/agreed it is important that SAPOL has the Diversity and Inclusion Representatives service for employees.

Figure 11: Importance placed on understanding appropriate and inappropriate behaviour and challenging inappropriate behaviour

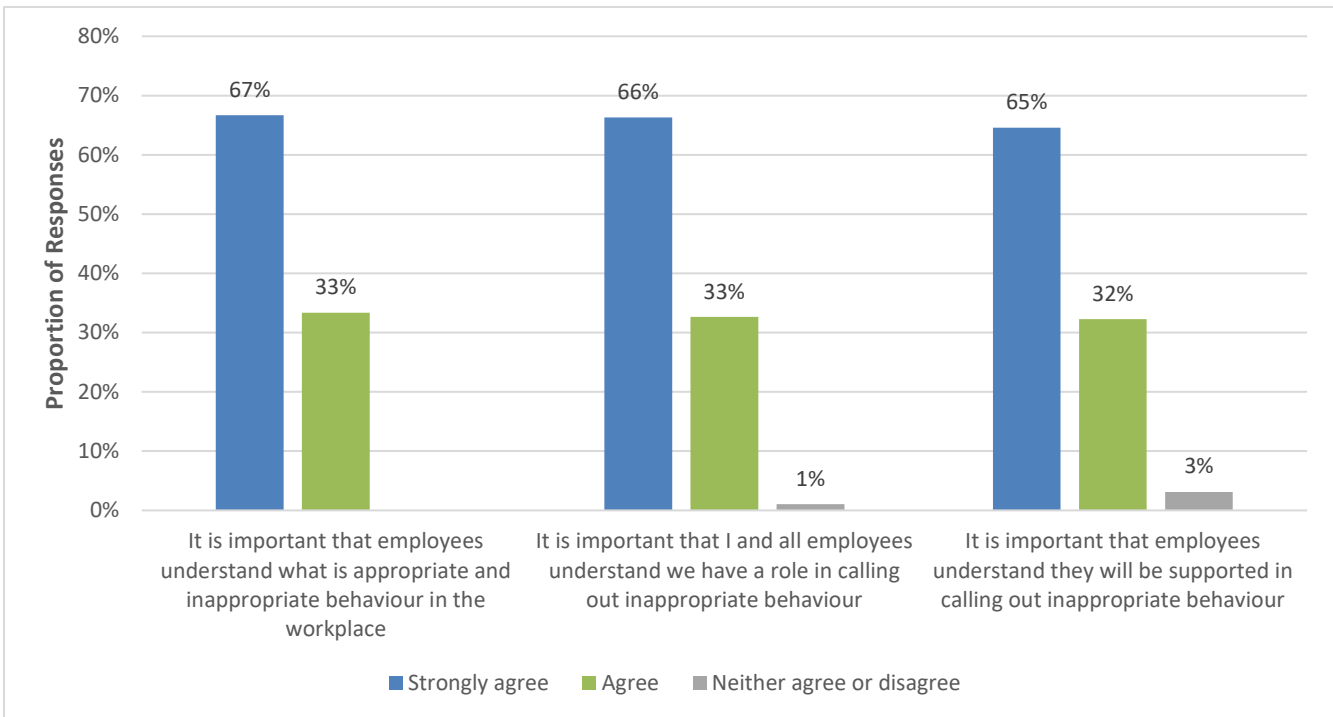
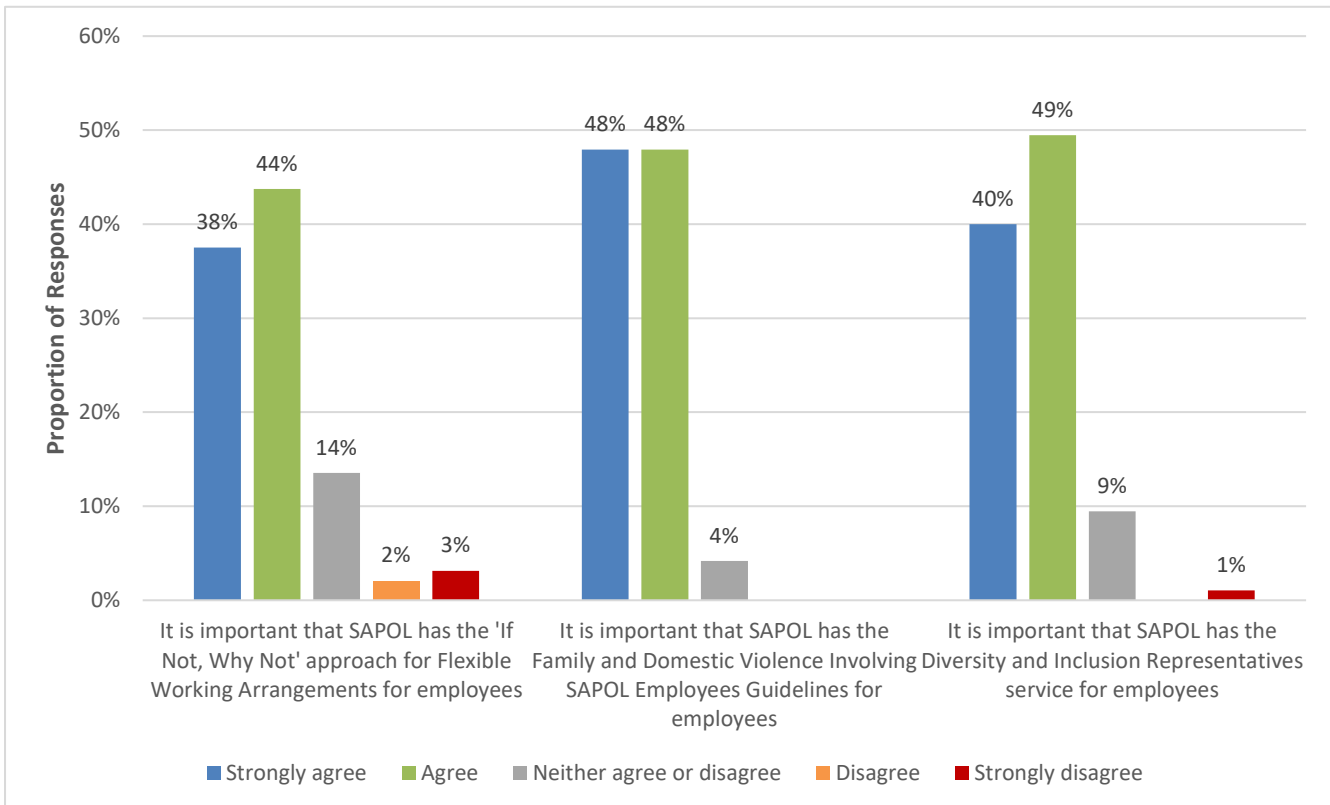


Figure 12: Importance placed on a number of Project Equitas initiatives



Respondents had an opportunity to indicate their acceptance of the need for change through their understanding of the benefits of Project Equitas initiatives for SAPOL and its employees. 68% of respondents used this feedback opportunity. The main benefits raised were:

- A safer workplace;
- Employees feeling valued and supported (e.g. professional development; flexibility to achieve work/life balance; challenge inappropriate behaviour);
- A respectful and inclusive work environment, with a diversity of employees who are treated fairly and equitably;
- Enhanced wellbeing of employees; and
- A harmonious work environment, with motivated and happy employees.

A number of respondents acknowledged that these benefits can contribute to a higher retention of employees, which is a cost saving for SAPOL, and promotes SAPOL as a 'modern' organisation and employer of choice. A small number of respondents also noted that these benefits can contribute to improved service delivery to the community.

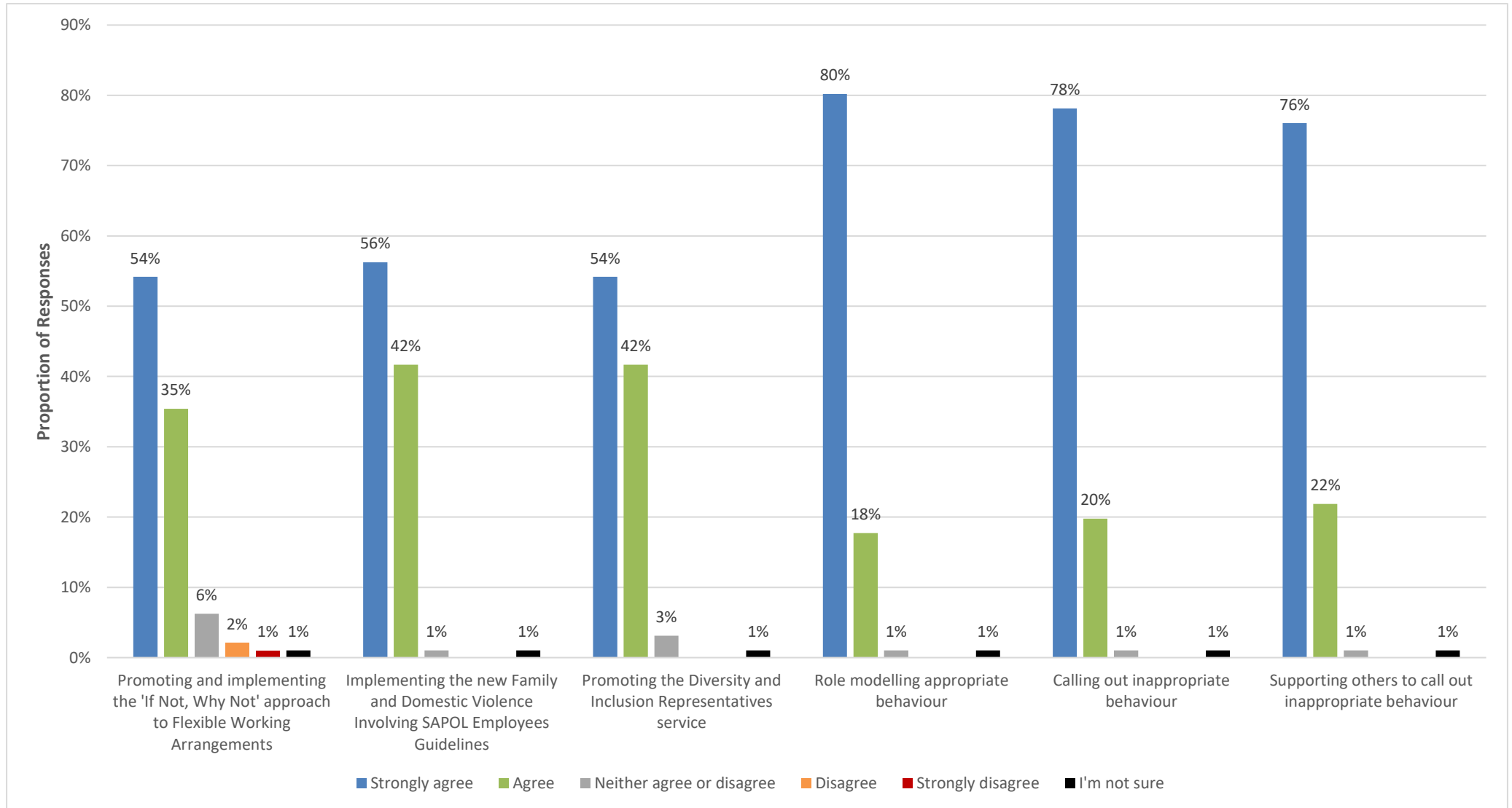
To investigate the **desire to engage** element of willingness to change, the EOC Monitoring team tested whether respondents considered a set of tasks related to Project Equitas initiatives as part of their role (results presented in Figure 13). This investigation found that:

- 89% strongly agreed/agreed that promoting and implementing the 'If Not, Why Not' approach for flexible working arrangements is a part of their role.
- 98% strongly agreed/agreed that implementing the '*Family and Domestic Violence Involving SAPOL Employees Guidelines*' was a part of their role.
- 96% strongly agreed/agreed that promoting the Diversity and Inclusion Representatives service was a part of their role.
- 98% strongly agreed/agreed that role-modelling appropriate behaviour is a part of their role.
- 98% strongly agreed/agreed that calling out inappropriate behaviour is a part of their role.
- 98% strongly agreed/agreed that supporting others to call out inappropriate behaviour is a part of their role.

Respondents provided examples of how they have been **engaging** in the change process. Quite a few reflected the areas that were tested in the survey (such as leading by example or challenging/calling out employees in front of other employees for use of inappropriate language (including gender biased language) and/or behaviour).

"...making a point that they may use such language/behaviour in their own home but that this is 'our' workplace and such language/behaviour is not appropriate among others at work" Survey Respondent

Figure 13: Testing if set of tasks related to Project Equitas initiatives are considered to be part of supervisors or managers role



In addition, respondents mentioned the use of meetings (for teams and managers) to discuss and reinforce values, standards and expectations, as well as provide updates on the progress of Project Equitas and options for managing or reporting related issues. Using these structured forums, and in some cases setting 'diversity and inclusion' (or similar) as an agenda item, contributes to encouraging open discussion and normalising diversity and inclusion into business as usual.

"A proactive agenda point in all meetings so items of a DI nature are embraced as opportunities rather than viewed as issues." Survey Respondent

Qualitative data indicated that it was common for respondents to lead and encourage more informal local workplace discussions following the release of Project Equitas information or initiatives to reinforce key messages. A number of respondents acknowledged that at times clarification or further information is shared through one-on-one interactions. One respondent mentioned that they reinforced Project Equitas emails by resending it to their staff with their own commentary to highlight the key messages – this personal note has been received positively by their staff.

There were examples that demonstrated respondents are **engaging** in the change process and taking action to make this a part of business as usual (in particular improving gender equity and normalising working flexibly in SAPOL). One respondent reported that they drove and supported the recruitment of more women into roles in a particular branch where women are under-represented and encouraged part-time employees to team up in operational roles on patrol teams rather than taking on administration roles.

Another respondent reported **engagement** in the change by raising the benefits of Project Equitas initiatives and challenging peers with contemporary research.

"As a manager it is vital that I shut down the perception that flexible work is "soft" and limited to part-time and women who have a family. This still happens. My continued voice and commitment in explaining why SAPOL is improving our conditions/safety and [flexibility] and the benefits (adding in research that supports it) is necessary to educate senior members." Survey Respondent.

Summary of assessment

The results indicate that the supervisors and managers willingness to support the cultural change, in particular for the elements of accepting the need for change and desire to engage in the change, is **adequate**.

Section 4: The capacity of the Diversity and Inclusion Branch to fulfil its purpose and objectives

The Diversity and Inclusion Branch

The new Diversity and Inclusion Branch commenced operations on 18 July 2018 and replaced the functions of the former Equity and Diversity Section. This new branch was the result of SAPOL acting on the EOC's recommendation to establish a new and streamlined internal Complaints Resolution Unit (**Recommendation 30**). In order to establish the new branch, SAPOL reallocated existing resources to expand from two full time equivalent (FTE) staff to a total of 15 FTE. This includes a small team of trained, professional mediators.

The Branch manager, also a professional mediator and recruited from outside of SAPOL in 2018, 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 strategic and operational documents that include the branch '*Vision, Purpose, Objectives and Principles*' and SAPOL's '*Diversity and Inclusion Strategy*'. Practical resources such as an amended General Order, new Standard Operating Procedures and specific policies around confidentiality and conflict of interest have been designed to ensure consistency and continuity in service delivery.

It is critical that the branch has the capacity to fulfil its purpose and objectives, in particular:

- Provide a confidential centralised complaints process;
- Address conflict using a variety of alternative dispute resolution techniques;
- Provide support to staff to complete the notification procedure;
- Safeguard the emotional and psychological wellbeing of those involved in a notification;
- Conduct an inquiry or investigation into unlawful workplace behaviour;
- Assisting all staff to increase their ability to manage conflict effectively;
- Support supervisors and managers to lead by example and role model respectful workplace behaviours; and
- Educate about appropriate, respectful and professional workplace behaviours.

Background of capacity-building and communication activities

Through the implementation of recommendations by Project Equitas the Diversity and Inclusion Branch has participated in training on equal opportunity, diversity and inclusion related topics, plus undertaken informal development/training or information sharing opportunities at the branch level. A summary of these activities follows.

Recommendation 21(a): Biennial training – respectful behaviours, unconscious bias and bystander responsibilities (further background information about this recommendation is provided in the ‘Understanding and modelling appropriate behaviour’ theme in section 2)

All D&I Branch members are required to complete the two mandatory on-line training modules that focus on diversity and inclusion:

- Module 1: Overview of equity and diversity, examples of unconscious bias and impacts in the workplace.
- Module 2: Information about what actions can be taken when inappropriate behaviour occurs in the workplace, bystander responsibilities, how to report or respond to the behaviour.

Recommendation 31: Complaints management tool

The D&I Branch uses a centralised complaints system, IAPro, which members have been trained in as part of their induction.

Rec 32: Training of complaint resolution unit staff and others

The training required for the D&I Branch members as part of this recommendation links back to recommendation 21(a) above.

Other supporting development/training or information sharing

- During branch establishment (May 2018), members provided with vision statement and the ‘*Respectful Behaviours Guidelines*’.
- Mediation role play session (2) provided to members, plus introduction to alternative dispute resolution.
- Mediation training (delivered by external contractor) undertaken by two members.
- Members are encouraged to work alongside each other to learn about other disciplines, for example mediators have worked with trainers and investigators to gain an insight into both their work and the SAPOL culture.
- All members have seen the presentation that the branch is using in its face-to-face engagement sessions at SAPOL worksites. Many members are involved in the delivery of this presentation at worksites.
- Catch-up session focusing on the presentation for those that recently joined the branch to enhance awareness of the notification process and the message being delivered via the presentation.
- ‘Refresher’ information pack comprising the background/establishment documents sent to branch members in late December 2018, as a resource to refresh awareness and understanding.
- ‘Refresher’ sessions (December 2018 and January 2019) with members covering topic such as discrimination, sexual harassment (including predatory behaviour), current best practice and research.
- Regular staff meetings used to discuss processes and work undertaken by the branch.

EOC findings

Understand the impact of sex discrimination, sexual harassment, and diversity & inclusion

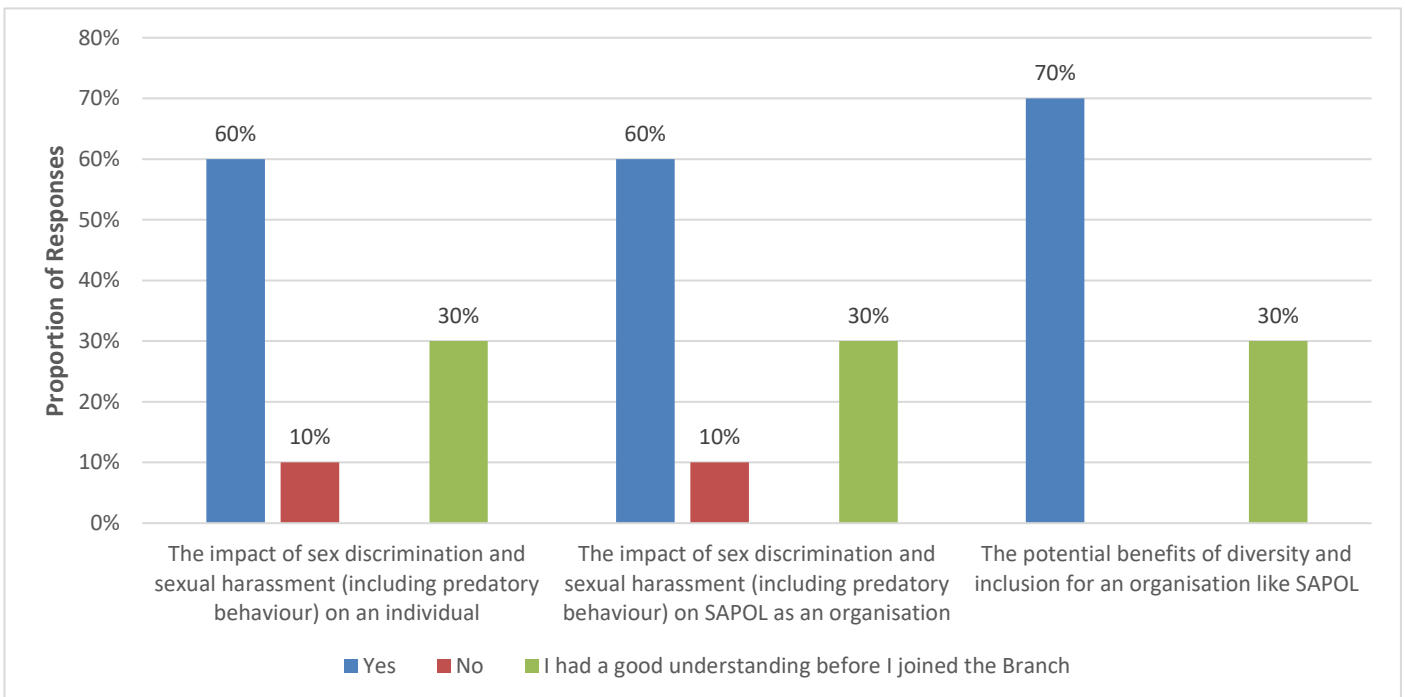
The EOC considers that it is critical that branch members have an understanding of the impact of sex discrimination and sexual harassment (including predatory behaviour) on an individual (as indicated by **Recommendation 32**), as well as for SAPOL as an organisation. Furthermore, given the scope of responsibility for the branch it is important that members understand the potential benefits of diversity and inclusion at an organisational level.

The vast majority of branch respondents (refer to Figure 14) indicated that they do have an understanding of the:

- Impact of sex discrimination and sexual harassment (including predatory behaviour) on an individual and on SAPOL as an organisation; and
- Potential benefits of diversity and inclusion for an organisation like SAPOL.

Respondents indicated that they had gained this since working at the branch or had a good understanding before joining the branch.

Figure 14: Understand the impact of sex discrimination & sexual harassment and diversity & inclusion



When exploring what has been useful in building or reinforcing branch members understanding of the impact of sex discrimination, sexual harassment and diversity and inclusion, it emerged that the most useful tools/supports have been mentoring/direction from leadership and the EOC Independent Review. The respondents also indicated that SAPOL's mandatory online Diversity and Inclusion training modules have contributed to their understanding.

A number of respondents provided supporting commentary that on-the-job experience, for example practical implementation of the branch tasks and observations in the workplace, has been useful for understanding sex discrimination, sexual harassment and diversity and inclusion. One respondent noted that external sources, such as research conducted by the branch or its individuals and media articles/documentaries, have also been useful in building or reinforcing their understanding.

While our survey question focused on the understanding of the individuals within the Diversity and Inclusion Branch, it was highlighted that the branch can contribute to cultural change by consistently communicating about appropriate and respectful workplace behaviours across SAPOL.

It should be noted that one respondent indicated they do not have an understanding of the impact of sex discrimination and sexual harassment (including predatory behaviour) on an individual or SAPOL level.

It is critical that the Branch Manager continues the development/training and information-sharing activities with all members to build and reinforce understanding of the impact of sex discrimination and sexual harassment (including predatory behaviour). In addition, the Branch Manager should review the training (formal and informal) status of all members and build this into future performance management discussions.

Training, tools and support

In order for the Diversity and Inclusion Branch to undertake its key tasks it is important that the branch has been provided sufficient training, tools and support.

Overall, the results were positive with the majority of branch respondents in strong agreement/agreement that sufficient training, tools and support had been provided to complete the key tasks that were tested in the survey (refer to Figure 15). For example, 80% of respondents strongly agreed/agreed that they have been provided sufficient training, tools and support in:

- Addressing conflict using a variety of alternative dispute resolution techniques; and
- Assisting all employees to increase their ability to manage conflict effectively

It is acknowledged that training is only one form of skills development and, as one respondent highlighted, 'learning on the job' and the practical application of theory on the job are other ways that had been an important contributor to their development.

Areas for improvement were identified in the key task areas of:

- Supporting SAPOL employees to complete the necessary steps of the notification procedure; and
- Preventing workplace conflict through education initiatives (training, information sessions, formal and informal coaching).

Only 60% of respondents believed the above had been adequately provided.

These results indicate that the Diversity and Inclusion Branch would benefit from reviewing (as a group) current approaches to complete these tasks and ways to address any gaps or challenges in achievement of the D&I Branch's purpose and objectives. This exercise would be timely as the D&I Branch approaches the completion of its first year of service delivery.

In addition, feedback was captured that highlighted the need for further training in systems (for example the centralised complaints system IAPro and how it is used differently by the units within the branch) to assist branch members to become more confident users.

Confidence to perform role

Confidence is a key aspect of capacity and a facilitator of effective performance in a role. The EOC Monitoring team found that the vast majority of the branch members are confident (either moderately confident, confident or very confident) to perform the tasks tested in the survey that are relevant to their role (refer to Figure 16).

There were two tasks however that each recorded a response of either not very confident or not confident at all. These were:

- Safeguard the emotional and psychological wellbeing of SAPOL employees who are involved in a notification; and
- Educating SAPOL employees about the importance of diversity and inclusion,

Given these tasks involve interacting with SAPOL employees (a key stakeholder for the branch), it is important that all branch members are confident when interacting with key stakeholders.

As highlighted by one survey participant, the branch is less than 12 months old and it is reasonable to expect that the confidence levels of its members will improve with more practical experience.

Figure 15: Provision of sufficient training, tools and support to complete key tasks

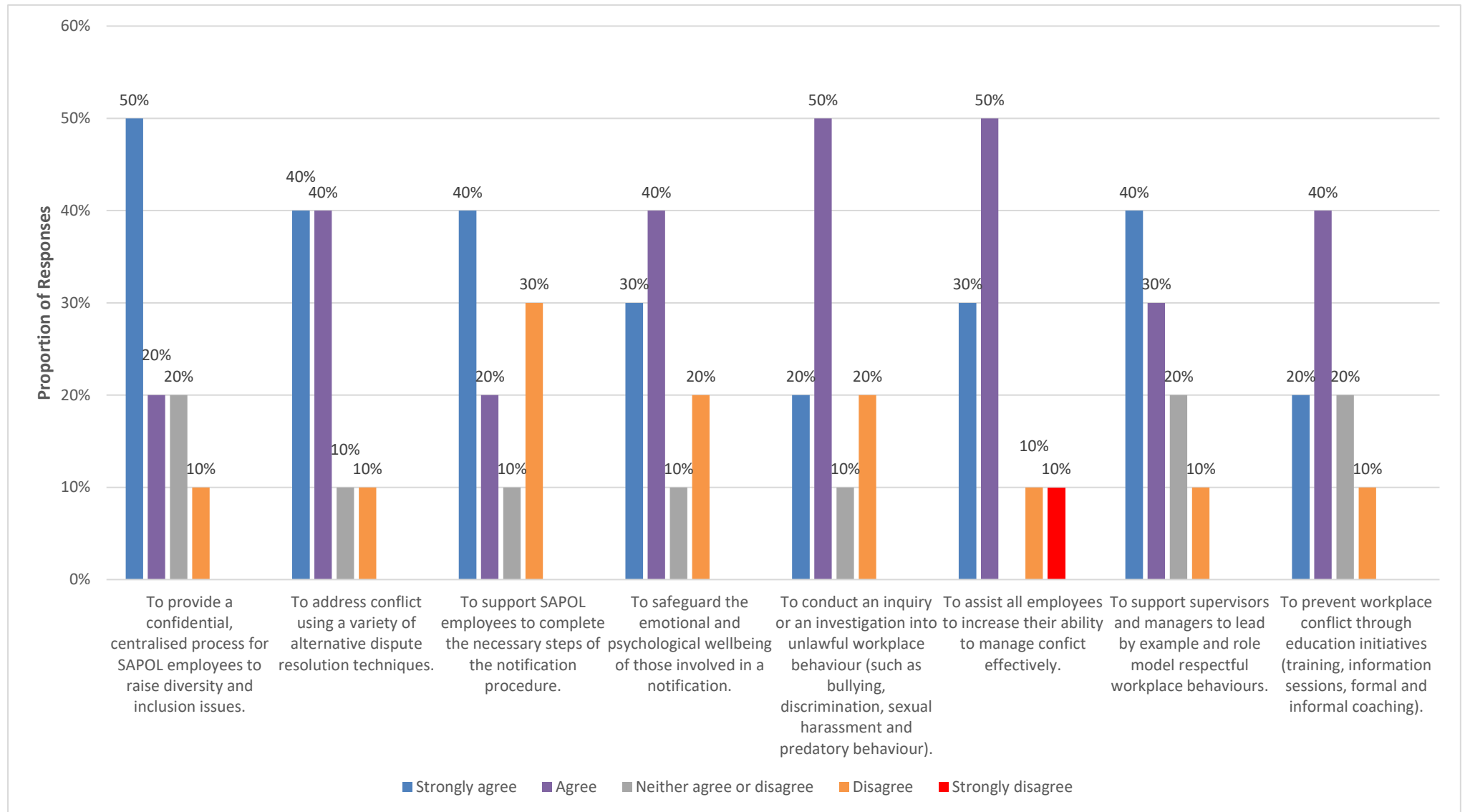
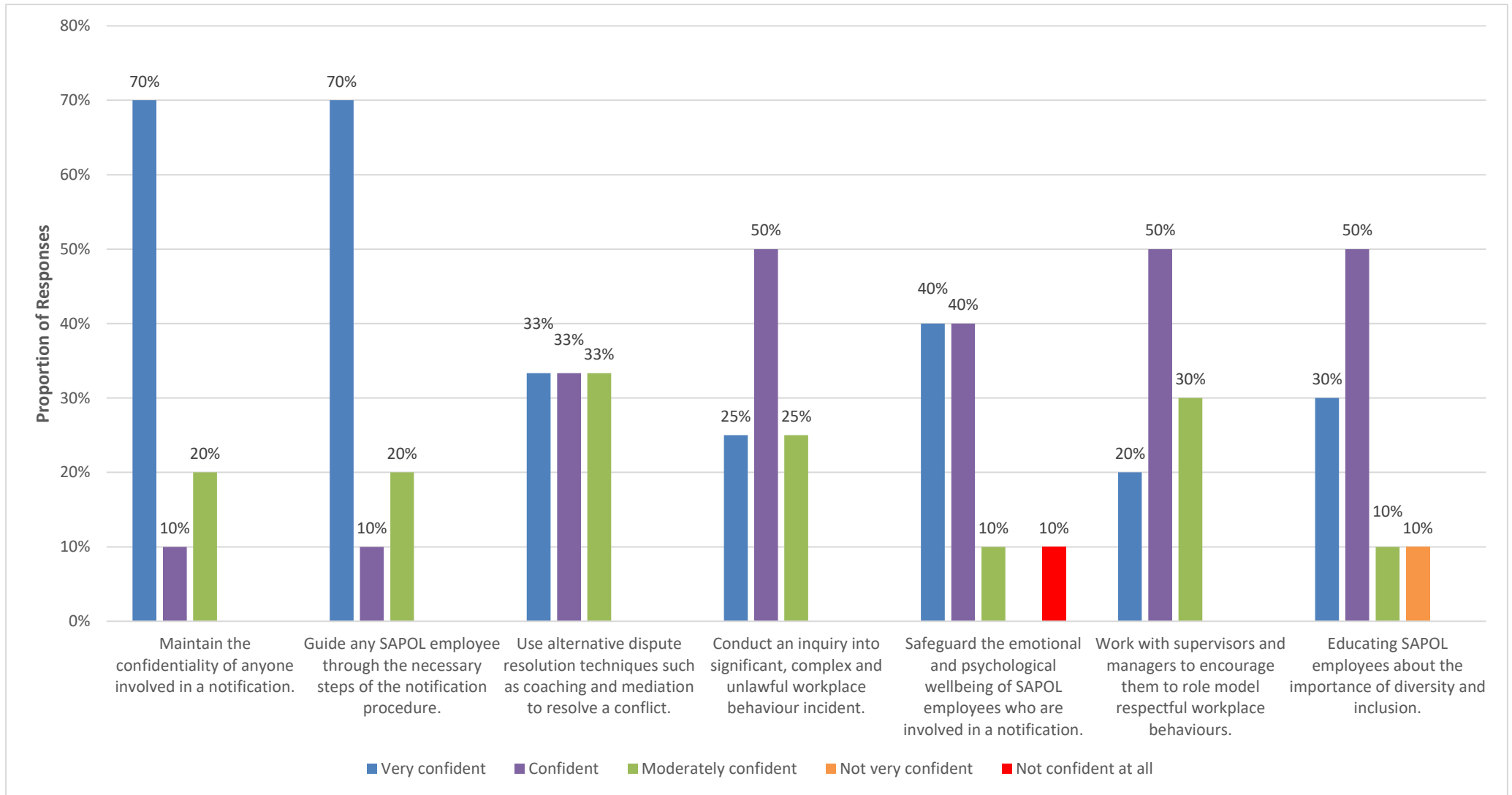


Figure 16: Confidence to undertake tasks in own role



Looking ahead

Survey respondents suggested training, tools or supports that would benefit current and future members of the branch. These included:

- Networking with interstate policing jurisdictions or other organisations with a similar model to the Diversity and Inclusion Branch and working towards similar goals;
- Training in the centralised complaints system (IAPro);
- Access to the latest trends in sex discrimination, sexual harassment (including predatory behaviour) and diversity and inclusion, e.g. for SAPOL, similar organisations, and at state and national levels.

Summary of assessment

Results from the Diversity and Inclusion Branch indicate that staff capacity to fulfil its purpose and objectives is **adequate**. While the capacity has been assessed as adequate, **follow-up action is required to maintain momentum**. It is important that all branch members are confident to perform their role, especially given they interact with employees who may be vulnerable and/or under stress.

Key Consideration 6

SAPOL's Diversity and Inclusion Branch Manager

- Review the training status of branch members to ensure all have been trained to understand the impact of sex discrimination and sexual harassment (including predatory behaviour) on an individual and at the organisational level;
- Incorporate the topic of 'confidence to perform role' with branch members during Individual Performance Management discussions to identify development needs; and
- Review training, tools and supports for existing and new branch members to maintain and enhance the branch's capacity moving forward.

Key Consideration 7

In order to identify what is working well and ways to achieve the purpose and objectives of the branch, SAPOL's Diversity and Inclusion Branch Manager along with branch members review its current approaches to:

- Supporting SAPOL employees to complete the necessary steps of the notification (internal complaints) procedure; and
- Preventing workplace conflict through education initiatives (training, information sessions, formal and informal coaching).

Conclusion

This is the EOC Monitoring team's third report. Its purpose is to provide an update on the implementation of the recommendations from the EOC Independent Review, and investigate if the capacity and willingness of supervisors and managers is adequate to contribute to the cultural change effort required (based on EOC recommendations). In addition, this report investigated the capacity of the Diversity and Inclusion Branch to achieve its purpose and objectives.

Project Equitas is still on track with the practical implementation of the EOC recommendations with 25 recommendations completed and the remaining 13 underway.

Since the release of the EOC's second evaluation report in September 2018, the implementation achievements to note are the '*Exit Management Strategy*' (**Recommendation 20**) roll out (and associated its reporting) and the Diversity and Inclusion Representatives network (**Recommendation 37**) training and activation. The completion and transition of these initiatives to standard business operations is providing employees with an opportunity to exit in a respectful manner and offer ideas for improving the organisation. Furthermore, employees will be supported with a network of trained and approachable colleagues during challenging times or experiences. These reforms are likely to positively contribute to employees wellbeing and the cultural change effort.

During the drafting of this report, a risk to implementation that surfaced was in relation to the review of standards for promotion (**Recommendation 12**). A lengthy implementation time is required to allow for extensive consultation. It will be important for SAPOL to communicate with the workforce in a timely manner with meaningful information to maintain engagement.

The detailed analysis sections of this report focused on 12 of the total 38 recommendations from the perspective of SAPOL's supervisors, managers and Diversity and Inclusion Branch. These cohorts are critical for integrating the initiatives of Project Equitas into 'business as usual' and have a key role in promoting and facilitating SAPOL's desired cultural change. It is important that these cohorts have the capacity and willingness to effectively contribute to the cultural change.

The capacity of supervisors and managers was assessed under four themes and the capacity is adequate for three of the four. However, it was noted that there are challenges and action is required to maintain momentum. The theme of 'challenging and reporting inappropriate behaviour' was assessed as less than adequate. There is a need to focus on enhancing employees confidence to challenge and report inappropriate behaviour, in particular where this is coming from employees who are sworn or of a higher classification/rank.

After analysing the quantitative and qualitative data regarding the Diversity and Inclusion Branch's capacity to fulfil its purpose and objectives, the assessment concluded that their capacity is adequate with follow up action required to maintain momentum.

The willingness of the supervisors and managers to support the cultural change required was also assessed as adequate.

The EOC has provided SAPOL with some points for consideration to enhance the efforts of Project Equitas for the best possible project outcomes.

Supervisors and managers having adequate capacity and willingness to contribute to the cultural change effort (based on EOC recommendations) may not immediately equate to successful cultural change. Adequate capacity and willingness serves as a foundation for effective utilisation and adoption of Project Equitas initiatives as standard business practice. This practice impacts other employees experience of the workplace culture. This will be the focus of analysis for our next report in December 2019.

Bibliography

Chief Executive Women, *Your Leadership Shadow*, <https://cew.org.au/programs/your-leadership-shadow/> (accessed 16/04/2019)

Data Analysis Australia, *Response Rates*, <https://www.daa.com.au/articles/analytical-ideas/response-rates/> (accessed 12/04/19)

Equal Opportunity Commission of South Australia, *2016 Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police* (EOC: Adelaide, SA).

SA Police Project Equitas, *Recommendation Closure Report - Recommendation 21*, Approved by Assistant Commissioner Bryan Fahy, Project Director – Project Equitas (24/01/2018), Pg 2

SA Police Project Equitas, *Recommendation Closure Report - Recommendation 17*, Approved by Assistant Commissioner Bryan Fahy, Project Director – Project Equitas (17/07/2018), Pg 2

SA Police, 2017, *Diversity and Inclusion Strategy 2018-2020*, Pg 2

SA Police, 2018, General Order 8420, 'Human Resource Management, Diversity and Inclusion'

SA Police, 2019, *I Work For SA - Your Voice Survey: SAPOL Results – A Snapshot*, Pg 3

Skills You Need, *Building Confidence*, <https://www.skillsyouneed.com/ps/confidence.html> (accessed 29/01/2019)

Sufi S., Nanadic A., Silva R., Duckles B., Simera I., de Beyer JA, Struthers C., Nurmikko-Fuller T., Bellis L., Miah W., Wilde A., Emsley I., Phillippe O., Balzano M., Coelho S., Ford H., Jones C. and Higgins V., 2018, *Ten simple rules for measuring the impact of workshops*, PLOS Computational Biology 14(8): e1006191, <https://doi.org/10.1371/journal.pcbi.1006191> (accessed 29/11/2018)

Fryrear A., 27/07/15, *What's a Good Survey Response Rate?*, SurveyGizmo, <https://www.surveygizmo.com/resources/blog/survey-response-rates/> (accessed 15/04/19)

Workplace Gender Equality Agency (WGEA) *Gender Strategy Toolkit*, Pg 31.

https://www.wgea.gov.au/sites/default/files/documents/Gender_Strategy_Toolkit.pdf (accessed 22/2/19)

Appendix

Appendix A: Summary of EOC Monitoring Project progress and reports

Appendix B: Summary of classifications/ranks of online survey respondents

Appendix A: Summary of EOC Monitoring Project progress and reports

Report 1: Foundational Activities

Purpose: Extent SAPOL had set a foundation for positive cultural change (leadership in the change process & key immediate actions (formal acknowledgement & apology, REP, SAFE Space, Task Force Portus, GE Action Plan)

Findings

- ELT have demonstrated a commitment & understanding of the need for cultural change; vision for change clearly articulated across the organisation by SAPOL leadership and Project Equitas
- Key immediate actions implemented - centred on the welfare of victims of sex discrimination, sexual harassment and predatory behaviour, which are of utmost priority

Key Consideration Themes:

- Staged approach for introducing Project Equitas members
- Differentiate communications
- Link how employee feedback is used
- Set clear behaviour expectations
- ELT & senior leaders active role engagement
- Structured handover process for GEAP

Report 2: Change in Policy, Processes & Systems

Purpose:

- Snapshot of key metric indicators of change
- Evaluated the policies, processes & systems that contribute to the desired culture

Findings

- SAPOL on track to deliver policy, process and system changes that support gender equality and safety for women in the workplace
- Revitalisation & promotion of FWA and the complete restructure of the internal complaints process

Key Consideration Themes:

- ELT discuss flex work options for specialist roles
- Develop reporting schedule highlighting data requirements
- Set goals/targets related to KPIs
- Set targets along promotional pathway (sworn/non-sworn)
- Support/guidance for conducting face-to-face exit interviews
- Option for exiting employees to provide reason for leaving

Report 3: Assessment of Capacity and Willingness

Purpose:

- Assessment of SAPOL's supervisors and managers capacity and willingness to support cultural change
- Assessment of the capacity of the Diversity and Inclusion Branch to fulfil its purpose and objectives

Findings

The capacity of supervisors and managers to support cultural change was assessed under the following four themes:

- Understanding and modelling appropriate behaviour: assessment = adequate.
- Challenging and reporting inappropriate behaviour: assessment = less than adequate.
- Supporting, promoting and enacting new policies and processes: assessment = adequate with action required to maintain momentum.
- Managing people effectively: assessment = adequate with challenges.

The willingness of supervisors and managers to support cultural change was assessed as adequate.

The capacity of the Diversity and Inclusion Branch to fulfil its purpose and objectives was assessed as adequate with follow-up action to maintain momentum.

Key Consideration Themes:

- Review the completion status for the mandatory online diversity and inclusion training courses/modules to ensure all employees are up to date
- Develop strategies to enhance employee confidence to challenge/call out employees who are sworn or of a higher classification rank
- Communicate disciplinary outcomes (without identifying details)
- Human Resources Service provide enhanced support around managing flexible teams
- Engage supervisors/managers in the finalisation and roll out of the re-invigoration of the performance management system
- Review the training status of Diversity and Inclusion Branch members and incorporate 'confidence to perform role' into IPM discussions
- Review approaches of the Diversity and Inclusion Branch to identify what is working well and ways forward

Report 4: Change in Practice and Culture

Purpose

Extent that SAPOL have changed business practices to support overall cultural change in becoming a more diverse and inclusive workplace (with particular reference to gender equality)

Key Components

- Progress in implementation of the recommendations
- Snapshot of key metric indicators of change (SAPOL at a Glance)
- Evaluation of change in key factors/elements of the SAPOL culture (as per Independent Review Report)
- Evaluation of key business practices that contribute to cultural change
- Re-run key aspects of 2016 EOC survey to inform the purpose of Report 4 (including extent of sex discrimination, extent of sexual harassment (experienced & witnessed) and complaints management and outcomes)
- Map WGEA roadmap location -> detect change since 2016 EOC Review & SAPOL 2017 WGEA mapping exercise (as per Gender Equality Action Plan)

Appendix B: Summary of classifications/ranks of online survey respondents

