

Final Report

Change in perceptions, experiences and practices that support gender equality and cultural change in SAPOL

March 2020

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

In the four years since I was first asked to examine the workplace culture within South Australia Police, there has been a significant shift in the way we as a community view sexual harassment and discrimination in the workplace. Movements like #MeToo have emerged and, while there is still considerably more work to be done, there is now greater awareness around these issues than there has been in the past.

South Australia Police has an integral role in our community, enforcing the law and – after a thorough examination of their workplace practices – I have more confidence that SAPOL is moving towards a workplace where all employees are treated fairly and with respect, with a greater emphasis on gender equality.

As at the end of February, SAPOL has completed 33 of the 38 recommendations our office made in the review, with the remaining five recommendations expected to be complete by the end of 2020. These recommendations provided a pathway to addressing the many disturbing findings highlighted in my 2016 review, which included a high prevalence of sex discrimination and sexual harassment, and obstacles to gender equality.

I commend the Commissioner of Police Grant Stevens for his courageous and comprehensive commitment to tackling these issues – first by inviting my office to undertake the 2016 review, and then by supporting action taken through SAPOL to comprehensively address these issues. It has taken a significant investment, from the establishment of a dedicated project team, an overhaul of policies, processes and systems, training on gender equality, people management and leadership.

This fourth and final progress report measures the change in perceptions, experiences and practices in SAPOL since the review was released, from the point of view of SAPOL staff, who provided feedback in surveys, focus groups and interviews. Pleasingly, staff are saying there has been change. While no level of disadvantage, discrimination or harassment is ever acceptable, responses to the 2019 EOC survey suggest that SAPOL staff are now experiencing lower levels of sexual harassment compared with national figures, and have an increased awareness of behaviours that constitute sexual harassment including predatory behaviour.

There have been positive signs in the organisational processes and systems that support staff who complain about harassment and discrimination, with employees viewing new measures favourably. Gender equality objectives and key performance indicators for senior leaders are included in the SAPOL's corporate business plan, and there have been developments in the goal of achieving gender balance across ranks and levels. Significant steps have been made to normalise flexible working arrangements, which support gender equality through opportunities for promotion and more equal sharing of family or caring responsibilities.

Although SAPOL have made excellent progress on gender equality in the relatively short time since the release of the 2016 review, more action is needed. A low level of trust around confidentiality, and confidence in SAPOL acting on reports, means not all complaints are reported. There is still uncertainty around the commitment of leaders as a collective to support change, and potentially, resistance to change.

The cultural change that is needed in SAPOL will only be achieved through persistence, patience and ongoing monitoring and leadership. Strong, strategic and systemic management is needed to build a workforce that is safe, fair, inclusive and equal for all – irrespective of gender.

I extend my sincere thanks to Retired Assistant Commissioner Bryan Fahy, Assistant Commissioner Linda Fellows and all the past and present members of the Project Equitas team for their commitment to this work and their cooperation with my team members. I also want to acknowledge the extraordinary members and staff of SAPOL who have collaborated with us in our monitoring and review work by responding to our surveys, participating in our on-on-one interviews and focus groups and sharing their stories and ideas. Your continued engagement and action in the drive to create a more inclusive, respectful and safe working environment for all SAPOL staff reassures me that gender equality will eventually be simply ‘business as usual’ – the way people work together – always.

A handwritten signature in black ink, appearing to read 'Niki Vincent', with a large, stylized initial 'N'.

Dr Niki Vincent

Commissioner for Equal Opportunity (SA)

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- > Assistant Commissioner Linda Fellows
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- > Survey respondents

The EOC Monitoring team:

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with guidance from:

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

Supporting your Well-being

For Every Reader:

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

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

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

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

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

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

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

Women's Domestic Violence Court Assistance Service a legal service to assist victims of domestic or family violence. Tel. 1300 366 424

Q Life: a counselling and referral service for people who identify as LGBTIQ. Tel. 1800 184 527 or access the online chat service at [www.qlife.org.au](http://www qlife.org.au).

Working Women's Centre SA: information, support, advice and advocacy services to women on work-related issues. Tel. (08) 8410 6499 or 1800 652 697 for regional callers. Email wwc@wwc.org.au (Monday, Wednesday-Friday 9am to 5pm).

For SAPOL Employees:

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

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

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

The Equal Opportunity Commission's Restorative Engagement Program is available to current and former SAPOL employees (who were employed by SAPOL after February 2007) who wish to voluntarily share their personal accounts of sex discrimination, sexual harassment and/or predatory behaviour in a safe,

confidential environment. The program provides the opportunity for employees to have their experiences acknowledged by a senior leader from SAPOL, and to contribute to ongoing change within SAPOL to address these issues. You can find out more by contacting the EOC on 08 8207 1977.

Executive Summary

In early 2016, the Equal Opportunity Commission (EOC) was invited by South Australia Police (SAPOL) to conduct an independent review into the nature and extent of sex discrimination and sexual harassment, including predatory behaviour, within SAPOL.

The initiation of the independent review was an acknowledgement by the Commissioner of Police, Grant Stevens, of the vital importance of promoting gender equality and providing a safe and supportive workplace for SAPOL staff.

The resulting final report, *Independent Review of Sex Discrimination, Sexual harassment and Predatory Behaviour in the South Australia Police* (the 2016 EOC Review), was released in December 2016. It found a high prevalence of the experience of sex discrimination and sexual harassment in SAPOL – and a particularly high prevalence of predatory behaviour reported by those who had been sexually harassed (i.e. the misuse of authority or influence to exploit others for sexual gratification). It also found that many other elements of SAPOL's culture would likely obstruct the ability of the organisation to harness the benefits of diversity. The Review included 38 recommendations to combat sex discrimination, sexual harassment and predatory behaviour and improve the safety and well-being of SAPOL staff.

Six key areas covered in the recommendations included:

- Leadership
- Workforce management
- Training and development
- Flexible workplace cultures
- Dispute resolution and complaints
- Well-being and support services.

All recommendations were accepted for implementation by the Commissioner of Police and in early 2017 SAPOL established the Project Equitas team, under the executive leadership of an Assistant Commissioner. This team is dedicated to implementing the recommendations of the 2016 EOC Review.

The EOC was subsequently engaged to independently monitor and report on SAPOL's progress in implementing the recommendations and to evaluate whether a change in culture was being achieved. The EOC SAPOL Monitoring Project commenced in May 2017. It concluded at the end of February 2020 and was funded by SAPOL at the rate of 1 full time equivalent (FTE) for its duration.

The EOC took a deliberately staged approach to evaluation over the term of the monitoring project, aiming to focus only on evaluating change that could reasonably be expected at a given point in the cultural change program. Its three monitoring reports (from January 2018 to May 2019) addressed the following:

- Report 1 (delivered January 2018) focused on the extent to which SAPOL had set a foundation for positive cultural change and noted seven areas for improvement on the issues of change management, change leadership and immediate actions for cultural change.

- Report 2 (delivered September 2018) focused on an assessment of the policies, processes and systems that contribute to the desired culture and noted six areas for improvement for flexible working options for specialist roles, gender equality reporting, target setting and employee exit management processes.
- Report 3 (delivered May 2019) focused on an assessment of SAPOL's supervisors' and managers' capacity and willingness to support cultural change, and the capacity of the Diversity and Inclusion Branch to fulfil its purpose and objectives. Seven areas for improvement were noted.

The focus for this fourth (and final report) has been the measurement of change in perceptions, experiences and practices that support gender equality and cultural change in SAPOL.

- The data collection for this final report included collecting SAPOL corporate and Pulse survey data, surveying SAPOL employees, facilitating focus groups across the organisation, and interviewing a sample of the SAPOL Executive Leadership Team. The anonymous online survey was designed to capture perceptions, experiences and opinions of SAPOL staff on matters related to workplace culture and practices, leadership and accountability, and the nature and extent of sex discrimination and sexual harassment since the release of the EOC Review in December 2016. A total of 1095 employees completed the survey (18% response rate based on SAPOL total strength of 6176 employees as at end of June 2019).
- Focus groups added value to the data collection process by generating grounded evidence which was used to test patterns or discrepancies in preliminary data and fill gaps around recent Project Equitas activities not captured in the survey. A set of broad questions was developed to guide the group discussions. A total of 94 employees participated across 8 sessions – 49 senior leaders (defined as Senior Sergeant/ASO6 and above) and 45 other employees. Sessions were offered at Elizabeth, Christies Beach and Murray Bridge police stations and at Police Headquarters. Video-conferencing was available at these venues to allow offsite personnel to participate. In addition, two focus groups were conducted using teleconferencing for regionally-based personnel from the west coast, north and south-east of South Australia.
- An additional focus group was held with 20 supervisors, managers and Diversity and Inclusion Representatives across SAPOL. This session provided feedback, insights and self-assessment to inform the EOC's understanding of progress against the Workplace Gender Equality Agency (WGEA) Gender Equality Roadmap framework (refer to Chapter 4 for the WGEA assessment).
- Semi-structured interviews were held with five members of SAPOL's Executive Leadership Team. These discussions aimed to explore their perspectives on key achievements, opportunities for improvement, lessons learned and commitment to gender equality efforts.

Progress in the implementation of recommendations

As of 13 February 2020, 33 recommendations had been fully implemented and 5 are underway. SAPOL has made significant progress on the following recommendations:

- Reviewing and updating online training modules with the purpose of increasing awareness of sex discrimination and sexual harassment;

- Development of a new performance management system (iEngage);
- Developing and implementing a new exit management strategy;
- Establishing the policy framework for flexible working arrangements;
- Establishing a new complaints resolution unit.

While the majority of the recommendations have been implemented, it is imperative that SAPOL is vigilant in monitoring and evaluating the effectiveness of the completed policy/process/system based recommendations, in order to take corrective action, where relevant, to optimise the outcomes of their cultural change process. In addition, it is essential that SAPOL maintain a strong strategic and systematic management approach to the work of building a more gender equitable, diverse, inclusive and safe workplace. Without such an approach, it will be difficult to gauge whether programs and initiatives are helping the organisation effectively progress towards the desired end-goal. A strategic and systematic approach must be integrated into the overall organisational strategy and with all functions and levels of an organisation. It must identify practical goals, measurable objectives linked to the goals, promote active and inclusive leadership, be easy to communicate, hold the organisation accountable for its progress and follow a transparent governance process. This will ensure investment in initiatives is appropriately targeted, will increase commitment to, and accountability for, the initiatives and will assist all parts of the organisation to work together towards the achievement of the objectives.

Such an approach will see SAPOL piloting/trialling small-scale projects before implementing initiatives across the organisation, mitigating/minimising project risks early (for example flexible working arrangements reaching 'saturation' level) and following up to ensure ownership has transitioned from project teams to the business owners.

The EOC has also identified some very specific key risks to the satisfactory implementation of the recommendations and to the achievement of their intended outcomes. These include:

- Not applying a range of effective engagement and communication activities to support the rationale, roll out and use of targets for participation of women in promotional/development pathway courses (recommendation 13) and women in training (recommendation 23).
- The range of reviewed training delivery methodologies (recommendation 25) not meeting the needs of those working flexibly or regionally.
- Inadequate supply of effective information technology options to support those using flexible working arrangements (FWAs) or awaiting a FWA application decision, in particular working from home and working remotely (recommendation 28). In addition, the options need to extend to meet the requirements of the 'Stay in Touch' policy users who are on extended leave (recommendation 29).
- Lack of reporting on the Gender Equality Action Plan (recommendation 4) to ensure that all staff are aware of progress on gender equality initiatives (recommendation 11).
- Lack of ongoing responsibility for the monitoring and management of gender equality in SAPOL (recommendation 9).

- Concern that the Human Resources Service may be unable to meet internal service delivery requirements while also progressing the implementation of recommendations from review conducted in 2018 by an external contractor (recommendation 16).
- People and performance management skills of all supervisors not being at a level to discuss values, performance, growth and well-being with meaning and purpose to facilitate effective implementation of iEngage (recommendation 18).
- Inconsistent or ineffective application of the new exit management strategy (recommendation 20).

The process of cultural change

The report of the 2016 Independent Review was very clear that for SAPOL to become a more gender equitable, diverse, inclusive and safe workplace it would need to undertake a major cultural change project. The report noted that challenges of such large-scale cultural change and that responses to this across the organisation would vary. While some in SAPOL would embrace the change, others would need some convincing of the benefits - and some would find it very challenging, fearing the loss of power, status, position, self-esteem, relevance, identity, competence and/or jobs, and resist strongly (either openly or covertly). Tackling such resistance can be challenging and confronting for leaders. It requires patience and persistence, being prepared to take the heat, and allowing for incremental changes to build up over time.

Workplace culture and behaviours

It has been just over three years since SAPOL initiated its cultural change work. Since then, important progress has been achieved. However, there are a number of areas where significant improvement still needs to be made.

The 2016 EOC Review found 36% of survey respondents had experienced sexual harassment sometime prior to 2016. The Australian Human Rights Commission (AHRC) found in its 2018 National Survey found that in the preceding five years that 33% of respondents had experienced sexual harassment at work and 20% of people had experienced workplace sexual harassment in the previous 12-month period.¹ In comparison, 96 employees (9%) who responded to the 2019 EOC survey reported that they had experienced sexual harassment between 2016 and 2019. However, there were significant discrepancies, not only between male and female personnel, but also between sworn and non-sworn staff. Of sworn female staff who responded to the 2019 EOC Survey, 55 or 19% of the 292 sworn female survey respondents experienced sexual harassment compared with 8 (6%) non-sworn female survey respondents. Nevertheless, the experience of sexual harassment by sworn female personnel remains lower than national statistics, with the AHRC finding that 23% of women in Australian workplaces were subject to sexual harassment over a 12-month period. Respondents who stated they had witnessed sexual harassment decreased from 850 (52%) in 2016 to 183 (17%) in the recent 2019 EOC survey.

¹ Australian Human Rights Commission (2018). *Everyone's business: Fourth national survey on sexual harassment in Australian workplaces* (AHRC: Sydney), p. 30.

The 2019 EOC survey found increased awareness of behaviours that constitute sex discrimination, sexual harassment and predatory behaviour, suggesting that SAPOL's education initiatives have made a positive impact. However, work still needs to be done to address the discrepancy between the experience and perception of predatory sexual harassment for those who experience it.² Eight formal complaints of predatory sexual harassment in SAPOL have been made to the Diversity and Inclusion Branch and Taskforce Portus, an interim investigative team tasked with investigating allegations of sex discrimination and sexual harassment, including predatory behaviour. That said, of the 9% of 2019 EOC survey respondents who had experienced sexual harassment, 19 people or 20% of those who had experienced sexual harassment stated that the harassment had been perpetrated by a person in a position of authority - while another 25 respondents or 26% reported that they had been sexually harassed by someone of higher rank, either their immediate supervisor, a manager more senior than their supervisor or someone of a higher rank but not in their chain of command. These 25 individuals did not identify this as predatory behaviour - even though it was. In total, almost half of the 9% of respondents in the 2019 EOC survey who reported that they had been sexually harassed in SAPOL since the release of the independent review in 2016 had experienced this by a perpetrator in a position of more senior rank.

In terms of sex discrimination, 251 (23%) respondents to the 2019 EOC survey stated they had experienced discrimination since 2016. This compares with 743 (45%) in the 2016 review - however the latter did not limit the timeframe on the experience of sex discrimination.

SAPOL's training has also been successful in increasing respectful behaviour within teams, with a 12% increase in the perception of respectful treatment of others within the workplace after the rollout of training. However, less than half (42%) of the employees who completed the Pulse survey believe that the organisation as a whole treats employees fairly, irrespective of cultural background, gender, disability, sexual orientation or religion.

Complaints process and well-being systems

Supports within SAPOL established since the 2016 Review include SAFE Space,³ the Diversity and Inclusion (D&I) Branch,⁴ and D&I Representatives⁵ across the organisation. The Restorative Engagement Program was established in 2017 and operated for 12 months before being transitioned to the EOC's Conciliation team as a specialised process available upon request. There is evidence that SAPOL employees are taking advantage of these supports by actively engaging with the D&I Branch and making contact with the D&I Representatives over a range of issues.

² Predatory sexual harassment is defined as the misuse of authority or influence to exploit others for sexual gratification.

³ SAFE Space is a free independent service that provides support, advice and advocacy, and allows people to report harm informally and confidentially.

⁴ The D&I Branch provides a confidential process for notification of all diversity and inclusion matters including workplace conflict and inappropriate behaviour.

⁵ D&I Representatives provide information to employees experiencing bullying, sexual harassment or discrimination on options for seeking further advice and support and support D&I initiatives in the workplace.

Employees view the D&I Branch and complaints process more positively than the former Equity and Diversity process. Alternative Dispute Resolution (ADR)⁶ in which D&I Branch staff are trained, is used in over half of complaints, which is important because ADR can provide a quicker, more flexible, less stressful and more confidential means of resolution compared to the court system. However, there is still a low level of trust that the confidentiality of reports of sex discrimination and sexual harassment will be maintained by parties outside of the D&I Branch, and lack of confidence that SAPOL will act on such reports. This continues to influence significant under-reporting, and will undermine SAPOL's capacity to understand the extent of these problems and address them appropriately. Although confidentiality is a difficult thing to ensure completely, a reassessment of strategies for maintaining it, along with the consequences for breaching it should be undertaken. Better promotion of the avenues for anonymous reporting that are available in SAPOL may also help improve reporting rates. In addition, it would be useful to consider ways in which managers could be alerted to problems within their teams without compromising confidentiality, while enabling them to mitigate negative consequences for victims. More generally, lack of communication to SAPOL employees of the consequences for perpetrators of sexual harassment and sex discrimination continues to undermine confidence in the process as it reinforces the prevalent view that reporting "makes no difference". SAPOL needs to clearly communicate disciplinary outcomes to demonstrate that inappropriate behaviour is being taken seriously. At the time of writing this report, the first organisation-wide communication of consequences was due to be released shortly.

Leadership and accountability

The incorporation of gender equality objectives and key performance indicators (KPIs) for senior leaders in the corporate business plan has provided an opportunity to demonstrate accountability. However there are a number of areas that are limiting progress. There remains uncertainty surrounding the commitment of leaders as a collective to supporting positive cultural change, suggesting SAPOL leaders might need to reassess how they demonstrate their collective commitment to this change. This needs to include the development of effective communication strategies that engage all employees and appeal to different audiences.

Finally, although SAPOL has extensive data on gender equality, it is uncertain how much of this is collected or analysed strategically. A dedicated schedule for data collection, analysis and reporting is essential to assist SAPOL's ELT to identify, monitor and evaluate progress on gender equality into the future. The reporting of gender equality objectives and KPIs (via Business Plan reporting) is limited to the ELT. While this reporting can be provided to any Service if requested, there is currently no dedicated schedule or process for reporting beyond the ELT, which undermines accountability of leadership. Regular reporting could also be adapted to support SAPOL's broader diversity and inclusion objectives beyond gender equality.

Workforce management

There have been a number of positive developments in SAPOL's workforce management strategy in terms of gender equality. In particular, the goal of achieving gender balance at all ranks/levels and the start of a

⁶ Alternative Dispute Resolution indicates resolution options that are alternatives to taking a matter to court, and can include mediation, conciliation and arbitration.

gender diverse leadership pipeline, have shown significant progress at some ranks, and there has been an increase in female non-sworn personnel at senior levels. However, as the promotion of women has not occurred at the same rate across all ranks/levels, in some cases, promotion of women to a particular rank has left a lower proportion of women in the rank below. There has been an increase in female sworn personnel across a number of service areas, and an increase in female non-sworn personnel in Operations Support.

Training has also been done to mitigate unconscious bias in selections, and role capability statements and entry requirements are currently being revised in line with modern requirements of the job. SAPOL's new exit management strategy has a greater focus on retention and, better training of those involved in administering this, as well as ongoing monitoring of exit data under the new process, will allow SAPOL to track trends and to identify and address any consistent systematic or cultural issues that arise. However, there are currently some concerns surrounding the consistency of the strategy's implementation, particularly with regard to exit interviews, and SAPOL will need to monitor this going forward.

Performance management in SAPOL remains a key challenge. The recent introduction of the iEngage performance management system, with its focus on employee development and well-being is a progressive step. However, its usefulness will depend largely on managers and supervisors using the system effectively, and it should be noted that issues such as unwillingness to address problematic behaviours will not be resolved by the new recording system alone. SAPOL is aware of this and will monitor the use and effectiveness of iEngage in the early stages of adoption.

Training and development

The awareness of training and development opportunities among EOC survey respondents has dropped significantly since 2016 and SAPOL should revise its communication strategies to increase employee understanding and engagement in this area. However, it is heartening to note that the participation of women in training and development opportunities has increased across a number of courses to better reflect the proportion of women in SAPOL. In terms of communication, directly addressing the misconception that men are now disadvantaged when it comes to training and development might help to mitigate negativity surrounding the promotion of opportunities for women in SAPOL.

Active encouragement to participate in training and development is variable and often dependent on managers/supervisors. In some cases, lack of encouragement is underpinned by staffing and resourcing pressures. These may be particularly apparent in regional areas and for those working flexibly, making flexible training delivery important to ensure equitable access to such opportunities.

Flexible workplace culture

Significant steps have been made towards normalising flexible working arrangements within SAPOL. This is demonstrated by an increase in the number and spread of applications for flexible working arrangements (FWAs) across the organisation, and an increase in the number of men applying for FWAs. The proportion of the total SAPOL workforce, including sworn and non-sworn personnel, taking up FWAs has increased from 8% at 30 June 2015 to 12% at 30 June 2019. Between July and December 2019, this increased to 13%. As

of December 2019 the proportion of female employees had increased from 23% in 2015 to 25%, while male employees taking up FWAs increased from 1% in 2016 to 6%. A greater proportion of non-sworn employees were accessing flexible working arrangements compared to sworn personnel.

New information technological infrastructure will enable 'Stay in Touch' policy to be operational by the end of March 2020. However, further development of the infrastructure is required to extend the current capability to work flexibly in SAPOL. This hampers the capacity to work from home or remotely.

There remain challenges to the sustainable adoption of FWAs. These are particularly evident in operational and country environments, where operational responsiveness is of paramount importance, and where limited staffing makes flexibility difficult when it comes to backfilling positions. Significant stigma is evident around flexible work at senior levels, part-time positions, and FWA's for men. This shows that much more work needs to be done to address negative attitudes and misconceptions, and to make flexible working arrangements in SAPOL effective and sustainable.

Conclusion

This is the fourth and final report by the EOC Monitoring team and the focus was to provide SAPOL with evidence of practice and cultural change and insights on making change efforts more effective.

With the completion of 33 of the 2016 Review's 38 recommendations and the remaining 5 underway, we have found important changes evident in SAPOL (see Figure 1). However a strong strategic focus with improvements in several key areas is still needed to enable SAPOL to harness the benefits of diversity.

SAPOL leaders and other staff may have expected to see more positive change, especially considering their investment over the past three years. However, the cultural problems at the heart of gender inequality, sex discrimination and sexual harassment were never going to be 'fixed' in such a short timeframe. It will take significant time to make gender equality the cultural norm in SAPOL. Nevertheless, SAPOL is in a prime position to build momentum on the back of the completed 2016 Review and the monitoring reports by the EOC Monitoring team. Compared to many other organisations, SAPOL has a much better understanding of the issues in its workplace and the impacts these are having on its workforce, as well as a stronger base of positive action from which to build the changes that are needed to become an organisation in which "...gender equality is simply part of how business is done and how people work together – always".⁷

⁷ Workplace Gender Equality Agency (2016). *The Business Case for Gender Equality*, (WGEA: Sydney)

Figure 1. Negative cultural elements from the 2016 Review and their status in 2019

Negative cultural elements in 2016	Findings of the 2020 EOC review of progress
Prevalence of sex discrimination & sexual harassment	<ul style="list-style-type: none"> • Rates of sexual harassment have dropped to below the national average • Changes in rates of sex discrimination and predatory behaviour are inconclusive at this time. Future evaluation needs to be planned to ensure comparable timeframes
Inaction on sex discrimination and sexual harassment matters	<ul style="list-style-type: none"> • Organisation-wide training was undertaken to raise awareness and confidence to call out inappropriate behaviour and report, but this is not always occurring • Establishment of the D&I Branch • Perception that taking action makes "no difference" remains
Employees not confident to report sexual harassment	<ul style="list-style-type: none"> • Employees report increased confidence to address inappropriate behaviour • Under-reporting rates have not improved within SAPOL but remain consistent with the national average
SAPOL not supporting complainants of sex discrimination or sexual harassment	<ul style="list-style-type: none"> • The new D&I Branch is perceived more positively by employees • Clear and effective communication of consequences for perpetrators still needs work
Lack of access to and support for flexible working arrangements	<ul style="list-style-type: none"> • Significantly increased approval rates for FWAs • Challenges to the accessibility of FWAs remain especially in regional environments where staffing may be more limited
Susceptibility to bias in selections/promotions and training & development	<ul style="list-style-type: none"> • Unconscious bias training for selection advisory committee personnel and reviewing of position information documents • Women participating in training & development proportionate to female personnel in SAPOL

Summary of 2020 recommendations

On the basis of the findings of this report, the EOC makes the following recommendations:

Monitoring & Evaluation

It is highly recommended that SAPOL develop a data collection and reporting schedule integrating all new reporting requirements arising from the EOC's recommendations to ensure this is manageable and streamlined with existing reporting requirements. This data should be utilised to monitor the effectiveness of the completed policy/process/system based recommendations. This will enable SAPOL leadership to be consistently, effectively and regularly informed about the impact of gender equality initiatives, cultural change and areas of concern. In particular, SAPOL will benefit from critically and comprehensively evaluating and monitoring the following areas:

1. Complainants' satisfaction with the complaint process, including the consequences of reporting for complainants.
2. Review strategies for evaluating complainant and respondent satisfaction with the Diversity and Inclusion Branch complaint process to increase response rates, including any victimisation of complainants as a result of reporting. This information must be used to continuously improve the services of the D&I Branch.
3. Effectiveness of the service provided by the Diversity and Inclusion Representatives Service ensuring it is effective for both the employees making contact and the employee providing the service.
4. The use and effectiveness of the iEngage performance management system in progressing and achieving its objectives of values, performance, growth (including improving employee awareness of and access to training and development opportunities) and well-being for sworn and non-sworn employees.
5. Reasons (and associated contributing factors) for employee exit to assess the impact of cultural change and to address any significant and ongoing problems with workplace culture.
6. The administration of its exit management strategy, giving consideration to:
 - The adequacy of training for HR personnel and managers in administering the strategy;
 - The level/status of completion of the training by HR personnel and managers; and
 - The consistency of the administration of the exit management strategy by the Human Resources Service.
7. Managers/supervisors' capability to implement 'If Not, Why Not' from the request step through to managing teams with personnel accessing flexible working arrangements.
8. Setting a tangible and quantified target/goal for the flexible working arrangements Key Performance Indicator that is sustainable for meeting service delivery requirements.

Communication

It is recommended that a review and revision of the Engagement and Communication Plan is undertaken. This should include adapting and differentiating communication strategies, including more face-to-face communication (for example discussion by leaders in team meetings) to increase employee understanding and engagement. Future communications need to consider:

9. Actively promoting the importance of the Diversity and Inclusion Branch, the reporting pathways and developing the confidence of employees to report to the Branch. This includes:
 - Reassessing confidentiality strategies at the team level or with perpetrators and/or victims to ensure confidentiality is taken seriously and consequences are enforced for breaches
 - Regularly communicating disciplinary outcomes (without identifying details of parties involved) to demonstrate that inappropriate behaviour is being treated seriously and to serve as team training and development tools for supervisors and managers.
 - Promoting the availability of anonymous reporting.
10. Sharing examples of progress on and the impact of gender equality initiatives and cultural change with particular regard to gender equality strategic objectives, gender equality key performance indicators, the Gender Equality Action Plan, and the Diversity and Inclusion Strategy – as well as plans for future action - across the organisation.
11. Addressing prevalent misconceptions regarding the fairness of selections and promotions, including communicating the benefits of up-coming changes to selections and promotions processes.
12. Effectively communicating the rationale for women only information and training sessions, particularly to supervisors and managers, (including the benefits based on feedback from participants) to counter ongoing (and substantial) negativity about these.
13. SAPOL review and update the 2017 Engagement and Communication Plan with the purpose of guiding and supporting SAPOL into the next stage of their cultural change initiative, including
 - Updating with innovative actions and activities for each of the 'change levers' identified in the 2017 Plan (with associated target audience, objective, timing and responsibility).
 - Enhancing messaging to 'engage the base, persuade the middle and alienate the opposition'.⁸
 - Strategies for managing resistance.
 - Reporting requirements to roles responsible for gender equality in SAPOL on the progress, achievements and challenges for the updated Engagement and Communication Plan.

⁸ Refer to the research of Anat Shenkev-Osorio's to support framing strategies by enhancing messaging to 'engage the base, persuade the middle and alienate the opposition', Shenker-Osorio, Anat (2012), *Don't Buy It*, (Ingram Publisher Services US: New York).

Education and training

It is recommended that SAPOL develop education and training to enhance understanding and capability in the following areas:

14. Understanding of what constitutes predatory sexual harassment.
15. Vigilantly building the capacity⁹ and reinforcing the expectation of its senior leaders and its supervisors and managers to effectively lead and manage the change required to become a diverse and inclusive organisation and to role model the behaviours required to support a positive culture where all employees are valued for their diversity and are treated equally. This includes all people managers understanding their accountability and reporting responsibilities for gender equality objectives and Key Performance Indicators to enable them to then practice accountability.
16. Increasing skills and confidence for all employees, including managers/supervisors, to challenge inappropriate behaviour, regardless of the rank/level of the perpetrator.
17. Providing support to managers/supervisors to implement flexible working arrangements within their teams. This support needs to consider:
 - Consistency in the implementation of flexible working arrangements across SAPOL, ensuring operational constraints are accounted for and implementation is sustainable, which may include backfilling, establishing a casual roster and undertaking matching of employees already on part-time working arrangements
 - Improved technology/tools to make vacancies resulting from flexible working arrangements visible across SAPOL enabling the backfilling of positions.
 - Ensuring that flexible working arrangements are a matter of negotiation and not perceived as an inalienable right of employees.
18. Developing a framework for adequately training its trainers, ensuring subject matter expertise in development and delivery of information sessions and training programs, providing engaging delivery methods, and for evaluating information sessions, training programs and tools (content, delivery, and effectiveness in improving participant knowledge, skills and engagement).
19. Continuing to expand training delivery methodologies (with involvement of regionally-based trainers) to enhance flexibility with a focus on equal opportunity for sworn and non-sworn staff - with a focus on accessibility for those working flexibly and regionally.

⁹ Capacity in the areas of preventing and responding to sex discrimination and sexual harassment; bystander responsibilities; people and performance management; difficult conversations in the workplace; and behavioural expectations.

1. Introduction

1.1 The 2016 EOC Independent Review

In 2016 the Commissioner of South Australian Police (SAPOL) engaged the Equal Opportunity Commission (EOC) to undertake an independent review into the nature and extent of sex discrimination, sexual harassment and predatory behaviour within SAPOL. This review was not driven by any particular event, act or issue. Police Commissioner, Grant Stevens, and his leadership team made a commitment to undertake a “health check” of their workplace. SAPOL wanted to identify opportunities to improve their practices; create a culture of positivity and inclusivity; and most importantly ensure the safety and well-being of its staff.

The independent review focused primarily on the five years preceding the time of the review in order to provide a contemporary picture of the SAPOL workplace.

Almost 2,000 people in SAPOL’s workforce took part in an anonymous survey, and over 50 people participated in confidential interviews.

The EOC’s *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police* (the 2016 EOC Review) was released on 12 December 2016. It found that ‘negative attitudes to women, or indeed anyone who did not fit the traditional white, masculine, male mould’ were widespread.

The Review found elements of the SAPOL culture were severely hindering the ability of the organisation to harness the benefits of diversity. These key ‘culture limiting’ elements were:

- Prevalence of sex discrimination and sexual harassment (including predatory behaviour);
- Inaction about sexual harassment and sex discrimination matters;
- Employees not confident to speak out about incidences of sexual harassment (concerned about being victimised);
- SAPOL not supporting complainants of sexual harassment or sex discrimination;
- Lack of access to, and support for, flexible working arrangements;
- Susceptibility to bias (in particular in selections/promotions process and training and development opportunities).

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 six key areas covered in the recommendations included:

- Leadership
- Workforce management
- Training and development
- Flexible workplace culture

- Dispute resolution and complaints
- Well-being and support services.

SAPOL's Commissioner accepted all recommendations and established 'Project Equitas' - a team dedicated to their implementation.

The EOC was subsequently engaged to provide independent oversight of SAPOL's progress in the implementation of the 2016 EOC Reviews' recommendations, and to measure the impact of the changes on workplace culture.

1.1.1 Cultural change project

The 2016 Review, found that SAPOL would need to embark on a major workplace cultural change project in order to become a gender equitable workplace.¹⁰ It noted however, that undertaking any major cultural change is challenging, particularly in long-established, hierarchical organisations with strong traditions and conventions¹¹ and that resistance could be expected.

The Review outlined the following five elements for adaptive cultural change:¹²

1. Significantly displacing, re-regulating and rearranging some of the old organisational DNA
2. Building on what is working well already
3. Active experimentation - because there are no 'silver bullets' to cultural change
4. Including diverse views and skills
5. Allowing time to consolidate new sets of norms and processes.¹³

It is important to highlight the intentional use of the term 'adaptive' within the context of cultural change. Heifetz et al. make a clear distinction between adaptive and technical challenges; whereas technical challenges have clearly defined problems and solutions that work when applied effectively, adaptive challenges can only be addressed through new learning, as well as changes in people's priorities, beliefs, habits and loyalties – this is referred to as the shift in 'hearts and minds' in the 2016 EOC Review.¹⁴ These challenges require significant stakeholder engagement and experimentation in order to understand the problems and to develop and test solutions.¹⁵

¹⁰ Equal Opportunity Commission of South Australia (2016). *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police* (Adelaide, SA: EOC), p. 36.

¹¹ EOC (2016), *Independent Review*, p. 37.

¹² Heifetz, R. A., Linsky, M., and Grashow, A. (2009). *The Practice of Adaptive Leadership: Tools and Tactics for Changing your Organisation and the World*, (Harvard Business Press: Cambridge, MA), p. 19.

¹³ EOC (2016), *Independent Review*, p. 37.

¹⁴ EOC (2016), *Independent Review*, p. 4.

¹⁵ Heifetz R., Grashow A. and Linksy M. (2009). *The Theory Behind the Practice – A Brief Introduction to the Adaptive Leadership Framework* (Harvard Business School: Boston Massachusetts), pg 7.

While many issues are comprised of both adaptive and technical challenges,¹⁶ it is common for the adaptive components to be treated as if they were technical challenges – which often results in failure.

It was acknowledged that while an emergency management approach is often utilised in SAPOL in its work in protecting the community, it is not an appropriate approach for successful and sustainable cultural change management. The latter requires leaders to resist the urge to ‘leap into action’, because identifying, understanding and addressing culture challenges takes time and reflection, including engagement with diverse stakeholders to come up with new ways of operating that can be field-tested before implementation. SAPOL must view their cultural change process largely as an adaptive challenge.¹⁷

1.1.2 About Project Equitas

At the time of the 2016 Review’s release, it was announced that Assistant Commissioner (A/C) Bryan Fahy would be appointed to lead the implementation of the EOC’s recommendations (recommendation 9). In March 2017, a team called ‘Project Equitas’ was established under A/C Fahy with the mandate to implement the remaining recommendations.

From its establishment until the end of 2019 on average between 15 and 20 FTE equivalent positions were dedicated to implementing the recommendations.¹⁸ This allocation of resources is an indication of the commitment by SAPOL’s ELT to the cultural change initiative. A decision is yet to be made by SAPOL regarding the ongoing operation of Project Equitas.

Looking beyond Project Equitas, SAPOL’s assumption has been that the completed 38 recommendations would be transitioned to general business operations. While this may be a reasonable assumption, SAPOL must commit to ongoing monitoring and evaluation of the issues raised in the 2016 EOC Review as the EOC’s independent monitoring and evaluation role will cease with the release of this final report. This issue is discussed further in the next chapter.

1.2 About the EOC Monitoring Project

The monitoring, evaluation and reporting activities of the EOC Monitoring team were based on a continuous cycle focussing only on measuring changes that could be reasonably expected at a given point in the cultural change effort (see Figures 2 and 3). The specifically-defined evaluation focus for each public report, was designed to provide SAPOL with relevant, current and constructive feedback that could be used to adjust activities in order to achieve the best possible outcomes over the long-term. Initially, the EOC planned to prepare 5 public monitoring reports on SAPOL’s progress in implementing the 2016 recommendations. It was later decided however, to consolidate reports 4 and 5.

¹⁶ Heifetz, Grashow and Linksy, *The Theory Behind the Practice*, pg 7.

¹⁷ EOC (2016). *Independent Review*, p. 37.

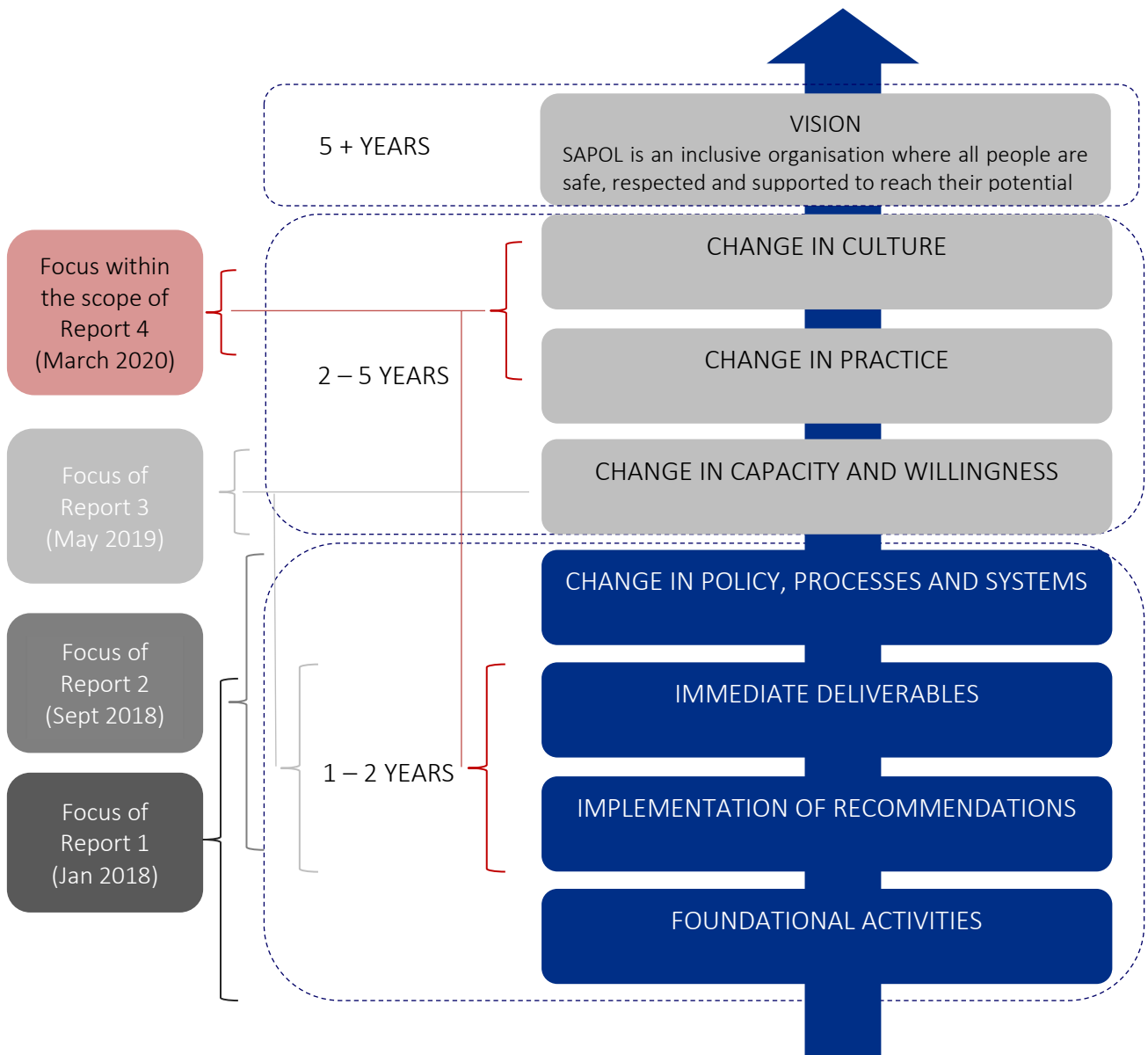
¹⁸ Calculation of Project Equitas full time equivalent includes all employees who worked full time or part time, any extended leave taken and those who worked in Taskforce Portus

Figure 2. Evaluation and reporting schedule for the EOC Monitoring Project

TIMEFRAME		REPORT TITLE		EVALUATION FOCUS
2020	March ¹⁹	Final Report: Changes in business practice and evidence of change in culture	Progress in implementing the 38 recommendations	<p>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).</p> <p>A roadmap for the continual, in-house monitoring and evaluation of cultural change in SAPOL.</p>
2019	May	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

¹⁹ The timeframe for the Final Report (Report 4) has changed from December 2019 to March 2020 and incorporates the handover component

Figure 3. Summary of the program logic model for SAPOL’s cultural change effort



1.3 Focus for Report 4

As can be seen in Figures 2 and 3, the focus for Report 4, this final report of the EOC Monitoring team, has been the measurement of change in perceptions, experiences and practices that support gender equality and cultural change in SAPOL.

It is important to note that SAPOL has been undergoing significant change in addition to the implementation of the 2016 Review recommendations. These additional changes have included the 50/50 recruitment

strategy introduced in 2015,²⁰ Recruit 313 (the recruitment of an additional 313 cadets), and strategic targets set by the former government to increase youth recruitment. It is important to note these additional initiatives when considering the perceptions and attitudes of SAPOL staff towards recruitment strategies and outcomes reported in this review.

In addition, SAPOL has recently introduced a new centralised information management system (SHIELD) and a new Human Resources software platform (Chris21) and, at the time of writing, it was also undertaking Stage 2 of the introduction of its new District Policing Model. The possible stress and change-fatigue that the implementation of such significant parallel initiatives may have created in SAPOLs workforce should also be taken into consideration when reading this report.

1.4 Methodology and structure

1.4.1 Report development stages

In developing this report, the EOC Monitoring team took a six-stage approach. These stages, along with their key steps, are presented in Figure 4.

1.4.2 Online survey

An online survey was developed to assess the changes in practices and culture that support gender equality in SAPOL since the release of the 2016 Review. The survey was designed to capture perceptions, experiences and opinions of SAPOL staff on matters related to workplace culture and practices, leadership and accountability, and the nature and extent of sex discrimination and sexual harassment from December 2016 to August 2019 (i.e. a period of approximately 2.5 years). The 2019 survey repeated many questions from the 2016 survey, along with new questions related to the capacity of supervisors/managers to support employee career development and progression, including performance management, and to promote the importance of appropriate behaviour and to challenge inappropriate behaviour regardless of gender or rank/level.

SAPOL's Project Equitas team was consulted in the development of the survey. The team also provided support for its distribution and promoted its engagement. In addition, the Public Service Association of South Australia (PSA) and Police Association of South Australia (PASA) sent emails to their respective members encouraging them to complete the survey. During the period that the survey was open, feedback from PASA indicated that a SAPOL employees on leave had not received the internal email notifying them about the survey. Once alerted to this issue, the Project Equitas team arranged for employees on leave to be identified and for the survey to be forwarded to them. The original closure date of the survey was extended by 7 days

²⁰ 50/50 recruitment set gendered targets to ensure that 50% of new recruits were female.



to allow for this delay in notification. The online survey was open for a total of four weeks (8 July – 4 August 2019).

Figure 4. The stages in the development of the final report

Stage 1: Planning the evaluation

- Identify the evaluation objectives
- Development of the key evaluation questions
- Identify the data needs
- Identify the target audience/s for consultation
- Scope and develop the data collection tools (online survey, face-to-face consultation)

Stage 2: Initial data collection

- Project Equitas provide existing data/information (closure reports, corporate data, etc)
- Deploy online survey with all SAPOL employees (8/7/2019 - 4/8/2019)

Stage 3: Initial data analysis

- Initial analysis of existing data/information
- Initial analysis of data collected through online survey

1.4.3 Face-to-face consultation

Focus groups were incorporated into the data collection phase in order to explore and test patterns and discrepancies found in the quantitative data, as well as to gather qualitative data about Project Equitas activities implemented post the survey period.

At each location two focus group sessions were offered; ASO6/Senior Sergeant and above, and ASO5/Sergeant and below.²¹ A total of 94 employees participated across 8 sessions (49 and 45 respectively).

Figure 5. Focus group sessions

Location	Date	Participation Status
Elizabeth Police Station	14 October 2019	9 participants
Police Headquarters (Wakefield Street, Adelaide)	21 October 2019	31 participants
Christies Beach Police Station	28 October	32 participants
Regional teleconference	31 October 2019	14 participants
Murray Bridge Police Station	6 November 2019	8 participants

1.4.4 Workplace Gender Equality Agency (WGEA) assessment

In 2016 the EOC utilised the WGEA Gender Equality Roadmap framework to inform its assessment of SAPOL. Figure 6 presents the key focus areas assessed in 2016 as part of the EOC Review as well as the additional key focus areas assessed for the current report (facilitated by the availability of new data and information).

While the 2016 assessment was based on corporate and consultation data, an expanded approach was applied for the 2019 assessment. The latter included a facilitated self-assessment session with a group of 20 SAPOL supervisors/managers and Diversity and Inclusion Representatives (13 women and 7 men).

The results and findings from the WGEA roadmap assessment are discussed later in Chapter 4.

²¹ The separation of manager/supervisor and employee focus groups was intended to facilitate the confidence of employees to discuss issues.

Figure 6. Summary of WGEA key focus areas in scope for assessment

WGEA Key Focus Area	Assessed in 2016 (Review)	Assessed in 2019 (Final Report)
Stakeholder engagement	x	✓
Strategy and business case	x	✓
Leader and manager capability	x	✓
Policies and processes	x	✓
Gender composition	✓	✓
Flexibility	✓	✓
Talent pipeline	✓	✓
Leadership accountability	✓	✓
Measurement and reporting	✓	✓
Gender inclusive culture	✓	✓
Supply chain	x	outside scope of Final Report
Gender pay gap	x	outside scope of Final Report

1.4.5 Additional comparative data sources

The EOC Monitoring team utilised the Office of the Commissioner for Public Sector Employment’s 2018 ‘I Work for SA – Your Voice Survey’ and the 2018 Australian Human Rights Commission’s National Workplace Sexual Harassment Survey as comparative data in the current report. These external sources of data did not have the same evaluation focus as the EOC and used different parameters. Where this is the case, the difference in parameters has been noted in this report.

1.4.6 Terminology

In sections 3.1 and 3.2, this report has used the terminology of “victim” and “perpetrator” to describe those who reported that they had experienced sex discrimination and/or sexual harassment and those who had allegedly perpetrated the latter. This report acknowledges that language plays a significant role in shaping the understanding of and responses to sexual assault and sexual harassment. The use of the terms “victim” and “perpetrator” in this report has been chosen for consistency with the terminology used by the Australian Human Rights Commission.²²

1.4.7 Gender categories

Overwhelmingly, respondents to the 2019 EOC Survey chose to identify as either female or male. As only 6 respondents chose to select “other”, this category was not included in the report’s analysis (as there was insufficient data to do so).²³

²² AHRC (2018). *Everyone’s business: Fourth national survey on sexual harassment in Australian workplaces* (AHRC: Sydney); AHRC (2017). *Change the Course: National Report on Sexual Assault and Sexual Harassment at Australian Universities* (AHRC: Sydney); AHRC (2012). *Report on the Review into the Treatment of Women in the Australian Defence Force* (AHRC: Sydney).

²³ No category other than female or male was included in SAPOL’s corporate data or the SAPOL Pulse surveys.



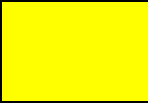


2 Progress in the Implementation of Recommendations

This chapter provides a summary of the status of implementation of each of the 38 recommendations made in the 2016 EOC Review. Where relevant, comments have been provided to explain progress. Potential risks/challenges in the implementation of recommendations or the achievement of intended outcomes have been highlighted following the summary.

It should be noted that this section serves only as a status update of SAPOL's activities, and does not necessarily signal a successful change in practice or culture. The analysis of evidence of practice and cultural change is discussed later in this report.

2.1 Status of implementation of recommendations

The following status summary shows that 33 recommendations have been implemented and that implementation is underway for the remaining 5.

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 (for those recommendations with implementation underway or only just completed)
	Potential risk to achieve intended outcome/s (for those recommendations where implementation is completed)

RECOMMENDATION

COMMENT / DELIVERABLES



Immediate Action

1	Statement of apology from the Executive Leadership Team (ELT)	Recommendation completed (6 January 2017). Pledge signed by all ELT members and communicated across SAPOL.
2	Restorative Engagement Project	Recommendation completed (21 April 2017). The REP service ran for 12 months and has now transitioned into the EOC's Conciliation team where it remains available as a specialised process for SAPOL staff, and former staff, upon request.
3	SAFE Space	Recommendation completed (6 March 2017). SAFE Space promoted across SAPOL on an ongoing basis.

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> '.
5	Leadership Professional Development programs	A total of 190 leaders (124 sworn and 66 non-sworn) participated in Leadership Shadow training across 9 sessions which concluded on 29 November 2017. Key principles have been incorporated into internal training courses for supervisors/managers 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.
6	Leadership performance feedback tool	Initial implementation with ELT in 2017. For the ELT members they will continue to undergo a feedback exercise once during the lifetime of their three year contract. SAPOL has engaged an external contractor to conduct the feedback process and provide associated leadership development support, for example analysis and interpretation of collated feedback and coaching. In 2020, the feedback process and associated leadership development support will be used by 21 participants in the Inspector's Qualification Program.
7	Gender equality incorporated into business planning	SAPOL's Corporate Business Plan 2018-2020 includes gender equality strategic priorities. Services are responsible for reporting on their contribution to the strategic priorities. In addition, each service area should report on how they are going to contribute (through service-specific activities) to the Gender Equality Action Plan (GEAP). Reporting on the strategic priorities (and on the GEAP) has not occurred.

RECOMMENDATION

COMMENT / DELIVERABLES



8	Gender equality KPIs for leadership	<p>All existing executive contracts now include an equality-focused performance requirement which is monitored by the Commissioner. The requirement is also part of all new executive level contracts.</p> <p>KPIs have been incorporated into the Corporate Business Plan 2018-2020 (linked to recommendation 7) and progress reporting is part of the Business Plan reporting cycle. Services are responsible for reporting on the KPIs at disaggregated levels (such as gender, rank/level, workplace, employment status) by areas and branches. The requirement for reporting is embedded in the Gender Equality Action Plan (GEAP). Reporting on the KPIs (and on the GEAP) has not occurred.</p>
9	Appoint leadership on gender equality	<p>Assistant Commissioner Bryan Fahy appointed (22 March 2017). Assistant Commissioner Linda Fellows took over responsibility in April 2019.</p>
10	Communications and engagement plan	<p>Recommendation completed with the finalisation of a plan on 26 June 2017. Communications about Project Equitas activities were monitored and analysed as activities were implemented.</p>
11	Gender equality advisory group	<p>The Gender Equality Action Group was formed following an expression of interest process conducted in early 2019. The Group comprises 12 members (8 females, 4 males) and held its first meeting at the end of May in 2019. The Group has continued to meet quarterly as it supports SAPOL in implementing actions under its Gender Equality Action Plan (GEAP). This Group reports to the Manager, Diversity and Inclusion Branch who is expected to facilitate an information exchange with the overarching Diversity and Inclusion Advisory Group (DIAG).</p>

Workforce Management

12	Review of standards for promotion	<p>SAPOL reviewed the selections and promotions framework, along with the Selection Advisory Committee (SAC) processes and guidelines and Position Information Documents (PIDs).</p> <ul style="list-style-type: none"> - Guidelines for reviewing Position Information Documents (PIDs) for roles/positions (including leadership and management statements) completed. Gender-neutral language, people management and leadership skills were focus areas. At the time a vacancy becomes available, the Guidelines will be guide the review of the associated PID. - Expression of Interest policy for acting in management roles will be operational before June 2020. The policy is relevant for sworn and non-sworn management roles. - A complaints history check is undertaken as part of the assessment of applicants for Officer level and above. - SAPOL has developed a new model for potential vacancies at rank/specialist positions which will see these vacancies advertised, assessed by a Selection Advisory Committee
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RECOMMENDATION

COMMENT / DELIVERABLES



and successful applicants ranked in order of merit and placed into a merit pool. This approach will aim to reduce the number and frequency of Selection Advisory Committees, reduce the requirement for members to constantly apply for vacancies of a similar nature and reduce the number of advertised vacancies. The workforce, and relevant employee associations were consulted during the development of this model. Change to legislation is underway to enable the merit pool approach. Expected to be operational in late 2020. The roll out will be supported by a communications and engagement package, such as information sessions.

13 Targets for women at promotion and development pathways

A gender proportional target for women participating in development pathway courses was implemented in February 2020 (linked to recommendation 23). Respective Service Areas are responsible for ongoing measurement, monitoring and reporting to ELT on a quarterly basis. The roll out of the target has been supported by an email to all SAPOL employees with supporting resources of Frequently Asked Questions and a Case for Change. These supporting resources are accessible on the intranet pages for both the Diversity and Inclusion Branch and Project Equitas.

14 Talent Identification program

Implementation is underway via two approaches:

- A pilot mentoring program was announced in early 2019 and SAPOL employees were invited to submit expressions of interest to nominate as either a mentor or mentee. Twenty-two pairings were established – with 6 mentors being external to SAPOL. The program is considered a personal and professional development opportunity. It is supported by a set of “FAQs”, Handbook, Midway Self Development Plan and Self Development Plan. SAPOL are looking to continue the program in 20-21 and will undertake a review to inform this decision.
- A talent identification program has been developed. The purpose of the program is to prepare employees for promotion/career development within a framework that is robust, fair and transparent. There are linkages with the new iEngage performance management system (recommendation 18), where supervisors can identify and support employees to participate in the talent identification program. SAPOL will engage an external contractor to provide an independent screening process to gain entry into the program. The program is expected be operational with selected employees participating by the end of 2020.

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 was incorporated into the 2018 corporate training cycle (as a once off) for all employees. Induction processes now include handover process information.

RECOMMENDATION

COMMENT / DELIVERABLES

16 External review of Human Resources

A professional services firm undertook the review (April - August 2018). A project has been separately established to coordinate the implementation of the recommendations in conjunction with other business improvement opportunities. The implementation of recommendations is continuing as the Branch within Human Resources is working towards enhancing its structure, capability, processing/operations, accessibility and communications.

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.

18 Reinvigoration of performance management system

The review of SAPOL's Individual Performance Management (IPM) process resulted in the development of a new performance and development system, iEngage, which was rolled out in early November 2019. The new system is intended to promote a culture of open communication, cooperation, collaboration, continuous improvement and high performance. The key performance discussion areas are 'values', 'performance', 'growth' and 'well-being'. The iEngage cycle includes an initial planning discussion with formal discussions at the six and 12 month points. Check-in conversations can be recorded through the cycle. Between June-September 2019 face-to-face training was delivered to 1208 supervisors/managers (Senior Sergeant, Sergeant, ASO5/6 and equivalent that fulfil a supervisory role) as they are responsible for leading the discussions with their team members. Face-to-face awareness sessions were available for employees during the 2019 corporate training cycle. An instructional on-line video user guide was produced and made available for all on the SAPOL intranet. An email was sent across SAPOL (25 October 2019) notifying all employees of the new system and the link to the on-line video user guide. iEngage went live on 13 November 2019. The training is now included within the Sergeant, Senior Sergeant and Long Term Absence courses. It is too soon to assess its impact.

19 Review of equipment to ensure practicality for women

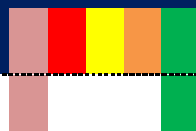
SAPOL has reviewed operational uniform and equipment and undertaken changes in order to ensure gendered considerations are applied. The two relevant General Orders '*Operational Safety Equipment*' and '*Procurement and contract management, uniforms*' have been amended to ensure there is a gender balance in decision-making processes to bring a consideration of the needs of women and men to decisions. These General Orders were gazetted in 2019.

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.

RECOMMENDATION

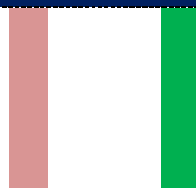
COMMENT / DELIVERABLES



The option to contact the EOC Monitoring team to share the experience and reason for exiting was included in the exit survey in October 2018. Five employees made contact with the EOC.

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



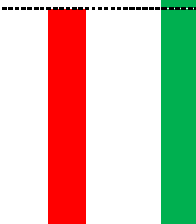
Two mandatory online modules for all employees and a module for supervisors have been reviewed, rewritten and rolled out in 2017. These modules have been updated with relevant references to new policies and processes since 2017, such as the Diversity and Inclusion Branch. The updated modules are expected to be rolled out for completion by the workforce in 2020.

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 (approved internally in April 2019) with the long term direction for training and development and comprises 11 areas for training to focus on as identified in the 2016 EOC Review. These 11 areas for training form the D&I 'suite of resources'. The Delivery Plan is supported by the D&I Foundation Training Document (approved internally in May 2019) which provides guidance to course developers and reviewers to ensure the training upholds the expectations and future directions in relation to the 11 areas for training and D&I Training Suite. The Curriculum Document (approved internally in April 2019) also supports the Delivery Plan as it sets out the course structure for the D&I 'suite of resources', such as course length, outcomes, course structure and assessment methods. The D&I Foundation Training Document incorporates training delivery methodologies (recommendation 25). The D&I Branch has the over-arching responsibility for the ongoing delivery of the training plan.

23 Targets for women in training



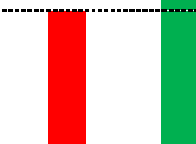
A gender proportional target for women participating in training courses was implemented in February 2020 (linked to recommendation 13). Respective Service Areas are responsible for ongoing measurement, monitoring and reporting to ELT on a quarterly basis. The roll out of the target has been supported by an email to all SAPOL employees with supporting resources of Frequently Asked Questions and a Case for Change. These supporting resources are accessible on the intranet pages for both the Diversity and Inclusion Branch and Project Equitas.

24 Training opportunities for employees on extended leave



The Long Term Absence Course syllabus has been reviewed and updated with content relevant to 2016 Review. Opportunities for continued training and development will be managed through the 'Stay in Touch' policy (recommendation 29).

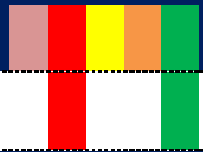
25 Review of training delivery methodologies



This review informed the D&I Foundation Training Document (product of recommendation 22). All eight areas for attention for training (as highlighted in the 2016 EOC Review) are designed to be delivered across three methodologies – face-to-face, online and independent learning option – for general employees, supervisors and managers. As the D&I Branch has the over-arching

RECOMMENDATION

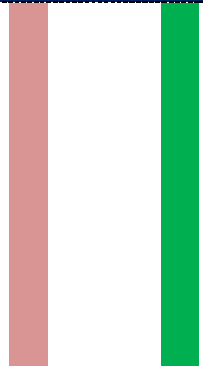
COMMENT / DELIVERABLES



responsibility for the ongoing delivery of the training plan (recommendation 22), they are also responsible for ongoing accessible training delivery methodologies.

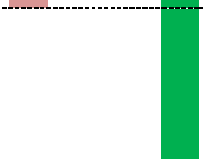
Flexible Workplace Cultures

26 All-roles flex approach



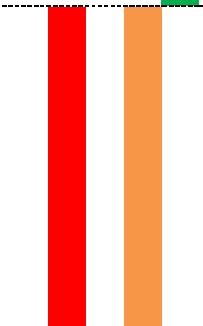
'Working Flexibly in SAPOL' principles issued across the organisation in February 2018 and updated General Orders issued May 2018. The Flexible Work team is based in the Human Resources Service and is responsible for ongoing support of employees, the review and monitoring of flexible work applications and reporting to the ELT. Training and awareness-raising sessions have been delivered to support the roll out of the new approach. Face-to-face training was delivered to 163 managers/approvers in June 2018. Supervisors received face-to-face training as part of the July-September 2018 training cycle. Optional face-to-face awareness sessions were delivered for all employees between May-July 2018 – 454 employees attended. The training has been included in the Long Term Absence course. Information and resources, such as process flow charts, scenarios and case studies for different flexible working arrangements, are available on the SAPOL intranet.

27 Funding the backfilling of employees on maternity leave



The backfilling of inactive sworn employees is dependent on the implication (if any) for frontline operations. For example, if backfilling an inactive sworn employee will lead to a reduction of personnel in patrols then a corporate decision is made not to backfill the vacancy created by maternity leave.

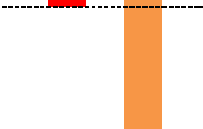
28 Technology and facilities to support flexible workplace culture



Following the completion of an internal Remote Access Business Case, work has progressed on remote access technology solutions. IT infrastructure has been built and set up to enable access for users of the Stay in Touch policy (recommendation 29). The next stage is to expand the scope of remote access to enable greater functionality (e.g. to the remote use of SHIELD, the corporate drive etc.). This work currently is unfunded.

SAPOL has established Wellness Rooms in a range of work sites across the state, which can be used for breastfeeding or expressing breastmilk. Communication about the availability of Wellness Rooms was delivered across SAPOL in late January 2019. A maternity uniform was made available in late 2019.

29 'Stay in Touch' policy



The IT infrastructure will be completed in early 2020. By the end of March 2020 the 'Stay in Touch' policy will be functional and users will be able to log in and have access to the SAPOL intranet on their personal computer.

Dispute Resolution and Complaints

RECOMMENDATION

COMMENT / DELIVERABLES



30 New Complaints Resolution Unit

The new Diversity and Inclusion Branch was launched on 18 July 2018. Resources were reallocated to expand from 2 to 15 FTE (which includes a small team of trained, professional mediators). The new Branch works according to the principle of early intervention with a 'victim-centred' approach, where complaints are resolved through alternative dispute resolution (ADR) methods where possible. In cases where there is a breach of relevant regulations, acts or codes, an investigation is undertaken (with the consent of the victim). One hundred and eighty-four reports had been received as at 30/06/2019, with 109 of these allocated for ADR (including conflict coaching, mediation, training and one-on-one conversations). Forty-four were allocated for inquiry by the Investigations Unit and 11 conduct investigations were allocated to the Investigations Unit (linked to recommendation 33), 11 matters were locally resolved, 4 matters were referred to the Internal Investigations Service.

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 on matters is stored for future reference, ensuring complainants only need to explain the details of their complaint once. IAPro is inaccessible to general worksites and is 'partitioned' so that only those professionally involved in the Diversity and Inclusion Branch can access it. D&I Branch staff annually sign an undertaking to uphold confidentiality and conflict of interest policies.

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 undertook training as part of SAPOL's mandatory training. The Commissioner for Equal Opportunity presented to the SA Judiciary on sexual harassment and gender inequality at its annual Judicial Development Day on 2 December 2018.

33 Task Force to investigate allegations of sexual misconduct

Task Force Portus was established on 3 February 2017 and it investigated allegations of sex discrimination, sexual harassment and predatory behaviour. Since 18 July 2018 it has been incorporated into the Diversity and Inclusion Branch (linked to recommendation 30) as the Investigations Unit and it investigates allegations of discrimination (all types), sexual harassment, predatory behaviour, bullying, victimisation and inappropriate workplace behaviour against another/other employee/s.

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

Existing processes not reviewed due to legislative amendment, which included revised disciplinary processes and penalties. The '*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.

RECOMMENDATION

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Well-being and Support Services

35 Mechanisms to ensure safety of employees experiencing domestic violence

Employee guidelines were developed and released to coincide with White Ribbon Day on 25 November 2017.

36 Training in domestic violence intervention

Face-to-face training delivered (July-September 2018) to employees with an additional training component for those with management responsibilities. Local district trainers provided catch-up sessions for those unable to attend during the training cycle.

37 Review of the roles and responsibilities of Equity Contact Officers

An expression of interest process for interested employees was undertaken in November 2018, with selections and probity checks undertaken by the D&I Branch. Those selected (approx. 75) undertook training (December 2018-January 2019). On 1st 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 and an intranet announcement. A contact list for reps is available on the intranet.

38 Confidential cultural surveys

Recommendation completed - first Pulse Survey conducted on 2 November 2017 & repeated on a quarterly basis since then. A summary of results for each survey is shared across SAPOL and a comprehensive report goes to the ELT.

2.2 Key risks/challenges to implementation and impact

Data from the 2019 EOC survey and focus groups indicated that there are some important key risks/challenges to the satisfactory implementation and impact of the recommendations. These have been grouped as risks to implementation and risks to the achievement of intended outcomes.

2.2.1 Risks to implementation

There are some key risks to the satisfactory implementation of recommendations that are underway or only just completed. These risks include

- SAPOL not applying a range of engagement and communication activities to build understanding, support and engagement for the roll out and use of targets for women participating in development pathway courses (recommendation 13) and for women participating in training (recommendation 23). There will be resistance to the use of targets. For example in many focus groups and in the survey, respondents argued that this is 'preferential treatment for women' (a major concern about this was also frequently raised in relation to 'women only training and information sessions'). Engagement and communication activities will need to be customised to engage and inform the 'moveable middle' of the resistance spectrum.²⁴ These activities will need to continue after the initial introduction of the targets to minimise or mitigate the undermining effect of the "rumour mill" in SAPOL. Resistance is discussed in Chapter 5.
- The range of reviewed training delivery methodologies (recommendation 25) are currently not meeting the needs of those working flexibly or regionally.
- While work is underway to provide remote access to the SAPOL intranet, there remains an inadequate supply of effective information technology options to support those using flexible working arrangements (FWA) or awaiting a FWA application decision, in particular working from home and working remotely (recommendation 28). Recent building of IT infrastructure can be used to enable greater functionality, such as remote access to SHIELD and the corporate drive, however funding has not been allocated for this next stage. Without such access, SAPOL's ability to support its employees to balance commitments outside of work with work will be constrained.

2.2.2 Risks to achievement of intended outcomes

A number of key risks for recommendations that have been completed and transitioned to business units for ongoing operationalisation were identified through consultation. There is a risk that the intended outcome will not be achieved for the following:

- Lack of reporting on the Gender Equality Action Plan (GEAP) (recommendation 4). The GEAP was launched in December 2017, yet most focus group participants were unaware of its progress/achievements and of the activity of the associated Gender Equality Action Group (GEAG)

²⁴ Shenker-Osorio, Anat (2012), *Don't Buy It*, (Ingram Publisher Services US: New York).

(recommendation 11). Monitoring, evaluation and reporting on the impact of this action plan and this group is essential for engagement, driving cultural change and to identify areas for improvement.

- Perceived lack of ongoing responsibility for the management of gender equality in SAPOL (linked to the leadership role for Project Equitas (recommendation 9)), along with the associated 'Business Engagement Plan' (recommendation 10). Many focus group participants expressed concern that once Project Equitas closes²⁵ and the EOC was no longer involved in monitoring SAPOL, the impetus for change and supporting engagement and communications would inevitably die back. Given the challenges identified in this report, the EOC shares these concerns. A member of the SAPOL Executive Leadership Team needs to continue to be accountable for gender equality in SAPOL.

This role will involve ongoing oversight and responsibility for the planning of ongoing monitoring, evaluation and reporting on all the recommendations that have been transitioned from Project Equitas into business operations. Without ongoing monitoring, evaluation and reporting of outcomes and impacts, opportunities to ensure that these initiatives are creating the intended cultural change will be missed. This ongoing monitoring, evaluation and reporting activity should be part of the reporting schedule that the EOC Monitoring team has identified as an EOC 2020 Recommendation for SAPOL. An example framework for six completed recommendations for ongoing monitoring, evaluation and reporting is presented in Appendix 2 – this can be further developed by SAPOL for the remaining completed recommendations.

- Concern that the Human Resources Service, in particular its Management Branch, is unable to meet its internal service delivery requirements while progressing the implementation of the recommendations from the external review (recommendation 16) completed in 2018. This could delay the ability of the SAPOL human resources function shifting to a strategic focus that contributes to SAPOL building a culture of gender equality.
- Sub-optimal use of iEngage, the new performance management system (recommendation 18) due to the people and performance management skills of many supervisors not being at a level to facilitate effective discussion about values, performance, growth and well-being with meaning and purpose. The system is expected to meet a number of current gaps, such as career development (for both non-sworn and sworn employees), relevant training opportunities (for both non-sworn and sworn employees), well-being check and reinforcing expected behaviours, especially for those who are not committed to the cultural change required. In addition, supervisors will need to make links with the talent identification program (and associated mentoring program) (recommendation 14) for relevant team members. Without adequate performance and people-management skills (see risk regarding 'poor quality training delivery' over the page), the iEngage system will not be utilised effectively and will not be able to fulfil its potential.
- Experiences of the exit management strategy (recommendation 20) shared with the EOC Monitoring team highlighted that this strategy is not being applied effectively, in particular the optional face-to-face exit interview has not been conducted by trained personnel, which affects the quality of the information/data

²⁵ At the time of writing a decision regarding the future of Project Equitas had not been made.

collected. The application of the strategy is an opportunity for SAPOL to learn about experiences (positive and/or negative) to continually improve and adapt employee retention strategies. Without up-to-date information/data, SAPOL is risking further employee exits by not addressing issues or gaps.

- Quality of training delivery - SAPOL needs to ensure training is effectively delivered by using professional trainers for face-to-face training and by evaluating all training and utilising the feedback for continuous improvement. Training was identified in the 2016 EOC Review as a critical component of changing attitudes and behaviours of staff in relation to sex discrimination and sexual harassment. Many concerns were raised regarding the quality of training delivered internally, which is relevant for leadership professional development programs (recommendation 5), training on sexual harassment, sex discrimination, predatory behaviour, unconscious bias, bystanders responsibilities and understanding and accommodating flexible work (recommendation 21), training of complaint resolution unit staff (recommendation 32), training in domestic violence intervention (recommendation 36) and D&I representatives (recommendation 37). The quality of training delivery is discussed in sub-section 3.5.6.
- The policy framework for working flexibly in SAPOL has been established (recommendation 26). Discussion during consultation surfaced a number of issues with the operationalisation of the policy and that uptake of flexible working arrangements (FWAs) is at 'saturation level'. Without addressing these issues, in consultation with supervisors and managers, SAPOL is risking sustainable operationalisation of FWAs and the flow on benefits of talent attraction, employee retention and productivity.²⁶ Examples of the issues are:
 - Employees not willing to negotiate their FWA request;
 - Managers approving FWAs because they perceive that 'higher up' management will approve it anyway;
 - Managers being told to 'make it work';
 - Vacancies resulting from FWAs not being backfilled;
 - Increased workload for team members not using flexible working arrangement due to lack of backfilling.

²⁶ Workplace Gender Equality Agency (2016), *Gender strategy toolkit* (WGEA: Sydney), p. 31, accessed 13 September 2019, https://www.wgea.gov.au/sites/default/files/documents/Gender_Strategy_Toolkit.pdf.

2.3 Follow up from Report 3

The EOC Monitoring team's third report raised some points for the Project Equitas team to consider as they continued 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 3.

Report 3 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.

Action:

The Police Academy is responsible for the monitoring of completion of corporate training, including the Diversity and Inclusion training. The Diversity and Inclusion Branch also monitor completion rates. Only 5% of SAPOL personnel had not completed the training at the time of writing this report.

Report 3 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.

Action:

SAPOL has rolled out Respectful Behaviours training, as well as Bystander Response training for personnel up to the rank of Superintendent and to the level of ASO6. They have reviewed attendance (completion rate of approximately 70% for the period of July to early November 2019) and are in the process of scheduling catch-up training to ensure that staff across all service areas and districts have undertaken the training. An increase in the perception of respectful behaviours within teams and an increased confidence to address inappropriate behaviour was recorded in the July 2019 Pulse Survey. The EOC remains concerned that some personnel lack an understanding of the concept of power imbalance. As a result, they are considering the development of a targeted training for supervisors to improve awareness and understanding of power imbalance and its impact.

Report 3 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.

Action:

SAPOL are currently working on how disciplinary outcomes can be better communicated without compromising confidentiality. However, both the survey and focus group responses clearly demonstrated that this has not yet been achieved.

Report 3 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.

Action:

The Flexible Work website has been updated to include more information to support supervisors and managers with implementing flexible work arrangements. Data on flexible work in each of the service areas is taken to the Executive Leadership Team on a regular basis to ensure Assistant Commissioners are aware of the situation in their areas of responsibility. Better technological support in the form of a solution for remote access to allow more flexible work is projected to be available for employees early in 2020. Ongoing associated risks are discussed in section 3.6.

Report 3 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.

Action:

1208 supervisors and managers were trained on the revised performance management system, iEngage, between June – September 2019, which went live on 7 November 2019. The training is now included within the Sergeant, Senior Sergeant and Long Term Absence Courses to catch all supervisors that were on long term leave/absence or have become a supervisor after the initial training roll-out.

The Human Resources service will monitor the use of iEngage system over the first few months of implementation to ensure that all employees will have a performance management plan in place as soon as possible. Associated risks with the use of the iEngage system are discussed in section 3.4.

Report 3 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.

Action:

Training of all Diversity and Inclusion Branch staff has been reviewed, leading to a number of changes. New staff members observe the Diversity and Inclusion Trainer when they present face-to-face training to cadets

on sex discrimination, sexual harassment and predatory behaviour. At the time of writing, the Diversity and Inclusion Branch Manager had also provided further training during team meetings on racism, sexual harassment, the importance of diversity and inclusion and the potential impacts when diversity and inclusion are lacking, respectful workplace behaviours, LGBTIQ+, and delivery of the Diversity and Inclusion Representative training on discrimination.

The topic of “confidence to perform” will be included in the new performance management plans and is currently incorporated in regular one-to-one meetings between staff and managers of the Branch. Staff have been provided with access to the Diversity Council of Australia website and are encouraged to share knowledge. They are also given the opportunity to support the Diversity and Inclusion Branch trainers in the delivery of sessions to SAPOL personnel.

Report 3 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).

Action:

The Diversity and Inclusion Branch constantly monitor the notification procedure. This includes daily allocation meetings, which allow Diversity and Inclusion Branch staff to identify the most suitable approach for handling notifications and to review approaches. The Branch has also undertaken an internal review with the purpose of highlighting achievements and areas for further work.

The Diversity and Inclusion Branch has undertaken considerable work on training in response to both particular workplace issues and in consultation with managers about more general areas that would benefit from training. The Branch have also recently trialled a new round of engagement sessions tailored to meet the needs of individual workplaces. Analysis of the trial will allow them to determine how this approach might be delivered across the organisation.

3 Cultural change in SAPOL: Analysis and findings

In this section the cultural change data analysis and findings are presented using seven themes from the 2016 Review. Two of these themes, 'dispute resolution and complaints' and 'well-being and support services' are combined in this report under the 'complaints process and support systems' theme. For each theme, a summary from the 2016 Review is provided. This is a 'reminder' of what was found and provides a baseline for measurement of cultural change to date.

The EOC's assessment of progress in cultural change to date is summarised at the end of each theme using the signs of success that were identified by the EOC Monitoring team in collaboration with Project Equitas during the development of the EOC's monitoring program in 2017. Where the understanding of progress is incomplete, specific suggestions for ongoing monitoring and evaluation activities have been made.

3.1 Workplace culture and behaviours

Summary from the 2016 EOC Independent Review

The 2016 Review found that sex discrimination and sexual harassment were significant issues in SAPOL:

- Around 45% of those surveyed reported that they had experienced sex discrimination
- Women were more likely to have experienced this discrimination, and lesbian, gay and bisexual (LGB) employees also experienced sex discrimination in higher numbers than heterosexual men in SAPOL.
- Thirty-six percent of survey respondents reported they had experienced sexual harassment while employed with SAPOL, with 43% of this cohort indicating this had occurred within the preceding five years.
- Males were significantly more likely to have been the alleged perpetrators of sexual harassment.
- While the level of sexual harassment in SAPOL in the preceding five years was similar to the prevalence of sexual harassment reported in the general workplace population, the experience of predatory sexual harassment in SAPOL was much higher (49% of SAPOL respondents who reported sexual harassment experiencing predatory behaviour).
- The level of formal reporting (by victims or bystanders) of sexual harassment was very low.

Along with the above prevalence of sex discrimination and sexual harassment, the 2016 EOC Review found further negative cultural elements. These were:

- Employees not being confident to speak out about incidences of sexual harassment as they were concerned about being victimised.
- Inaction on, and lack of confidentiality in sexual harassment and sex discrimination complaints.
- Lack of support for complainants.
- A lack of access to, and support for, flexible working arrangements.
- A susceptibility to gender bias, in selections/promotions and training and development opportunities.

The 2016 Review noted that SAPOL had an unconscious masculine lens through which it determined its priorities and approach to running the organisation.

The expected signs of success in the improvement of SAPOL's workplace culture were as follows:

- Reduced prevalence of sex discrimination and sexual harassment (including predatory behaviour)
- Improved employee confidence to speak out about incidences of sexual harassment.

The EOC's 2020 Findings

3.1.1 Positive aspects of working in SAPOL

As noted in the 2016 Review many SAPOL employees emphasised positive aspects of the culture. This included comradery, team support, serving the community and the ad-hoc flexibility to work around family commitments other personal commitments.

3.1.2 The experience of sexual harassment

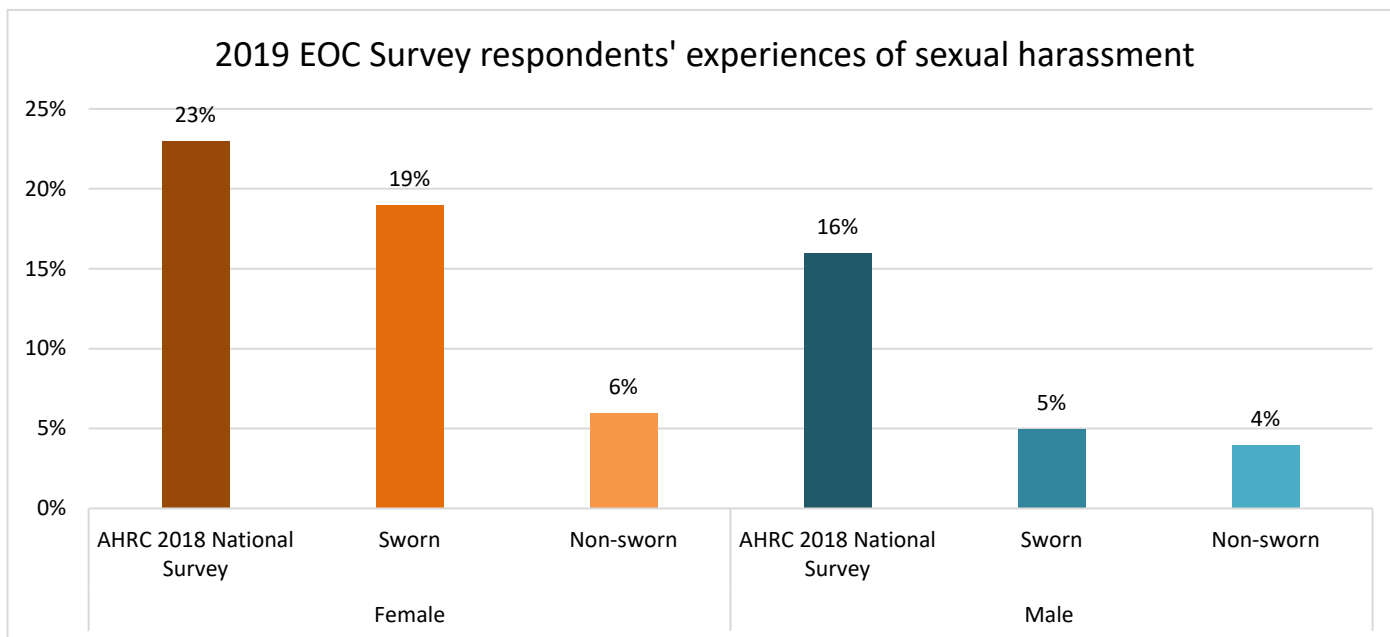
While 96 (9%) 2019 EOC survey respondents reported that they had experienced sexual harassment in the two and a half years since the 2016 Review (63 female survey respondents compared with 31 male survey respondents), this is substantially lower than 36% of respondents in the 2016 survey who reported the experience of sexual harassment in the previous 5 years. It is also significantly lower than the 20% of Australians who reported that they had been sexually harassed in the workplace in the previous 12 months in the Australian Human Rights Commission's 2018 National Survey of sexual harassment at work.²⁷

Disaggregation of the 2019 SAPOL survey data by sworn and non-sworn personnel showed up some stark differences in the experience of sexual harassment for female staff and male staff. While male personnel experienced similar levels of harassment between 28 (5%) sworn and 3 (4%) non-sworn staff, female sworn survey respondents were three times more likely to experience sexual harassment than their non-sworn counterparts with 55 female sworn staff experiencing harassment compared with 8 female non-sworn staff (Figure 7). Although this is a decrease compared with the 2016 EOC survey, which found that sworn female staff were four times more likely to experience sexual harassment, and the proportion of female sworn survey respondents who experienced sexual harassment (19%) is lower than the national figure on workplace sexual harassment of women over 12 months as determined by the AHRC (23%), this data suggests there is still work to be done on addressing sexual harassment for sworn female staff.²⁸

²⁷ Australian Human Rights Commission (2018). *Everyone's business: Fourth national survey on sexual harassment in Australian workplaces* (AHRC: Sydney), p. 30. This survey was conducted both online and by telephone with a sample of over 10,000 Australians aged 15 years and older from various sectors/industries. It measured people's experiences of sexual harassment over the course of their lifetime, in the preceding five years and within the preceding 12 months.

²⁸ AHRC (2018). *Everyone's business: Fourth national survey on sexual harassment in Australian workplaces* (AHRC: Sydney), p. 25.

Figure 7. Comparison of sworn and non-sworn experiences of sexual harassment

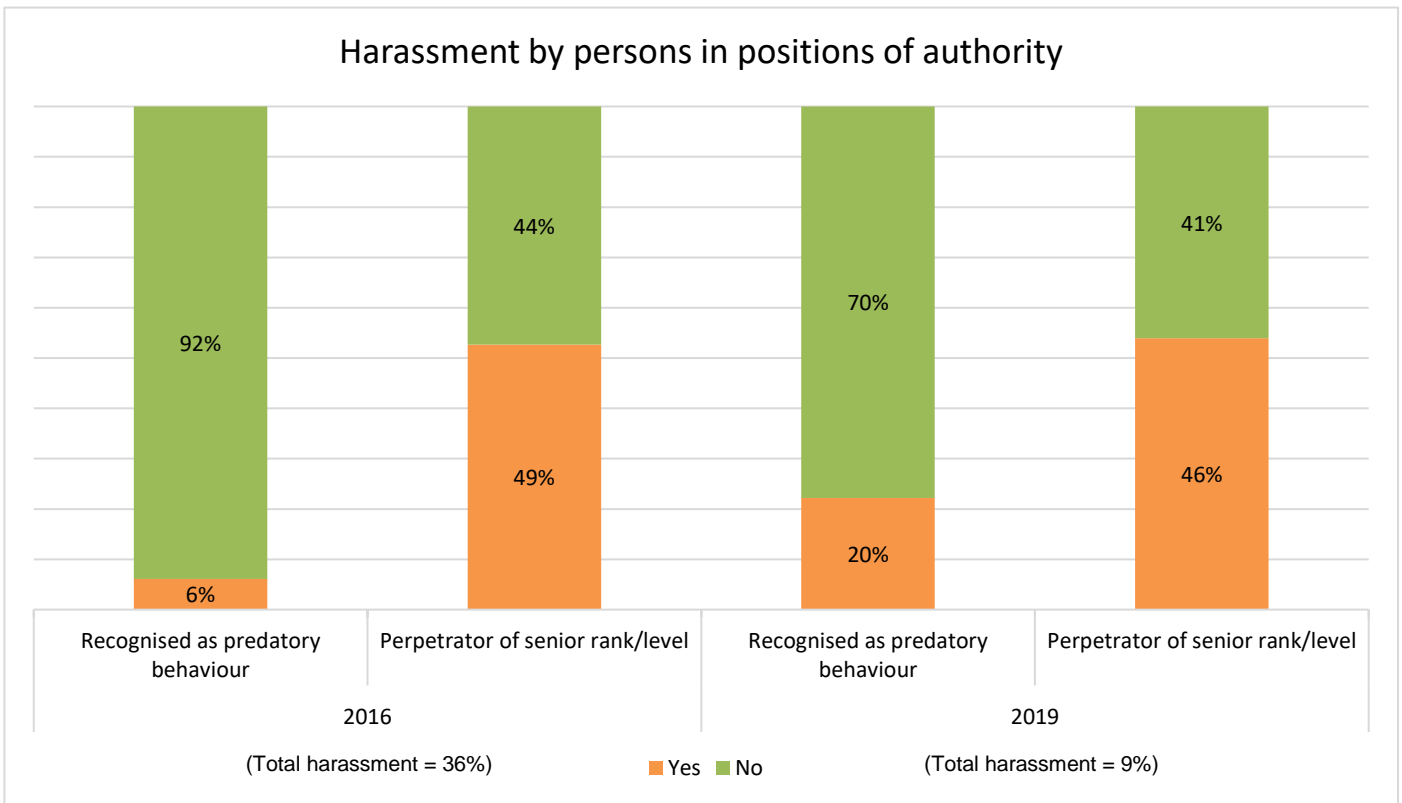


SAPOL respondents who stated they had witnessed sexual harassment in the workplace decreased from 850 (52%) over the previous 5 years in 2016, to 183 (17%) over the previous 2.5 years in the 2019 EOC survey. The reported experience of sexual harassment in SAPOL between the 2016 and 2019 EOC surveys suggests a decline in the incidence of harassment, despite the difference in timeframes between the 2016 and 2019 EOC surveys (5 years versus 2.5 years) making a direct comparison difficult. Regardless, there remains an ongoing need eradicate sexual harassment altogether.

3.1.3 Predatory behaviour

Predatory sexual harassment remains an issue for SAPOL. While only one formal complaint of predatory sexual harassment in SAPOL has been made to the D&I Branch since the 2016 review, a further 7 reports were made to Taskforce Portus, the interim investigative team tasked with investigating reports of sex discrimination, sexual harassment and predatory behaviour. Of the 96 (9%) 2019 EOC survey respondents who had experienced sexual harassment, 19 employees, or 20% of those who had been harassed, stated that the harassment had been predatory - while an additional 25 respondents or 26% of those who experienced harassment reported that they had been sexually harassed by someone of higher rank, either an immediate supervisor, a manager more senior than their supervisor or by someone of higher rank but not in their chain of command (i.e. they did not identify this as predatory behaviour - even though it was). Thus, in total, almost half of the 9% of respondents in the 2019 EOC survey who reported that they had been sexually harassed in SAPOL since the release of the independent review in 2016 had experienced this by a perpetrator in a position of more senior rank. As Figure 8 shows, although the actual number of reports is smaller, the proportion of sexual harassment allegedly perpetrated by a person in a position of authority over the victim was almost identical in 2019 when compared to 2016.

Figure 8. Incidence and perception of predatory behaviour reported in the EOC Survey



Although recognition of what constitutes predatory behaviour was higher among respondents who reported the experience of workplace sexual harassment in SAPOL in 2019 when compared to 2016 (as Figure 8 shows), a substantial gap in understanding still remains. However, it should be noted that 72 or 39% of witnesses to sexual harassment recognised what they saw as predatory behaviour. Whilst acknowledging that the difference between ranks does signify, and is understood as, a power differential in SAPOL, focus group participants suggested that sworn SAPOL employees may be confused by the concept of what constitutes predatory behaviour from a policing perspective, which could, in part, explain the discrepancy between the experience and recognition of predatory behaviour for victims. Regardless, there remains work to be done by SAPOL to increase the understanding of what constitutes predatory sexual harassment.

EOC 2020 Recommendation

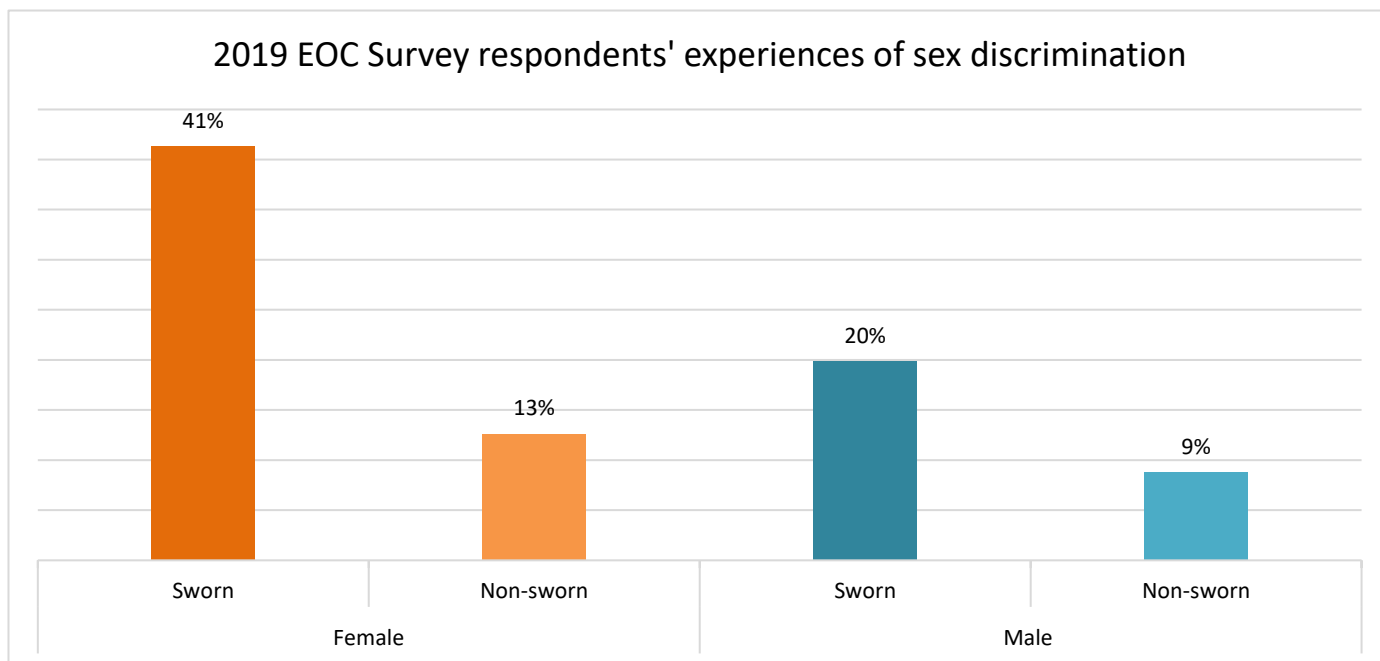
SAPOL must address the knowledge gap in the understanding of predatory sexual harassment.

3.1.4 The experience of sex discrimination

Two hundred and fifty-one (23%) respondents in the 2019 EOC survey reported that they had experienced sex discrimination since the 2016 Review. Of these 151 were female and 100 were male. As with sexual harassment experiences, there were also significant differences between sworn and non-sworn personnel. One hundred and twenty-two, or 41% of the 295 female sworn survey respondents stated they had

experienced discrimination, compared with 25, or 13% of their non-sworn counterparts. The difference between male sworn and non-sworn personnel was significantly lower (Figure 9). It should also be noted that at least 18 (4%) male survey respondents who stated they had experienced discrimination cited examples of affirmative action for women. Differences between sworn and non-sworn personnel's experiences of sex discrimination were not assessed in the 2016 EOC survey.

Figure 9. Comparison of sworn and non-sworn experiences of sex discrimination.



Around 740, or 45% of respondents in the 2016 Review stated that they had experienced sex discrimination at some point during their career at SAPOL. Unfortunately, the lack of a clearly defined time period in the 2016 survey made it difficult to compare the 2016 and 2019 prevalence of reported sex discrimination.²⁹ The Office of the Commissioner for Public Sector Employment's latest 'I Work for SA – Your Voice Survey' provided a sense of how SAPOL was performing against the rest of the South Australian (SA) public sector.³⁰ The latter indicated that SAPOL respondents had witnessed less harassment or bullying in their workplace between the end of 2017 to the end of 2018 compared to the overall SA public sector (37% had witnessed such behaviour or were not sure compared to 47% across the SA public sector).³¹

²⁹ It is suggested that SAPOL use 2019 percentage (over 2.5 years) as a benchmark for future monitoring and evaluation of the experience of sex discrimination.

³⁰ The Office of the Commissioner for Public Sector Employment's 'I Work for SA - Your Voice Survey' was conducted from 24 September to 26 October 2018. The survey was open to all public sector employees. It gathered information on employees' perceptions on a range of workplace matters including values, development, leadership, service and inclusivity. A number of these matters are outside the scope of the EOC Monitoring team.

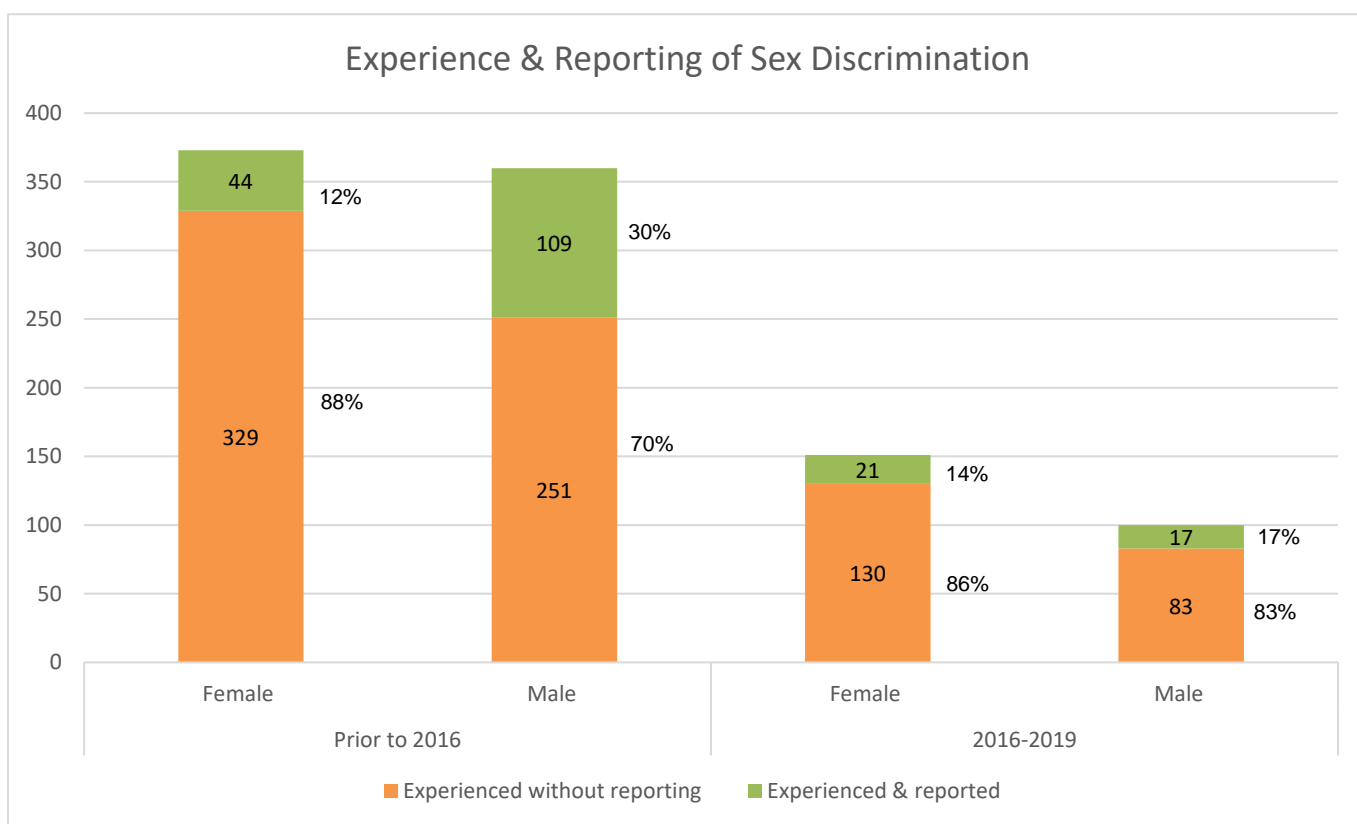
³¹ The questioning by the Office of the Commissioner for Public Sector Employment in their 2018 'I Work for SA - Your Voice Survey' did not separate harassment and bullying behaviours.

3.1.4 Reporting of sex discrimination and sexual harassment

The 2019 EOC survey found that there remains a significant lack of formal reporting of experiences of sex discrimination and harassment by both victims and witnesses. This is consistent with the findings of the AHRC’s 2018 National Survey,³² which found that less than 17% of survey respondents who experienced sexual harassment in the workplace in the last five years made a formal report or complaint about this.

In the 2019 EOC Survey, 38 respondents in total, including 21 women, stated they reported sex discrimination to SAPOL. This accounts for 14% stated that they reported the discrimination they experienced, an increase of 2% from 2016. The percentage of men reporting experiences of discrimination decreased from 30% (109) in 2016 to 17% (17) in 2019 (Figure 10).

Figure 10. The experience and reporting of sex discrimination in SAPOL among EOC survey respondents

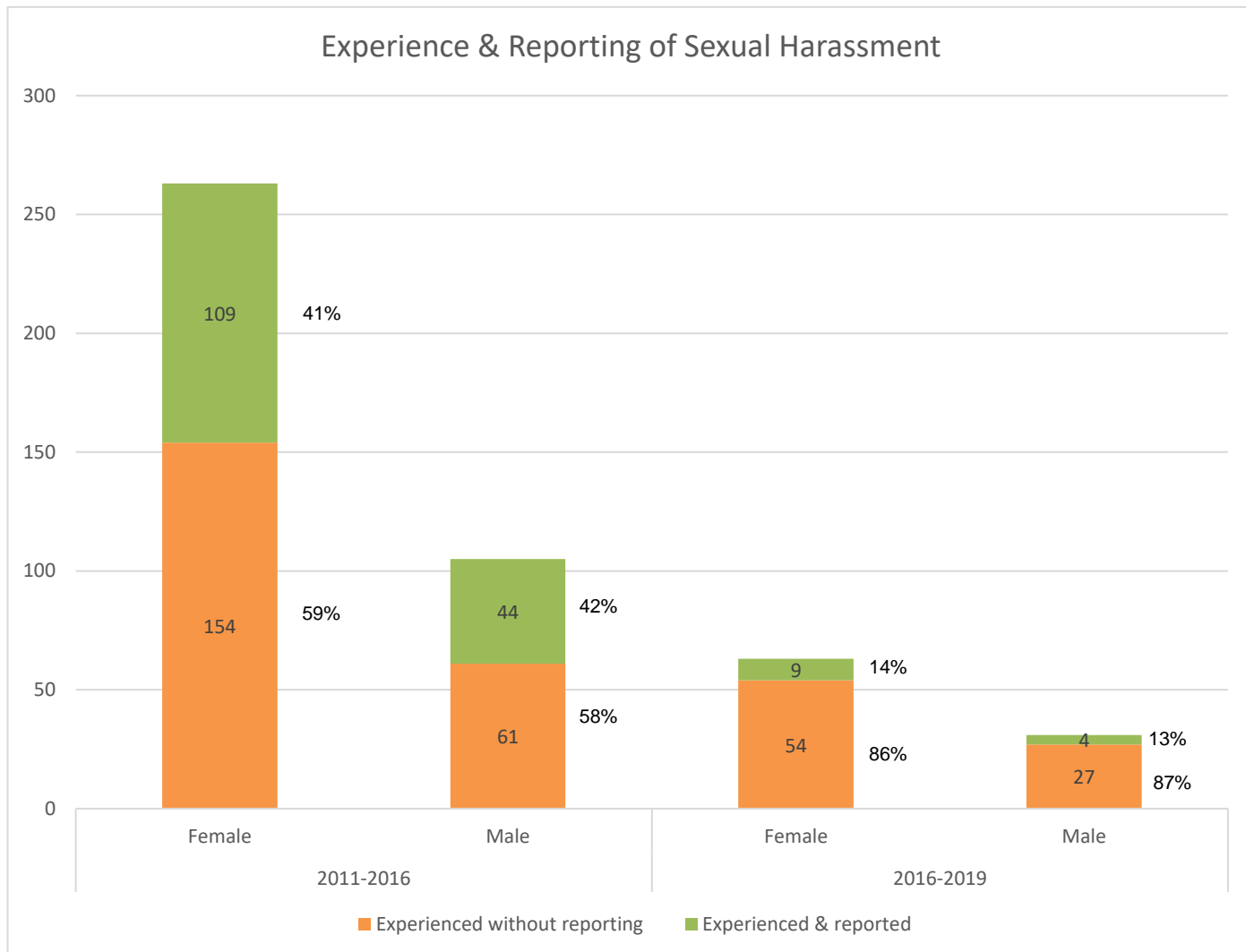


Forty-three formal reports of sexual harassment were made to SAPOL through the Diversity and Inclusion Branch from May 2017 to June 2019, while a further 38 reports were made through Taskforce Portus prior to the establishment of the D&I Branch. It should be noted these numbers do not include the small number of reports that were made to the Internal Investigations Service (IIS). Historically, the lack of a formal data sharing procedure between IIS and the D&I Branch has potentially impacted the ability of SAPOL to accurately assess the levels of sexual harassment within the organisation. However, the D&I Branch is currently working on a more formal approach to data sharing that will help to mitigate this risk. Nevertheless,

³² AHRC (2018). *Everyone’s business*, p. 73

as with sex discrimination, formal reporting of sexual harassment remains low in SAPOL. This is evident when compared with the experience of sexual harassment noted by 2019 EOC survey respondents (Figure 11).

Figure 11. EOC survey respondents' experiences and reporting of sexual harassment in SAPOL from 2011 to 2019



3.1.5 Bystander Action

In the 2019 EOC survey respondents who had witnessed sexual harassment could select multiple options to describe the action they took. Most witnesses stated that they supported the victim, either by listening and talking to them (42%), by offering advice (37%), or by supporting them to report the behaviour (25%). However, although respondents to the July 2019 SAPOL Pulse survey showed high levels (85%) of confidence to intervene if they were to witness inappropriate behaviour, only 23 (13%) EOC survey respondents confronted the person who behaved inappropriately and 22 (12%) intervened to separate the victim from the person displaying the behaviours, and only 25 people or 14% of witnesses to sexual harassment formally reported the behaviour. Another 28 (15%) survey respondents stated they took no action at all in response to witnessing sexual harassment. However, this was a significant improvement on the 2016

survey, in which 200, or 31% of survey respondents who witnessed sexual harassment stated they did nothing.

3.1.6 Other forms of disrespectful behaviours – bullying and racism

While bullying and racism were not in scope for this investigation, as was the case for the 2016 Review, such behaviours were mentioned by some survey respondents and focus group participants. One exiting employee also recounted to the EOC the experience of disability discrimination in SAPOL. This experience not only involved discrimination but also poor management, including bullying behaviour, at the local level. These behaviours have been noted in the interest of continual improvement and to provide indications of other cultural issues in SAPOL that will limit its capacity to harness the benefits of a diverse and inclusive culture.

The experience of the employee who faced disability discrimination highlights the importance of the action plans under the D&I Strategy. SAPOL is currently developing an Aboriginal and Torres Strait Islander (ATSI) Action Plan under the Diversity and Inclusion (D&I) Strategy. This Action Plan is part of a suite of plans for key areas under the D&I Strategy (discussed in sub-section 3.3.3), including Gender Equality, Generational Diversity, Disability Access and Inclusion, Culturally and Linguistic Diverse (CALD) groups and Lesbian, Gay, Bisexual, Transgender, Intersex and Queer/Questioning (LGBTIQ). The development and implementation of these action plans will contribute to embedding diversity and inclusion across SAPOL business.

3.1.7 Respect, diversity and leadership

The March 2019 SAPOL Pulse survey found that 75% of employees believed their team had a positive culture which valued diversity, and that they felt supported, while 80% believed the people in their workgroup treated each other with respect. There was a 7% difference between female and male respondents (66% compared to 73% respectively). The subsequent Pulse survey in July 2019 showed a significant increase in the perception of respect within the team (78% of female and 82% of male respondents). The latter coincided with the roll-out of Respectful Behaviours training, which was held from April to June 2019 (discussed further in section 3.5 Training and Development).

The perceptions of leadership and the organisation as a whole were less positive. In response to the March 2019 Pulse Survey 53% of staff felt valued, while only 42% believed the organisation treats people fairly with respect to cultural background, gender, disability, sexual orientation or religion. This question was not asked again in the July survey, however, the majority of respondents in both the SAPOL Pulse survey in July 2019 and the Office for the Public Sector's 'Your Voice' 2018 survey believed that SAPOL is committed to creating a diverse workforce. This might suggest that while SAPOL's commitment to creating a diverse organisation is clear, the way in which this is translated into action is not always viewed as inclusive.

Although over 50% of employees had no desire to leave SAPOL and a further 16% planned to stay working for the organisation for the next three years at least, the March 2019 Pulse survey found that only one third of employees felt that SAPOL inspired and motivated them to perform at their best.

This perception of culture - moving from positive at the team level to less positive at the organisational level - was discussed during focus groups. The discussions uncovered three key factors that may contribute to this situation:

- Organisational leaders not being visible and therefore having minimal interaction with the workforce.
- High rate of change across information management systems. SHIELD, an upgraded data management system with flexibility for new technology, data analytics and biometric technology, was implemented in 2018/2019 along with a new Human Resources software platform (as highlighted in section 1.3). The workforce is finding that the systems are not working as well as expected and/or inadequate training means the systems/software are not being used effectively and efficiently – this leaves employees feeling like they are spending more time than needed on administration, not being listened to and not feeling as if their more important work (in “protecting the community”) is valued.
- SAPOL is initiating the second phase of the District Policing Model (as highlighted in section 1.3) – this is unsettling for the workforce as they wait to find out about roles and locations.

Discussion on the expectation of SAPOL leadership to role model appropriate behaviours to support cultural change can be found in section 3.3.1.

In the 2019 EOC survey, perceptions on the organisation’s progress in changing the culture ranged from very negative (where respondents saw no improvement) through a view that the culture has always been positive. However, most respondents sat somewhere in the middle, pointing out that while significant progress has been made in some areas, there remains significant room for improvement.

“The corporate messages are very positive however there has been little change at the operational level. SAPOL needs a lot of work to challenge and change long held attitudes and culture that supports highly sexualized language and behaviour in the workplace.” **Survey Respondent**

“I think SAPOL has moved forwards a great deal, people are gaining courage to speak up about inappropriate behaviours and be more respectful to one another. It is a cultural change journey and therefore won’t be an overnight success but SAPOL is moving in the right direction and it is turning into a positive workplace.” **Survey Respondent**

Figure 12. Change progress summary for workplace culture and behaviours

<p>Ideal End Goal (from 2016 EOC Independent Review): SAPOL employees work in a respectful, inclusive, safe and productive workplace that does not tolerate sex discrimination and sexual harassment and in which leaders act as role models for gender equality.</p> <p>In working towards this goal, the expected signs of success along the way are outlined below along with supporting key points.</p>		
Signs of Success	Key Points of Change Progressing	Key Points of Challenges for Change Progressing
Experiences of sex discrimination and sexual harassment (including predatory behaviour) decreases	<p>There is evidence of increased awareness of what behaviour constitutes sex discrimination, sexual harassment and predatory behaviour.</p> <p>Overall, sexual harassment has significantly decreased compared to the national average.</p>	<p>Continued significant under-reporting may lead to SAPOL underestimating the incidence of sexual harassment and sex discrimination.</p> <p>There is still much work to be done in educating employees about what constitutes predatory sexual harassment and in eliminating it.</p> <p>Sworn female staff are subjected to disproportionately high levels of sexual harassment compared to male and non-sworn personnel.</p>
SAPOL employees perceive it safe to challenge inappropriate behaviour/s	Employees report an increased confidence to personally challenge inappropriate behaviour in their peers.	Lack of confidence to challenge inappropriate behaviours in employees of a senior rank or level remains to be addressed.
Extent of sexual harassment witnessed decreases	Witnessing of sexual harassment decreased significantly between 2016 and 2019.	Under-reporting of witnessed sexual harassment needs to be addressed.
Employees have higher morale, motivation and positive outlook, attitude and behaviours	Increases in perceptions of respect within teams following the roll-out of Respectful Behaviours training.	Negative perceptions of organisation's treatment of employees as respectful and fair.
<p>Change Progress Summary</p> <p>Moderate progress has been made in improving the workplace culture and behaviour in SAPOL, but there are a number of areas where significant improvement still needs to be made.</p> <p>There is evidence of increased awareness of behaviours that constitute sex discrimination, sexual harassment and predatory behaviour, suggesting that education initiatives have had a positive impact. However, work still needs to be done to address the discrepancy between the experience and perception of predatory behaviour, and to address predatory sexual harassment within SAPOL.</p> <p>Training has also been successful in increasing the perception of respectful behaviour within teams. However, a significant proportion of employees do not believe that the organisation as a whole treats employees fairly, irrespective of cultural background, gender, disability, sexual orientation or religion.</p>		

3.2 Complaints process and support systems

Summary from the 2016 EOC Independent Review

The 2016 EOC Independent Review found there was significant under-reporting of sexual harassment in SAPOL due to widespread mistrust in the complaints systems, victimisation of those who did complain, and a belief that there were few or no consequences for perpetrators. Many survey respondents and interviewees noted that perpetrators who had committed multiple offences continued to be promoted within the organisation. Other criticisms of the complaints processes included that complaints were not followed up in a timely fashion (or at all), people were not kept informed, there was too much paperwork involved and an adversarial approach was often taken.

The EOC recommended that SAPOL establish a new and streamlined internal complaints resolution unit that reports directly to an Assistant Commissioner (recommendation 30). On 18 July 2018, SAPOL's new Diversity and Inclusion (D&I) Branch commenced operations, replacing the functions of the former Equity and Diversity Section. This new D&I Branch was the result of significant policy, process and system reform to completely restructure how equity and diversity complaints are resolved. The aim was to have an internal complaints process that was characterised by fairness, confidentiality, accessibility, transparency and efficiency; with criteria set as good practice by the Australian Human Rights Commission's guidelines for internal complaints processes.

The EOC's 2020 Findings

3.2.1 Formal complaints

Of the 96 (9%) 2019 EOC survey respondents who had experienced sexual harassment, 13 reported to someone, however, only 3 of these reported directly to the D&I Branch. Only 25 people or 14% of bystanders who had witnessed sexual harassment, reported the incident. Although 58% of women and 65% of men in the July 2019 SAPOL Pulse survey stated they were comfortable and confident in reporting discrimination or harassment to the D&I Branch, the low percentage of formal reporting compared to experiencing or witnessing sexual harassment, suggests there is still much work to be done in this area. Greater awareness-raising and reminders about the D&I Branch could be helpful as 23% of respondents in the same Pulse survey noted that their team manager did not do this.

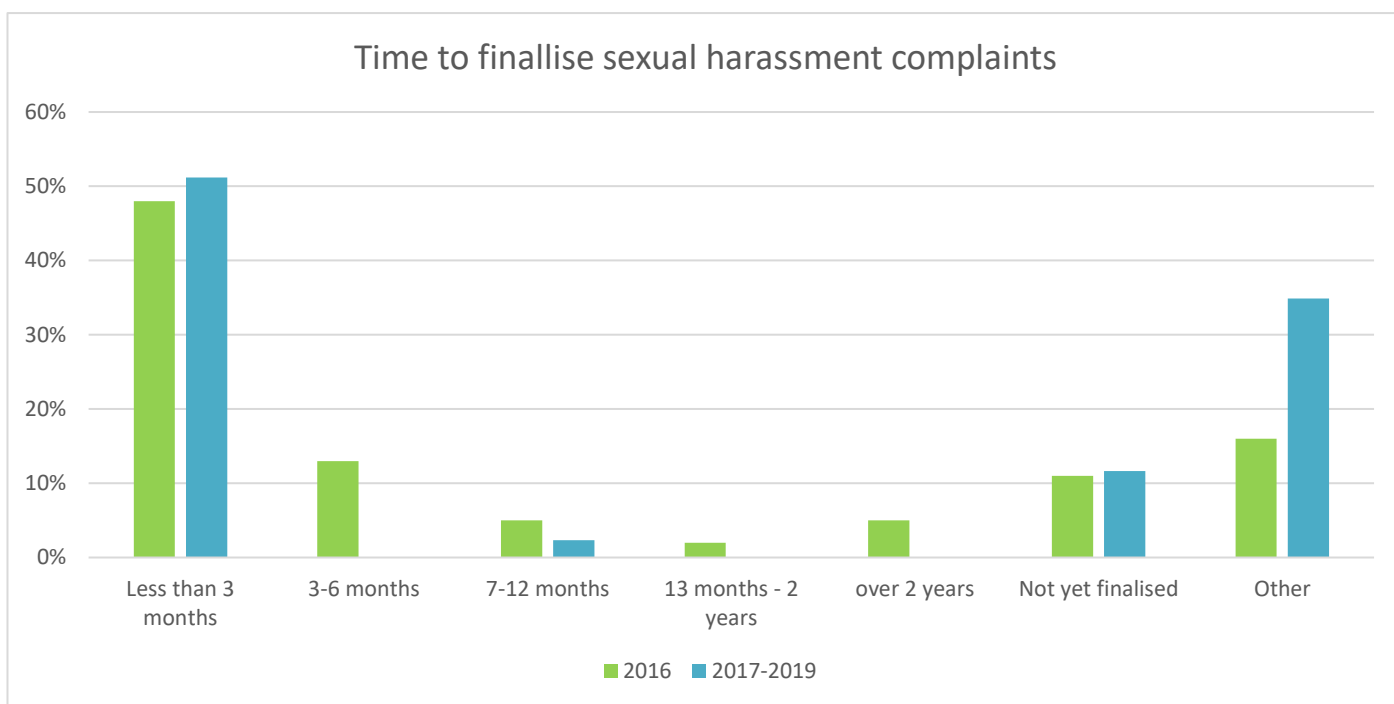
Although 7 2019 EOC survey respondents people reported sex discrimination to the D&I Branch, only four of these fell within the Branch's definition of discrimination. Therefore the EOC has only been able to assess the perspectives of these four individuals in the context of the D&I Branch complaints process, and it should be noted that such a small number makes it difficult to evaluate the new complaints process in relation to this type of complaint. In terms of timeframe, two complaints were processed within three months, and only one was satisfactorily resolved. There is no information on the satisfaction level with the complaints process from three of the four complainants.

Thirteen (1%) of the total number of EOC Survey respondents stated that the timeframe for the resolution of complaints was a problem, however it should be noted that only 3 of these had made a formal complaint.

SAPOL’s corporate data from December 2017 to June 2019 demonstrates that 22 (51%) of sexual harassment complaints were resolved within the first three months (Figure 13). Furthermore, four of the five complaints “not yet finalised” were still within the three-month timeframe as of 30 June 2019. Complaints with a timeframe of “other” are those where the D&I Branch was unable to determine the timeframe from records because these relate to complaints that have been referred on to the Internal Investigation Section. As Figure 13 shows, complaints are being resolved in a timelier manner by the new D&I Branch than was occurring at the time of the 2016 Review. It should also be noted that the legacy of the old Equity and Diversity Section and its poor reputation for supporting complainants may play a role in any negative perceptions of the new D&I Branch.

Actions taken by the D&I Branch to improve the timeliness of their complaint handling include immediate acknowledgement of receipt of complaints (within business hours). Notifications are assessed on receipt to determine whether urgent contact is required and whether the Employee Assistance Section should be contacted. Notifications are then considered in depth at the next daily allocations meeting and assigned to a D&I Branch member. It should also be noted that parties to the notification, in particular the respondent, play a significant role in how quickly complaints can progress from notification to resolution.

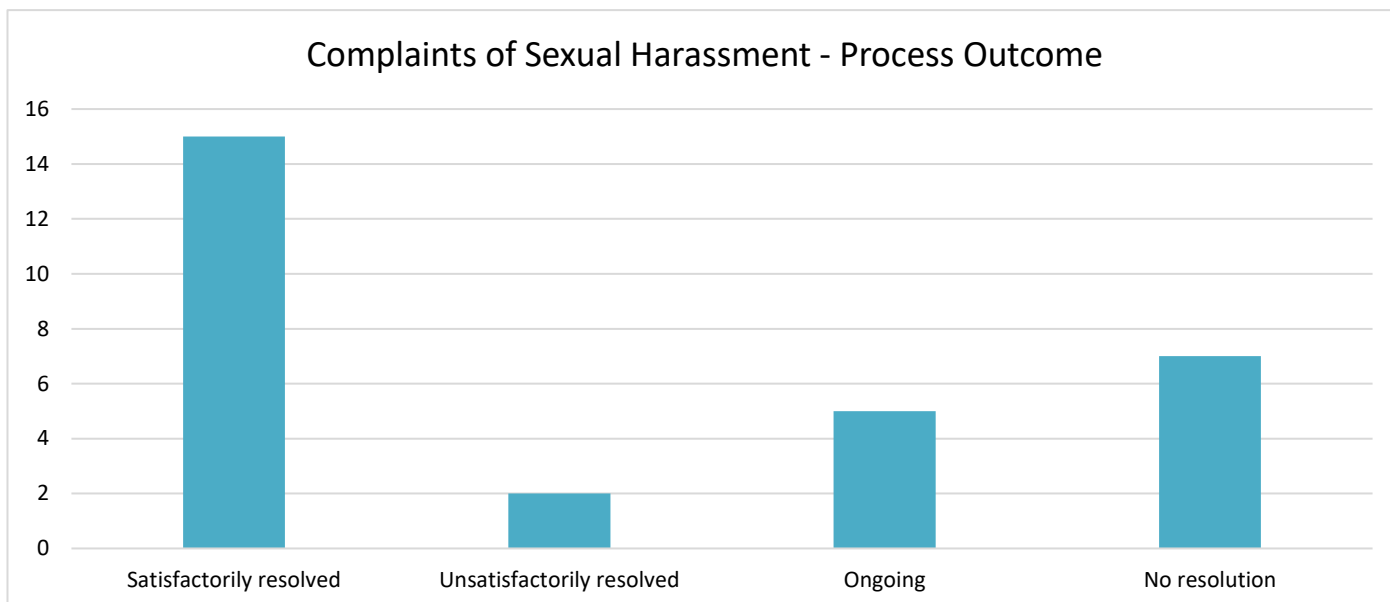
Figure 13. Timeframe of sexual harassment complaints



Although there was some variation, 15 of sexual harassment complaints between December 2017 and June 2019 were satisfactorily resolved according to SAPOL’s records (Figure 14). Seven cases were not resolved because the notifier either did not want to participate in the resolution process, or did not want the respondent notified, meaning the D&I Branch was unable to activate the alternative dispute resolution process. It should

be noted that even if no resolution was achieved, allegations of a serious or significant nature could still be elevated to the Internal Investigation Section. It should be noted that the 2016 Review used different parameters to gauge official outcomes, categorising them as substantiated, unsubstantiated or unclear, rather than resolution status. Therefore the EOC has been unable to make a direct comparison.

Figure 14. Resolution status of sexual harassment complaints



Of the twelve respondents to the 2019 EOC survey who reported the sexual harassment they experienced, only one of the twelve considered the matter to be satisfactorily resolved, with the perception of the remaining eleven respondents evenly split between unsatisfactory resolution, ongoing and no resolution. Of these twelve, four felt sufficiently or somewhat informed about the complaint process and three felt sufficiently or somewhat informed about the progress of their complaint. While complainants are supposed to be advised of outcomes under the new D&I Branch complaints process, seven of the twelve survey respondents who reported sexual harassment to the D&I Branch said they did not feel sufficiently informed about the outcome of their complaint or the reasoning behind the outcome. Although this is too small a number to draw any definitive conclusions about the discrepancy between the official status of outcomes and complainants' satisfaction levels, this highlights the importance of more formal strategies for evaluating outcomes from the perspective of complainants.

It has been difficult for the D&I Branch to formally measure the perceptions that complainants and respondents have of the complaints process due to low response rates to their evaluation survey. Where the D&I Branch receives survey or verbal feedback from complainants unhappy with the outcome, they offer the opportunity to further discuss this with the Branch. It might help the D&I Branch to consider alternative strategies to encourage parties involved in a complaint to evaluate the D&I Branch process, as well as a data collection strategy and procedures for recording all feedback, and any active follow-up undertaken. It should

also be noted that the use of Alternative Dispute Resolution, rather than more “traditional” forms of punishment, may be influencing perceptions of justice with regard to complaint resolutions.

In the 2019 EOC survey, 37 respondents expressed concerns with support for the victim.

“Follow up with those who make complaints, support them, take action and keep them updated with the investigation process and action taken. Listen to how the victims would like it to be handled; they know the situation and their offender the best. Follow up with their victims to see if the harassment has stopped or if they have been aggrieved in the workplace as a result of taking action.” **Survey Respondent**

Concerns about the apparent lack of consequences for perpetrators of sex discrimination or sexual harassment were also expressed by 113 survey respondents.

“It is sad to see that he has been promoted to S/Sgt despite having poor people skills, and documented complaints against him for discrimination.” **Survey Respondent**

“...harsher penalties. There are Sgt's on the IQP that should never be awarded positions of authority.”

Survey Respondent

“Problem people are just moved on from place to place, nothing is done to actually deal with the problem, which results in a multitude of victims.” **Survey Respondent**

Throughout the EOC’s monitoring of SAPOL, developing and communicating de-identified case studies of complaints and their consequences for perpetrators (outlining the behaviour/s, management action/s and outcomes) has been suggested by numerous respondents. The EOC has also recommended this in the first and third progress reports (released in January 2018 and May 2019 respectively). While SAPOL leadership has argued that this is difficult to do without compromising confidentiality, they acknowledged this work needed attention as such case studies would be an important tool for SAPOL to demonstrate and communicate that it is taking action, that there are important consequences for such unlawful behaviour, and thus that the culture is changing. Such de-identified case studies could also be used by supervisors and managers to aid the understanding of appropriate and inappropriate behaviour more generally among their team members. At the time of writing this report, SAPOL was preparing to communicate a de-identified case study of inappropriate behaviour and the consequences for the perpetrator to staff. To thoroughly address concerns that reporting makes no difference and build trust with staff, SAPOL will need to ensure that they communicate consequences on an ongoing basis.

EOC 2020 Recommendation

The Diversity and Inclusion Branch review formal strategies for evaluating complainant and respondent satisfaction with the complaint process to increase response rates. This should include any victimisation of complainants as a result of reporting. This information must be used to continuously improve the services of the D&I Branch.

EOC 2020 Recommendation

De-identified case studies of complaints and their outcomes (including disciplinary outcomes for perpetrators) to be developed as a priority and communicated regularly to all staff to demonstrate that inappropriate behaviour is being treated seriously and to serve as team training and development tools for supervisors and managers.

3.2.2 Reporting

Reporting of Sexual Harassment

The reasons given for not reporting sexual harassment in the EOCs 2019 survey did not differ markedly from those given by respondents in the EOCs 2016 survey (see Figure 15). Of greatest prevalence was a fear held by 47 (50%) respondents that there would be negative consequences for complainants' reputations. Other prevalent barriers to reporting sexual harassment included a lack of confidence in the reporting process making a difference expressed by 31 (33%) people who did not report their experience of sexual harassment, or the fear held by 29 (31%) survey respondents that their career would be adversely affected if they reported.

"Too many victims are afraid to "officially" report matters because they end up being vilified by the other "boys club" members. We need to do more to empower victims of this discrimination and harassment..."

Survey Respondent

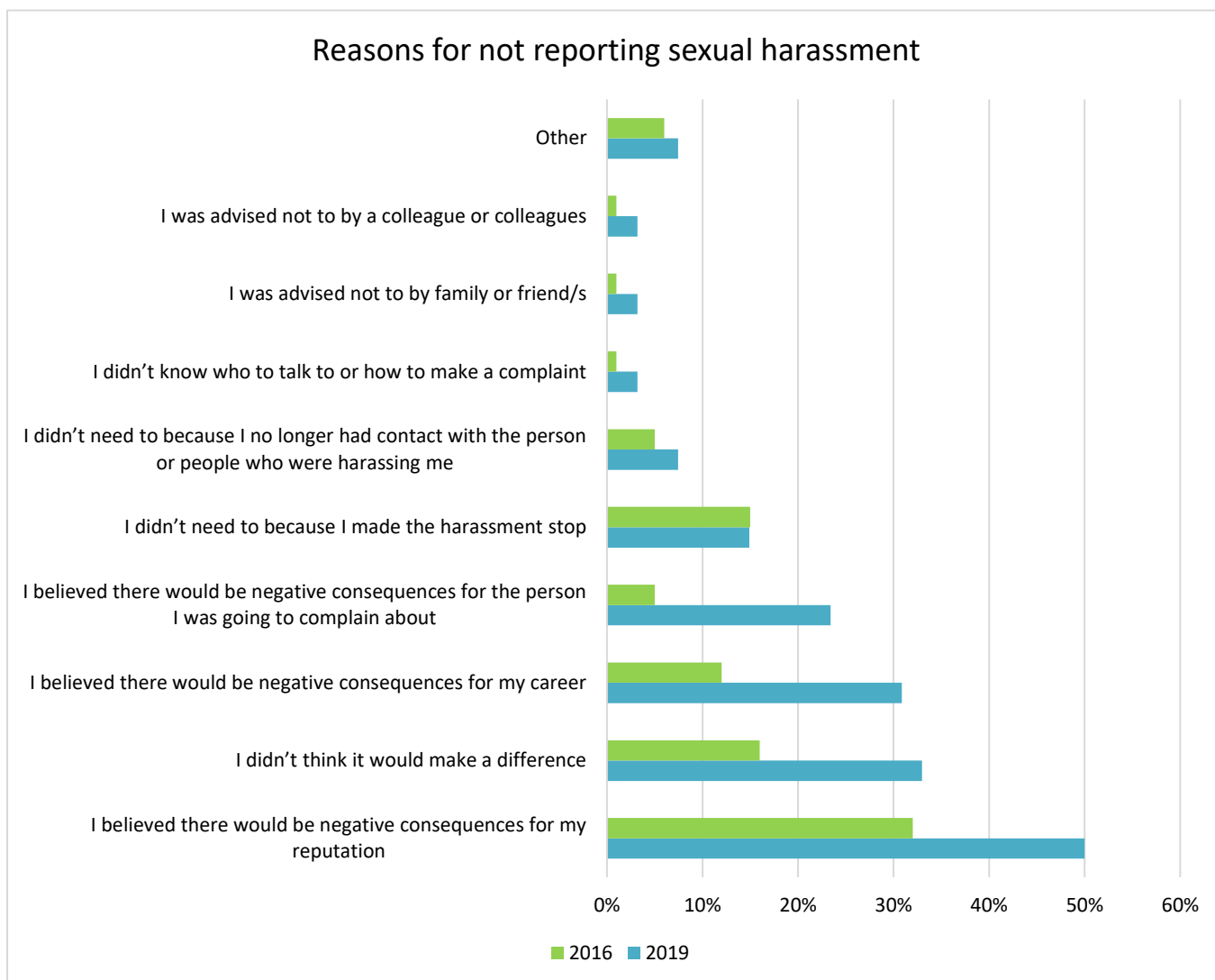
These concerns were also raised in the July 2019 SAPOL Pulse survey in which 36% of female personnel and 25% of male personnel were not confident that SAPOL would follow up or respond appropriately to reports of inappropriate behaviour.

"While the perception remains that (alleged) offenders appear to suffer little consequence for their actions, many still don't bother re the process as it just creates too much angst for them with little or no protection."

Survey Respondent

"The consequences of sexual harassment and predatory behaviour need to be transparent to continue gaining the confidence of the victims to speak up. Tell the organisation how many have been charged and what penalty was issued." **Survey Respondent**

Figure 15. Reasons for not reporting sexual harassment (2016-2019)



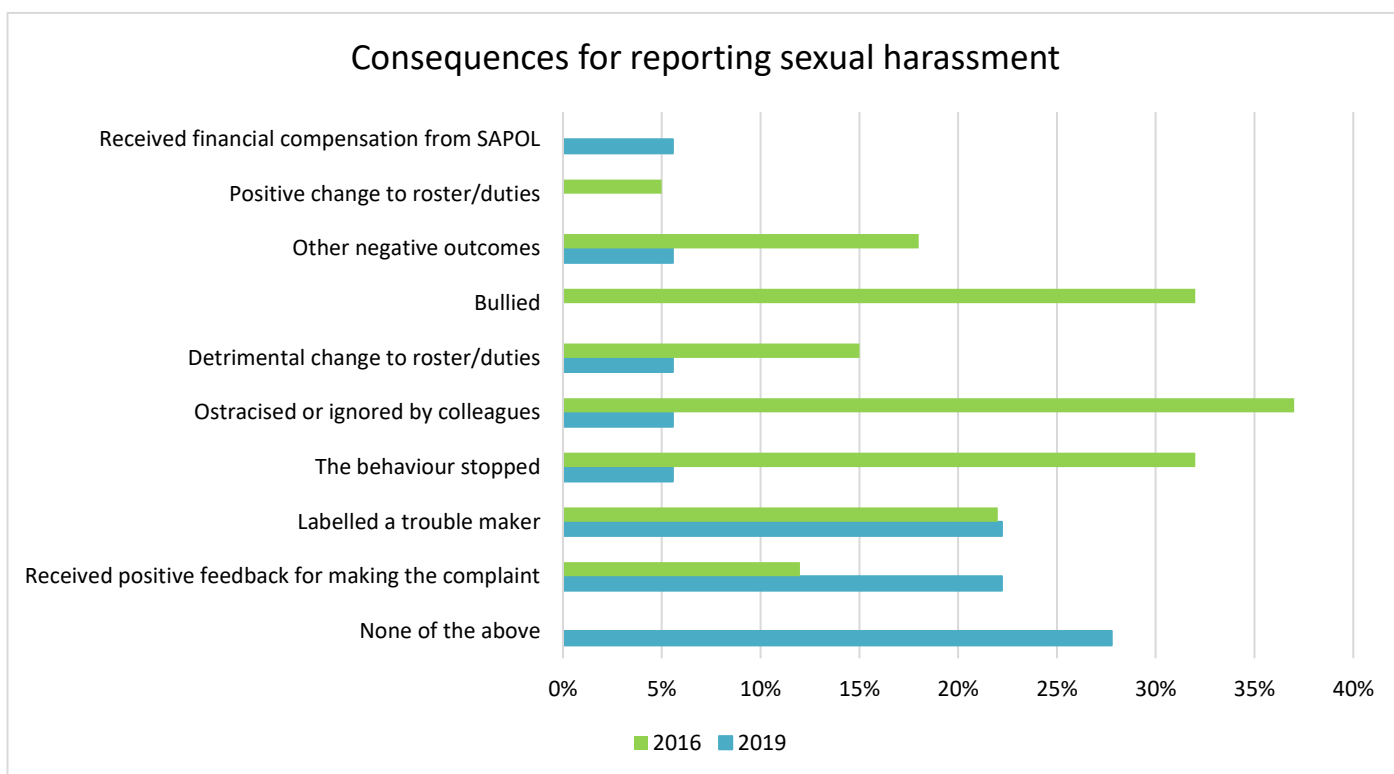
The concern about speaking up within the organisation more generally was highlighted in SAPOL’s ‘I Work for SA – Your Voice’ survey results in 2018.³³ Here it was found that less than half of the respondents (44%) agreed it was safe to speak up and challenge the way things are done in SAPOL. This is 3% lower than the South Australian average, which was in turn 24% below the Australian Public Sector.³⁴ While the scope of this question was broader than sex discrimination and sexual harassment, it provides an indication of the need for improvement. This concern was identified as a barrier to positive cultural change in the EOCs 2016 Review. More recently it was highlighted in the EOC’s third monitoring report (May 2019), where it was recommended that SAPOL develop strategies to enhance employees’ confidence to challenge/call out or report inappropriate behaviour. This issue will require ongoing intervention and monitoring.

³³ Government of South Australia (2018). “I Work for SA – Your Voice Survey: SAPOL Results - A Snapshot,” p. 3.

³⁴ Government of South Australia (2018). “I Work for SA – Your Voice Survey: South Australian Government Highlights Report,” <https://publicsector.sa.gov.au/about/office-for-the-public-sector/iworkforsa-yourvoicesurvey/>, accessed 09/10/2019, p.5.

There are a number of positive signs of change in the way in which people who report sexual harassment are treated within SAPOL. In particular, there was an absence of bullying reported by 2019 EOC survey respondents, compared with a third of 2016 survey respondents who had experienced bullying as a result of reporting. In addition, 4 of 13 (31%) people who reported sexual harassment to someone within SAPOL said they had received positive feedback for reporting in the 2019 survey, compared to 12% in 2016. The percentage of people reported being labelled as a trouble-maker for reporting remained the same in both 2016 and 2019 (Figure 16). This suggests that, despite the D&I Branch's strict emphasis on confidentiality, there remains a lack of confidentiality either at the team level or with the perpetrators and/or victims of sexual harassment, which was noted in focus group consultations. This, coupled with inappropriate or inadequate responses to sexual harassment, remains an ongoing problem for those who report sexual harassment.

Figure 16. Consequences for reporting sexual harassment (2016-2019)



EOC 2020 Recommendation

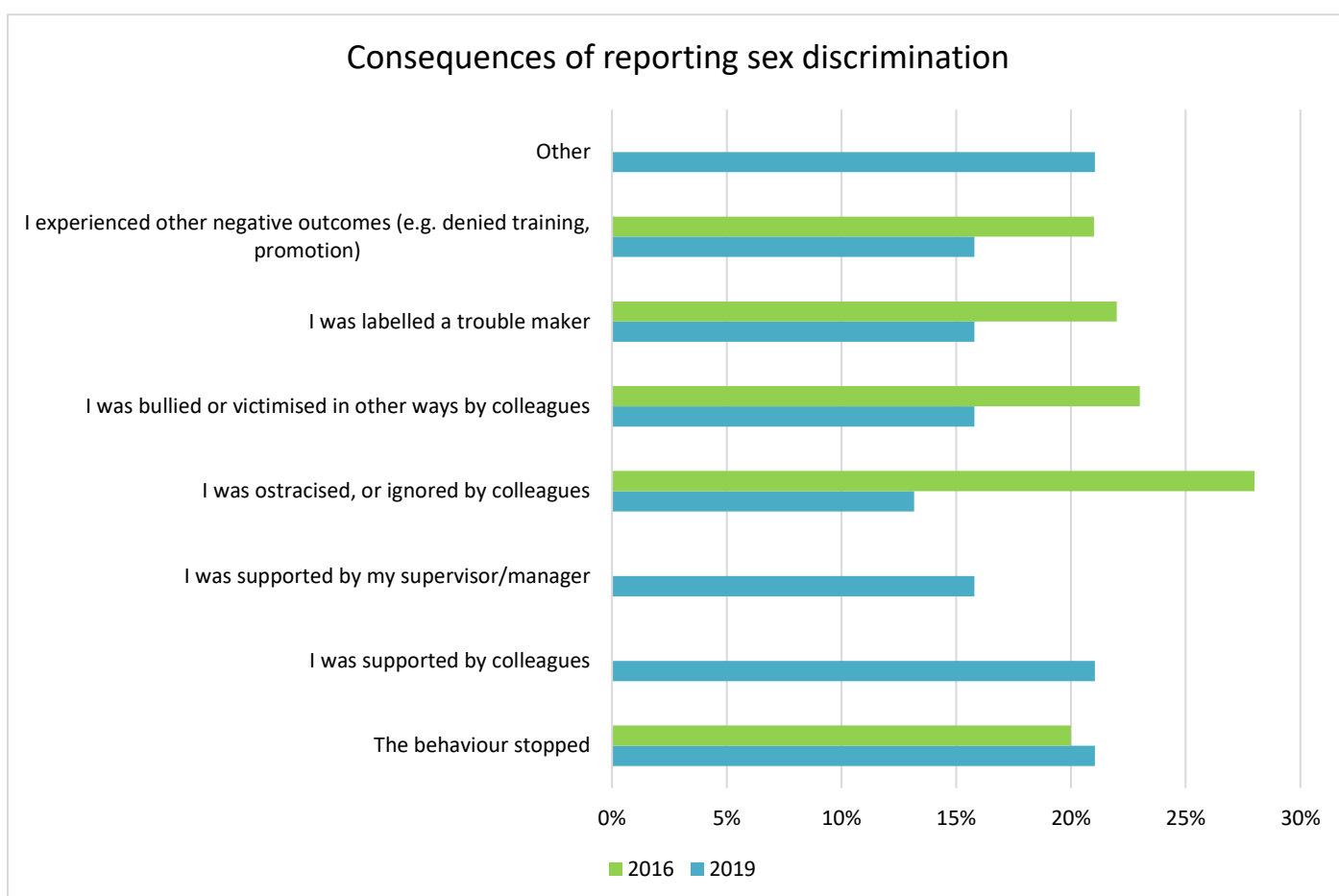
SAPOL reassess confidentiality strategies at the team level or with perpetrators and/or victims to ensure confidentiality is taken seriously and consequences are enforced for breaches.

With all sexual harassment complaints now being handled by the D&I Branch, several managers in focus groups raised the issue of not being made aware of incidences of sexual harassment within their teams - and thus not being able to take action to mitigate the issues associated with this in their teams. An area for further work by the Diversity and Inclusion Branch should be in balancing the confidentiality of matters they are managing with working with local management where it may aid the parties involved and the outcomes.

Reporting of Sex Discrimination

Similar patterns can be seen in the reporting of sex discrimination. One hundred and eleven survey respondents who experienced but did not report discrimination cited negative consequences for their reputation (52%), while 98 cited negative consequences for their career (46%), while 113 (53%) believed reporting would make no difference. Although the numbers of people who formally reported sex discrimination are small, positive changes are evident from the increase in the percentage of people supported by their supervisor/manager (16%) and by their colleagues (21%) in 2019, compared to 8% of people who received positive feedback for making a complaint in 2016. However, there remains work to be done in making the reporting process more supportive for those who have experienced discrimination. Bullying, victimisation and ostracisation of victims is still far too prevalent (Figure 17).

Figure 17. Consequences of reporting sex discrimination (2016-2019)



Anonymous reporting

Anonymous reporting is consistent with a victims' rights approach and could strengthen SAPOL's efforts to improve its understanding of the prevalence of sexual harassment and sex discrimination. Being able to report inappropriate behaviour without formally identifying themselves minimises the risk of negative

consequences for the victim.³⁵ The reporting procedure in SAPOL currently allows for anonymous reporting through the submission of a PD185 form or PD351 through the mail, or through a verbal report by telephone. This is advertised to personnel on the D&I Branch intranet site. However, the D&I Branch receives very few anonymous reports at this stage. Therefore, the EOC suggests that SAPOL assess the effectiveness of current avenues for anonymous reporting and, if appropriate, consider a trial of online anonymous reporting to determine whether this improves reporting rates and SAPOL's ability to identify and address problems at a systemic level.

EOC 2020 Recommendation

SAPOL develop, implement and monitor strategies to improve employee confidence to report sex discrimination and sexual harassment, including promoting access to anonymous reporting.

3.2.3 Organisational support services and systems for those who have experienced sexual harassment and sex discrimination

SAPOL established the SAFE Space service (recommendation 3), an external and independent free service, on 12 December 2016 to provide support and confidential advice to victims of sexual harassment and sex discrimination. The SAFE Space was publicised in the Police Gazette in February 2017. Since December 2016, a total of 25 employees have accessed SAFE Space. Both SAFE Space and SAPOL's Employee Assistance Program (EAP) are promoted daily on all email follow up responses for trauma exposure, all welfare check phone calls to members, all annual psychological reviews, and in all Employee Assistance Section presentations and lectures. Cards promoting the EAP and SAFE Space are available in all police buildings. An organisational-wide promotion of the EAP also occurred mid-2019 when the EAP provider was changed. Both SAFE Space and EAP are also permanently attached to the top banner of the homepage of SAPOL's intranet.

The Restorative Engagement Program (REP) (recommendation 2) was also established as an independent program within the EOC, with procedures separate from the EOC's legislatively mandated complaint mechanisms. The REP was active from February 2017 to the end of December 2017. During this timeframe 13 conferences were conducted and feedback from the participants was overwhelmingly positive. All complainants reported feeling respected and supported during the process, and that they had achieved what they had hoped to achieve by participating. All complainants felt that the SAPOL representative who attended their conference responded meaningfully to their story.

³⁵ Hanrahan, M. and Kamal, NJB. (2019), *University of Melbourne Introduces Anonymous Register*, Farrago News, accessed 4 November 2019, <http://farragomagazine.com/2019/06/13/university-of-melbourne-introduces-anonymous-register/>

In December 2017, the REP transitioned to the EOC's conciliation team to provide the service as required. At the time of writing, the EOC was coordinating the first conference since the transition, with another person considering whether to participate.

SAPOL issued "Family and Domestic Violence involving SAPOL Employees Guidelines" (recommendation 35) in November 2017 and training in family and domestic violence intervention (recommendation 36) was delivered between July and September 2018. Local district trainers were able to deliver the training to any employees who missed it in the July to September window. The responsibility for ongoing policy and training in this area rests with the Family and Domestic Violence Branch.³⁶ The Guidelines are set for review before June 2020.

The recently established D&I Branch is a key avenue of support and its regular communication with SAPOL personnel since its establishment in July 2018, has resulted in employees engaging with the D&I Branch. In the April to June quarter of 2019, the Branch dealt with 40 notifications related to bullying, discrimination, and sexual harassment or other workplace issues. Almost half (19) of the notifications to the D&I Branch were allocated for Alternative Dispute Resolution, which takes a range of approaches to resolving disputes including mediation, workplace mentoring, conflict coaching, training, one to one conversations, and facilitated discussions. A further 15 notifications were allocated for Preliminary Inquiry, while five were resolved locally and one was referred to the Internal Investigations Service.

An internal review was undertaken of the D&I Branch in September and October 2019 aimed at evaluating the complaint process, the nature and number of reports, reception of the centralised reporting system, the Alternative Dispute Resolution (ADR) approach, staffing requirements and the case management system. The review highlighted positive changes including that having a centralised body to manage reports improves the independence and consistency of outcomes. Daily meetings of the D&I Branch also allow them to identify and address problem areas as they arise from complaints. The introduction of ADR strategies where appropriate, was seen to bring about positive changes with non-punitive consequences. Positive changes noted in feedback to the Branch include the confidence of SAPOL staff in reporting to the D&I Branch, including those who have been encouraged to come forward as a result of positive experiences their colleagues have had with the D&I Branch. Managers have been seeking assistance from the D&I Branch for resolving matters at the local level and respondents named in reports have fully engaged with the D&I Branch and even, in some cases, gone on to become advocates for the Branch and its processes.

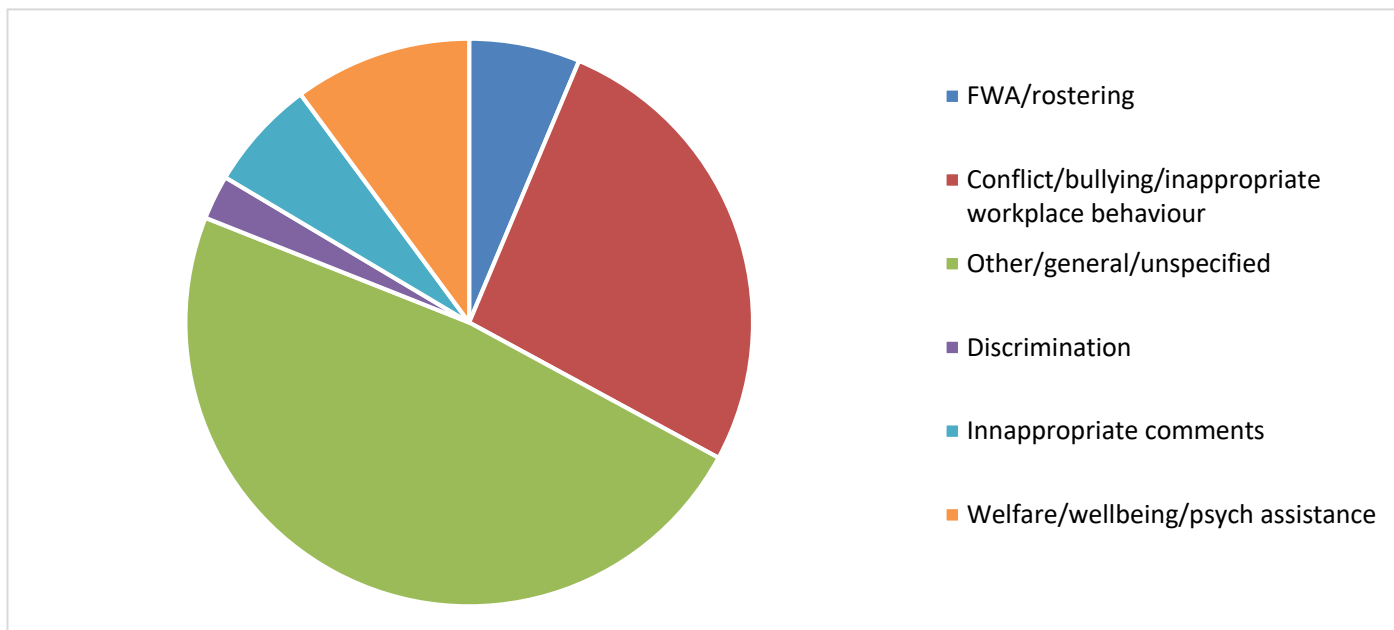
Feedback in focus group sessions was that there was generally greater confidence in the new D&I Branch when compared with the previous Equity and Diversity Section. The Diversity and Inclusion Representatives (linked to recommendation 37) also fulfil an important role in supporting employee well-being across the organisation, by supporting employees who experience or have questions about potential discrimination, sexual harassment or bullying. They facilitate the next steps for support, promote diversity and inclusion and

³⁶ South Australia Police (2018). *Project Equitas Closure Report: Recommendation 36*, (SAPOL: Adelaide, SA), pp. 1-2.

model respectful behaviour. Between September 2018 and July 2019, 79 contacts were made with Diversity and Inclusion Representatives (Figure 18). In 48% of cases, the reason for these contacts remain unspecified. However, of the balance, the largest proportion of contacts (27%) were related to conflict, bullying and inappropriate behaviour in the workplace. Other reasons for contacting the Diversity and Inclusion Representatives were in relation to welfare, well-being and/or psychological assistance (10%), inappropriate comments (6%), flexible work arrangements and rostering (6%), and discrimination (3%) (Figure 18). In addition, 26% of survey respondents who had witnessed sexual harassment encouraged the victim to talk to a Diversity and Inclusion Representative.

Based on feedback collected during consultation, it appears that some Diversity and Inclusion Representatives may be having difficulty separating their information provision role from an advocacy role. They need to be better trained and supported to keep their role focused on providing information, otherwise they may become too involved in issues, which can impact their own well-being. As the service provided by the Diversity and Inclusion Representatives is relatively new, it is important that the effectiveness of this service is carefully monitored and evaluated to identify aspects that are working well and areas for improvement.

Figure 18. Contact with Diversity & Inclusion Representatives



EOC 2020 Recommendation
SAPOL monitor and evaluate the service provided by the Diversity and Inclusion Representatives to ensure the face-to-face service is effective for both the employees making contact and the employee providing the service.

3.2.4 Support services and systems at the local level

A SAPOL service area is trialling a system of support at the local level. This trial involves the Training Sergeants meeting with Probationary Constables and new Constables to develop support relationship and be a potential support pathway, if needed in the future for issues related to sex discrimination, sexual harassment and well-being.

In 2019 SAPOL began a new initiative with Police Academy graduates involving a debrief forum between the training course and the D&I Branch just prior to graduation. This is an opportunity for the D&I Branch to reinforce respectful behaviours and to highlight options if an issue arises. This debrief process can lead onto a one-on-one with the Diversity and Inclusion Branch if needed. In addition, SAPOL has established a committee at the Police Academy comprised of representatives from the training course, D&I Branch and SAPOL management. The committee provides an opportunity for any concerns raised by cadets from the training course to be heard by the D&I Branch and management, and for a response to be developed if needed.

Discussions with ELT members also highlighted actions taken at a local level to build support relationships, if needed in the future, and provide opportunities for discussion and feedback on workplace expectations and issues. These include:

- Organising informal face-to-face discussions with a trusted senior employee;
- Expectations being discussed with the associated Service head, along with the D&I Branch providing a presentation;
- Surveying at the local level to enable anonymous, open feedback to understand issues at play (if any).

Figure 19. Change progress summary for complaints process and support services

<p>Ideal End Goal (from 2016 EOC Independent Review): SAPOL has processes in place to resolve workplace gender equality and sexual harassment complaints and channels for complaining inspire trust in victims of sex discrimination and sexual harassment. All employees have access to trusted, specialist well-being services to support them when needed.</p> <p>In working towards this goal, the expected signs of success along the way are outlined below along with supporting key points.</p>		
Signs of Success	Key Points of Change Progressing	Key Points of Challenges for Change Progressing
Employees perceive complaint reporting and resolution channels/processes as trustworthy (confidential, consistent, accessible)	Employees have more confidence in the D&I Branch compared with the old Equity and Diversity process.	Concerns remain around confidentiality of reporting (outside of the D&I Branch), inappropriate or inadequate response for the perpetrators and victims experiencing negative consequences after reporting.
Parties involved in complaint reporting and resolution channels/processes are supported		The lack of evaluation/feedback makes it impossible to assess the level of support parties

		receive during the complaint process.
Parties involved with complaint reporting and resolution channels/processes were satisfied with the process		The lack of evaluation/feedback makes it impossible to assess party satisfaction with the process.
Channels/processes are trained professionals in alternative dispute resolution (ADR)	D&I Branch staff are trained in their areas of expertise, including ADR.	
History of appropriate behaviour is included in criteria for promotion		Under development and will require monitoring for effectiveness in the early stages
Monitoring of notifications and/or complaints to identify item not progressing and/or problem areas or individuals	The D&I Branch regularly monitor notifications to identify problem areas.	
SAPOL employees perceive it safe to report sex discrimination and sexual harassment	More employees who report experiences of sex discrimination and sexual harassment are receiving positive feedback for reporting.	Lack of confidence in confidentiality of reporting process and victimisation of complainants remain significant issues to be addressed.
Support services are promoted, and employees supported by internal independent, confidential and trained colleagues	Employees are aware of the D&I Branch. Employees are contacting D&I Representatives for advice and support.	Managers/supervisors need to play a greater role in promoting supports like the D&I Branch and Representatives
External independent, confidential and professional person-centric support accessible to employees	SAPOL employees have access to external and independent SAFE Space and the Employee Assistance Program (EAP), both of which are regularly promoted.	
Family and domestic violence policy activated by committed and trained supervisors/managers	The Family and Domestic Violence policy was developed by the Family and Domestic Violence Branch, who are responsible for training.	
Change Progress Summary	<p>Employees view the D&I Branch and complaints process more positively than the former Equity and Diversity process. Alternative Dispute Resolution in which D&I Branch staff are trained, is used in over half of complaints.</p> <p>Supports within SAPOL established since the 2016 review include SAFE Space, the D&I Branch, and D&I Representatives across the organisation. There is also evidence that SAPOL employees are taking advantage of these supports.</p> <p>However, there remain concerns around confidentiality and victimisation. Although confidentiality is a difficult thing to ensure completely, a reassessment of strategies for ensuring confidentiality, and consequences for breaches might be helpful. In addition, it might also be useful to consider ways in which managers could be alerted to problems within their teams (without compromising confidentiality), to enable them to mitigate negative consequences for victims of sexual harassment. More generally, lack of communication to SAPOL employees of the consequences for perpetrators of sexual harassment and sex discrimination undermines confidence in the process and influences low reporting rates as it perpetuates the widely held view that reporting “makes no difference”.</p>	

3.3 Leadership and accountability

Summary from the 2016 EOC Independent Review

The 2016 Review found that negative attitudes to women, or indeed anyone who did not fit the traditional white, masculine mould, were widespread in SAPOL. In addition, the 2016 EOC Review found that responding to individual incidents alone will not prevent sex discrimination and sexual harassment occurring.

The EOC found that gender equality activity was occurring only in response to issues that could not be ignored and initiatives were ad hoc, reactive and tactical rather than planned, proactive and strategic. This resulted in initiatives being disconnected and fragmented, which limited synergies, efficiencies and impact.

The Review argued that the leadership commitment to gender equality needed to be more visible and that a number of formal mechanisms to help demonstrate and operationalise leadership commitment were lacking (for example a business case, gender equality strategy, key performance indicators and communications/engagement). The Review noted that SAPOLs leaders and managers would need support and training in order to drive the cultural change required for it to be a gender equitable organisation.

The EOC's 2020 Findings

3.3.1 Leadership capability and role modelling

The SAPOL Pulse Surveys have revealed employee concerns about the ability of senior leaders to manage positive change. In the July 2019 Pulse survey, only 38% of employees were confident in the ability of senior managers to effectively lead and manage change, and keep employees informed and only 50% of respondents in the same survey (51% of female and 49% of male survey respondents) perceive that SAPOL leaders role-modelled the behaviours required to support a positive culture where all employees are valued for their diversity and are treated equally.

SAPOL employees tended to have a more positive perception of their immediate managers and supervisors, with 70% of respondents in the March 2019 Pulse Survey agreeing that their supervisor/manager valued differences in people and could talk openly with their employees about concerns relating to diversity and inclusion. Similarly, 64% believed that their immediate supervisors/managers demonstrated their commitment to diversity and inclusion through their behaviours and actions.

Examples from the EOC 2019 survey demonstrated the diversity of experiences SAPOL employees have with their leaders and managers in this regard:

My managers have frequently spoken about and shown leadership on many of these issues. We often are given some pre-reading and then have a group discussion on things such as gender and race. My managers inspire me to think. **Survey Respondent**

My current Superintendent of the last year is amazing! Openly promotes and demands the importance and adherence to these issues and providing a good and safe work environment. A breath of fresh air.

Survey Respondent

The culture that exists of Senior Management covering for each other needs to be removed. The view of the lower ranks is that if a boss does something then there is no point in complaining as the upper ranks close ranks and protect their own.” **Survey Respondent**

The 2019 EOC survey also found that sexualised talk continues in the SAPOL workplace and that some managers continue to engage in this behaviour. One survey respondent hypothesised that some managers engage in this type of inappropriate behaviour to gain acceptance in the team. This respondent described their experience of a male employee continually propositioning female employees and a female employee using sexualised talk with a junior male employee. This respondent did not consider making a formal complaint because their Sergeant was involved in the inappropriate behaviour.

EOC 2020 Recommendation

SAPOL must be vigilant in building the capacity³⁷ and reinforcing the expectation of its senior leaders and its supervisors and managers to effectively lead and manage the change required to become a diverse and inclusive organisation and to role model the behaviours required to support a positive culture where all employees are valued for their diversity and are treated equally. This includes all people managers understanding their accountability and reporting responsibilities for gender equality objectives and Key Performance Indicators to enable them to then practice accountability.

3.3.2 Accountability

The 2016 EOC Review made two recommendations related to the accountability of senior leaders and managers to effectively lead and manage change with a commitment to diversity. It recommended the development and implementation of gender equality strategic objectives within business plans (recommendation 7) and the establishment of gender equality key performance indicators (KPIs) for all SAPOL leaders (recommendation 8).

³⁷ Capacity in the areas of preventing and responding to sex discrimination and sexual harassment; bystander responsibilities; people and performance management; difficult conversations in the workplace; and behavioural expectations.

SAPOL has since incorporated a diversity and inclusion performance requirement into existing executive performance agreements. This requires executive leaders to effectively contribute to developing a more confident, capable, diverse and inclusive workforce. Achievement against this indicator is measured by the degree to which there is a positive contribution and change. The Commissioner is responsible for monitoring executive performance in accordance with contractual arrangements.³⁸ While the EOC Monitoring team has not viewed the executive performance agreements or assessed the value of having the performance requirement in the agreements, the EOC Monitoring team has been informed that the Commissioner is monitoring the performance of the ELT members against this requirement.

The strategic objectives and KPIs have been developed and are integrated into SAPOL's corporate business plan (2018-20). Reporting on the corporate business plan occurs on a quarterly basis.

Upon viewing SAPOL's 2018-19 KPI report, the EOC Monitoring team noted that within the 'People' focus area of SAPOL's corporate business plan the following priorities/strategic objectives are listed:

- Implementation of Gender Equality Action Plan;
- Flexible work arrangements;
- Developing and equipping our people to proficiently perform their role and function;
- Fostering positive cultural change for an inclusive, respectful and safe work environment;
- Health and well-being of all staff;
- Talent Management Framework and Individual Performance Management; and
- Strategic workforce planning capability.

For the first two priorities SAPOL has set associated gender equality KPIs:

- Number of women as a percentage participating in vocational and developmental training;
- Number of women as a percentage of the total selected for promotional positions; and
- Percentage of SAPOL employees formally applying and accessing flexible working arrangements.

The recent implementation of gender proportional targets for women participating in developmental pathways courses (recommendation 13) and training (recommendation 23) will provide a benchmark for the first two KPIs above. It then follows ELT members will be able to have meaningful discussion regarding progress and the status of the contributing activities, especially where corrective actions are required to progress for KPIs.

To support meaningful discussion regarding the KPI focusing on flexible working arrangements KPI, SAPOL need to set an associated tangible and quantified target (or goal). This advice was provided by the EOC Monitoring team in Report 2 (September 2018).

EOC 2020 Recommendation

SAPOL set a tangible and quantified target/goal for the flexible working arrangements Key Performance Indicator that is sustainable for meeting service delivery requirement.

³⁸ South Australia Police (2019). *Project Equitas Closure Report: Recommendation 8*, (SAPOL: Adelaide, SA), p. 1.

While the inclusion of the gender equality priorities/strategic objectives and KPIs should help to ensure that there is a continued focus on gender equality, the results of the quarterly reviews of progress by the ELT could be better utilised to continue to inform and engage the broader SAPOL workforce about the progress being made and any areas of underperformance. This would help to counter the significant cynicism the EOC team encountered in its 2019 focus groups about leadership and accountability in this area – as well as the many concerns expressed about the lack of effective ongoing communication and engagement of the workforce on these issues. In doing so, the ELT could actively practice and demonstrate its accountability. This is discussed further in ‘Reporting on Gender Equality (refer to sub-section 3.3.5).

The EOC Monitoring team learnt that some SAPOL service areas have developed business plans at the service level that align with the corporate business plan. It was not explored by the EOC Monitoring team whether the associated senior leaders and managers of these services are practicing leadership and accountability by utilising the specific disaggregated data/information to engage their teams in relation to progress made and areas for improvements regarding gender equality in their service areas. If this is occurring, it would be an example of accountability and leadership being practiced.

The EOC Monitoring team noted that the deployment of Pulse surveys (recommendation 38) across SAPOL is quarterly and a summary of results for each survey is emailed across the organisation.³⁹ In addition, the quarterly results and findings (including themes from employee qualitative feedback) are provided to the SAPOL Executive Leadership Team (ELT). A number of the ELT members interviewed referred to this reporting mechanism as an opportunity to reflect, discuss any related up-coming activities and consider whether corrective action is required. While this reporting mechanism contributes to the ELT’s practice of accountability, it is not clear whether the ELT are then sharing the learnings from the reporting mechanism with their managers/supervisors. By doing so, the practice of accountability is spread across senior and middle management. Without this sharing of accountability SAPOL is not optimising valuable reinforcement, context and insights into impact that could be gained from the Pulse surveys.

3.3.3 Diversity and Inclusion Advisory Group

The Diversity and Inclusion Advisory Group (DIAG) was established with the intent to provide advice on SAPOL’s diversity and inclusion strategies, policies and communication to the Commissioner of Police, Project Equitas and the Human Resources Service. The DIAG comprises 5 female and 3 male members from SAPOL (the Assistant Commissioner of the Human Resources Service and the Manager of the Diversity and Inclusion Branch) and external organisations such as the university sector, private sector, community sector, government sector and Australian Refugee Association. These external representatives were chosen based on their knowledge, expertise, and ability to provide strategic advice across the areas of diversity and inclusion.

³⁹ The majority of focus group participants had not seen/read the Pulse Survey results summary reports.

The DIAG is mandated to ensure that the actions in the 2018-20 Diversity and Inclusion Strategy (and its action plans) are implemented. The Diversity and Inclusion Branch is responsible for the ongoing operation and monitoring of the DIAG, as well as providing executive management. The Branch will commence a review of the DIAG before June 2020. In addition, they will also undertake a review of the Strategy to inform its next iteration.

Since its establishment in January 2019 the DIAG has met five times (January, April and August in 2019, and February 2020). It provided advice on topics such as:

- The age inclusion action plan
- Gender targets and quotas
- Promoting flexible work
- A potential LGBTIQ+ staff survey
- A resource produced by the Diversity and Inclusion Branch on women only leadership development courses and information sessions.⁴⁰

3.3.4 Gender Equality Action Group

The purpose of the Gender Equality Action Group (GEAG) (linked to recommendation 11) is to provide initiative, input and assistance to internal SAPOL stakeholders, including Diversity and Inclusion Advisory Group, Human Resources Service and Chiefs for Gender Equity Implementation Leaders, with:

- The delivery of actions in the 2018-20 Gender Equality Action Plan (linked to recommendation 4);
- Modelling an inclusive approach by fostering a culture that values gender equality; and
- The representation of SAPOL in gender equality community events and initiatives.

Expressions of interest for membership of the GEAG were sought from all SAPOL employees in early 2019. A panel selected GEAG members based on the potential for their experience to assist SAPOL in implementing gender equality strategies and initiatives, and to ensure gender balance and representation across services. The Group held its first meeting in May 2019.

Administrative support for both the DIAG and the GEAG is provided by the Diversity and Inclusion Branch. The GEAG includes 7 female and 4 male members.

The GEAG held meetings in May and August 2019 and has provided advice and feedback to the D&I Branch in a number of areas, such as:

- The “Why Women Only?” resource
- Promoting Men’s Health Week
- The attendees’ selections process for Australasian Council for Women and Policing awards to ensure the focus of the awards was relevant for the selected attendees

⁴⁰ The ‘Why Women Only’ resource was made available to staff on 9 August 2019 and distributed to D&I Representatives in September 2019. It has been shared on recruiting pages by units when running recruitment drives, but there is no data on how much the resource has been viewed by staff.

- Promoting flexible work.

In addition, a subcommittee was formed to work on initiatives to commemorate the 125th anniversary of women's suffrage.

The feedback from GEAG has provided the D&I Branch with an opportunity to test and explore ideas and insight into the SAPOL workforce more broadly, due to the mix of genders, non-sworn/sworn personnel, metropolitan/regional members and the variety of skills and talents.

3.3.5 Reporting on Gender Equality

To date, SAPOL has not reported on the Diversity and Inclusion Strategy. Reports on aspects of the Gender Equality Action Plan (GEAP) have been provided to the ELT, for example

- Proportion of request for FWAs approved;
- % of employees on FWAs by gender and level;
- % of women participating in promotional training; developmental training; vocational training; and
- % of women selected for promotional positions.

Such snapshots have been available on the intranet page of the Diversity and Inclusion Branch since December 2018.

However, a comprehensive evaluation report on all the activity within the scope of both the Diversity and Inclusion Strategy and GEAP is critical to understanding their impacts. This should be undertaken immediately in order to guide future direction and activity (as both conclude at the end of 2020).

The lack of reporting on gender equality strategic objectives, KPIs (as raised earlier), the Gender Equality Action Plan or the Diversity and Inclusion Strategy, means that SAPOLs leadership team members are unable to hold themselves and their workforce accountable for progress and tangible outcomes on gender equality. They are also failing to demonstrate an important aspect of their leadership commitment to gender equality and limiting their capacity to continue to engage their workforce on this.

New strands of data collection and reporting need to be manageable and integrated into existing lines of business reporting. The need for an integrated reporting schedule was raised in the EOC's second monitoring report.

EOC 2020 Recommendation

It is crucial that SAPOL develop a data collection and reporting schedule that integrates all new reporting requirements arising from the EOC recommendations to ensure this is manageable and streamlined with existing reporting requirements, and can be consistently, effectively and regularly used to inform SAPOLs leadership about the impact of gender equality initiatives and culture change, as well as areas of concern. This information should also be used to regularly inform and engage the broader SAPOL workforce in the ongoing gender equality change process.

Figure 20. Change progress summary for leadership and accountability

<p>Ideal End Goal (from 2016 EOC Independent Review): SAPOL leaders have the necessary capability, confidence and commitment to build a gender-inclusive culture that is free from sexual harassment and sex discrimination and act as role models for gender equality and inclusion.</p> <p>In working towards this goal, the expected signs of success along the way are outlined below along with supporting key points.</p>		
Signs of Success	Key Points of Change Progressing	Key Points of Challenges for Change Progressing
Leadership communicates their commitment to gender equality regularly	The ELT have made their initial commitment to gender equality in SAPOL clear.	Lack of reporting on progress weakens the perception of commitment.
Leadership makes a visible effort to support, role model and progress gender equality	Half the workforce perceive that SAPOL leaders are role modelling the behaviour necessary to support a positive culture.	Half of the workforce is still uncertain about whether leaders are committed to supporting a positive culture at SAPOL.
Leadership holds themselves accountable for progress of gender equality objectives	Gender equality strategic objectives and KPIs set and incorporated into corporate business plan. Performance requirements set into executive agreements and monitored by the Commissioner. Gender Equality Action Plan established.	Reporting of progress is limited to the ELT. This impacts ability to demonstrate accountability and maintain engagement of workforce
Gender equality data is collected with progress reported and informs actions/strategies to improve/progress gender equality or target areas of concern	SAPOL currently collect data on flexible working arrangements and promotion/leadership and training, which will help them to identify and monitor these areas of concern.	It is uncertain how collection and analysis of gender equality data is used strategically at this stage.
Leadership engages the workforce on gender related development intervention/activities (two-way interaction)	Initial communication and engagement approaches attempted to engage the workforce across a range of gender-related developments.	Over time, there is little evidence that a variety of communication and engagement activities have been applied, allowing for two-way interaction, except when leadership has needed to address employee concerns about the impact of gender-related initiatives.
Strategies, policies and training and development and communications have a gender equality lens integrated	SAPOL have integrated gender equality into a number of policies. Training and development has focused on gender equality in both training the workforce to understand its importance, and in providing training and development to support female participation in SAPOL's workforce at all levels.	Communication strategies need to be reconsidered to ensure they engage all employees

Change Progress Summary

It is evident that SAPOL employees are aware of the initial commitment the ELT made to gender equality. The incorporation of gender equality objectives and KPIs for senior leaders has provides opportunities to practice and demonstrate accountability. Gender equality is being included in strategies, policies and training and development.

However there is significant scope for improvement. Many SAPOL staff remain uncertain about the commitment of their leaders in supporting positive cultural change, suggesting SAPOL leaders might need to reassess how they demonstrate their individual and collective commitment to this. Added to this is the need for SAPOL to focus on effective communication strategies that engage all employees. This may involve adapting and differentiating strategies that appeal to different audiences.

Importantly, although SAPOL has extensive data on gender equality, it is uncertain how much of this is collected or analysed strategically. A dedicated schedule for data collection, analysis and reporting would allow SAPOL to continue to identify, monitor and evaluate progress on gender equality into the future. Such a schedule could also be adapted to support SAPOL's broader diversity and inclusion objectives. The reporting of Gender Equality Action Plan, objectives and KPIs is limited to senior/executive leadership forums and thus there is an inability to hold leaders to account.

3.4 Workforce management

Summary from the 2016 EOC Independent Review

The 2016 EOC Review reported that SAPOL's total workforce was 32% female. In the administrative stream, female participation was skewed to lower-level administrative staff. In terms of sworn police, where women made up 27%, there had been a 4% increase in the preceding five years in female senior sworn personnel but only a 1% increase in total female sworn members over the same period. The pipeline for female participation in executive leadership was weak. With the exception of Chief Inspectors, Assistant Commissioners and Deputy Commissioner, women were under-represented in all ranks from Senior Constable First Class. Of particular concern were the ranks of Senior Sergeants, Inspectors, Superintendents and Chief Superintendents. In non-sworn roles, women made up 62% of staff. However they occupied a disproportionately high percentage (81%) of the lowest three levels. At senior administrative levels, non-sworn female personnel made up 38% of senior ASO level staff and 36% of management administrative service staff. In terms of protective security staff, 16% were female as at 30 June 2016. Although the percentage of women was seen to increase at higher classification levels, it should be noted that the low numbers of female protective security personnel meant this equated to only 2 female FTE staff.

The Review noted that part of the reason for the low level of female participation in higher ranks was unconscious bias across the organisation, with leaders unconsciously promoting those who fit into their stereotypical view of a manager.

It was also noted that sworn female employees leave the job earlier than sworn male employees (sworn employees are the largest cohort with SAPOL). The SAPOL workforce data from 30 June 2015 indicated that the average age at time of exiting for female sworn officers is lower than male sworn officers (44 years vs 52 years) with women having on average 10 years less service than their male counterparts (17 years vs 28 years). Given the promotional structure of SAPOL, having women leave the job earlier than men reduces the number of women reaching the higher ranks of the organisation. Further, given the training investment SAPOL makes in each of its employees, losing females early has financial implications.

It was recommended that SAPOL's performance management system be reviewed so that all staff had up-to-date performance management plans and quarterly meetings to discuss their performance and development (including health/well-being issues). It also identified that SAPOL needed contemporary human resources (HR) services in order to maximise the effectiveness of its workforce. Rather than services being transactional, they needed to move to a strategic approach, providing SAPOL with data on contemporary workforce planning and support for managing employees effectively. Importantly, assistance to manage poor behaviours was lacking and consideration was to be given to a HR business-partner model where HR experts are partnered with managers and provide coaching and hands-on support.

The EOC's 2020 Findings

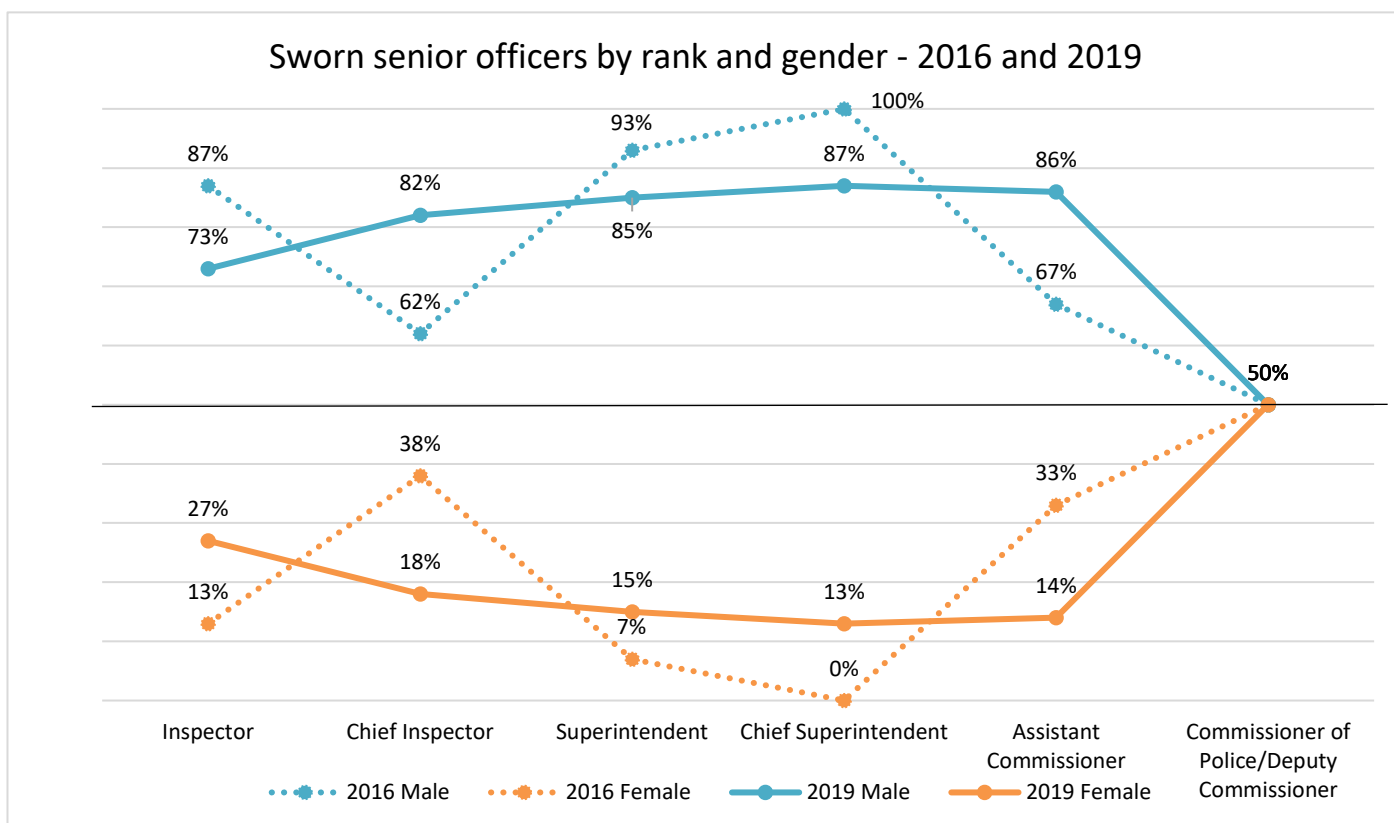
3.4.1 Workforce composition

The percentage of women in the overall SAPOL workforce has risen from 32% in 2016 to 37% in 2019. There has been a 4% increase in female sworn to 32% and female non-sworn personnel to 63%, and a 5% increase in protective personnel to 23%.

There have been increases in the proportion of female sworn personnel across a number of services including 72 (4%) in State Operations; 49 (4%) in Security and Emergency Management; 92 (6%) in Metropolitan Operations; and 54 (8%) in the Crime Service. However, the largest percentage increase has been the 59 female sworn members who have joined Human Resources between 2016 and 2019 (16%). The distribution of male and female non-sworn personnel has remained largely unchanged, with the exception of a 12% increase adding 22 female personnel in non-sworn Operations Support.

There have been increases in the proportion of women across most ranks of sworn personnel. Of particular note is an 18% increase in female constables, in line with the 50/50 recruitment target introduced in 2016.

Figure 21. Proportions of female and male sworn officers by rank



As shown in Figure 21, the narrowing of the gap between male and female sworn personnel at Inspector, Superintendent and Chief Superintendent ranks is a positive sign, particularly in terms of building a more gender-diverse executive leadership pipeline, which is key to sustaining gender equality for SAPOL. It should be noted however, that due to low numbers more generally in the higher ranks, the increase in female

personnel at some ranks has resulted in a substantial decrease in lower ranks, for example, an increase in female Superintendents has led to a decrease in female Chief Inspectors as they were promoted up the ranks.

As many of the 2019 EOC survey respondents noted, lack of gender diversity at senior levels perpetuates the idea that management opportunities are for male personnel.

“I sit at a weekly meeting with branch heads and it is a room full of men. Until there is a shift on who 'sits in the room' and ensuring there is a gendered balance across all management levels, then that change will be slower than anticipated or needed by our people. It also reinforces the messaging that senior managers are men and the opportunities are for men. This provides a disincentive for women to aspire to senior roles.”

Survey Respondent

Furthermore, several respondents argued that a greater proportion of female personnel at senior levels would assist SAPOL to address ongoing problems with sexual harassment and sex discrimination.

“My workplace still has a significant gender bias towards men. There are no female supervisors above the rank of B/Sgt within the area. Seeking to change this imbalance would significantly enhance the ability of SAPOL and managers to counter sexual harassment and discrimination.” **Survey Respondent**

In terms of non-sworn personnel below ASO6 level, the proportion of female public servants has dropped from 73% in 2016 to 65%, heading closer towards gender parity for administrative support positions at lower administrative levels. There has been a 9% increase in the proportion of women in senior public servant roles to 40%.

3.4.2 The 50/50 recruitment policy

Although the target for recruiting 50% women announced by Commissioner Stevens in December 2015 in order to make SA Police an “employer of choice” for women has increased the proportion of women at lower ranks, it has not been without challenges. The Commissioner himself noted in a video blog available to SAPOL employees that, while this was the right direction to take in policy terms, consultation with the workforce could have been better.

During the EOC’s 2019 consultation, it was noted that SAPOL is benefiting from the 50/50 recruitment policy as it is seeing more women in the pipeline for leadership. However, there remain significant reservations among SAPOL employees that were evident in feedback both the 2019 EOC Survey and in focus groups.

Although some survey respondents commented that there would be negative impacts on operational effectiveness, such as the belief that there would be fewer staff willing to work night shifts, most of the survey

respondents and focus group participants who had reservations about 50/50 recruitment were concerned that it was not based on merit.

“The only sex discrimination I have seen is in our recruiting process. When approximately 80% of applicants are male and we hire on a 50/50 basis then good men are missing out on jobs. No propaganda video is going to convince me otherwise... The lowering of fitness and other standards to allow female applicants to pass has also devalued all the successful female applicants who have gone before them.”

Survey respondent

While some of this negative feedback can be traced in part to a lack of communication and understanding (based on the feedback provided to us in the focus groups) it is also a fairly typical backlash response to culture change initiatives in relation to gender equality.⁴¹ This issue will be discussed further in Chapter 5.

3.4.3 Selections and promotions

The EOC's third monitoring report released in May 2019 noted that the implementation of recommendation 12, the review of standards for promotion, which involved a comprehensive review of the selections and promotions framework, was still a work in progress. The extensive nature of the work involved was noted as a potential challenge to SAPOL's achievement of this recommendation, particularly if workforce engagement with the implementation and roll out of changes was not maintained.⁴² At the time of writing, SAPOL are currently still working on recommendation 12 and the target for women participating in developmental pathway courses (recommendation 13) was just launched.

In terms of selections and promotions, the results of the July Pulse survey have not been particularly encouraging. Although 54% of women and 43% of men agreed that both men and women have equal opportunity for recruitment at SAPOL, only 31% of female respondents and 25% of men believed that recruitment and selection was based on competence to perform the job.

“I believe there is a culture emerging...where men are now becoming victims of sex discrimination as opposed to women. This seems to be growing within SAPOL. It is sold as equal opportunity but in my opinion has gone too far.... It is being given preferential treatment purely because you are a woman, not because you are the best person for the position...how is that not discrimination against men? I will absolutely not apply for a position when I hear it WILL BE 50/50 purely because I feel I may win that position over a man who has better skills than I do, but they 'must' appoint a woman ... I have been a member of SAPOL for 15years. I worked hard to get to where I am and achieve what I have. I feel that my

⁴¹ Chief Executive Women and Male Champions of Change, 2018, *Backlash & Buy-In*.

⁴² Equal Opportunity Commission of South Australia (2019). *Report 3: Progress in the implementation of recommendations and assessment of capacity and willingness to support cultural change* (EOC: Adelaide), p. 27.

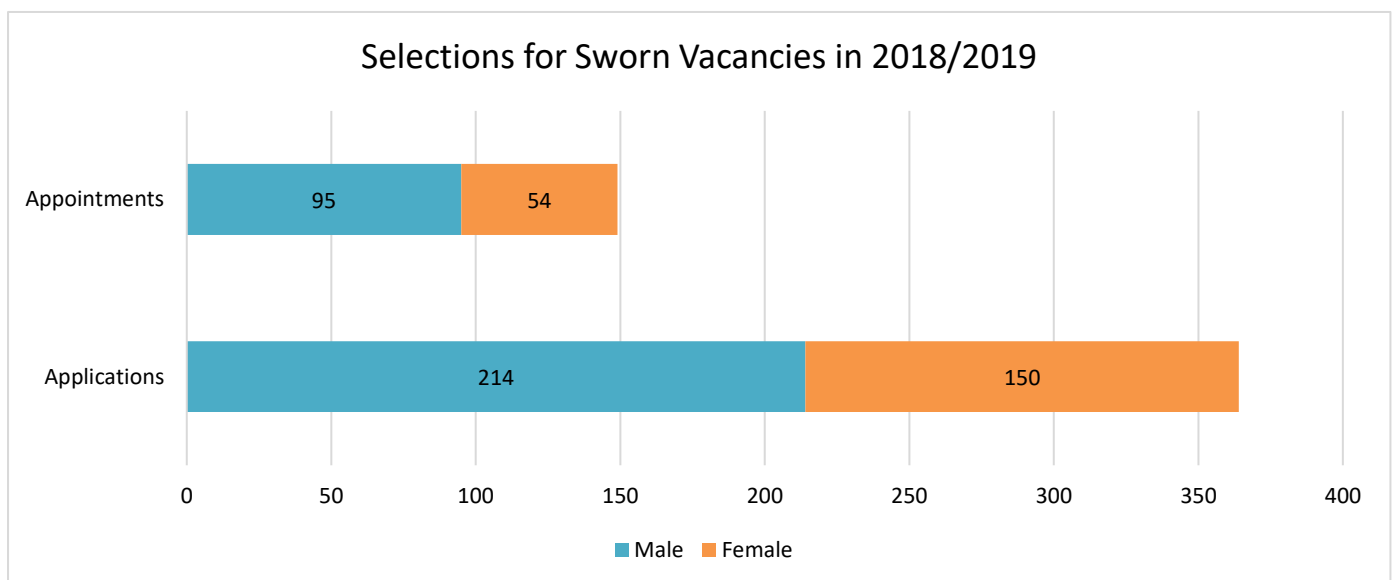
efforts are now viewed as less than what they are because people presume I have been given opportunities purely because of my gender, not because of the hard work I put in.” **Survey Respondent**

It was also concerning to see from survey respondents and hear from a number of focus group participants that managers often perpetuate this belief by stating that some personnel had been preferentially selected for promotional positions over “more appropriately qualified” members..

“Since the implementation of the 50/50, I have actively heard managers stating certain people had obtained promotional positions purely for their gender where more appropriately qualified members would have been selected.” **Survey Respondent.**

The ‘vagina vote’ was also discussed during a focus group. This derogatory term is frequently used when a woman has been promoted in SAPOL, particularly to a senior rank. This misconception was addressed in the *Gender Parity – Dispelling the Misconceptions* video produced by Project Equitas. However, the views continue to be prevalent and SAPOL will need to be vigilant in addressing them. SAPOL’s data does not support the perception that women are being unfairly advantaged in the selection process. 214 men and 150 women applied for the 257 vacancies advertised during the 2018/2019 year. Of the 149 appointments, 64% (95) were men and 36% (54) women (see Figure 22). However, it is important to note that no men applied in 46% (24) of the positions to which women were appointed.

Figure 22. Applications and appointments to sworn vacancies in 2018/2019



A frequent suggestion from 2019 EOC survey respondents was the use of a blind recruitment process to remove any perceived bias from the selection process. SAPOL was advised by the EOC to trial the approach (recommendation 12(d) of the 2016 EOC Review). A discussion paper exploring the viability of a blind recruitment and selections process was presented to the ELT on 29 March 2018. It was decided not to apply

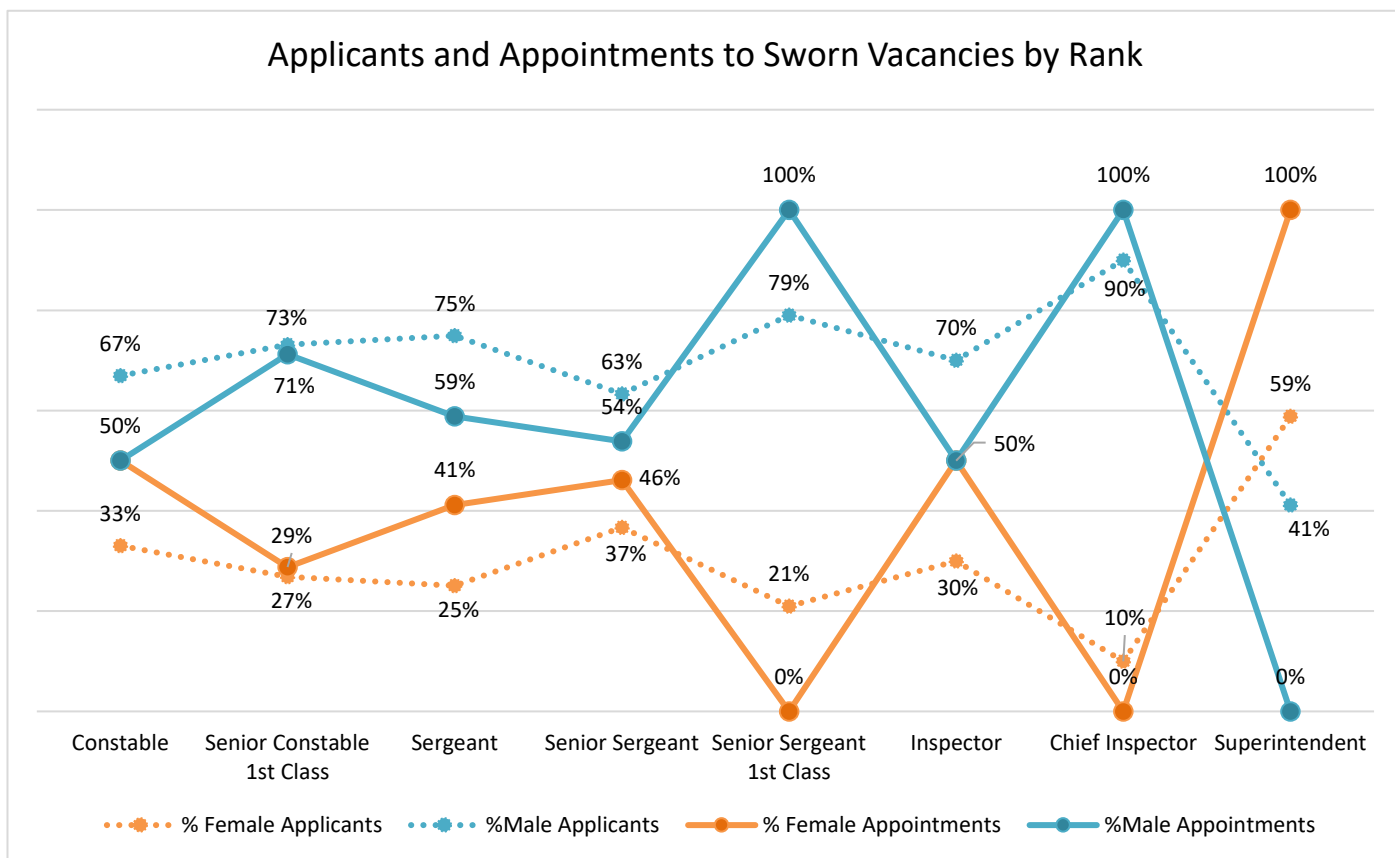
blind recruitment as research indicated that with an emphasis on behavioural requirements in applications, as is the case in the policing sector, it is not always possible to de-identify applicants. In addition, the research revealed that it is more beneficial to concentrate on removing bias from recruitment processes, such as the composition and running of selection panels, which was an area that Project Equitas was working on (e.g. reviewing the standard for promotions (recommendation 12)).

EOC 2020 Recommendation

SAPOL continuously address employee misconceptions and discontent regarding the fairness of selections and promotions, including communicating the benefits of up-coming changes to selections and promotions processes (e.g. addressing unconscious bias, inconsistent decision-making, favouring friends).

Promotion and selection play an important role in building and maintaining a gender diverse leadership pipeline. Figure 23 demonstrates that the appointments for some ranks is at, or approaching, gender parity. This is more so at lower ranks at this stage. However, assuming female Constables and Sergeants are able to progress through the ranks without any significant barriers to promotion in the future, the situation in more senior ranks should reflect better gender diversity over the longer term.

Figure 23. Applications and appointments for 2018/2019 sworn vacancies by rank



The likely influence of unconscious bias on the under-representation of women across most ranks in SAPOL was noted in the 2016 EOC Review. In response, Project Equitas developed a video (which contributed to recommendation 12 and 21) addressing the different types of unconscious bias, and encouraged viewers to actively reflect on the ways in which unconscious bias might influence their perceptions of, and interactions with, others. Ninety-eight percent of SAPOL members have viewed the unconscious bias video. However no feedback evaluating its impact was collected.

A number of respondents to the EOCs 2019 survey, as well as some focus group participants, raised concerns that there continue to be employees promoted despite having been known to behave inappropriately. The EOC's 2016 Review recommended that applicants for Officer level and above have their performance reviewed for complaints (recommendation 12(c)).

In August 2019 Project Equitas developed a concept paper on merit pool selection to address perceptions of bias, cronyism and inconsistency in the selections process and to ensure that selection criteria for positions are related to the actual capabilities required for performing a role (recommendation 12 (d)). The proposed model would result in applicants for vacancies at rank/specialists positions being assessed by a selection advisory committee made up of employees not linked to the vacancies. Those applicants who are successful will be ranked in order of merit and placed in a merit pool for up to 12 months. The aim of merit pool selections is to reduce inconsistency of decision making, selection advisory committee workload, and to improve the efficiency and transparency of the selection process.⁴³ Consultation was undertaken with SAPOL employees and the Police Association of South Australia (PASA) – employees were supportive and PASA provided 'in-principle' support subject to regulatory changes.

Prior to implementation of this approved model for merit pool selections the *Police Regulations 2014* will need amending to accommodate merit pools. Project Equitas and SAPOL's Legislative Review Section is currently working with the Office of the Parliamentary Counsel to amend the *Police Regulations 2014*. Following the drafting of the regulations there will be further consultation with employees and PASA. The final step will then be having the drafted regulations passed through Cabinet. The new merit pool selection process is expected to be functional by the end of 2020. Communications and engagement activities (for example email notifications and face-to-face forums) will support the roll out of the new process.

3.4.4 Developing leadership skills

SAPOL has implemented mentoring (linked to recommendation 14) and leadership shadow programs (recommendation 5) to support the development of supervisors/managers. These programs are aiming to build leadership capability and confidence.

⁴³ South Australia Police (2019), *Recommendation 12d – Proposed Merit Pool Selection Concept Paper*, SAPOL: Adelaide, SA, p. 7.

The pilot of the SAPOL mentoring program was launched in July 2019, has 25 female and 19 male participants and will run for 12 months. The pilot program is considered a personal and professional development opportunity. The objectives of the pilot program are:

- Support employees in their self-development
- Strengthen relationships, developing and building networks
- Develop individuals and improve their performance and effectiveness in the workplace
- Strengthen inter-agency relationships
- Improve communication and interpersonal skills
- Provide a sustainable support mechanism for employees
- Support and guidance for professional development activities

The pilot program was initiated with an introduction day for the selected mentors and mentees which provided an overview of the program and roles and responsibilities within the mentoring relationship, this included the mentees and mentors making a commitment to each other about the way and how often they communicate. It has also been supported by a number of resources such as a set of “FAQs”, Handbook, Midway Self Development Plan and Self Development Plan.

The EOC Monitoring team learnt from Project Equitas that the program is informally receiving positive feedback from participants. The participating mentors and mentees convened in January 2020 (the midway point for the pilot program) to provide an opportunity for networking, broader discussions around others experiences and ways of working and how participants are benefiting from the mentoring relationship. In mid-2020 SAPOL will be seeking feedback from the participants to inform an evaluation of the program against its objectives to decide whether it will continue.

The leadership shadow program was delivered over 9 sessions towards the end of 2017 for sworn and non-sworn personnel, with 46 female and 146 male participants. The leadership shadow program aims to help participants understand gender equality issues and how what they say, what they do, what they prioritise and what they measure are critical for them to be positive role models. Key principles of the leadership shadow program is now incorporated into internal training courses for supervisors/managers.

The talent identification program (recommendation 14) is under development and is due to be rolled out by June 2020. This program will be aiming to ready employees for promotion/career development and will be linked to the iEngage performance management system (recommendation 18).

While these activities link with training and development, they have been presented in this ‘Workforce management’ section, as they contribute to the Ideal End Goal developed by the EOC in the 2016 Review - in particular ‘developing the best people’.

3.4.5 Examples of removing barriers in specialist areas

To date, the SAPOL STAR Operations Section has only had one female tactical operator. In 2017/18 SAPOL implemented a mentoring-type program for women interested in STAR Operations, with the aim of increasing

the participation of women in the selection process. Five women attended the 2018 STAR Operations information seminars, which was an improvement from nil in the previous ten years. One woman applied for selection and participated in phase 1 of the pre-selection course which she passed, however she was not successful in progressing onto phase 2. The mentoring-type program is ongoing.

SAPOL has initiated work with the purpose of removing barriers and bias, and raising interest to encourage applications and selection of women in STAR Operations and considers it a work in progress for SAPOL.

Early in 2019, the formation of a new Security Response Section (SRS) was announced. This section is trained to a higher level than operational police officers involved in general duties, however the training is not to the same level as STAR Operations. During the development of the internal recruitment and assessment process, a commitment was made to set fitness and physical capabilities at a level that was both fit for purpose and to encourage women. This encouragement took the form of promoting the role using appropriate language and imagery. This commitment and approach is an excellent example of SAPOL practicing an element adaptive cultural change, in particular active experimentation, which is helpful in managing risk and uncertainty and learning to modify future options.

Following the application stage, successful applicants undertake a two week training course. The target was for the course to comprise 31% women, reflecting the proportion of women in the SRS targeted rank/s of Constable and Senior Constable within SAPOL – the course comprised 20% women.

3.4.6 Effective people management

The relationship between SAPOL employees and their supervisors and managers was explored in the SAPOL Pulse Surveys. In the March 2019 Pulse Survey, Two-thirds of employees (62%) agreed that they received positive and constructive feedback on their performance, which was also consistent across all of the Pulse surveys conducted in 2018. In July 2019, 63% agreed that their manager recognised and acknowledged when they had done their job well. A lower number (55%) in the same survey said they had regular feedback conversations with their managers. Nevertheless, In July 2019, SAPOL employees were generally positive about their ability to communicate their concerns with their supervisor/manager (77%), and the respect with which they were treated by their managers (81%, compared to 72% in the South Australian Public Service).⁴⁴

The EOC Monitoring team's third audit report, which focused on the capacity and willingness to support cultural change, along with the results of the recent SAPOL Pulse surveys, indicate a gap between the confidence of supervisors/managers and the perceptions of team members. In the third EOC audit report, 98% of supervisors and managers surveyed said they were confident to address poor performance, and believed that calling out inappropriate behaviour and supporting others to do the same was part of their role. However, the confidence of SAPOL employees about the ability of managers and supervisors to manage

⁴⁴ Government of South Australia (2018). "I Work for SA – Your Voice Survey: South Australian Government Highlights Report," <https://publicsector.sa.gov.au/about/office-for-the-public-sector/iworkforsa-yourvoicesurvey/>, accessed 09/10/2019, p.10.

inappropriate behaviour was lower. Across the 4 Pulse surveys conducted from March 2018 to March 2019, an average of 62% of respondents agreed that their supervisor/manager held team members accountable for their performance, and in the EOC 2019 survey, 690 (67%) respondents agreed that their manager promoted the importance of appropriate behaviour within the team.

However, the results of the 2019 EOC survey suggest that when it came to challenging inappropriate behaviour of personnel at more senior levels, employee confidence in their managers and supervisors was lower. Five hundred and thirty-two (52%) of survey respondents believed that their manager promoted the importance of challenging peers or those of more senior rank about inappropriate behaviour, while 182 (18%) disagreed. A similar pattern was evident in terms of leading by example with 524 (51%) agreeing that their supervisor/manager challenged inappropriate behaviour regardless of gender or rank/level, while 195 (19%) of respondents disagreed. This gap between addressing inappropriate behaviour within teams and with personnel at senior levels highlights a need for more support for supervisors/managers to develop their knowledge/skills/confidence and effective action.

'Difficult Conversations' training was one component in the rolling training plan that SAPOL instituted in response to recommendation 22 to develop people management within the organisation. It aimed to provide supervisors with an understanding of the importance of managing poor behaviour, and guidelines to support supervisors to do so, including preparing for, and documenting of, difficult conversations, as well as a step-by-step guide for managing the conversation. The 'Difficult Conversations' training was delivered to supervisors and managers in conjunction with the iEngage training for SAPOL's new performance management system from June to the end of September 2019. It is thus unlikely that the impact of the training was reflected in the 2019 EOC Survey. This training has been included in the Sergeant, Senior Sergeant and Long Term Absence courses to capture those who were on extended leave/absence or have become a supervisor after the training block of June to September 2019.

A factsheet on preventing and managing conflict developed by the Diversity and Inclusion Branch was also made available to all SAPOL employees on 17 July 2018, to coincide with the launch of the D&I Branch. However, this training does not directly address scenarios where the inappropriate behaviour is perpetrated by someone of a senior rank or level. SAPOL may therefore find it useful to provide more specific support for all employees, any of whom may find themselves in such a situation.

EOC 2020 Recommendation

SAPOL continue to develop and monitor the knowledge, skills and confidence of their staff (particularly supervisors/managers) through training, mentoring and coaching, to actively challenge inappropriate behaviour regardless of the rank or level of the perpetrator of such behaviour.

An external review of the services provided by Human Resources Management Branch (HRMB) (recommendation 16) was completed in 2018 and SAPOL are implementing the recommendations. There is potential that this will provide additional support for supervisors/managers through upskilling, HRMB staff

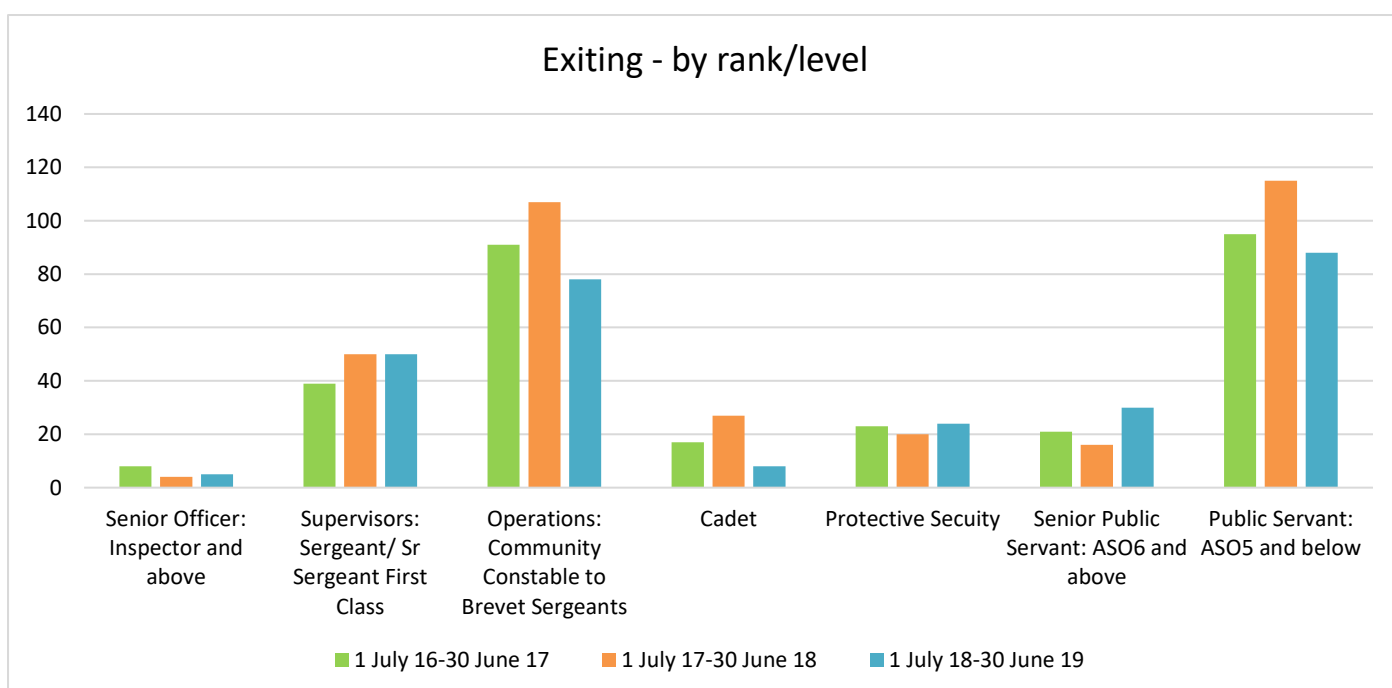
upskilling, additional HR specialist capability and implementing a HR Business Partner model to improve engagement and internal customer service. A key direction that HRMB is working towards is changing its mix of sworn and non-sworn personnel. This change is designed to introduce the required specialist HR expertise into SAPOL, ensuring a foundational aspect of the right person is in the right role with the right skills. HRMB is aiming to have completed the recommendations by the end of June 2020.

SAPOL has recently (November 2019) launched new staff performance and development system (iEngage) which incorporates a prompt to discuss well-being and welfare with the intent of starting an ongoing conversation and normalising the topic. While it was not a dominant theme from the 2019 EOC survey and focus groups, a number of respondents raised concerns about supervisors and managers capacity for genuine care for the welfare of staff. This is an area that SAPOL needs to monitor and evaluate for iEngage to inform system effectiveness.

3.4.7 Employee exit management

Since the 2016 Review, the majority of exiting sworn employees have been at operations level (below the rank of sergeant) or non-sworn public servants (at ASO5 level or below) (see Figure 24). However the number of public servants at ASO6 and above and sworn supervisors exiting SAPOL has risen since then, while the number of cadets exiting has dropped significantly. The EOC has been unable to identify reasons underlying this change. For the most part, employees leave before 5 years or after 30 years of service. Almost half (47%) of those exiting since the 2016 Review, have been in the 55 to 64 year age bracket. The EOC requested exit data broken down by gender but, as this was not forthcoming by the time of writing this report, the EOC has been unable to make any more detailed comparisons with the 2016 Review.

Figure 24. Employees exiting SAPOL (July 2016 – end June 2019)



The retention of high performing employees, as well as skills, experience and corporate knowledge were key foci of SAPOL's revision of its exit management strategy. To address the 2016 Review recommendation 20, Project Equitas developed and implemented a formal exit management strategy, which they communicated to the SAPOL workforce in July of 2018 (via email to all staff as well as issuing a notice in the July edition of the Police Gazette). The new strategy includes SAPOL's revised *Advice of Separation* form (PD89), which asks if separating employees have explored a number of alternatives to separation that might eliminate their need to leave the organisation.⁴⁵ These include, but are not limited to alternative duties, lateral transfer, secondment, project work, multi-skilling/rotating in positions within units, leave without pay, and flexible working arrangements, including part-time employment. Exiting employees are also reminded about their ability to access the Employee Assistance Program provided by Converge International. In the event that employees choose to continue with the exit process, they are to be informed about SAPOL's re-employment policy by their manager.⁴⁶ The new exit management strategy also includes the option for the separating employee to participate in a confidential online survey about their reasons for leaving, as well as the option for a face-to-face exit interview. Employee exits is an area that will require ongoing monitoring and evaluation to ensure the new exit management strategy is effective.

The new exit survey covers a host of possible reasons for leaving SAPOL, including personal reasons, the pursuit of new career opportunities, relationships within SAPOL teams, the working environment, and satisfaction with the job, workforce, leadership, and training and development opportunities. Each of these categories is further broken down in order to gain a better understanding of the role in which the poor management or other aspects of the workplace culture in SAPOL may have played in the decision of an employee to leave the organisation. Information regarding an option to contact the EOC about their experiences and reasons for leaving SAPOL was also included in the exit survey from October 2018.

In 2016/17, the most significant reason for employees exiting SAPOL (61%) was the pursuit of a different career path, while retirement accounted for 24% of exiting employees. In 2018/2019, retirement had risen to account for 39% of employees leaving SAPOL, while the pursuit of a different career had dropped to 14%.

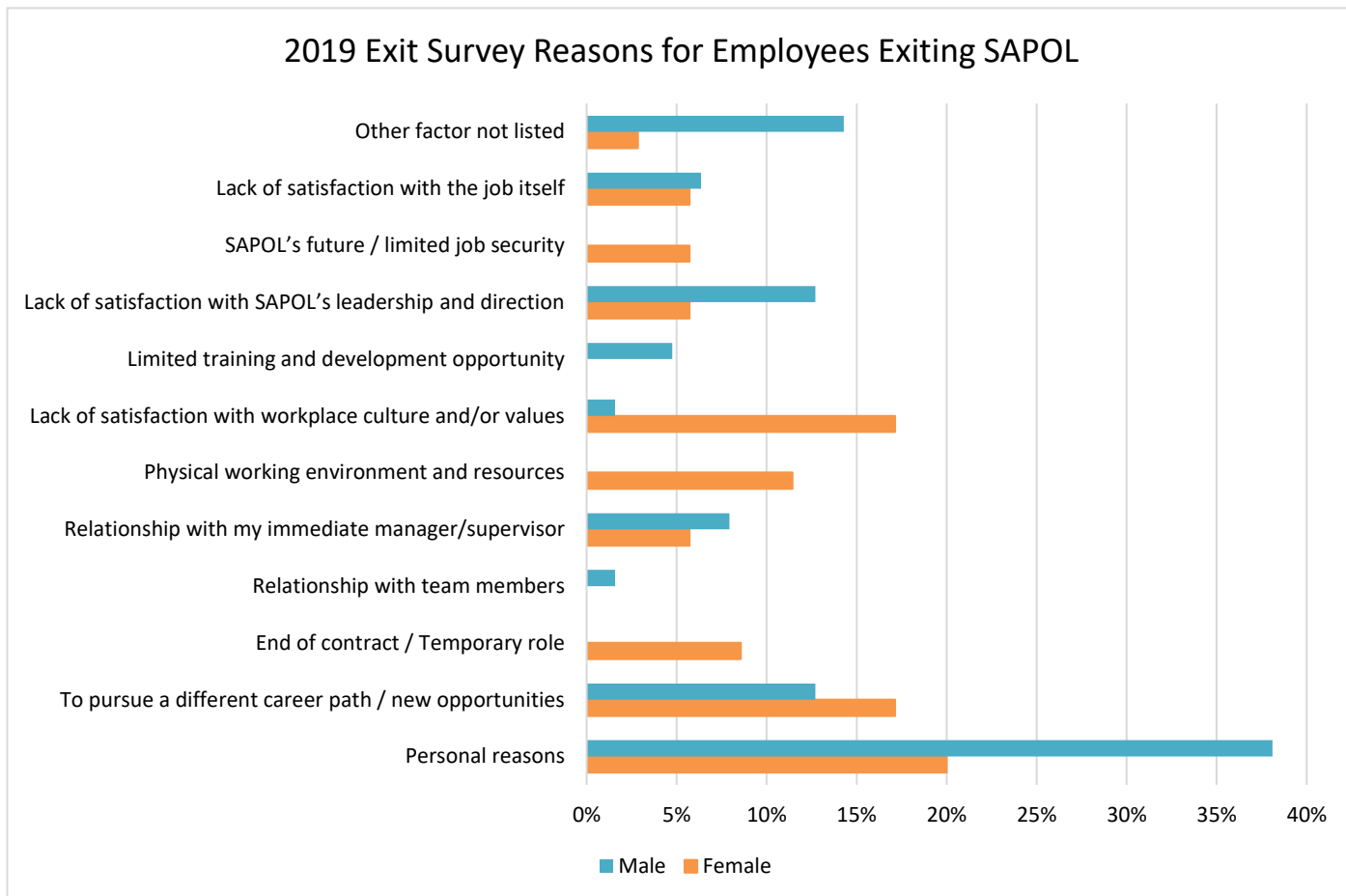
The online exit survey was launched in March 2019, and so for the period between April and September 2019 the EOC was also able to examine differences between reasons for leaving given by male and female personnel. Thirty-one (58%) survey respondents for this six-month period cited personal reasons for leaving SAPOL (Figure 25). However, there was a significant difference between men and women, 38% of male respondents compared with 20% of female respondents. "Personal reasons" for men were predominantly related to retirement and, to a lesser extent, health reasons. For women "personal reasons" were spread evenly across change in residence/job relocation, health and retirement. However, in terms of evaluating SAPOL's workforce management, it is also important to understand attrition patterns among the remaining survey respondents. While pursuit of a different career or new opportunities was a factor for 8 male and 6 females respondents, it should be noted that lack of satisfaction with SAPOL's leadership and direction and relationships with managers/supervisors continued to play a role in reasons for employees leaving SAPOL

⁴⁵ South Australia Police (2019), *Advice of Separation from South Australia Police (PD89)*, SAPOL: Adelaide, SA, p.1.

⁴⁶ South Australia Police (2019), *Advice of Separation*, p. 3.

in the period from April – September of 2019. Also of concern is the disproportionately high number of female respondents (6 female respondents compared with 1 male respondent) who cited a lack of satisfaction with SAPOL’s culture and values as a contributing factor in leaving the organisation in 2019. SAPOL must analyse all reasons for exits, along with the associated contributing factors, in detail to fully understand the reasons for employees leaving.

Figure 25. Reasons for employees exiting SAPOL in provided in the new exit survey April – September 2019



The option to contact the EOC provided through the exit survey was used by five employees. For two employees a factor contributing to them initiating the exit process was the lack of flexibility in their role to meet work-life requirements. For another other employee who initiated the exit process, it appeared to be under involuntary separation conditions and the employee considered themselves to have experienced discrimination. The EOC communicated to the employee that they could lodge a formal complaint with the EOC for investigation. The fourth employee exited because of a lack of satisfaction with workforce diversity, inclusion or equal opportunities, and alleged that they had experienced disability discrimination, poor management and bullying in SAPOL. The fifth employee lacked satisfaction with their job with limited promotion/advancement opportunities and not being able to use their skills, abilities and/or talents to their full potential contributing to this dissatisfaction.

Two of the exiting employees who contacted the EOC reported that the new exit management strategy (recommendation 20) had not been applied properly. In one case, the HR personnel involved in managing

the separation, thought that the process of the exiting employee returning equipment to SAPOL (formerly referred to as PD569 Employee Separation Checklist) amounted to the requested face-to-face exit interview (which is not the case). Correspondence to the exiting staff member from the HR personnel when this error was discovered was unapologetic and unsympathetic. In the second case, the employee requested an exit interview with a HR representative but instead, their manager conducted the exit interview without any apparent understanding of what to do. These experiences highlight the need for SAPOL to review its exit management strategy to ensure all HR personnel and managers are properly trained in delivering the strategy and that it is being applied consistently. As there are components of the strategy that are conducted face-to-face, it is critical that HR personnel involved in these components are highly competent.

EOC 2020 Recommendation

SAPOL keep track of reasons (and associated contributing factors) for employee exit to assess the impact of cultural change initiatives and to address any significant and ongoing problems with workplace culture.

SAPOL review the administration of its exit management strategy, giving consideration to:

- The adequacy of training for HR personnel and managers in administering the strategy;
- The level/status of completion of the training by HR personnel and managers; and
- The consistency of the administration of the exit management strategy by the Human Resources Service.

3.4.8 Update on the interim Enterprise Bargaining Agreement

An interim enterprise bargaining agreement was negotiated by the Police Association of South Australia and representatives for the Department of Treasury and Finance Chief Executive in October 2019. The agreement includes a number of reforms that will affect workforce management, such as:

- The recruitment of non-sworn legal practitioners into Prosecution if the role cannot be filled by a sworn officer;
- The recruitment of civilian personnel as triple-zero call operators;
- Transitioning sworn cell-guard positions to non-sworn positions;
- The creation and implementation of part-time specific sworn positions and roles;
- The ability of sworn members to access ad-hoc shifts across districts and functions on a voluntary basis;
- The development of further opportunities for flexible rostering.⁴⁷

These reforms have potential flow-on effects for working flexibly in SAPOL, which is discussed in section 3.6.

⁴⁷ Police Association of South Australia (2019), *Police Journal (October 2019)*, PASA: Adelaide, SA, p10

Figure 26. Change progress summary for workforce management

<p>Ideal End Goal (from 2016 EOC Independent Review): SAPOL is an employer of choice, with the best people recruited, developed, promoted and retained at all levels.</p> <p>As working towards this goal, the expected signs of success along the way are outlined below along with supporting key points.</p>		
Signs of Success	Key Points of Change Progressing	Key Points of Challenges for Change Progressing
Gender balance at leadership levels	Increase in the proportion of women at the ranks of Inspector and Superintendent.	Decrease in the proportion of women at the ranks of Chief Inspector and Assistant Commissioner
Pipeline to leadership is gender diverse	Pipeline is building from Constable rank with 50/50 recruitment, and evident at some upper ranks. Increased percentage of women at senior non-sworn levels.	Risks to sustaining a gender diverse pipeline include backlash and misconceptions around the promotion of women. In addition, if positive cultural change is not maintained, there is a risk of attrition of female personnel at senior levels.
Structural barriers to equitable career progression are removed (e.g. role capability statements, biased recruitment/promotion processes, equipment)	Revision of role capability statements in line with actual position requirements is in progress. Education around “unconscious bias” in selections.	See comments above. Also relevant here.
Gender equality principles are integrated into strategic workforce planning (talent attraction, development and retention)	Talent ID and Stay in Touch programs under development.	
Active, current and productive performance management discussions and plans which include career development/progression and health and well-being of employees	Employee development and well-being incorporated into iEngage performance management system recently implemented.	Effectiveness of iEngage will depend on managers/supervisors using it as intended. SAPOL will monitor in the early stages of adoption.
Leadership (supervisors and upwards) trained in managing and mitigating unconscious bias (linked to Leadership and accountability)	Unconscious bias video focused on selections has been made available to all employees and had been viewed by 98% of SAPOL members.	Possible risks include lack of staff engagement with the unconscious bias video
Higher levels of employee retention	Numbers of Cadets exiting SAPOL have dropped significantly	Overall, number of exiting employees remain the same.
Contemporary workforce planning – SAPOL planning and managing for current and future workforce	Incorporated into implementation plan for HRMB review recommendations – SAPOL is taking action	An area for SAPOL to monitor and evaluate
People management expertise in management and HR	HR aspect incorporated into implementation plan for HRMB	An area for SAPOL to monitor and evaluate

	review recommendations – SAPOL is taking action. Training has been provided to enhance expertise in the management level.	
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Change Progress Summary

There have been a number of positive developments in SAPOL’s workforce management in terms of gender equality. In particular, the attempts at achieving gender balance at all levels and a gender diverse leadership pipeline show significant progress at some ranks. However, in some cases, this has adversely affected the proportion of women at other ranks. Work has also been done to mitigate unconscious bias in selections, and role capability statements and entry requirements are being revised in line with the requirements of positions. Monitoring in the early stages of implementation of these changes will help to consolidate and normalise positive change. SAPOL’s new exit management strategy has a greater focus on retention and, with ongoing monitoring of exits under the new process, will allow SAPOL to track trends and to identify and address any issues of concern. Unfortunately, the undertaking of this tracking exercise does not appear to be done currently.

Performance management remains a key challenge. The recent introduction of the iEngage system, with its focus on employee development and well-being is a positive step. However, its usefulness will depend largely on managers and supervisors using the system effectively, and it should be noted that issues such as the unwillingness to address problematic behaviours will not be resolved by the new recording system alone. SAPOL is aware of this and will monitor the use of iEngage in the early stages of adoption.

3.5 Training and development

Summary from the 2016 EOC Independent Review

The 2016 EOC Review found inequality in the training and development opportunities offered to women and men in SAPOL. In the preceding 12 months, 71% of male survey respondents reported participation in training programs and development opportunities compared to 64% of female respondents.

The Review noted that the training offered needed to better address the skill gaps that exist in SAPOL, particularly in people management. It also needed to be better designed and delivered so it was more accessible to those juggling families, working flexibly and living in rural areas.

Training on sex discrimination, sexual harassment and what constitutes acceptable behaviour was identified as a foundation for changing attitudes and behaviours of staff.

The EOC's 2020 Findings

3.5.1 Diversity and inclusion training

In response to Recommendation 21, SAPOL developed two online courses on sex discrimination and sexual harassment, entitled Diversity and Inclusion for Employees, and Diversity and Inclusion for Managers and Supervisors. The courses include information about the difference between bullying and ordinary conflict, and the behaviours that constitute discrimination, harassment, sexual harassment and victimisation. They were also expanded to include recognising unconscious bias and the responsibilities of bystanders. The Managers and Supervisors course also covers managerial responsibilities for providing a workplace free of bullying, harassment and discrimination, SAPOL's legal liability, assessing and differentiating between inappropriate behaviours and resolution options, and interpreting grievance management procedures. There is no formal assessment for the employee training, however there is an online self-assessment for the managers and supervisors course. Most participants in the managers and supervisors online training who completed a self-assessment had confidence in their understanding of the topics covered (85%) and in their ability to apply the information they had gained from the training (93%). These courses were rolled out in July 2017 and are to be completed every two years. As of June 2019, 95% had completed this training. The remaining 5% mainly comprises new employees and employees on extended leave.

Project Equitas is nearing the completion of creating a training plan to cover developing people and performance management among SAPOL personnel (recommendation 22). Included in this plan is Respectful Behaviours training, which was delivered face-to-face in an initial training window from April to June 2019. In addition to helping SAPOL employees understand appropriate behaviour in line with SAPOL's "Respectful Workplace Behaviours Guidelines", the training covered employee rights and responsibilities with regard to bullying, harassment and discrimination. To develop participant understanding, Respectful Behaviours training encouraged self-reflection and a focus on the consequences of disrespectful behaviour, bullying, harassment and discrimination on individuals, workplaces and the organisation. With the initial training delivered from April to June 2019 and subsequent catch-up training sessions delivered up until end

of January 2020, SAPOL have trained 4,804 employees from a target cohort of 5,915 (approximately 80% completion rate). This training will be repeated every three years.

As has been noted in section 4.1 Workplace Culture, it is encouraging that the Pulse survey conducted in July 2019, showed a 10% increase (compared with the Pulse survey conducted in March 2019) in SAPOL employees agreeing that those in their workplace treat each other with respect. This result aligns with the findings of the 2018 'I Work for SA' survey (conducted by the Office for the Commissioner of Public Sector Employment), which found that 77% of SAPOL respondents agreed that people in their workgroup treat each other with respect.⁴⁸ SAPOL's result was five percent higher than the result for the SA public sector overall.

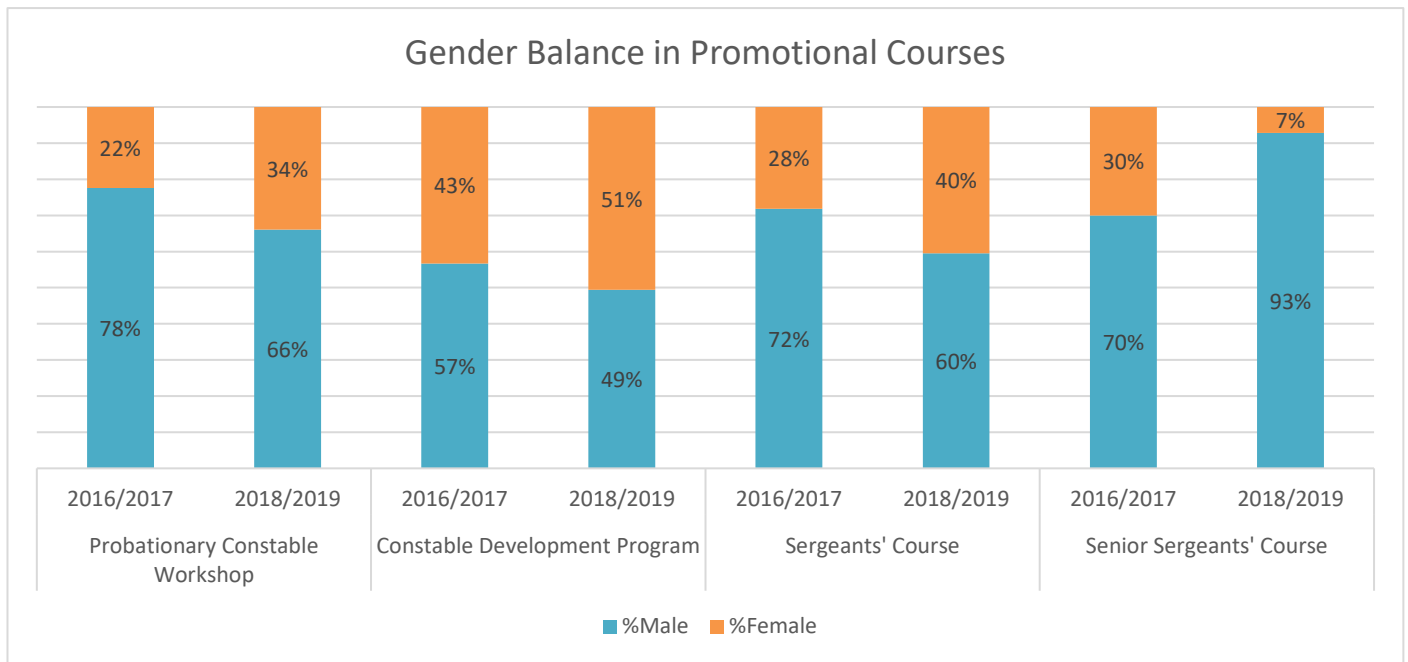
3.5.2 Professional training and development

To investigate equality in training and development opportunities accessed by women and men in SAPOL, the EOC Monitoring team used the SAPOL Promotional and Development Framework, which has a focus on sworn employees and the promotional component of their career pathway. At the time of writing, the developmental pathways for non-sworn employees were far less structured. However, the iEngage performance management system and the Talent Identification program, currently under development, will potentially improve professional training and development support for non-sworn employees.

The data showed an increase in the proportion of female personnel applying, being accepted into, and completing promotional courses at a number of levels. The proportion of women in the Probationary Constable Development Workshop had risen from 22 (22%) in 2016/2017 to 144 (34%) in 2018/2019, with the proportion of women in the Constable Development Program increasing from 68 (43%) to 92 (51%) in the same period (Figure 27). Although these increases are likely to have been influenced by the 50/50 recruitment policy adopted in 2016, the trend continued in the Sergeants Course, rising from 11 (28%) to 17 (40%) women. However, there was a very substantial drop in female applicants for the Senior Sergeants course in 2018/2019 (1 (7%) compared to 7 (39%) in the previous year). There was no information available suggesting the reasons for this change, and the small number of total participants (10 in 2016/2017 and 14 in 2018/2019) makes it difficult to draw any conclusions about this.

⁴⁸ Government of South Australia (2018). "I Work for SA – Your Voice Survey: SAPOL Results - A Snapshot," p. 3.

Figure 27. Male and female participation in promotional courses in 2016 and 2019

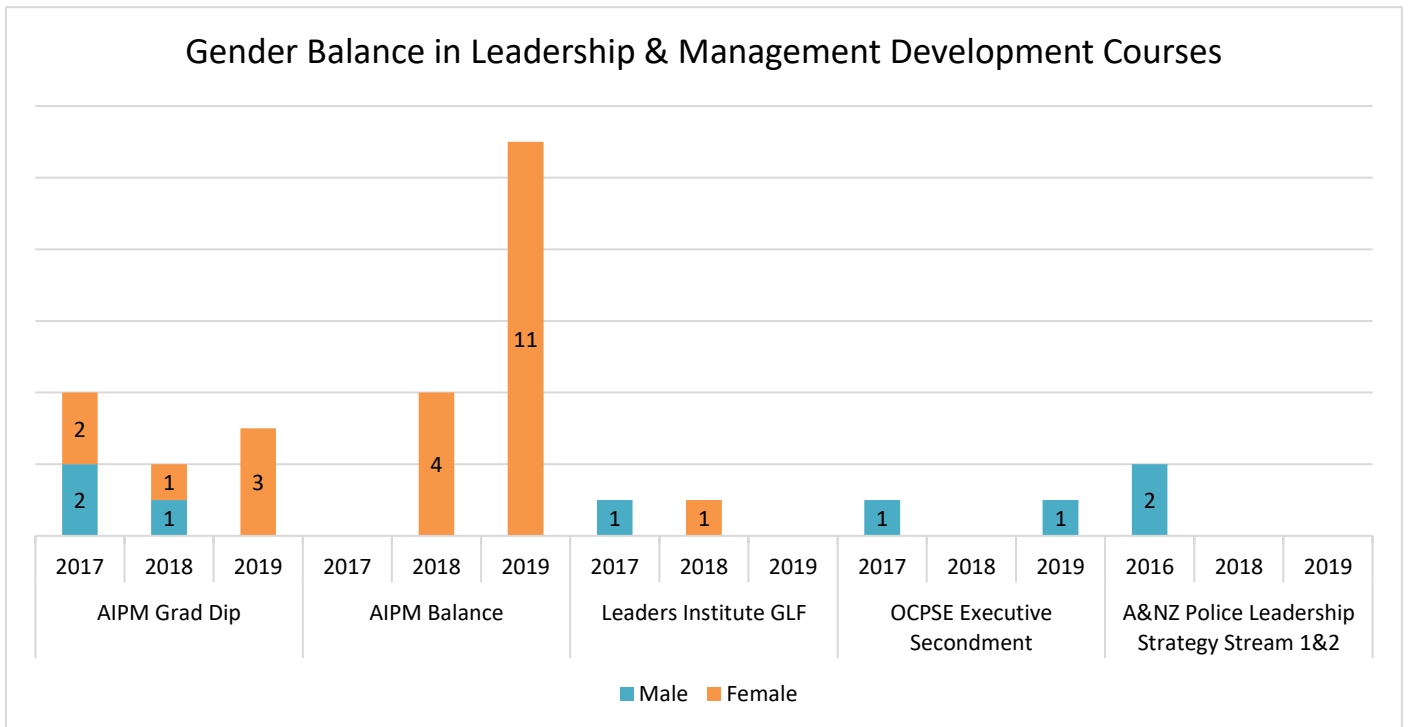


The Inspector Qualification Program has also seen a fluctuation in the proportion of female applicants from 2016 to 2019 and, again, low overall numbers make it difficult to draw general conclusions about these fluctuations. However, in 2016/2017 the proportion of female applicants accepted into the Inspector Qualification Program was higher than the proportion who had applied, with 9 (24%) applicants being female compared to 4 (40%) course participants. In 2018/2019, 15 women made up 32% of applicants and 12 women accounted for 29% of participants. These proportions have not changed significantly since the 2016 EOC Review, which found that 33% of female participants in the Inspector Qualification Program were female.

The proportion of female representation in Leadership & Management Development courses, reserved for senior officers and executive level personnel, has substantially increased (Figure 28). The Australian Institute of Police Management (AIPM) Graduate Diploma, aimed at the level of superintendent had 50% female representation in both 2017 and 2018, while 100% of participants in the 2019 program were female. The participation of SAPOL employees in the AIPM Balance program for Women Leaders in Public Safety⁴⁹ increased from nil in 2016/17 to 3 in 2017/18 with 11 female staff completing the course in 2018/19.

⁴⁹ Participants in this program learn to understand, negotiate and develop solutions to the “challenges for women in public safety leadership roles”. Australian Institute of Police Management, “Balance: Women Leaders in Public Safety,” accessed 25/08/2019, <https://www.aipm.gov.au/balance>

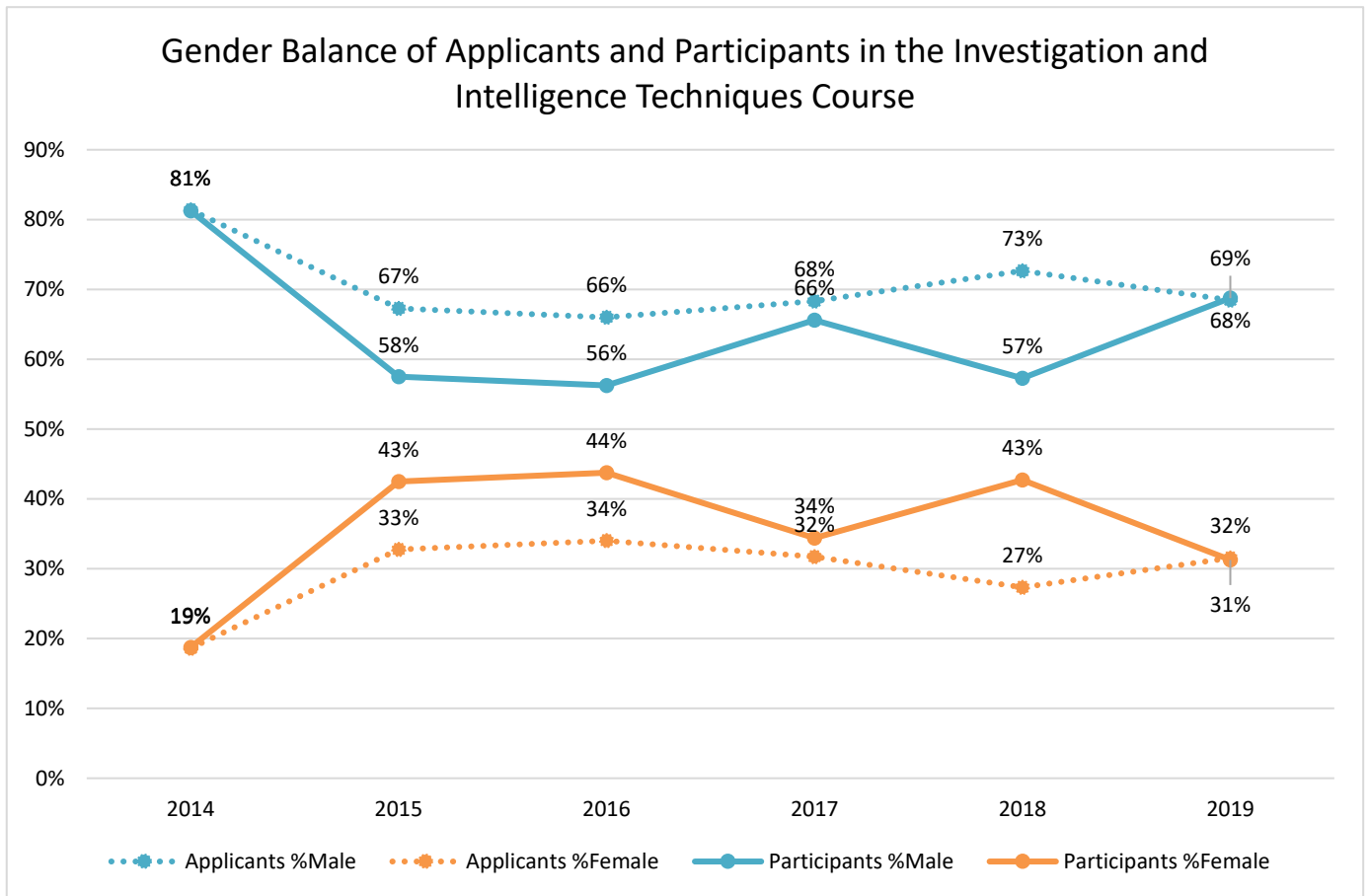
Figure 28. Male and female participation in leadership and management development courses 2016 - 2019



Another important opportunity for professional development within SAPOL is ‘Investigations Training’. This is the pre-requisite for becoming a detective - a much sought-after career within the organisation. The Investigation and Intelligence Techniques Course (IITC), for personnel currently working, or aspiring to work within areas requiring investigation skills, has seen an increase in the number of female applicants from 45 (19%) in 2014 to 75 (32%) in 2019 (Figure 29). However, it should be noted that the largest increase in female applicants was in February of 2015, coinciding with the 100-year anniversary of women in policing in South Australia.⁵⁰ The same pattern can be observed in terms of those accepted into the IITC, with an increase from 9 (19%) female participants in 2014 to 15 (31%) in 2019.

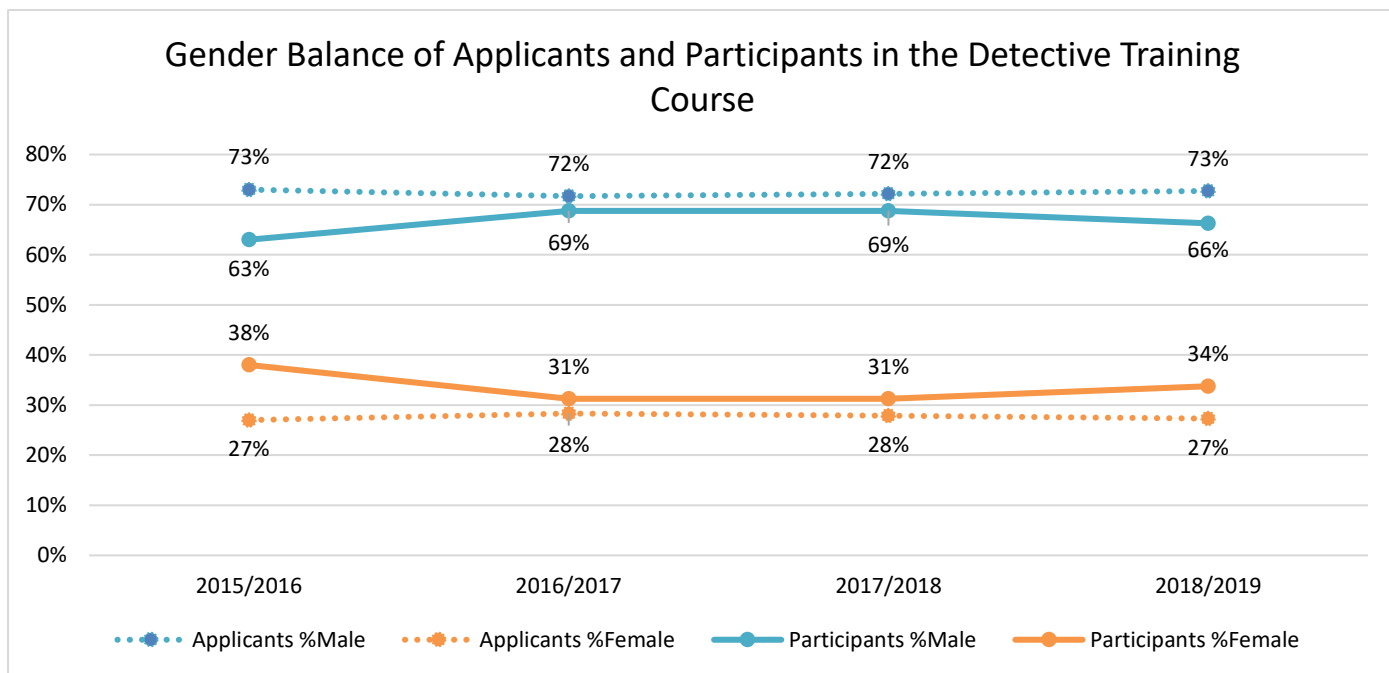
⁵⁰ South Australia Police (2015), *Annual Report 2014-2015*, (SAPOL: Adelaide SA), pg. 3.

Figure 29. Male and female applicants and participants in the Investigation and Intelligence Techniques Course (2014 – 2019)



In contrast, the proportion of women applying for, and participating in, the Detective Training course, for which the IITC is a prerequisite, has shown little change between 2015 to 2019 (Figure 30), with applications from female staff generally between 27% and 28%. The proportion of women selected for the courses has been marginally higher, dropping slightly from 38% in 2015/2016 to 34% in 2018/2019.

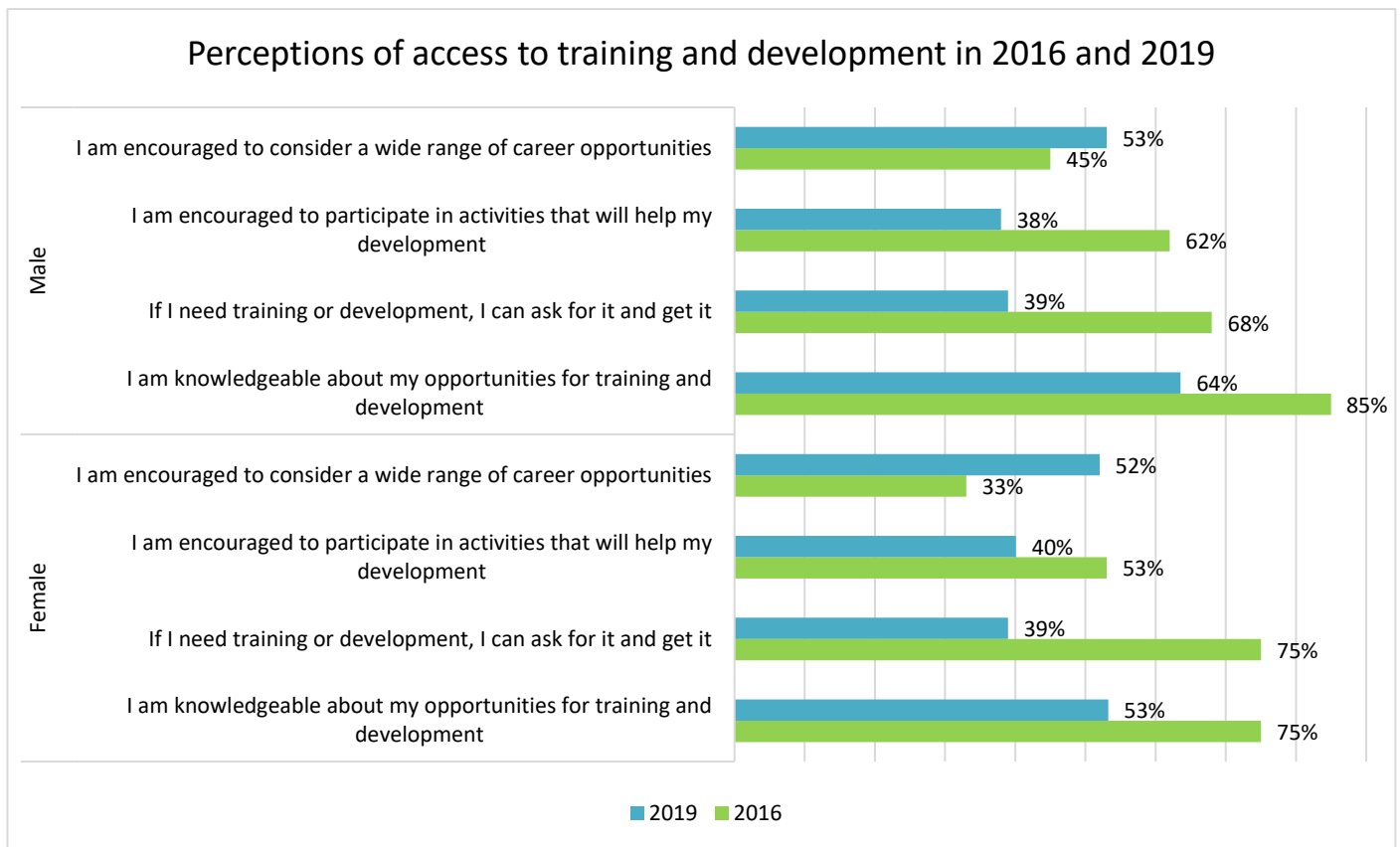
Figure 30. Male and female applicants and participants in the Detective Training Course (2015 – 2019)



3.5.3 Perceptions of access to training and development

The SAPOL Pulse survey conducted in July 2019 found that 67% of women and 60% of men agreed that both men and women have equal access to training and development. However, participants’ perceptions of the situation in relation to their own opportunities for training and development were less positive in their responses to the 2019 EOC survey (Figure 31). This is even more striking when compared with responses to the 2016 EOC survey. More responded positively in 2019 only when asked if they were encouraged to consider a wide range of career opportunities within SAPOL. Knowledge about training opportunities, perceptions of the ability to request and receive needed training, and of encouragement to participate in activities supporting development were all lower in the 2019 EOC survey (Figure 31). This suggests there is significant room for improvement in educating SAPOL employees about training and development available, and in supporting them to take advantage of these opportunities.

Figure 31. Perceptions of access to training and development in 2016 and 2019



3.5.4 Barriers to accessing training and development

A number of respondents to the 2019 EOC survey noted that SAPOLs training delivery structure/method did not provide flexible learning options. This lack of flexibility in delivery options impedes access to training and development for those working part-time or flexibly and for those working in regional areas in particular. This barrier was highlighted in the 2016 Review and resulted in the recommendation to review training delivery methodologies (recommendation 25).

“As a person on an FWA I found my opportunities severely restricted and have been turned down for training and development, and career progression, based on my part time status...” **Survey Respondent**

“Due to the cost of attending courses held in the metro area from the country we are discouraged from applying as the LSA cannot afford the costs and the loss of a member for extended time.” **Survey Respondent**

“Working in a country location is essentially putting all training and development on hold. There are some courses offered to suit the LSA, but nothing individualized for people who want to forward plan their career.” **Survey Respondent**

The lack of access to training and development for those based in regional areas was echoed by regional participants in focus groups. These participants noted that 'webex' (a video conferencing tool) is being used more by SAPOL for meetings, but using it for training delivery does not seem to have been explored. In addition, focus group participants noted that training content developed by SAPOL tends to be 'metro' centric and that the regional trainers need to apply a regional 'lens' to the content in order for it to be relevant for these participants. Examples were also given of experiences where a change to the administrative system has led to the Academy delivering training only to metropolitan locations and those within a one hour drive of Adelaide. For those beyond that range, a user guide was made available which refers to technological tools available only in the metropolitan area.

Comments provided by respondents to the 2019 EOC survey, as well as by focus group participants, indicated that a supervisor's or manager's view of training and/or development had a strong influence on employees' access to such opportunities. In addition, many non-sworn employees expressed disappointment through the EOC 2019 survey and in focus groups about the perceived lack of interest and support for their training and development needs. In order for SAPOL to realise its organisational commitment to support its employees to reach their potential⁵¹ it will need to ensure that training opportunities are available and accessible to all its staff.⁵²

EOC 2020 Recommendation

SAPOL must ensure the implementation of flexible training delivery (with involvement of regionally-based trainers) with a focus on equal opportunity of for sworn and non-sworn staff and equal access for those working part-time, flexibly and regionally.

The new iEngage performance management system (discussed in sub-section 3.4.6) has the potential to address some of the deficits that employees perceive in their opportunities for training/development and/or career development. However, this will depend on supervisors/managers using iEngage effectively and to its full potential. As summarised in 'Follow up from Report 3' (section 2.3), SAPOL will monitor the use of iEngage over the first few months of implementation to ensure all employees have up-to-date performance management plans. However it is important that this monitoring is broader than 'usage' and includes ongoing monitoring and evaluation to ensure that the full potential of this platform is realised.

⁵¹ South Australia Police, *Diversity and Inclusion Strategy 2018-2020*, (SAPOL: Adelaide, SA), pg. 2

⁵² During consultation, the EOC Monitoring team was made aware that the Police Psychologist does not travel to regional locations. While this issue is outside the scope of this report, SAPOL could learn from the continued review and expansion of flexible training delivery methodologies, in particular video-conferencing technology, for the purpose of making psychology assessment and counselling more accessible for SAPOL regional personnel.

EOC 2020 Recommendation

SAPOL monitor and evaluate the use of iEngage on an ongoing basis for effectiveness in progressing and achieving its objectives of values, performance, growth (including improving employee awareness of and access to training and development opportunities) and well-being for sworn and non-sworn employees.

3.5.5 Women only information sessions

The 2016 EOC Independent Review briefly noted the use of women-only training in SAPOL, for example Incident Management and Operational Safety Training (IMOST). While the 2016 EOC Review presented positive feedback from SAPOL employees for this approach, it did highlight research that cautioned such an approach is not a 'silver bullet'.⁵³ The research noted that the women-only approach is effective where there is support from senior management, integration with existing recruitment and promotion practices, and where systemic factors, such as those related to organisational culture or traditional career structures, are minimised or removed.⁵⁴

Since the release of the 2016 EOC Review, SAPOL has offered women-only information sessions when promoting internal recruitment of sworn positions in male-dominated areas of SAPOL. Women-only information sessions are offered simultaneously with information sessions for all employees to ensure the same information and opportunity for questions/answers is available to all participants. Attendance at an information session is not a requirement for applying for positions.

The 2019 EOC survey and focus groups found negativity about the women-only information sessions was prevalent. Both women and men expressed the concern that women only information and training sessions increased discrimination against women regardless of whether they attended a women only session, fostering an "us and them" mindset among some in SAPOL.

"The pendulum has swung, and females now have far more exclusive opportunities and access to training and development in this organisation than males." **Survey Respondent**

"I feel that discrimination has gone too far the other way, by overdoing the equality it has actually isolated females with a feeling of them being treated favourably, not equally." **Survey Respondent**

Ninety percent of the 151 negative comments in the 2019 EOC survey about training and development opportunities for women in the EOC's 2019 survey and focus groups came from men. Of particular concern was the expression of this view by 51 individuals in senior roles (i.e. senior public servant, senior officer,

⁵³ EOC (2016). *Sex Discrimination, Sexual Harassment and Predatory Behaviour in South Australia Police*, p. 68.

⁵⁴ Clarke, M. (2016). "Advancing women's careers through leadership development programs." *Employee Relations*, 33(5), p. 505.

supervisor categories). As it is crucial for this group to be role-modelling gender equality and inclusion within SAPOL, it is extremely important to increase their understanding of the rationale and benefits of the 'women-only' approach. Discussion in the focus groups highlighted a significant gap in knowledge and understanding regarding the women-only approach, and many participants indicated that the latter should be communicated better in SAPOL. Some focus group participants suggested this could be enhanced (particularly for women who are hesitant to participate due to the perceived stigma attached to doing so) by communicating feedback about the benefits from women who have taken part in such sessions. For example, some of those who participated in the women only Incident Management Course have described the training environment as supportive, less judgemental and more conducive to open discussion than mixed training courses. A number of participants noted that the women only course was equally helpful for current operational personnel, as well as those without recent operational backgrounds.

Whilst an information sheet about the rationale for women only sessions is available on the Diversity and Inclusion Branch's intranet page, this is only helpful if employees seek out this information themselves. The rationale needs to be widely communicated through a diversity of mechanisms, and particularly understood and embraced as an option for women staff by supervisors and managers in SAPOL.

EOC 2020 Recommendation

SAPOL more widely and effectively communicate (particularly to supervisors and managers) the rationale for women-only information and training sessions (including feedback from participants about their experiences in these sessions).

3.5.6 Quality of training and development

Significant concerns were raised in a Pulse survey and in the EOC's focus groups, about the quality and effectiveness of much of the training that SAPOL has developed and delivered. Less than half (43%) of respondents in the July 2019 Pulse survey believed that SAPOL provides them with training that is adequate, valuable and supportive of their career goals and much of the commentary about training in the focus groups was scathing (referencing poor development of the training and/or inconsistent and/or inadequate delivery). As an example, one focus group participant described an internal training that they had participated in and had rated highly because it had interesting and relevant content and was well-delivered over a two-hour session. A colleague attended the same training delivered by a different trainer the following day and had an entirely different experience when the program was delivered in ten minutes.

"The in service training is piecemeal and mostly reactionary." Survey Respondent

"The training offered by SAPOL is totally inadequate in relation to the work we do" Survey Respondent

In another face-to-face consultation, the need for engaging subject-matter experts and experienced and innovative facilitators for the development of and delivery of training was raised.

It is essential that SAPOL develops a framework for adequately training its trainers, ensuring subject matter expertise in development and delivery of information sessions and training programs, providing engaging delivery methods, and a framework for evaluating information sessions, training programs and tools (content, delivery, and effectiveness in improving participant knowledge, skills and engagement). Poor training programs (and/or poor training delivery) not only waste time and resources, but also lead to cynicism about the seriousness of the training content and SAPOL's commitment to its staff and their development. It is also important to note that the negative perceptions of training and development shared with the EOC by SAPOL staff may not always be reflective of reality. However, comprehensive evaluations of all training will both allow SAPOL to determine and address any validity in these perceptions, and will provide the organisation with the evidence to challenge any misconceptions around poor training.

EOC 2020 Recommendation

SAPOL develops a framework for adequately training its trainers, ensuring subject matter expertise in development and delivery of information sessions and training programs, providing engaging delivery methods, and a framework for evaluating information sessions, training programs and tools (content, delivery, and effectiveness in improving participant knowledge, skills and engagement).

Figure 32. Change progress summary for training and development

<p>Ideal End Goal (from 2016 EOC Independent Review): All employees have equal access to training and development opportunities. Talent is fully leveraged, irrespective of gender, and all staff are trained in skills that enable them to contribute to a safe workplace that values gender equality.</p> <p>In working towards this goal, the expected signs of success along the way are outlined below along with supporting key points.</p>		
Signs of Success	Key Points of Change Progressing	Key Points of Challenges for Change Progressing
All eligible employees have knowledge of existing training and development opportunities		Fewer employees are aware of the training and development opportunities available to them.
Perception of equal opportunity for both genders and parents/care givers		The perception that men are now being disadvantaged needs to be addressed.
Employees are encouraged to participate in training activities that support development		Active encouragement of participation in development remains variable and seems dependent on individual manager/supervisors.
Employees encouraged to consider a wide range of career opportunities	More employees believe they are encouraged to consider a range of career opportunities.	
Bias-free application and selection processes for development opportunities	Training in “unconscious bias” has been provided to all employees.	
Flexible training delivery methodologies to work in/around work-life commitments	Changes in technological support should assist in flexible training delivery.	This remains an area in development and will need to be monitored for effectiveness.
Training and development gaps and needs are monitored	Effective use of iEngage should make the identification and monitoring of training and development gaps easier.	This will need ongoing monitoring and evaluation to ensure effectiveness
<p>Change Progress Summary</p> <p>The awareness of training and development opportunities has dropped since 2016 and SAPOL should reassess its communication strategies to increase employee understanding and engagement in this area. In terms of communication, directly addressing the misconception that men are now disadvantaged when it comes to training and development might help to diminish the levels of negativity surrounding the promotion of opportunities for women in SAPOL.</p> <p>Active encouragement to participate in training and development is variable and often dependent on managers/supervisors. In some cases, lack of encouragement is underpinned by staffing and resourcing pressures. These may be particularly apparent in regional areas and for those working flexibly, making flexible training delivery important to ensure equitable access to training and development opportunities. Although SAPOL is working on changes in technological support that should assist in the delivery of flexible training, these remain under development and will need to be monitored for effectiveness.</p> <p>As noted in earlier sections, the usefulness of iEngage, in this case to monitor training and development gaps and needs, will depend on how effectively it is used by managers and supervisors.</p>		

3.6 Flexible workplace culture

Summary from the 2016 EOC Independent Review

The 2016 EOC Review found that the lack of workplace flexibility in SAPOL represented a structural and cultural barrier to career progression for women and men with caring responsibilities. The data showed that:

- 8% of staff worked part-time compared with 14 to 18% in other male-dominated occupations and 45% in the SA public service in general;
- 30% of respondents expressed a desire to work flexibly;
- 61% of respondents strongly agreed it was very difficult to work part-time and have a career at SAPOL;
- 71% of respondents believed that flexible working practices were applied inconsistently across SAPOL.

While SAPOL had policies in 2016 that supported flexible work, the EOC found that the culture did not support this. This lack of support was reported through the following experiences:

- Part-time applications (for a maximum six months) taking months to be assessed and were often refused without valid reason;
- If approved, employees frequently reported being placed into 'dead end' jobs, often at a lower rank and rate of pay than their previous appointment;
- Managers changing agreed work days with little or no notice, causing chaos for parents who had to rearrange childcare;
- Attitudes and practices with regard to flexible work in SAPOL were a considerable source of angst and were a contributing factor to many employees considering leaving the organisation.

There appeared to be little or no recognition of how effective flexible work and family-friendly policies/practices could promote well-being, gender diversity and inclusion.

The EOC's 2020 Findings

3.6.1 Introduction to SAPOL's position on flexible working arrangements

Implementing flexible working arrangements (recommendation 26) has been one of the largest pieces of reform undertaken by Project Equitas since the 2016 Review. SAPOL is committed to an 'If Not, Why Not' approach to flexible working, which balances the position that all roles can be undertaken more flexibly with recognition that not every type of flexible work option is achievable for every role or every employee in SAPOL.⁵⁵

⁵⁵ 'If Not, Why Not' is a principles-based approach which encourages further discussion of FWAs between applicants and SAPOL. It designed to mitigate the risks of indiscriminate acceptance of FWAs and to ensure that rejection of an FWA should only be on grounds where its acceptance would adversely affect operational effectiveness.

3.6.2 Take-up of flexible working arrangements

The proportion of the total SAPOL workforce, including sworn and non-sworn personnel, taking up flexible working arrangements (FWAs) has increased from 8% at 30 June 2015 to 13% at 31 December 2019. There is a large difference between men and women, with 6% of male personnel applying to work part-time and flexibly, up from 1% at the end of 2015, while 25% of female personnel were accessing part-time and flexible working arrangements as of December 2019 compared to 23% at the end of 2015. The greater increase in applications for FWAs by male personnel compared to female personnel is a positive sign as this was, and remains, an area for improvement in terms of accessibility to and acceptance of FWAs for men. The age brackets most likely to apply for FWAs since July 2018 have been employees aged 35-44 years, followed by those aged 45-54 years. This pattern was consistent across both genders.

Types of flexible work arrangements

There were 488 applications for part-time work in 2018/2019, which accounted for 57% of all flexible working arrangement applications, and 87% of these were requested by female personnel. Of the staff already working part-time within SAPOL in June 2018, 69% were sworn officers, with the remaining 31% being non-sworn personnel. With non-sworn personnel constituting less than 20% of the total strength of SAPOL, there was a disproportionately higher percentage of non-sworn staff already accessing flexible working arrangements compared to sworn members. For both sworn and non-sworn personnel, 92% of those already working part-time were female. SAPOL's new General Order 8420 *Human Resource Management* outlined a range of flexible working options and made changes to improve accessibility. These include:

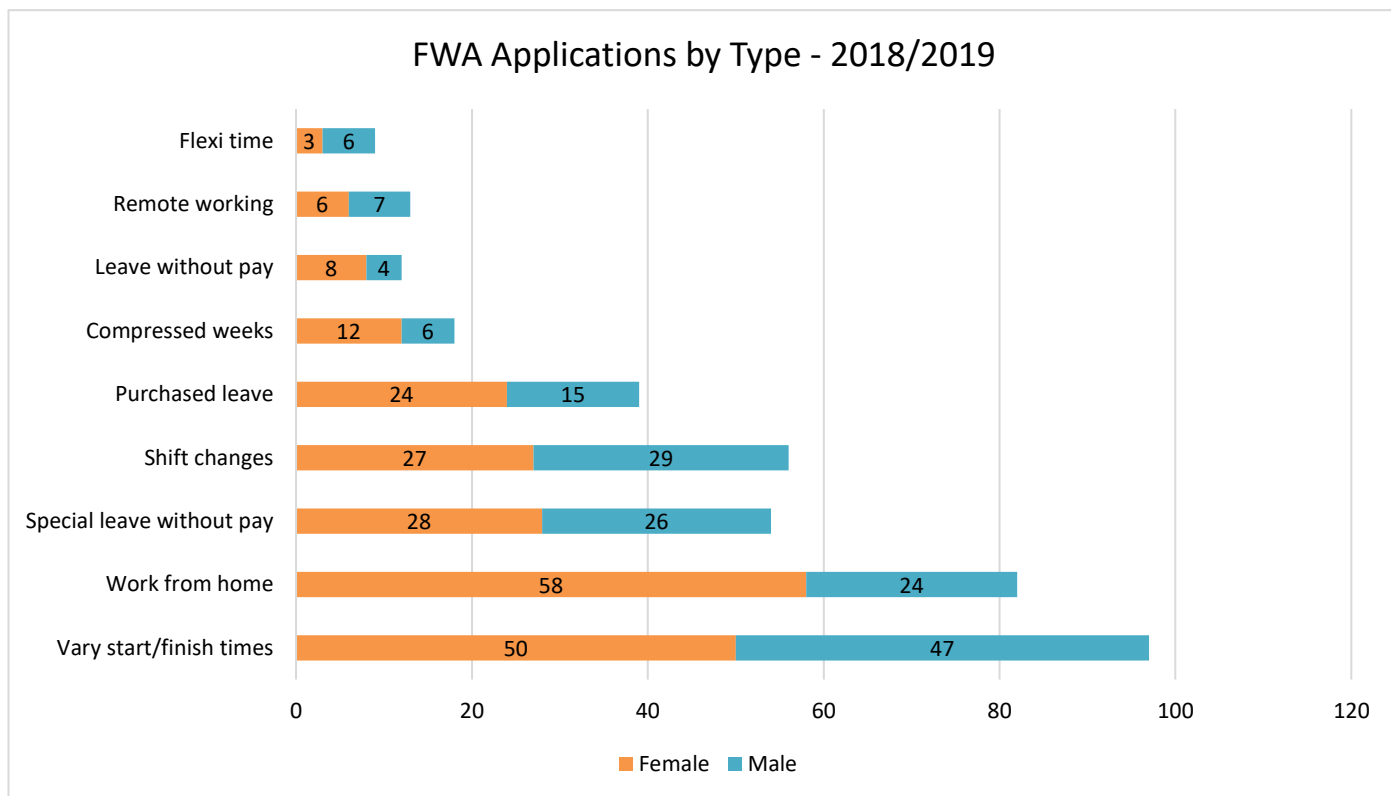
- Not being required to state a reason for applying for an FWA (except special leave without pay applications);
- Implementing all FWAs for a minimum of 12 months unless the applicant requests a shorter period
- Not waiting for a scheduled review to discuss necessary changes to an FWA;
- Revised delegated authority for approval of FWAs to the Officer in Charge (District/Area/Branch/Group managers) to improve consistency and timeliness. Exceptions include:
 - Special leave without pay and leave without pay for greater than 1 year with secondary employment, which require approval from the Assistant Commissioner, Human Resources Service
 - Flexi-time and working from home (limited duration), which require approval from manager/supervisor;
- Checks and balances for non-approval of FWAs at Service and organisational levels.⁵⁶

Of the flexible working options other than part-time, applications for working from home, purchased leave, compressed weeks, and leave without pay have come predominantly from female applicants. Men and women are equally represented in applications for special leave without pay, shift changes and varying start/finish times. Only in the case of flexi time, which is only accessible to non-sworn employees have

⁵⁶ South Australia Police (2018). *Project Equitas Closure Report: Recommendation 26*, (SAPOL: Adelaide, SA).

applications from men significantly outnumbered those from female employees (Figure 33). However, the total number of applicants for flexi time (9) is too small to be able to draw any conclusions.

Figure 33. Applications for flexible working arrangements by type



3.6.3 Experiences of working flexibly in SAPOL

Approximately half (55%) of female and 45% of male respondents to the July 2019 SAPOL Pulse Survey were satisfied with their ability to access flexible working arrangements, and over half (59% of women and 52% of men) felt free to discuss their need for flexible work.

There remain concerns among SAPOL staff about the consistent application of flexible work practices across the organisation. However, applications for flexible work in the 2018/2019 year have been spread across the services from 11% of State Operations Service personnel, up to 26% of Metropolitan Operations Service personnel, with a majority of applications being approved, demonstrating that flexible working arrangements are accessible to personnel across the organisation.

Figure 34. Approval rates of Flexible Working Arrangement applications 2018/2019

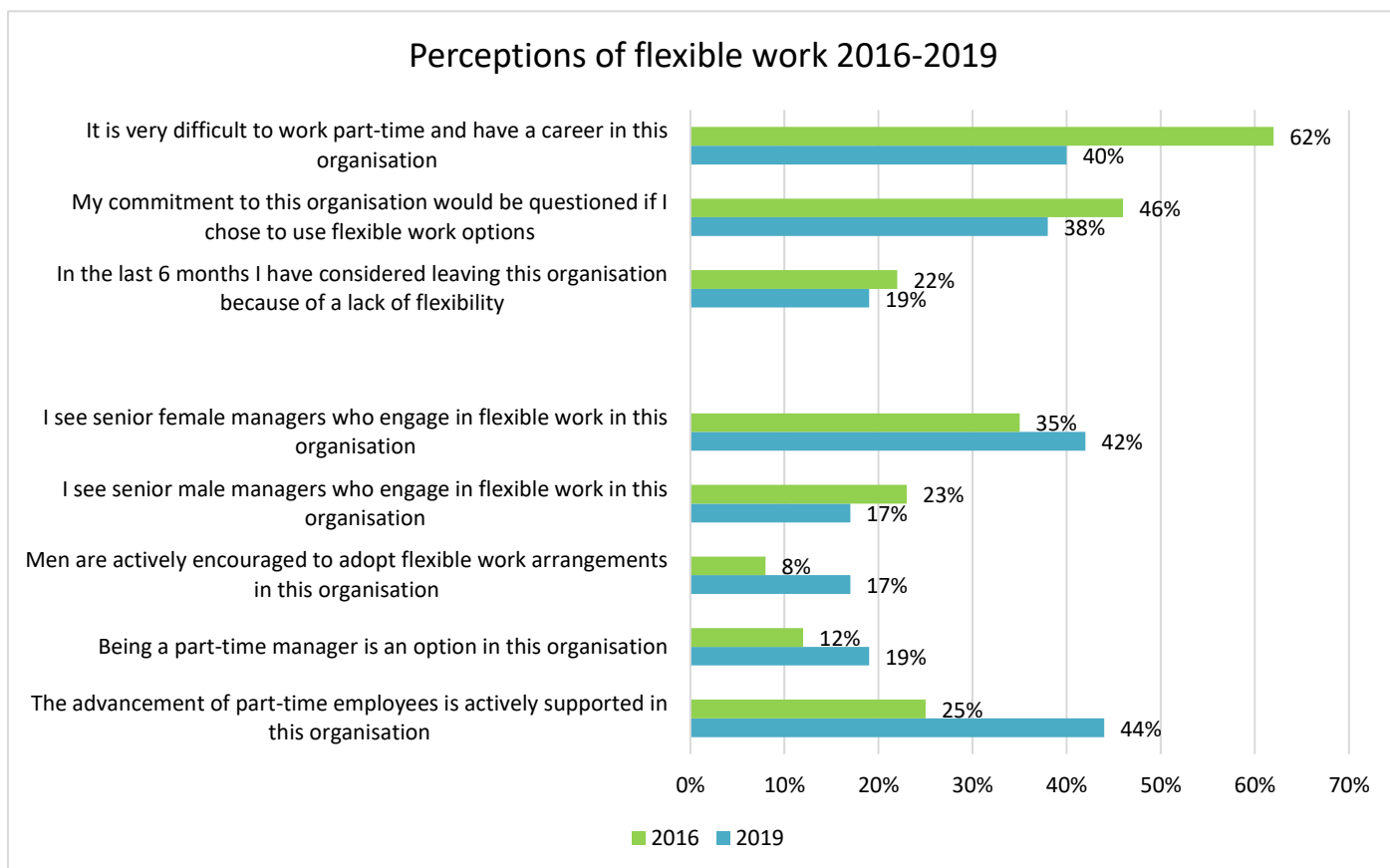
Approved	To be determined	Not approved
727	173	9

As can be seen from Figure 34, the recent approval rate of applications for flexible working arrangements is very positive. Furthermore, it is encouraging to note the level of agreement that the organisation actively encourages employees to consider flexible work increased from 13% in the November 2017 Pulse survey to 47% in the July 2019 Pulse survey.

Personal experiences of flexible work

As Figure 35 shows, data from the EOCs 2019 survey found that there is still a concern that working flexibly will result in an employee’s commitment to SAPOL being questioned and that it can have a negative impact on careers within the organisation. However, with the exception of examples of the EOC senior male managers working flexibly, there are signs of positive change across all areas in perceptions of workplace flexibility in 2019, when compared to the EOC data in 2016. The latter includes more visibility of senior female managers working flexibly, and a greater perception that it is possible to be a part-time manager. The difference has been greatest in the perception of the active encouragement of men to adopt FWAs and in the active support of the advancement of part-time employees.

Figure 35. Perceptions of flexible work in SAPOL (2016-2019)



A number of male and female non-sworn and sworn respondents highlighted the benefits of flexible working arrangements. The benefits identified included enhanced productivity, improved mental health and morale, and employee retention, demonstrating the value of FWAs to both the employee and organisation.

“I work in a section that ... had not a single person on any sort of flexible work option. There are now at least 10% on some sort of arrangement be it change of shift times, part time or working different rosters. I think it's great that we can accommodate people's individual needs to help them balance family and work.”

Survey Respondent

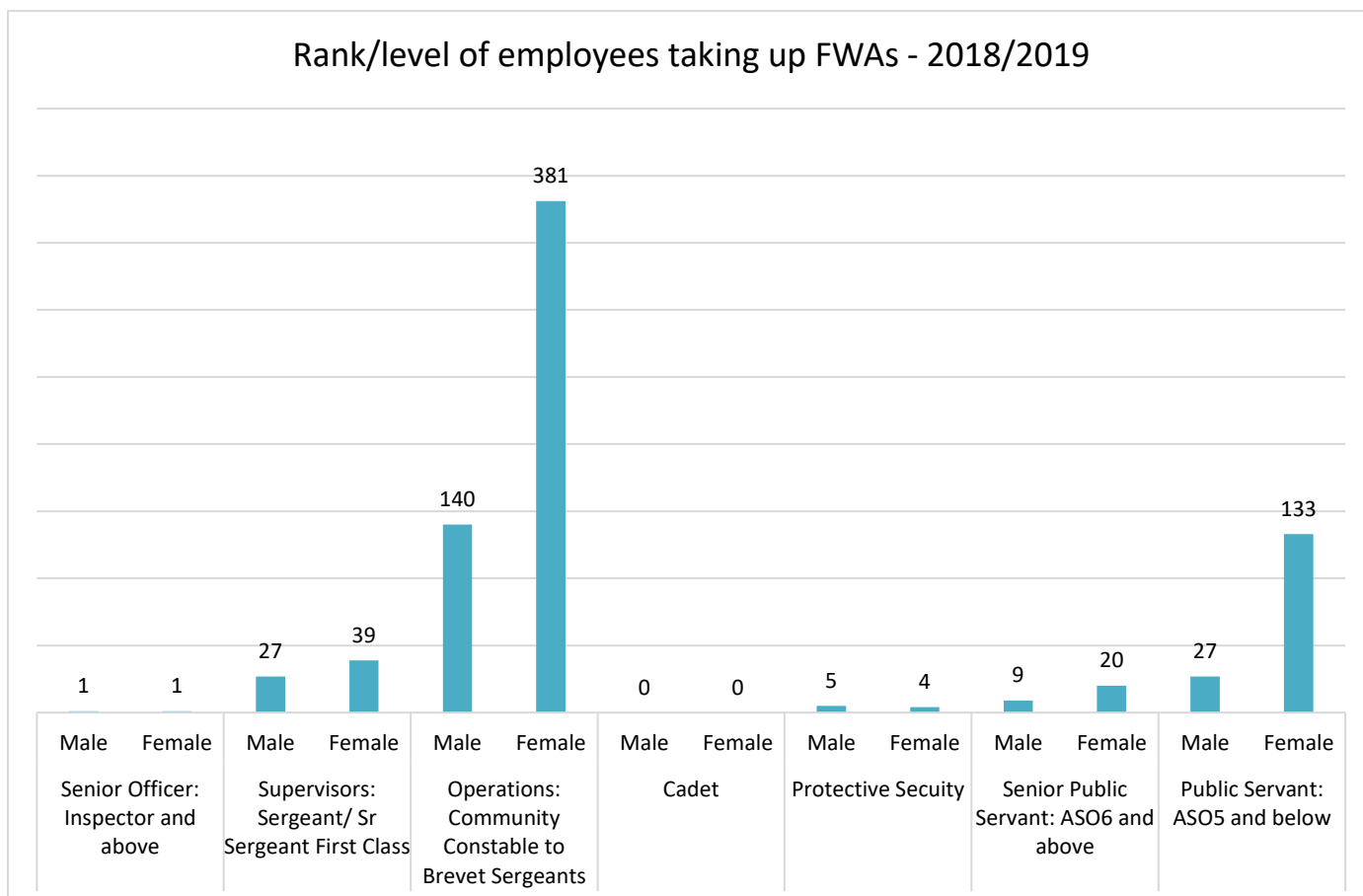
3.6.4 Flexible work at senior levels

One area which remains almost unchanged since the 2016 Review is the accessing of flexible working arrangements by those at senior sworn and non-sworn levels. In 2016, the EOC Review found that flexible work arrangements were not encouraged for senior managers within SAPOL, and the use of case studies of leaders working flexibly was part of the communications strategy employed by Project Equitas in an attempt to address this. However, the vast majority of applications for flexible work arrangements in 2018/2019 were confined to the rank of sergeant and below, with operational staff from community constables to brevet sergeants being the most represented (Figure 36).

Only two applicants were ranked at inspector or above. This pattern is consistent with the FWAs already in place as of May 2018, with no sworn officers above the rank of Senior Sergeant working flexibly. A similar pattern was observed with non-sworn personnel, with the majority of applicants at ASO5 level or below and significantly fewer applicants among senior public servants (although it should be noted that there were more applications and staff already working flexibly at ASO6 and above than among sworn personnel of corresponding seniority). While these patterns are undoubtedly influenced by the significantly fewer personnel at senior levels, the rates of uptake of flexible working arrangements are well below those of SAPOL more generally, with only one (3%) female senior officer and one (1%) male senior officer working flexibly. In percentage terms, this is higher than national figures for Australian police forces, with only 0.3% of commissioned officers working flexibly.⁵⁷

⁵⁷ Cole M and Sanderson C (2017) *Flexible working arrangements for police in Australia and New Zealand – Summary report* (PFA: Canberra), p. 46.

Figure 36. Employees taking up flexible working arrangements in 2018/2019 by rank/level



There are unique challenges to adopting flexible working arrangements at senior levels, in part related to the perceived need for those with supervisory responsibilities to be physically present in the workplace. Anecdotally, flexible working arrangements for senior ranks have been managed well in some cases. For example, one officer was able to access a flexible arrangement because his second-in-command was happy to “act up” to effectively backfill his position. This kind of arrangement has the added advantage of providing experience at more senior levels for employees acting up.

The 2019 EOC survey indicated that, while some respondents indicated that senior people using FWAs are not as visible as they should be in order to normalise working flexibly, others believed that those at senior levels should not access FWAs because of the challenges it poses when managing teams.

“It is difficult for any team to function when their manager works part-time, creates a lack of consistency...”

Survey Respondent

“While flexible working arrangements are encouraged, in some areas that is a good thing. SAPOL should not pursue part time for specific area/roles, including managers/supervisors, small country stations, specialist units.” **Survey Respondent**

The focus groups were used to further explore the views about FWAs for management, specialist and frontline roles. This feedback was consistent with the view of survey respondents, highlighting the following key concerns:

- Inconsistent management and decision-making;
- Specialist roles not adequately trained, creating a safety risk for the individual and team;
- Vacancies from FWAs not being backfilled, which challenges service delivery.

Significant concerns were also raised about the lack of support available to supervisors and managers to implement flexible working arrangements within their team environments. While the volume of applications and determination to approve as many as possible is a positive sign, this also risks placing a significant burden on the Flexible Work team and on the supervisors and managers expected to incorporate these arrangements into their day-to-day operational requirements. The challenge faced by managers and supervisors was noted to be even greater in regional areas (the challenge of utilising FWAs in the regions is discussed later in this section), where there is even more limited access to staff to backfill part-time arrangements, which make up the greatest number of flexible work applications.

3.6.5 Challenges for those working flexibly in SAPOL

Similar to the 2016 Review, many 2019 EOC survey respondents mentioned challenges surrounding working flexibly in SAPOL. Respondents expressed concerns that a stigma persists and some also highlighted that working flexibly detrimentally impacts opportunities for training and development and/or career progression. Both male and female respondents suggested that although FWAs might work in non-operational areas or lower ranks, they were “career-killer” in operations and made it “impossible to strive to commissioned rank”.

“The promotion around flexible work arrangements has been more prominent since the release of the EOC report, however the same stigmas to working part time in SAPOL persist. Women who work part time in particular are viewed as uncommitted to the organisation and not offered any support from management re career development or progression.” **Survey Respondent**

Furthermore, male personnel continue to face stigma particularly around the adoption of part time working arrangements.

“Being male and part time is undeniably the hardest thing I have ever had to do in SAPOL. The constant negative comments and jokes become tedious and can wear thin. You question yourself and your role and at times even feel inadequate. You work harder to gain respect but it still does not stop those who seem to think that belittling part time police officers is acceptable.” **Survey Respondent**

3.6.6 Challenges for progressing working flexibly in SAPOL

Many respondents to the 2019 EOC survey perceived that managers were still critical in determining access to FWAs. Although some respondents felt supported by their manager in requesting a FWA, others had managers who discouraged FWAs either on principle or on an individual basis.

*“I feel that the organisation has a genuine commitment to working flexibly but some individual managers are a major barrier to people accessing this.” **Survey Respondent***

These ‘in principle’ objections to flexible work in SAPOL and misconceptions about the value of flexible work (and those who take it up) need to be addressed. However, practical challenges to the sustainable implementation of FWAs also exist. Of particular significance are operational and resource constraints, which are particularly evident in rural and regional areas and in teams with limited resources, where balancing individual and strategic needs can pose difficulties.

Those working in rural and regional locations do have access to entitlements for when extended hours are worked to meet the, at times, unpredictable needs of the community. However, supervisors/managers and employees working in the regions are finding it particularly challenging to apply ‘If Not, Why Not’ and access FWAs. Regional and rural personnel noted that often the local team is small and if a member wishes to work flexibly, it is difficult to backfill their role as the capacity of the remaining team is already allocated or there is not another station/team nearby from which to draw personnel to backfill.

Discussion in the focus groups highlighted that, in general, regionally-based teams do their best to support each other, so varied start/finish times and ad-hoc arrangements are used, but arrangements that would result in reduced hours are too challenging to implement compared to the metropolitan policing environment.

In addition, the 2019 EOC survey and focus groups highlighted a critical concern for SAPOL’s ongoing implementation of ‘If Not, Why Not’. While the benefits of FWAs were acknowledged, there appears to be a disconnection between implementation and the strategic intent for FWAs. From the focus groups, the clear message was that in practice, supervisors and managers were feeling pressure to place more of an emphasis on the employee rather than organisational needs, rather than balancing these.

*“Some members believe ‘if not why not’ will mean whatever flexibility they ask for has to be accepted. Not all requests can be accommodated and still provide service delivery.” **Survey Respondent***

This disconnection is presenting itself in numerous ways:

- Employees not willing to negotiate their FWA request;
- Managers approving FWAs because they perceive that ‘higher up’ management will approve it anyway;
- Managers being told to ‘make it work’;
- Vacancies resulting from FWAs not being backfilled;

- Increased workload for team members not using FWAs due to lack of backfilling.

*“I think managers are pressured into meeting individual needs of their employees over organisational needs to the point that discrimination is happening for those who do not seek flexible working arrangements. Flexible working arrangements are important, I am not against them however the “if not - why not” policy has encouraged individuals to behave very selfishly to the detriment of their colleagues’ well-being and the organisation.” **Survey Respondent***

However, the positive experiences of the implementation of FWAs should also be noted. In focus groups, for example, managers stated that FWAs could take the pressure off SAPOL employees who were struggling with high levels of stress. This provided support for employee mental health and lessened the need for employees to take extended periods of sick leave.

The lack of two-way communication and compromise compounds the difficulties that managers face in implementing FWAs without jeopardising operational efficiency. Improvements in FWA negotiations would include:

- Reminding employees of their responsibilities when applying for FWAs (such as working through SAPOLs “Am I ready to work flexibly in SAPOL?” poster with questions of “In what ways is my role able to be flexible?”; “Am I flexible in negotiating outcomes?”);⁵⁸
- Providing an opportunity for supervisors/managers to discuss the benefits and challenges they are encountering with ‘If Not, Why Not’ and training to reinforce their capabilities and confidence to manage the FWA process from the request step to managing a team that works flexibly;
- Outlining backfilling opportunities, as feedback from focus groups suggests that backfilling has not occurred in all environments.

Communication with SAPOL since the EOC Monitoring Team conducted its focus groups and with Phase 2 of the implementation of the District Policing Model nearing completion, suggests that a more coordinated approach to backfilling is now occurring. Districts now coordinate a fortnightly staffing meeting with senior management and workforce planners, who inform managers about vacancies due to extended leave. The meetings discuss new FWAs and positions needing backfilling. SAPOL has stated that most districts have the capability to fill positions through local relieving and that metropolitan districts are generally able to fill within the district. State Operations Service covering regional, rural and remote areas face more challenges as they have less staff able to move, although SAPOL reports that they tend to be able to backfill with internal relieving and secondments. Monitoring and reporting on the utilisation of FWAs, how this translates into FTEs, the backfilling of positions created by FWAs and extended leave, and identifying where the gaps and opportunities tend to arise will assist SAPOL to manage the balance of individual and strategic requirements. As noted in ‘Follow up from Report 3’ (section 2.3), SAPOL is undertaking work to support supervisors and managers with regards to managing flexible teams and this highlights that the work needs ongoing attention.

⁵⁸ South Australia Police (2018). *Am I ready to work flexibly in SAPOL?* Poster

EOC 2020 Recommendation

SAPOL monitor the capability of managers/supervisors to implement 'If Not, Why Not', from the initial request through to managing teams with personnel accessing flexible working arrangements.

EOC 2020 Recommendation

SAPOL provide support to managers/supervisors to implement flexible working arrangements within their teams using supports such as mentoring, coaching and interactive face-to-face training. This support needs to consider:

- Consistency in the implementation of FWAs across SAPOL, ensuring operational constraints are accounted for and implementation is sustainable, which may include backfilling, establishing a casual roster and undertaking matching of employees already on part-time working arrangements.
- Improved technology/tools to make vacancies resulting from FWAs visible across SAPOL and enabling the backfilling of positions.
- Ensuring that FWAs are a matter of negotiation and not perceived as an inalienable right of employees.

Figure 37. Change progress summary for flexible workplace culture

<p>Ideal End Goal (from 2016 EOC Independent Review): Flexible working arrangements are valued, normalised and equally accessible to men and women in SAPOL</p> <p>In working towards this goal, the expected signs of success along the way are outlined below along with supporting key points.</p>		
Signs of Success	Key Points of Change Progressing	Key Points of Challenges for Change Progressing
Increased proportion and spread of employees working flexibly	A broad spread of FWAs across the organisation and the number of people working flexibly has increased.	
Employees feel comfortable to request FWA	Increase in FWA applications since the 2016 review suggests that many employees are comfortable requesting FWAs.	Inconsistent attitudes to FWAs held by managers. Stigma surrounding FWAs particularly in relation to commitment to SAPOL.
Value judgements are not made about flexibility needs	A reason is no longer needed for FWA applications, removing the ability to make value judgements.	
FWAs equitably accessible	More men are applying for flexible working arrangements.	Some men still report stigma in accessing FWAs. Regional employees also face significant challenges.
FWAs being accessed by employees across ranks/classifications		A perception remains that manager roles are not flexible, especially in operational contexts.
Supervisors/managers apply whole team approaches to FWAs		A whole team approach is not always considered, making sustainability within some teams difficult.
ICT equipment available to support working flexibly	Technological changes are in development to support the ability to work remotely.	
<p>Change Progress Summary</p> <p>Significant steps have been made towards normalising flexible working arrangements within SAPOL, shown by an increase in the number and spread of applications for FWAs across the organisation, and more men applying for FWAs. Technological support for working remotely is in development, which will significantly improve the ability to work from home.</p> <p>However, there remain challenges to the sustainable adoption of FWAs. These are particularly evident in operational and country environments, where operational responsiveness is of paramount importance, and where limited staffing makes flexibility difficult when it comes to backfilling positions. Stigma around flexible work at senior levels, part-time positions and commitment to SAPOL, and FWA's for men demonstrate that more work needs to be done to address misconceptions.</p>		

4 Assessment

4.1 Workplace Gender Equality Agency (WGEA) roadmap and key focus areas

The WGEA 'Gender Equality Roadmap' is a tool that enables organisations to plot their stage of maturity in their development towards gender equality. Organisations can use this to gain an understanding of progress, opportunities for improvement, and to inform planning as they mature towards a more gender equitable organisation.⁵⁹ The roadmap (Figure 38) outlines six phases of maturity to achieve workplace gender equality.⁶⁰ Generally, when undertaking an assessment, a framework of 12 'key focus areas' is utilised (Appendix 1). These key focus areas have been identified by WGEA through research and review activities. They form the elements of an effective gender strategy.

Figure 38. Phases of the Workplace Gender Equality Agency roadmap

Phase	Characteristics
1. Avoiding	<ul style="list-style-type: none"> ▪ barriers to female career progression are unrecognised or denied ▪ discriminatory behaviour towards women is normalised ▪ gender representation or equality issues are not measured ▪ no-one accepts accountability for gender equality
2. Compliant	<ul style="list-style-type: none"> ▪ gender equality is seen as a compliance risk, not a business enabler ▪ activity is limited to meeting compliance obligations ▪ compliance with gender legislation is the responsibility of support functions ▪ data is only gathered for compliance and not used elsewhere
3. Programmatic	<ul style="list-style-type: none"> ▪ gender equality only occurs in response to issues that can't be ignored ▪ initiatives are ad hoc, reactive and tactical, rather than proactive and strategic ▪ business priorities take precedence if/when necessary ▪ failure of gender programs to achieve change undermines long-term support
4. Strategic	<ul style="list-style-type: none"> ▪ a business case for addressing gender equality is promoted by leaders ▪ a gender strategy is developed linking to business strategy and objectives; it is used to guide investment and initiatives and is regularly reviewed ▪ action plans are implemented to realise gender equality strategic objectives ▪ governance and reporting mechanisms ensure leadership oversight
5. Integrated	<ul style="list-style-type: none"> ▪ gender equality is integrated into business and people policies and processes ▪ the business case is understood and embraced at all organisational levels ▪ investment in gender equality is unaffected by business challenges

⁵⁹ Workplace Gender Equality Agency, 2016, Gender strategy toolkit, p. 11

⁶⁰ Workplace Gender Equality Agency, 2016, 'Gender strategy toolkit'.

	<ul style="list-style-type: none"> ▪ structural and cultural barriers to female career progression are addressed
6. Sustainable	<ul style="list-style-type: none"> ▪ business leaders and managers are accountable for gender equality outcomes ▪ leaders have the capability, confidence and commitment to build gender-inclusive cultures ▪ the organisation is a role model for gender equality and influences others ▪ gender equality is simply part of how business is done and how people work together – always

4.2 Assessment of SAPOL

The 2016 Review and the EOC monitoring team utilised the WGEA toolkit as a framework for assessment of SAPOL.⁶¹ The exercise to derive the organisational assessment was based on the WGEA gender equality diagnostic tool. The diagnostic output is presented below.⁶²

In 2016, the assessment was undertaken by the EOC only, although SAPOL conducted its own self-assessment in 2017. The 2016 assessment focused on six key focus areas and plotted SAPOL from Avoiding level to Programmatic level in its assessment of SAPOLs levels of ‘gender inclusive culture’, ‘flexibility’, ‘measurement and reporting’, ‘leadership accountability’, ‘talent pipeline’ and ‘gender. In contrast, the 2019 assessment was facilitated by the EOC monitoring team utilising a specific focus group of SAPOL personnel comprised of 20 supervisors, managers and Diversity and Inclusion Representatives. In addition to the areas assessed in 2016 this review examined four additional key focus areas - namely ‘stakeholder engagement’, ‘strategy and business case’, ‘leader and manager capability’ and ‘policies and processes’. The maturity of SAPOL for each of the key focus areas has been plotted on a sliding scale to represent the variability across the key focus areas (Figure 39).

⁶¹ Equal Opportunity Commission, 2016, *Independent Review of Sex Discrimination, Sexual Harassment and Predatory Behaviour in the South Australia Police*, p. x

⁶² Workplace Gender Equality Agency, 2016, *Gender strategy toolkit*, p. 35

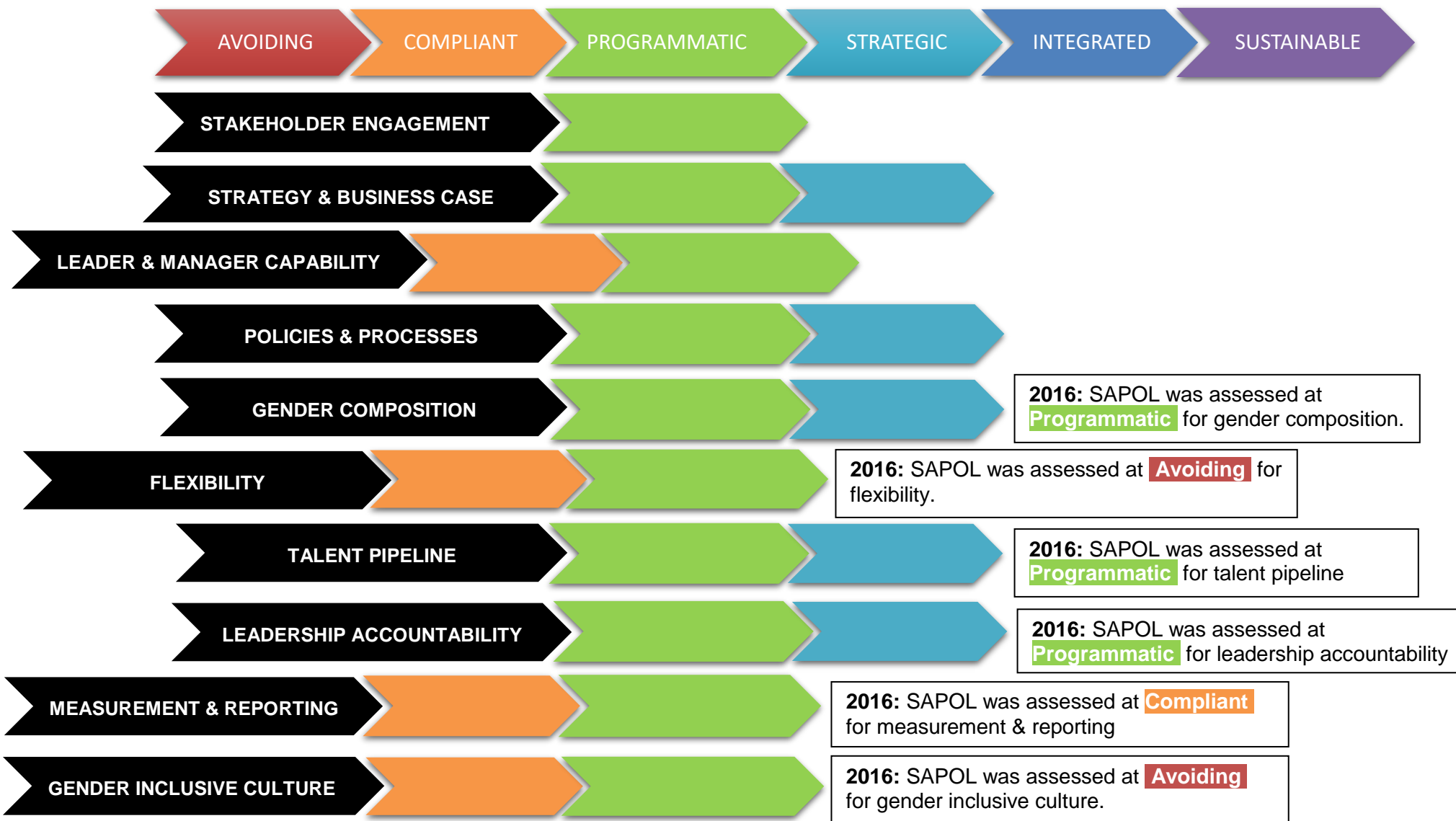


Figure 39. Snapshot of SAPOL against the WGEA key focus areas

STAKEHOLDER ENGAGEMENT

PROGRAMMATIC

The assessment of this area focused exclusively on internal stakeholders. While it was noted that there was considerable communication with stakeholders early in the gender equality reform process, more recently this engagement has been in relation to specific initiatives and has occasionally been reactive. In addition, evidence in this report suggests that the challenges SAPOL has faced in engaging stakeholders across the organisation have, in part, arisen from the one-way and largely one-dimensional approach to communication (i.e. email). A consultative approach is essential for engaging SAPOL personnel in the implementation of the gender equality strategy and addressing resistance and fear.

STRATEGY & BUSINESS CASE

PROGRAMMATIC

STRATEGIC

SAPOL has recognised the value of a gender strategy based on a credible business case. This would place them at the strategic stage. However, the evidence in this report indicates that this recognition is not yet organisation-wide. This suggests there remains work to be done in the effective communication of the business case, to ensure engagement across the organisation.

LEADER & MANAGER CAPABILITY

COMPLIANT

PROGRAMMATIC

Although some leaders have made the commitment to address gender inequality (programmatic), others resist moving beyond the stage where capability-building is limited to raising awareness of compliance responsibilities. In practice, it seems that many SAPOL managers require more education, training and development to build and maintain gender equitable teams, which is required to progress to the strategic stage and beyond.

POLICIES & PROCESSES

PROGRAMMATIC

STRATEGIC

A range of policies have been developed which support gender strategy and objectives. This places SAPOL at the strategic level. However, in some areas, the policy development has occurred more frequently on an “as needed” basis. It should be noted that this may be related to the transitional period in which SAPOL finds itself. Therefore SAPOL may find another assessment conducted after the conclusion of significant organisational changes, like the District Policing Model, to be a more useful measure.

GENDER COMPOSITION

PROGRAMMATIC

STRATEGIC

SAPOL was assessed at the programmatic stage for gender composition in the 2016 review. This stage still appears to characterise some of SAPOL’s approach where gender is monitored selectively for high-need or high-profile groups within the organisation. However, overall workforce gender composition is monitored strategically and SAPOL is working towards the strategic monitoring of outcomes by gender, particularly in the areas of recruitment, retention and attrition.

FLEXIBILITY

COMPLIANT PROGRAMMATIC

SAPOL was assessed at the avoiding stage for flexibility in the 2016 review, and the organisation's commitment to this area has resulted in some significant improvements, particularly in policies and in the encouragement it has given employees to consider and take up flexible working arrangements. However, in practice, compliance better characterises the approach to implementing FWAs at some levels of SAPOL. This is because of the challenges the practice of wide-scale approval has posed for teams and units already struggling with resourcing and particularly staffing limitations. As a result, flexibility is not benefiting all employees, but currently increasing the burden on some in terms of workload.

TALENT PIPELINE

PROGRAMMATIC STRATEGIC

SAPOL was assessed at programmatic for talent pipeline in 2016. This still characterises SAPOL in some respects. However, there is also evidence that female talent investment is linked to the gender strategy, particularly in the use of targets to increase the participation of women.

LEADERSHIP ACCOUNTABILITY

PROGRAMMATIC STRATEGIC

SAPOL was assessed at the programmatic stage for leadership accountability in 2016. In 2019, the Executive Leadership Team clearly recognised the need for gender equality action although there remains room for improvement in the way in which it, and senior leaders more generally, role-modelled and communicated their roles in driving progress. Feedback suggests that while this was done well in the early stages of implementing gender equality reform, more recent communication from senior leaders has not been as effective. Communication strategies need to focus on engaging all employees and may involve adapting and differentiating strategies that appeal to different audiences. The reporting of Gender Equality Action Plan, objectives and KPIs is limited to senior/executive leadership forums and thus there is an inability to hold leaders to account.

MEASUREMENT & REPORTING

COMPLIANT PROGRAMMATIC

SAPOL was assessed as compliant for measurement and reporting in the 2016 review and, in some areas, it appears that gender data-gathering and reporting still occurs only to meet compliance obligations. In other areas, there is evidence of improvement, but this appears to be reactive and limited to specific issues or needs. A more strategic, organisation-wide approach to data collection and analysis is essential for informing progress beyond the programmatic stage.

In 2016, SAPOL was assessed as 'avoiding' in terms of a gender-inclusive culture. Gender-specific barriers were unrecognised and there was little awareness that the culture needed to change. Although this is an area that takes time to evolve, SAPOL has demonstrated progress. Norms, attitudes and behaviours regarding gender equality still appear to be focused on compliance in some areas (and there are still some examples of 'avoiding'). However, in others there are initiatives aimed at influencing gender-related culture and behaviour, such as unconscious bias and respectful behaviours training. To move to the strategic level and beyond, it must be clear to all employees that gender equality and the supporting values and behaviours are part of an aspirational culture, rather than simply a compliance measure.

4.3 A key learning from focus groups

Throughout the data collection and analysis for this report, and particularly in the focus groups, it has become evident that many of the challenges that SAPOL has faced, and continues to face, have arisen from the way in which the organisation has implemented gender equality activities. Time, people and funding have been invested into the 'what' of their cultural change initiative. In future, the focus and investment need to be driven through a **strategic project management approach**. Such an approach considers not only 'what' work needs to be undertaken, but also:

- 'Why' it needs to be undertaken (i.e. the business reasons this is important); and
- A consultative and experimental approach to 'how' this should be done (i.e. involving smaller-scale trials of major initiatives before roll-out across the whole organisation where possible).

In some cases, the limited attention given to consultation/stakeholder engagement ahead of implementation has led to an underestimation of or lack of preparedness for the risks involved. As a result, this has constrained the return on the initiative to date and has fed resistance and backlash.

There are a number of ways in which SAPOL can improve the implementation of gender equality initiatives. For example, focus group participants indicated that SAPOL could enhance internal stakeholder engagement by tailoring messages to the target audience and delivering them face-to-face, and by involving managers to reinforce their accountability.

Furthermore high quality and effective training and support should follow change interventions from introducing the need for, and benefits of the change, through to the practicalities for use in day-to-day operations.

5 Resistance to Change

Gender equality initiatives often face resistance and backlash. The 2016 Review highlighted that resistance was to be expected when initiating gender equality in SAPOL. Evidence of resistance was uncovered during consultation in the development of this report, such as responses of ‘it’s discrimination against men’, ‘it takes us away from doing our job’, ‘the pendulum has swung too far’, ‘it’s preferential treatment for women’, ‘selections aren’t based on merit’ and ‘it should be best person for the job’. This resistance has come from men and women and employees in leadership roles.

The business case for gender equality is well established and the ELT must persist, keep engaging the workforce, communicate gender equality achievements and address resistance. This chapter covers the key aspects of addressing resistance – identify the sources, understand the forms of resistance and plan for resistance.

A key resource that this chapter draws on an extensive evidence review of resources to understand and counter backlash and resistance to gender equality initiatives by Michael Flood, Molly Dragiewicz and Bob Pease (from the Queensland University of Technology) that was commissioned by VicHealth in 2018. It provided recommendations about existing approaches and tools to prevent and respond to resistance.⁶³ VicHealth then translated the review findings into an evidence-based practice resource, ‘*(En)Countering Resistance*’.⁶⁴

5.1 Identifying the sources of resistance

Resistance to gender equality initiatives may arise from men and women and can exist at all levels of an organisation. It is important to understand the source of resistance to facilitate the customisation of future communications and strategies to counter this.

The source of resistance to change is more likely to come from the people who have benefited from the status quo. With regard to change initiatives aiming to progress gender equality, men are more likely than women to resist progress.⁶⁵ The review by Flood and his colleagues highlighted a number of factors that contribute to men resisting gender equality, including:

- Attitudes towards gender are more conservative than women’s;
- Poor recognition of actions or situations as discriminatory towards women;
- Less likely to perceive sexist incidents as discriminatory and potentially harmful for women; and
- Unlikely to detect discrimination and recognise its severity when the sexism is subtle.⁶⁶

⁶³ Flood, Michael, Dragiewicz, Molly, & Pease, Bob (2018) *Resistance and backlash to gender equality: An evidence review*. Crime and Justice Research Centre, Queensland University of Technology, Brisbane, Qld,

⁶⁴ VicHealth, *(En)countering resistance: Strategies to respond to resistance to gender equality initiatives*, pg. 2

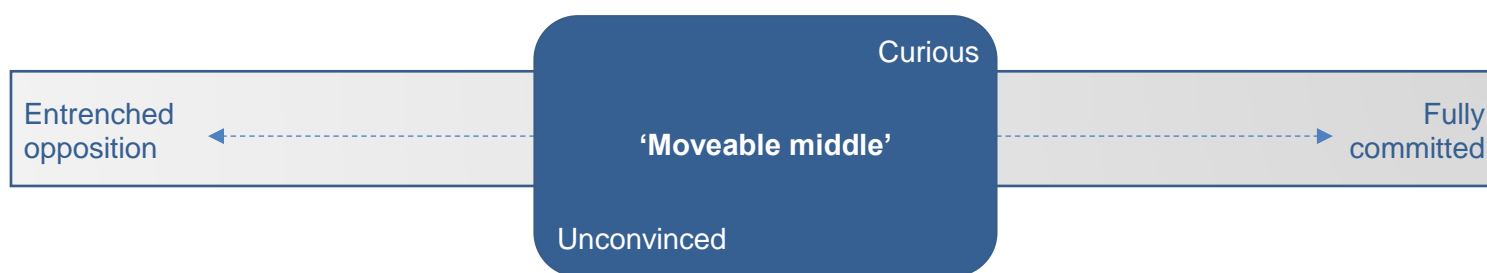
⁶⁵ Flood M. et al., *Resistance and backlash to gender equality*, pg. 10

⁶⁶ Flood M. et al., *Resistance and backlash to gender equality*, pg. 11

Flood and his colleagues also noted that a proportion of women may also be resistant to change in regard to gender equality.⁶⁷ During 2019 survey and focus group consultation, it was raised that current gender equality initiatives in SAPOL are putting women in the ‘spotlight’. For some female employees they have been able to progress in SAPOL in spite of their gender, but now there is more attention on ‘who’ does training or wins roles and women are experiencing backlash. This was evident by the use of terms/phrases such as ‘vagina vote’ (as mentioned in sub-section 3.4.3), ‘it’s preferential treatment for women’, ‘selections aren’t based on merit’ and ‘it should be best person for the job’. On the back of this experience women may resist gender equality initiatives.

VicHealth present a spectrum of resistance (Figure 40) with the fully committed on the far right and the entrenched opposition on the far left. This group on the far left are least likely to get on board with the change initiative. A shift in this group will only occur when any existing sexist social norms are updated with modern social norms. Mid-spectrum is the ‘moveable middle’ and according to VicHealth focusing on reducing and responding resistance with this group is an effective approach to substantial progress towards gender equality.⁶⁸

Figure 40. Spectrum of resistance (VicHealth 2018).



5.2 Understanding the forms of resistance

It is important to understand the range of resistance to the change in order to identify opportunities to overcome or minimise the resistance and enhance the buy-in. The resistance can take the form of disinterest or simple disagreement to claims of preferential treatment for women in recruitment, development and promotion opportunities through to the more active, aggressive opposition in order to restore the previous order.⁶⁹ VicHealth’s ‘(En)countering resistance’ resource includes the range of resistance often met when promoting gender equality.⁷⁰ This range has been merged with a set of drivers of resistance to change as identified by Chief Executive Women and Male Champions of Change based on evidence based practice (see Figure 41).

⁶⁷ VicHealth (2018), “Counter culture - seeing resistance as part of the process of social change,” LETTER, no. 48, <https://www.vichealth.vic.gov.au/media-and-resources/vichealth-letter/vh-letter-47-home>, accessed 1 October 2019.

⁶⁸ VicHealth, *(En)countering resistance: Strategies to respond to resistance to gender equality initiatives*, pg. 6.

⁶⁹ Chief Executive Women and Male Champions of Change, 2018, *Australian leaders urged to confront resistance to advancing women*.

⁷⁰ VicHealth, *(En)countering resistance: Strategies to respond to resistance to gender equality initiatives*, pg. 4.

The forms outlined by VicHealth are:

- Denial: “There’s no problem here.” Denial of the problem or the credibility of the case for change. Blame the victims.
- Disavowal: “It’s not my job to do something about it.” Refusal to recognise responsibility.
- Inaction: “It’s not a priority right now.” Refusal to implement a change initiative.
- Appeasement: “Yes. Yes. We must do something (one day).” Efforts to placate or pacify those advocating for change in order to limit its impact.
- Appropriation: “Of course we’d appoint more women, if only they were more experienced.” Simulating change while covertly undermining it.
- Co-option: “What about men’s’ rights? Men are victims too, you know.” Using the language of progressive frameworks and goals for reactionary ends.
- Repression: “We tried that once and women didn’t want to take up the promotion/training/opportunity.” Reversing or dismantling a change initiative.
- Backlash: “These feminists deserve all the abuse they get.” Aggressive, attacking response.

It is important to enhance the understanding of the forms of resistance with the driver/s of resistance. Figure 41 shows that the key drivers are lack of understanding, change fatigue, industry norms, cultural norms and fear.

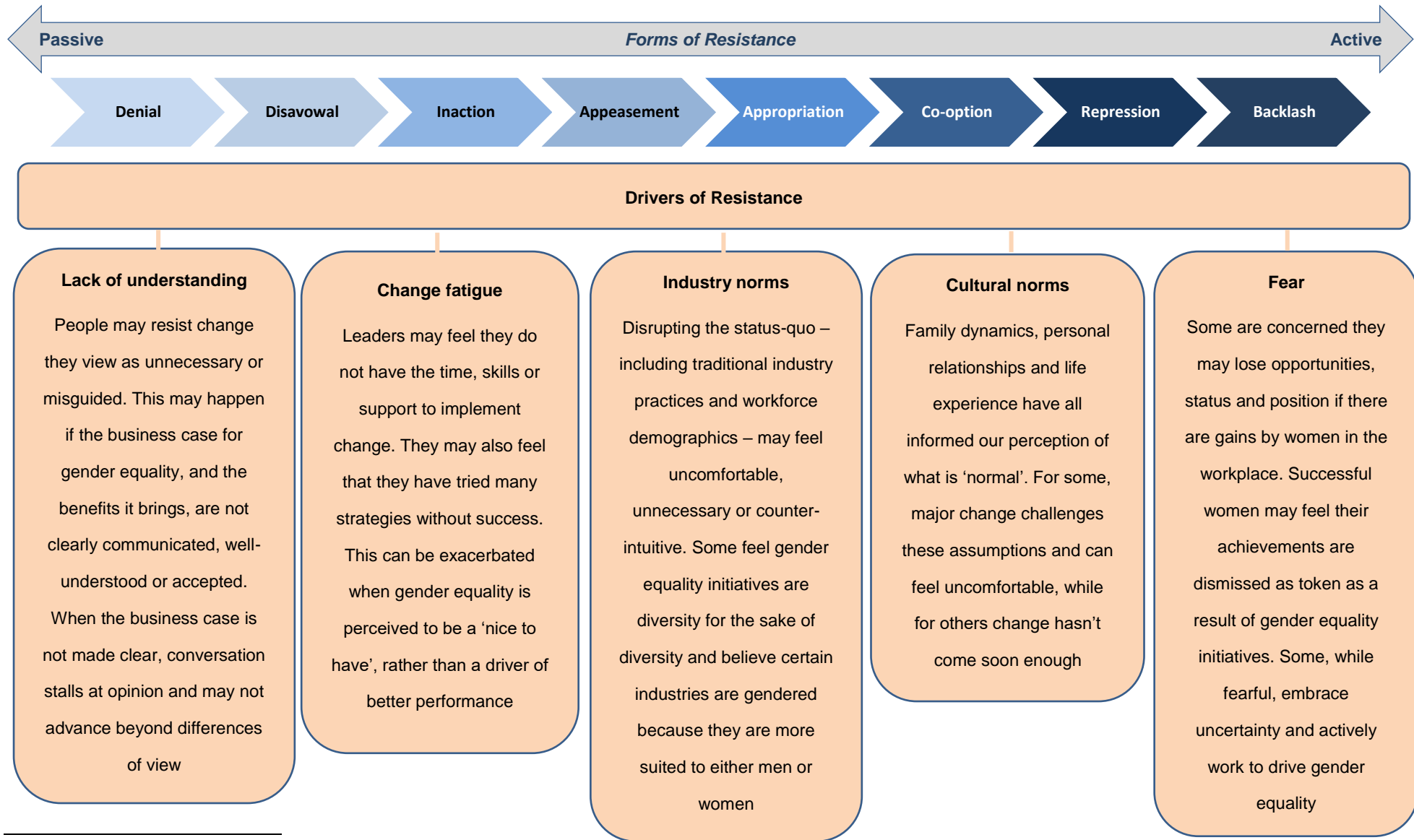
Using a ‘forms of resistance’ lens over the open text recorded through the EOC 2019 survey and focus group feedback, it is apparent that SAPOL is experiencing resistance to its gender equality strategy in the forms of denial, inaction and co-option. These forms of resistance are evident by the clustered perceptions of ‘it’s discrimination against men’, ‘it takes us away from doing our job’, ‘the pendulum has swung too far’, ‘it’s preferential treatment for women’, ‘selections aren’t based on merit’ and ‘it should be best person for the job’ in response to the 50/50 recruitment policy, women only information sessions, selections and promotions.

During change initiatives, those who resist change may be doing so because their privilege is being challenged – even though their privilege may not be visible to them. It follows that for members of privileged groups, the experiences of the advantages that accrue to them, are normal. As a result, when their privilege is challenged or they experience loss of their privilege, this is seen as disempowerment or victimisation.⁷¹ The rejection of the claim that women are disadvantaged and men are privileged, or even the counter-claim that now it is men who are disadvantaged is one of the most common forms of resistance to gender equality initiatives.⁷²

⁷¹ Flood et al., *Resistance and backlash to gender equality*, pg 10-11.

⁷² Flood et al, *Resistance and backlash to gender equality*, pg 15.

Figure 41: Forms and drivers of resistance (source: VicHealth;⁷³ Chief Executive Women and Male Champions of Change⁷⁴)



⁷³ VicHealth, *(En)countering resistance: Strategies to respond to resistance to gender equality initiatives*, pg. 4.

⁷⁴ Chief Executive Women and Male Champions of Change, 2018, *Backlash & Buy-In*, pg. 10.

5.3 Planning for and addressing resistance

Resistance to gender equality initiatives is common⁷⁵ but can be confronting and frustrating. According to Flood et al., there is substantial overlap between strategies for preventing and responding to resistance, so the following discussion will be applicable for SAPOL when introducing other activities related to gender equality or other change initiatives as well as in countering current resistance.

Drawing on VicHealth's '*(En)countering resistance*'⁷⁶ the optimal approach to prepare for, and respond to, resistance is to consider the following:

- Organisational strategies: How you involve leaders, individuals and groups, and address policies, practices and organisational structures, to support and influence change, as well as challenge resistance. For SAPOL this would involve
 - Engaging senior men to support and initiate gender equality activities;
 - Addressing those individuals and groups who are most likely to be resistant with materials specifically designed for them and face-to-face forums with a leader;
 - Establishing clear monitoring, evaluation and reporting processes to ensure all stages of the change process are implemented and progress is communicated.
- Framing strategies: How you articulate, communicate, or 'frame' something and explain why it's important influences how people process and respond to that information. For example, for SAPOL this would involve the following in a robust feminist framework
 - Articulating the rationale and benefits of a gender equality activity in terms of SAPOLs shared values and goals (using a business case, the accounts or narratives of the problem and solution by employees);
 - Anticipating and answering common resistant reactions (using FAQs/fact sheets, discussion forums) which will comprise emphasising that men will benefit too, moving men away from entitlement and addressing claims about male disadvantage; and
- Teaching and learning strategies: Consider teaching processes, the learning environment and the educators as a way to lessen the likelihood of resistance – needs to balance challenging the status quo and fostering readiness to make change. This would involve
 - Training in small groups with a balance of challenge and support drawing on a variety of teaching approaches such as personal stories, role-plays;
 - Knowledgeable and skilled educators who are effective facilitators of 'in moment' interactions;
 - Countering misinformation and denial by acknowledging doubts and fears, highlighting facts (not myths) and identifying fallacies.

Applying this approach with the understanding of the forms and drivers of resistance will see tailored engagement and communication activities for the committed through to the moveable middle (curious and

⁷⁵ Chief Executive Women and Male Champions of Change, *Backlash & Buy-In*, p. 17.

⁷⁶ VicHealth, *(En)countering resistance: Strategies to respond to resistance to gender equality initiatives*, pg. 7-11.

unconvinced). With a shift in the existing social norms the entrenched opposition will realise how outdated and ill-informed they were and start to modernise.

SAPOL engaged an external consultant in 2017 to develop the Project Equitas Business Engagement Plan. With just over three years of activity under Project Equitas, it is timely for SAPOL to review and update the plan for engagement and communication activities for the next year or so, to align with the next iteration of the Gender Equality Action Plan. The review and update should aim to shift the initial plan from setting the foundation for stakeholders to adapt and embrace the changes implemented by Project Equitas to enhancing momentum towards SAPOL progressing to the strategic and integration phases on the Workplace Gender Equality Agency roadmap, as well as preparing for, and responding to, resistance.

Feedback from the focus groups strongly recommended that a variety of engagement and communication modes are utilised to meet the needs of different stakeholders. The feedback indicated that much communication over the last two years has been largely dependent on email – focus group participants were not finding this engaging.

A revamp of the engagement and communication plan will support those in the workforce who have adapted and embraced the interventions to maintain momentum and facilitate progress. While those that are resistant may be the minority, strategies need to be in place to mitigate the harm they can create.

EOC 2020 Recommendation

SAPOL review and update the 2017 Engagement and Communication Plan with the purpose of guiding and supporting SAPOL into the next stage of their cultural change initiative, including

- Updating with innovative actions and activities for each of the 'change levers' identified in the 2017 Plan (with associated target audience, objective, timing and responsibility);
- Enhancing messaging to 'engage the base, persuade the middle and alienate the opposition';⁷⁷
- Strategies for managing resistance;⁷⁸
- Reporting requirement on progress, achievements and challenges for the updated Engagement and Communication Plan to the role responsible for gender equality in SAPOL.

⁷⁷ Refer to the research of Anat Shenkev-Osorio's to support framing strategies by enhancing messaging to 'engage the base, persuade the middle and alienate the opposition', Shenker-Osorio, Anat (2012), *Don't Buy It*, (Ingram Publisher Services US: New York).

⁷⁸ Tools could be based on Chief Executive Women and Male Champions of Change 'Backlash & Buy-in', VicHealth's '(En)countering resistance', 'Resistance and Backlash to Gender Equality: an evidence review' by Flood et al., Kegan and Laskow Lahey's 'Immunity to Change' and Anat Shenken-Osorio's research on messaging.

6 Conclusion – Making Further Progress

The focus of this report has been to provide SAPOL with evidence of practice and cultural change in relation to gender equality - and insights into making the change process more effective. The EOC Monitoring team has found that SAPOL has undertaken extensive activity, as noted by the completion of 33 of the 2016 EOC Review's 38 recommendations, resulting in:

- Increased awareness of behaviours that constitute sex discrimination and sexual harassment;
- Decreased experience of sexual harassment compared with national statistics of sexual harassment in Australian workplaces;
- New support systems established, including the Diversity and Inclusion Branch, to assist personnel who experience discrimination, harassment and bullying;
- Increased perception of respect within teams;
- Starting to build a gender diverse leadership pipeline;
- Increased female participation in training and development in line with the proportion of female personnel in SAPOL;
- Increasing awareness of unconscious bias in selections and working to mitigate this;
- Establishing the policy framework for flexible working arrangements; and
- Increased uptake of flexible working arrangements, especially by men.

Nevertheless, there remain considerable challenges to be addressed by SAPOL:

- Female sworn officers are still experiencing significantly higher levels of sexual harassment than their sworn male and non-sworn female and male counterparts;
- Predatory behaviour continues to be a problem for the organisation, and will remain so if lack of confidence to challenge inappropriate behaviour by personnel of senior ranks is not effectively addressed;
- Lack of transparent and effective consequences for perpetrators of inappropriate behaviour and ongoing fears of victimisation have continued to undermine reporting rates and confidence in SAPOL's commitment to change;
- Accountability for positive cultural change is not occurring at an organisational-wide level and contributes to uncertainty surrounding commitment of leaders to change;
- Misconceptions of gender equality and associated initiatives and resistance to change continue to hamper organisational-wide cultural change and need to be addressed and challenged;
- One-sided and sometimes one-dimensional communication undermines organisational-wide engagement with and understanding of gender equality issues;
- Lack of consistency in, access to and evaluation of training and development opportunities particularly for regional areas and those working flexibly;

- Lack of consistency in the implementation of flexible working arrangements threatens the sustainability of flexibility in the context of ensuring operational effectiveness.

Figure 42. Negative cultural elements from the 2016 Review and their status in 2019.

Negative cultural elements in 2016	Findings of the 2020 EOC review of progress
Prevalence of sex discrimination & sexual harassment	<ul style="list-style-type: none"> • Rates of sexual harassment have dropped significantly to well below the national average • Changes in rates of sex discrimination and predatory behaviour are inconclusive at this time. Future evaluation needs to be planned to ensure comparable timeframes
Inaction on sex discrimination and sexual harassment matters	<ul style="list-style-type: none"> • Organisation-wide training was undertaken to raise awareness and confidence to call out inappropriate behaviour and report, but this is not always occurring • Establishment of the D&I Branch • Perception that taking action makes "no difference" remains
Employees not confident to report sexual harassment	<ul style="list-style-type: none"> • Employees report increased confidence to address inappropriate behaviour • Under-reporting rates have not improved within SAPOL but remain consistent with the national average
SAPOL not supporting complainants of sex discrimination or sexual harassment	<ul style="list-style-type: none"> • The new D&I Branch is perceived more positively by employees • Clear and effective communication of consequences for perpetrators still needs work
Lack of access to and support for flexible working arrangements	<ul style="list-style-type: none"> • Significantly increased approval rates for FWAs • Challenges to the accessibility of FWAs remain, especially in regional environments where staffing may be more limited
Susceptibility to bias in selections/promotions and training & development	<ul style="list-style-type: none"> • Unconscious bias training for selection advisory committee personnel and reviewing of position information documents • Women participating in training & development proportionate to female personnel in SAPOL

Although considerable resources have been invested into the cultural change initiative, it has become evident that many of the challenges SAPOL have faced have arisen from the way in which cultural change has been implemented. Lack of awareness of or action to combat risks associated with the implementation of gender equality initiatives has, in some cases, undermined their effectiveness and has also adversely affected employees' attitudes to change. Furthermore, ad hoc and inconsistent data collection in some areas has hampered SAPOL's ability to comprehensively and critically monitor and evaluate the organisation. However, where a more strategic approach has been adopted, as is evident by the active experimentation approach to recruiting for the new Security Response Section, it is clear that gender equality initiatives can be successfully integrated into SAPOL's business.

SAPOL can improve the implementation of cultural change activities through a **strategic project management approach** to the adoption of gender equality initiatives, including risk assessment and contingency planning. This would allow SAPOL to more fully understand and mitigate risks associated with implementation, for example flexible working arrangements reaching 'saturation' level. This approach must include 'active experimentation' or an experimental mindset,⁷⁹ which will see more pilots or trials by SAPOL and allow them to fail, learn and adapt before rolling out implementation at the organisational scale.

Strategic project management of change also includes ongoing monitoring to ensure the effectiveness and accountability of the relevant SAPOL service areas, which take over the responsibility for initiatives from the Project Equitas team. Effective monitoring also requires a planned approach to data collection and analysis. In addition, employee engagement must be enhanced by tailoring messages to specific groups, which will allow SAPOL to assess and build on current understanding of gender equality initiatives, and to address misconceptions. Engagement may also be improved by delivering messages face-to-face, and by involving managers to demonstrate to employees their commitment to change.

For change to be sustainable, training and support needs to continue beyond the introduction of gender equality initiatives to ensure that the latter are effectively integrated into business, policies and processes across the organisation.

ELT members clearly stated their commitment to gender equality in SAPOL from the outset by working with managers, and connecting with the workforce. Becoming a sustainable gender equitable organisation will require SAPOL's leadership to continue driving gender equality actions and interventions. Leaders and managers will need to role model gender equitable and inclusive behaviours and coach others to do the same.

Summary of 2020 recommendations

On the basis of the findings of this report, the EOC makes the following recommendations:

Monitoring & Evaluation

It is highly recommended that SAPOL develop a data collection and reporting schedule integrating all new reporting requirements arising from the EOC's recommendations to ensure this is manageable and streamlined with existing reporting requirements. This data should be utilised to monitor the effectiveness of the completed policy/process/system based recommendations. This will enable SAPOL leadership to be consistently, effectively and regularly informed about the impact of gender equality initiatives, cultural change and areas of concern. In particular, SAPOL will benefit from critically and comprehensively evaluating and monitoring the following areas:

1. Complainants' satisfaction with the complaint process, including the consequences of reporting for complainants.

⁷⁹ Heifetz, R. A., Linsky, M., and Grashow, A. (2009). *The Practice of Adaptive Leadership: Tools and Tactics for Changing your Organisation and the World*, (Cambridge, MA: Harvard Business Press), p. 19.

2. Review strategies for evaluating complainant and respondent satisfaction with the Diversity and Inclusion Branch complaint process to increase response rates, including any victimisation of complainants as a result of reporting. This information must be used to continuously improve the services of the D&I Branch.
3. Effectiveness of the service provided by the Diversity and Inclusion Representatives Service ensuring it is effective for both the employees making contact and the employee providing the service.
4. The use and effectiveness of the iEngage performance management system in progressing and achieving its objectives of values, performance, growth (including improving employee awareness of and access to training and development opportunities) and well-being for sworn and non-sworn employees.
5. Reasons (and associated contributing factors) for employee exit to assess the impact of cultural change and to address any significant and ongoing problems with workplace culture.
6. The administration of its exit management strategy, giving consideration to:
 - The adequacy of training for HR personnel and managers in administering the strategy;
 - The level/status of completion of the training by HR personnel and managers; and
 - The consistency of the administration of the exit management strategy by the Human Resources Service.
7. Managers/supervisors capability to implement 'If Not, Why Not' from the request step through to managing teams with personnel accessing flexible working arrangements.
8. Setting a tangible and quantified target/goal for the flexible working arrangements Key Performance Indicator that is sustainable for meeting service delivery requirement.

Communication

It is recommended that a review and revision of the Engagement and Communication Plan is undertaken. This should include adapting and differentiating communication strategies, including more face-to-face communication (for example discussion by leaders in team meetings) to increase employee understanding and engagement. Future communications need to consider:

9. Actively promoting the importance of the Diversity and Inclusion Branch, the reporting pathways and developing the confidence of employees to report to the Branch. This includes:
 - Reassessing confidentiality strategies at the team level or with perpetrators and/or victims to ensure confidentiality is taken seriously and consequences are enforced for breaches
 - Regularly communicating disciplinary outcomes (without identifying details of parties involved) to demonstrate that inappropriate behaviour is being treated seriously and to serve as team training and development tools for supervisors and managers.
 - Promoting the availability of anonymous reporting.
10. Sharing examples of progress on and the impact of gender equality initiatives and cultural change with particular regard to gender equality strategic objectives, gender equality key performance indicators,

the Gender Equality Action Plan, and the Diversity and Inclusion Strategy – as well as plans for future action - across the organisation.

11. Addressing prevalent misconceptions regarding the fairness of selections and promotions, including communicating the benefits of up-coming changes to selections and promotions processes.
12. Effectively communicating the rationale for women only information and training sessions, particularly to supervisors and managers, (including the benefits based on feedback from participants) to counter ongoing (and substantial) negativity about these.
13. SAPOL review and update the 2017 Engagement and Communication Plan with the purpose of guiding and supporting SAPOL into the next stage of their cultural change initiative, including
 - Updating with innovative actions and activities for each of the ‘change levers’ identified in the 2017 Plan (with associated target audience, objective, timing and responsibility).
 - Enhancing messaging to ‘engage the base, persuade the middle and alienate the opposition’.⁸⁰
 - Strategies for managing resistance.
 - Reporting requirements to roles responsible for gender equality in SAPOL on the progress, achievements and challenges for the updated Engagement and Communication Plan.

Education and training

It is recommended that SAPOL develop education and training to enhance understanding and capability in the following areas:

14. Understanding of what constitutes predatory sexual harassment.
15. Vigilantly building the capacity⁸¹ and reinforcing the expectation of its senior leaders and its supervisors and managers to effectively lead and manage the change required to become a diverse and inclusive organisation and to role model the behaviours required to support a positive culture where all employees are valued for their diversity and are treated equally. This includes all people managers understanding their accountability and reporting responsibilities for gender equality objectives and Key Performance Indicators to enable them to then practice accountability.
16. Increasing skills and confidence for all employees, including managers/supervisors, to challenge inappropriate behaviour, regardless of the rank/level of the perpetrator.
17. Providing support to managers/supervisors to implement flexible working arrangements within their teams. This support needs to consider:
 - Consistency in the implementation of flexible working arrangements across SAPOL, ensuring operational constraints are accounted for and implementation is sustainable, which may include

⁸⁰ Refer to the research of Anat Shenkev-Osorio’s to support framing strategies by enhancing messaging to ‘engage the base, persuade the middle and alienate the opposition’, Shenker-Osorio, Anat (2012), *Don’t Buy It*, (Ingram Publisher Services US: New York).

⁸¹ Capacity in the areas of preventing and responding to sex discrimination and sexual harassment; bystander responsibilities; people and performance management; difficult conversations in the workplace; and behavioural expectations.

backfilling, establishing a casual roster and undertaking matching of employees already on part-time working arrangements

- Improved technology/tools to make vacancies resulting from flexible working arrangements visible across SAPOL enabling the backfilling of positions.
 - Ensuring that flexible working arrangements are a matter of negotiation and not perceived as an inalienable right of employees.
18. Developing a framework for adequately training its trainers, ensuring subject matter expertise in development and delivery of information sessions and training programs, providing engaging delivery methods, and for evaluating information sessions, training programs and tools (content, delivery, and effectiveness in improving participant knowledge, skills and engagement).
 19. Continuing to expanding training delivery methodologies (with involvement of regionally-based trainers) to enhance flexibility with a focus on equal opportunity for sworn and non-sworn staff - with a focus on accessibility for those working flexibly and regionally.

Although this report has found that there is still much important work to be done, there has been significant progress on a number of fronts thanks to the effort SAPOL has expended in addressing sex discrimination and sexual harassment, and the barriers that existed for many women in SAPOL. However, the cultural problems at the heart of gender inequality, sex discrimination and sexual harassment were never going to be 'fixed' in such a short timeframe. It will take significant time to make gender equality the cultural norm in SAPOL. Nevertheless, SAPOL is in a prime position to build momentum on the back of the completed 2016 EOC Review and the monitoring reports by the EOC Monitoring team. Compared to many other organisations, SAPOL has a much better understanding of the issues in its workplace and the impacts these are having on its workforce. With a strategic focus, ongoing reflection, and continual improvement SAPOL can leverage its strong base of action to build the changes that are needed as it works towards their long-term goal of becoming an organisation in which gender equality is a business and cultural norm.

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8 Appendix

8.1 Appendix 1: WGEA key focus areas

Key focus area	Description
Strategy and business case	<p>A coherent gender equality and diversity strategy is the basis for:</p> <ul style="list-style-type: none"> • targeting effort and resources towards clear gender equality objectives (immediate and longer term) • linking gender equality objectives to business strategy, plans and goals • communicating strategic intent regarding gender equality to stakeholders • mobilising and sustaining commitment to a common gender equality agenda • ensuring synergies and economies of scale are exploited through consistent and concerted action. <p>A business case – specific to your organisation and supported by reliable data – is a key foundation for the strategy. An approach reliant on individual or organisational values is unlikely to be sufficient in a commercial context.</p> <p>Clarity about how gender strategy supports business strategy is key to reaching the ‘sustainable’ phase; these two strategies are likely to be fully merged rather than separate agendas or documents.</p>
Leader and manager capability	<p>Achieving gender equality through the development of gender-diverse, inclusive, flexible teams and organisations requires knowledge, skill and supportive attitudes amongst all employees, particularly managers and leaders.</p> <p>Individuals will possess these capabilities to differing degrees and some will require support from the organisation to gain the requisite level of competence and confidence.</p> <p>Equitable opportunity for development of other key capabilities for all employees, irrespective of individual difference (e.g. gender), is a key foundation of equitable career advancement and diverse leadership teams.</p> <p>Gender-related development interventions and activities are often most effective when they are integrated into existing or future management and leadership development programs. In this way, gender equality, diversity and inclusion are positioned as part of broader leadership and management agendas, maximising participant buy-in and content synergies.</p>
Stakeholder engagement	<p>A stakeholder is an individual or group who or which has an interest in, or an ability to influence, a given gender equality outcome.</p>

	<p>Internally, all employees (and at different levels) have a role in gender equality; externally, stakeholders could include (but are not limited to) customers or clients, communities, shareholders, trade unions, professional or industry bodies, regulators and government.</p> <p>Different stakeholders have varying needs and expectations regarding gender equality; engaging and building support with each (individual or group, male and female) requires regular, two-way interaction to identify and respond to these.</p>
<p>Policies and processes</p>	<p>Progress towards sustainable gender equality, diversity and inclusion requires best practice to be integrated into the design and operation of key policies and processes.</p> <p>If policies and processes are not audited and optimised, their outcomes are unlikely to be gender-equitable and barriers which impact women disproportionately relative to men will continue to create gender inequality.</p> <p>Business processes include allocation of work, projects and customers /clients, procurement, marketing, problem-solving and decision-making. People processes encompass the organisation's approach to the management of employees throughout their tenure.</p> <p>Policy and process design can help address potential inequities in decision-making – such as by reducing the risk of conscious or unconscious gender bias – while process or procedural safeguards such as diverse decision-making, review groups and robust decision-making criteria will also help address these potential inequities.</p> <p>Polices and processes should be reviewed regularly to ensure they reflect changes in the external environment, such as legislative changes.</p>
<p>Gender composition</p>	<p>Leading organisations in gender equality recognise the need to ensure their procurement principles, practices, and overall supply chain management are consistent with, and actively support, its gender equality objectives. This includes ensuring that potential or existing suppliers or partners demonstrate commitment to, and action on, gender equality.</p> <p>Leveraging commercial influence within a supply chain (both up and downstream – i.e. as a provider and a buyer of goods and services) can help drive industry and national progress towards gender equality more quickly as it requires organisations to play a leadership role within their sphere of influence. Increasingly, international benchmarks for equitable supply chain practices are being established, such as within the United Nations Global Compact.</p> <p>There are strong reputational and brand benefits from adopting supply chain practices which promote gender equality. Research suggests that supplier diversity action impacts employee satisfaction with overall organisation equality efforts.</p> <p>Best practice includes consideration of gender equality within processes for initiating relationships with suppliers or customers and regularly reviewing these for 'fit' with the organisation's gender strategy.</p>

Flexibility	<p>Business benefits for organisations which embrace and provide equitable access to flexibility include talent attraction and retention, engagement, productivity and agility, which translate into stronger performance.</p> <p>Research and experience also indicate that work and career flexibility are drivers and enablers of equality, diversity and inclusion. Women are disproportionately impacted by a lack of family-friendly policies and practices because they comprise the majority of primary carers in the Australian workforce and therefore bear the double burden of managing work and family demands concurrently.</p> <p>Policies do not necessarily translate into practice. Often, barriers to increased flexibility reflect negative attitudes of employees (who fear stigma) and managers (who fear losing control). To make progress, organisations need to challenge assumptions, shift attitudes and build a flexible workplace culture.</p> <p>Flexibility solutions need to be team-based, not just individualised. Progress also requires men (especially male leaders) to embrace, utilise and role-model flexibility in all its forms. Only then will flexibility be normalised for employees of either gender or any background.</p> <p>The most flexible organisations do not make (or allow managers to make) value judgements about why flexibility is requested. This is irrelevant when performance is measured by outputs and results, not by the input of visible time spent at a particular time in a particular place.</p>
Talent pipeline	<p>Building a robust pipeline to leadership that is sustainably gender diverse involves identifying, attracting, developing, mobilising, fully utilising and retaining female and male talent equally at all levels. The pipeline begins when talented people join an organisation (including graduate recruitment) to the point where high-potential employees become the organisation's leaders.</p> <p>Capitalising on both female and male talent is critical, however, research and organisational learning indicates that, in many workplaces, there are structural and cultural barriers to equitable career progression for women and, as a result, female talent often 'leaks' from the pipeline at a higher rate than for men.</p> <p>Capitalising on female talent is about:</p> <ul style="list-style-type: none"> • creating a 'level playing field' that enables women and men to equally realise their full potential and maximise their contribution to organisational success • eliminating barriers specific or disproportionate to women. <p>Unconscious gender bias is an intangible but critical barrier to address. For example, it is manifested in leaders and managers hiring, developing, sponsoring and promoting 'in their own image'. Sometimes, this bias is institutionalised in capability frameworks which place higher value on male-typical behaviours. Other barriers include exclusive cultures and male networks, and a lack of appropriate mentors, sponsors and role-models.</p>

<p>Leadership accountability</p>	<p>Visible leadership commitment to gender equality is a critical success factor. Unless gender equality is seen as an important business issue to leaders, it is unlikely to be seen as important to others in the organisation and leadership hierarchy, particularly middle managers.</p> <p>This commitment needs to be communicated regularly to employees and other stakeholder groups as part of the broader business messaging. Communication includes what leaders say and do, as well as what they value and reward, and the expectations they set of others. To translate verbal commitment into meaningful action, leaders need to hold themselves and others accountable for measurable progress and tangible outcomes with respect to gender equality.</p> <p>There are a number of formal mechanisms that can help demonstrate and operationalise leadership commitment; these include gender targets, business scorecards, individual key performance indicators (KPIs) or objectives. The more meaningful consequences these mechanisms have (such as reward outcomes for leaders and their teams), the more impact they are likely to have (e.g. driving action and appropriate behaviours).</p> <p>Establishing an effective governance structure at the executive level to oversee diversity progress is also a prerequisite for success. The executive team, a sub-group of it, or a specific council or forum can provide the necessary oversight. Whatever model is used, visible business ownership, leadership and oversight of the gender equality strategy is critical.</p>
<p>Measurement and reporting</p>	<p>Robust reporting of key metrics is a core business discipline for understanding performance, reporting of gender equality and diversity data should be no different.</p> <p>Data can take many forms, and it will usually be a HR / diversity practitioner’s responsibility to identify which data will be most relevant and useful. Importantly, data can help drive the gender equality agenda by credibly demonstrating to stakeholders that there is an issue to be addressed or a risk to be managed, which will create a business benefit.</p> <p>Business stakeholders are likely to have work styles and preferences which are logic-driven, analytical and data-rational and are likely to respond positively to quantitative data (metrics). However, qualitative data (e.g. individual employee feedback or engagement survey responses) will provide valuable reinforcement, context and insight into human impact.</p> <p>Reporting will highlight whether or not interventions are delivering the expected results and return on investment (and, if not, which areas require corrective action or improvement). Regular progress reporting is therefore an important means of building and maintaining stakeholder support.</p> <p>All of the data collated and analysed for the WGEA annual reporting and EOCGE submissions is likely to be relevant. However, as these are annual snapshots, organisations should consider quarterly reporting to executive stakeholders for relevant metrics, plus supplementary data and trend analysis.</p>

<p>Gender inclusive culture</p>	<p>Organisation culture can be described as the set of prevailing attitudes and values which are recognised and shared by all members of an organisation. These attitudes and values determine the way business is conducted and the way work is delivered, including whether these are gender-equitable or not.</p> <p>Some organisations explicitly define and communicate values, principles, codes and behaviours that are valued and expected in their particular workplace.</p> <p>To achieve sustainable gender equality, an organisation’s culture will need to foster appropriate attitudes, values and behaviours which support and are congruent with gender strategy objectives; sometimes, this will require cultural change.</p> <p>Leaders, through their behaviours and actions (including the decisions they make), shape culture more than any other single factor. To foster a culture of gender equality, leaders’ behaviours need to be inclusive, and their decisions equitable.</p> <p>Cultural change can be measured and reported, such as through the use of benchmark questions around gender equality, diversity, inclusion and flexibility in employee engagement or ‘pulse’ surveys.</p>
<p>Supply chain</p>	<p>Leading organisations in gender equality recognise the need to ensure their procurement principles, practices, and overall supply chain management are consistent with, and actively support, its gender equality objectives. This includes ensuring that potential or existing suppliers or partners demonstrate commitment to, and action on, gender equality.</p> <p>Leveraging commercial influence within a supply chain (both up and downstream – i.e. as a provider and a buyer of goods and services) can help drive industry and national progress towards gender equality more quickly as it requires organisations to play a leadership role within their sphere of influence. Increasingly, international benchmarks for equitable supply chain practices are being established, such as within the United Nations Global Compact.</p> <p>There are strong reputational and brand benefits from adopting supply chain practices which promote gender equality. Research suggests that supplier diversity action impacts employee satisfaction with overall organisation equality efforts.</p> <p>Best practice includes consideration of gender equality within processes for initiating relationships with suppliers or customers and regularly reviewing these for ‘fit’ with the organisation’s gender strategy.</p>
<p>Gender pay equity</p>	<p>Gender pay equity is not only an issue of fairness, it is a key driver of gender equality and diversity overall because it impacts an organisation’s ability to attract, engage and retain talented women. Pay equity operates at two levels: organisational and in relation to comparable roles and/or job families (‘like-for-like’ comparisons).</p> <p>Overall, pay equity within an organisation requires gender-equitable opportunity for career progression (i.e. to the most senior, and usually higher paid, roles), which, in turn, requires the removal of barriers to progression.</p>

	Gender pay equity between comparable roles requires bias-free decision-making (starting with performance reviews and talent management decisions). Transparency in relation to pay equity decision-making is an important component of best practice.
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Source: Workplace Gender Equality Agency, 2016, Gender strategy toolkit' (WGEA: Sydney),

https://www.wgea.gov.au/sites/default/files/documents/Gender_Strategy_Toolkit.pdf (accessed 13 September 2019).

8.2 Appendix 2: Example framework for ongoing monitoring and evaluation

<p>Recommendation 4</p>	<p>Develop a Gender Equality Strategy utilising the <i>WGEA Gender Strategy Toolkit</i> and roadmap. In order to be sustainable, this will:</p> <p>(a) be based on a specific business case for addressing gender equality in SAPOL in line with the WGEA toolkit</p> <p>(b) link to, and support, SAPOL's overall business strategy and objectives</p> <p>(c) be used to guide effort, investment and specific initiatives – including ensuring that all structural and cultural barriers to female career progression are actively identified, challenged and addressed</p> <p>(d) ensure that gender equality best-practice is integrated into business and people policies and processes so that commitment to, and investment in, progress is unaffected by business challenges</p> <p>(e) establish governance and reporting mechanisms to ensure leadership oversight of progress</p> <p>(f) be reviewed every 12 months.</p>				
<p>Recommendation 11</p>	<p>Form a Gender Equality Advisory Group, with both male and female participants and with appropriate funding, such that key staff across the organisation provide advice to the Commissioner on strategies, policies and communications.</p>				
<p>Intention of Recommendation</p>	<p>A strategy that is underpinned by a business case detailing the case for change and associated benefits that guides the transformation in SAPOL with actions. The strategy links with SAPOL's business strategy, objectives, policies and processes.</p>				
<p>Focus for monitoring and evaluation</p>	<p>A gender equality focus is brought to strategies, policies and communications by a group that is representative of SAPOL.</p>				
<p>Monitoring Measures</p>	<p>Status of implementation</p> <p># Gender Equality Strategy actions completed (and associated implementation time frame)</p> <p># Gender Equality Strategy actions underway (and associated implementation time frame)</p> <p># Gender Equality Strategy actions yet to commence (and planned associated implementation time frame)</p>	<p>Delivery of outputs</p> <p>Outputs delivered by the Gender Equality Strategy (disaggregated by associated action)</p> <p>Outputs to be delivered by the Gender Equality Strategy with delivery timeframe (disaggregated by associated action)</p>	<p>Outcomes</p> <p>Outcomes delivered by the Gender Equality Strategy</p> <p>Progress of outcomes under the Gender Equality Strategy</p>	<p>Objectives</p> <p>Progress and achievement of the Gender Equality Strategy objectives</p> <p>Progress and achievement of the objectives of the Gender Equality Advisory Group</p>	<p>Feedback</p> <p>Feedback from the role responsible for the Gender Equality Strategy for what is working well & areas for improvement for delivering the Strategy to progress & achieve its objectives</p> <p>Feedback from the Gender Equality Advisory Group members for what is working well & areas for improvement for the Group to progress & achieve its objectives</p>
<p>Data Source for Monitoring Measures (data collection tool, who to contact)</p>	<p><i>To be completed by SAPOL</i></p>				
<p>Reporting purpose (frequency & who to)</p>	<p><i>Operational level (quarterly reports to Service Head or manager of the business unit responsible for day-to-day operationalisation)</i></p> <p>Reporting by the role responsible for the day-to-day operationalisation of the Gender Equality Strategy and Gender Equality Advisory Group focusing on</p> <ul style="list-style-type: none"> - # of Gender Equality Strategy actions completed vs underway vs yet to commence (with indication if on schedule) - summary of key outputs delivered 		<p><i>Strategic level (6 monthly reports to role responsible for gender equality in SAPOL)</i></p> <p>Reporting by the role responsible for the day-to-day operationalisation of the Gender Equality Strategy and Gender Equality Advisory Group focusing on</p> <ul style="list-style-type: none"> - # of Gender Equality Strategy actions completed vs underway vs yet to commence (with indication if on schedule and/or delivery risks) - summary of key outputs delivered - summary of management of delivery risks (with implications, e.g. for delivery timeframes, for linked actions) 		

	<ul style="list-style-type: none"> - summary of actions with delivery concerns - summary of how delivery concerns will be addressed (with implications, e.g. for delivery timeframes, for linked actions) - areas for improvements (if any) to optimise the delivery or impact of the Gender Equality Strategy actions - # meetings conducted by the Gender Equality Advisory Group - summary of key items that have been on the Gender Equality Advisory Group's agenda - summary of actions, output and impact of the key items - areas for improvements (if any) to optimise the coordination or impact of the Gender Equality Advisory Group - summary of progress and achievement of the Gender Equality Strategy objectives - summary of progress and achievement of the objectives of the Gender Equality Advisory Group 	<ul style="list-style-type: none"> - recommendations (if any) to optimise the delivery or impact of the Gender Equality Strategy actions - summary of progress and achievement of the Gender Equality Strategy objectives - areas for attention with suggested ways forward to progress & achieve the Gender Equality Strategy objectives - summary - # meetings conducted by the Gender Equality Advisory Group - summary of key items that have been on the Gender Equality Advisory Group's agenda - summary of actions, output and impact of the key items - recommendations (if any) to optimise the coordination or impact of the Gender Equality Advisory Group - summary of progress and achievement of the objectives of the Gender Equality Advisory Group - recommendations for improving the progress & achievement of the objectives of the Gender Equality Advisory Group 	
Recommendation 15	Develop a new structured handover process (with checklists and discussions) for management/supervisory positions to ensure poor behaviour of people in the team continues to be appropriately managed.		
Intention of Recommendation	Use a guided discussion between the outgoing and incoming manager to ensure continuity of management with incoming managers having a better understanding of employee behaviour, as well as understanding what to monitor and manage at the team, group or workplace level.		
Focus for monitoring and evaluation	Effectiveness of the handover process to enhance the incoming manager's understanding of <ul style="list-style-type: none"> - performance management of current behaviour issues; and - behaviour issues to monitor for potential performance management 		
Monitoring Measures	Incoming managers satisfaction levels Incoming managers satisfaction level with <ul style="list-style-type: none"> - understanding current issues, associated corrective actions, relevant HR contacts and next steps - understanding potential issues, associated corrective actions, relevant HR contacts and next steps 	Incoming managers confidence levels Incoming managers confidence to manage (a) current and (b) potential behaviour issues following the handover	Feedback Feedback from the managers with what is working well and areas for improvement for the handover process
Data Source for Monitoring Measures <i>(data collection tool, who to contact)</i>	<i>To be completed by SAPOL</i>		
Reporting purpose <i>(frequency & who to)</i>	<i>Operational level (quarterly reports to Service Head or manager of the business unit responsible for day-to-day operationalisation)</i> Reporting by the role/team responsible for day-to-day operationalisation of the handover process focusing on <ul style="list-style-type: none"> - summary of incoming managers satisfaction of understanding current issues, potential issues and next steps - summary of incoming managers confidence to manage team issues (if any) - areas for attention with suggested ways forward 	<i>Strategic level (6 monthly reports to role responsible for gender equality in SAPOL)</i> Reporting by the role/team responsible for day-to-day operationalisation of the handover process focusing on <ul style="list-style-type: none"> - summary of incoming managers satisfaction of understanding current issues, potential issues and next steps - summary of incoming managers confidence to manage team issues (if any) - areas for attention with suggested ways forward 	
Recommendation 18	Reinvigorate the performance management system so that all staff have up-to-date performance management plans and quarterly meetings about their performance, with health and wellbeing issues included in these discussions.		
Intention of Recommendation	Ensure the performance management system operates as a vehicle for providing support & identifying development opportunities for all employees, regardless of their personal or professional circumstances. A way in which managers and supervisors can monitor & manage performance concerns.		

Focus for monitoring and evaluation	Extent of uptake/use of the performance management system. Extent of progress & achievement of the objectives of the performance management system iEngage (meaningful and purposeful; engagement/relationships; wellbeing; growth and development; accountability). Identification of areas for improvement to optimise the progress and achievement of the objectives considering feedback/input from employees as the users, supervisors/managers as the implementers & iEngage administrator/s as the role responsible for day-to-day operationalisation.					
Monitoring Measures	Utilisation # employee plans up to date plans (& as a % of SAPOL) # of employees without up-to-date plans (& as a % of SAPOL)	Objectives Progress and achievement of the iEngage objectives measured through staff satisfaction with - relationships to discuss wellbeing concerns/issues - discussion and support for personal and professional development - discussion and support for role performance requirements - management of inappropriate behaviours [disaggregate the above areas of satisfaction by gender]			Feedback Feedback from the employees, managers and the role responsible for iEngage day-to-day operationalisation with what is working well and areas for improvement for iEngage	
Data Source for Monitoring Measures (data collection tool, who to contact)	<i>To be completed by SAPOL</i>					
Reporting purpose (frequency & who to)	<i>Operational level (quarterly reports to Service Head or manager of the business unit responsible for day-to-day operationalisation)</i> Reporting by the role responsible for iEngage day-to-day operationalisation focusing on - % of plans completed vs incomplete - hot spots for incomplete plans (including those that have been incomplete for extended time) - action/s taken to have incomplete plans completed - summary of progress and achievement of iEngage objectives measured through staff satisfaction & highlight variation by gender if significant - areas for attention with suggested ways forward		<i>Strategic level (6 monthly reports to role responsible for gender equality in SAPOL)</i> Reporting by the role responsible for iEngage day-to-day operationalisation focusing on - % of plans completed vs incomplete - hot spots for incomplete plans - summary of progress and achievement of iEngage objectives measured through staff satisfaction (highlight variation by gender if significant) - suggested ways forward for addressing hot spots (especially for those that have been incomplete for extended time) - areas for attention and suggested ways forward for improving the progress & achievement of iEngage objectives based on feedback from employee's, supervisors/managers & those responsible for day-to-day operationalisation of iEngage			
Recommendation 20	Develop a new exit management strategy for employees, including a simple online survey, externally managed, through which exiting staff can provide feedback about their experiences working with SAPOL and their reasons for departure. A summary should be reviewed quarterly by ELT to inform future strategy and targeting of problem areas and people.					
Intention of Recommendation	Enable employees to provide feedback on their experiences, which can be used to inform future workforce management strategies and target problem areas.					
Focus for monitoring and evaluation	Extent that the exit management strategy is effective at retaining employees (sworn and non-sworn). Impact that the data/information collected through the exit management strategy is having on SAPOLs workforce management strategies and addressing problem areas.					
Monitoring Measures	Utilisation of Exit Process	Exit Survey & Reasons/Factors for Leaving	Exit Interviews	Retention For those who initiated the exit process and	Short Term Response	Strategic Response Based on findings from the exit management strategy, description

	<p># employees initiated exit process</p> <p># employees who initiated exit process that did exit (& as % of those who initiated exit process)</p> <p># employees who initiated exit process & withdrew from exit process (& as % of those who initiated exit process)</p> <p>[disaggregated all of the above by gender, rank/level, Service/Branch, years of service]</p>	<p># who were sent the exit survey vs # who completed the survey</p> <p>For those who exit, list of common 'main reasons' employees are exiting with associated # of employees (disaggregate by gender)</p> <p>For those who exit, list of the 'factors' that contributed to the common 'main reasons' for employees exiting with associated # of employees (disaggregate by gender)</p>	<p># of exit interviews completed (compared to # of requests for exit interview)</p>	<p>withdrew from the process and stayed at SAPOL</p> <ul style="list-style-type: none"> - list the main reason/s they wanted to leave - describe what changed/happened to have them stay (in particular any actions by SAPOL) 	<p>For each problem area, summarise activity to address identified problem areas</p> <ul style="list-style-type: none"> - description of problem/issue requiring attention (when became aware of problem/issue - when corrective action/s were initiated and types of actions being taken - when problem/issue ceased requiring attention - findings from follow up report (if relevant) to indicate if problem/issue needs have been resolved or require further attention 	<p>of changes or updates to SAPOL workforce management strategies to improve (sworn and non-sworn) employee retention rate and/or improve the experience for (sworn and non-sworn) SAPOL employees</p>
<p>Data Source for Monitoring Measures (data collection tool, who to contact)</p>	<p><i>To be completed by SAPOL</i></p>					
<p>Reporting purpose (frequency & who to)</p>	<p><i>Operational level (quarterly reports to Service Head or manager of the business unit responsible for day-to-day operationalisation)</i></p> <p>Reporting by the role responsible for day-to-day operationalisation of the exit management strategy focusing on</p> <ul style="list-style-type: none"> - # employees who exited with their reason (disaggregated by gender, rank/level, Service/Branch, years of service) - # employees who initiated exit process and did not exit with their reason and action taken to retain employees (disaggregated by gender, rank/level, Service/Branch, years of service) - # of exiting employees sent the exit survey compared to # completed surveys (disaggregated by gender, rank/level, Service/Branch, years of service) - according to completed surveys summary of main reasons for leaving and the contributing factors (disaggregated by gender) - according to completed surveys summary of positive findings - status of exit interviews (# requested; # conducted; # pending; # not to be conducted) with explanation if any requested exit interviews will not be conducted and if any exit interviews have not been conducted by person requested - summary of positive & negative findings from exit interviews 			<p><i>Strategic level (6 monthly reports to role responsible for gender equality in SAPOL)</i></p> <p>Reporting by the role responsible for day-to-day operationalisation of the exit management strategy focusing on</p> <ul style="list-style-type: none"> - # employees exited with reasons (disaggregated by gender, rank/level, Service/Branch, years of service) - based on completed exit surveys (provide context of survey completion rate) summarise reasons for exiting and contributing factors for exiting - based on completed exit surveys summarise positive findings - based on completed exit interviews summarise positive & negative findings - # employees that initiated exit process and withdrew with reason/s for exiting and action/s taken to retain employees - summary of actions completed and/or underway to improve SAPOL employee retention (ie. through exit management strategy, addressing problem areas or people, SAPOL employee attraction, recruitment, development, retainment and transition strategies) 		

	<ul style="list-style-type: none"> - areas for attention with suggested ways forward for <ul style="list-style-type: none"> * improvements in exit management process * changes/updates to SAPOL employee retention strategies * potential problem areas or people 	<ul style="list-style-type: none"> - areas for attention with suggested ways forward for <ul style="list-style-type: none"> * improvements in exit management process * changes/updates to SAPOL employee retention strategies * potential problem areas or people 	
Recommendation 26	<p>Adopt an 'all-roles flex' approach across all operational and leadership areas, normalising flexible work for all staff regardless of gender or level. To support this SAPOL should consider:</p> <p>(a) re-writing policies so they are simpler and less prescriptive and so flexible working conditions are more open to negotiation. As an example, split shifts should be allowed.</p> <p>(b) removing the requirement to state a reason for a request to work flexibly. If flexible working is normalised it should not be necessary to provide reasons for working this way.</p> <p>(c) removing the six-month maximum time limit on Voluntary Flexible Working Arrangements (VFWAs) and enabling applicants to return to their previous full-time equivalent at the end of an agreement.</p> <p>(d) making policies, such as the flexible work policy, freely available to all staff and any support people (such as lawyers or family).</p> <p>(e) allowing flexible work applications to be managed and signed off locally to encourage a team-based approach and prevent unnecessary time delays.</p> <p>(f) ensuring refused applications for flexible work (and the reasons for their refusal) are reviewed and reconsidered by the Assistant Commissioner for HR with a quarterly report provided to ELT.</p> <p>(g) encouraging men and senior staff to take up flexible work opportunities in order to normalise the practice.</p>		
Intention of Recommendation	<p>Enhanced accessibility of flexible working arrangements by making the process widely available to all employees, simpler, less prescriptive and open to negotiation.</p> <p>Working flexibly in SAPOL would be normalised for all staff, regardless of gender, role type (such as operational, specialised) or seniority.</p>		
Focus for monitoring and evaluation	<p>Extent that FWAs are accessible and utilised</p> <p>Extent that operationalisation of the policy is effective and efficient</p>		
Monitoring Measures	<p>Utilisation of FWAs</p> <ul style="list-style-type: none"> - current # of approved FWAs - # requests for FWAs - status of requests by approved, declined, being processed, pending further action (provide description of action e.g. access to IT device, backfilling vacancy, etc) - indication of time to process request to determine outcome of approved or declined - # requests for FWAs where negotiation was required - reason for declined request [disaggregate each of the above by type of FWA, gender, sworn/non-sworn, rank/level, Service/Branch] 	<p>IT infrastructure or devices to enable working flexibly</p> <ul style="list-style-type: none"> - # FWA users using IT infrastructure and devices to enable working flexibly 	<p>Feedback</p> <p>Employees feedback on operationalisation</p> <ul style="list-style-type: none"> - understanding of options available - understanding of process - understanding of responsibilities - confidence to request FWAs - satisfaction with processing timeframe - satisfaction with request outcome - impact of using FWA (for those using FWAs) <p>Supervisors/managers feedback on operationalisation</p> <ul style="list-style-type: none"> - understanding of process - understanding of responsibilities - confidence to negotiate (if relevant) - support to negotiate (if relevant) - satisfaction with process - confidence to manage team accessing FWAs - impact on team members not using FWAs - impact on delivering service requirement <p>FW team's feedback on operationalisation</p> <ul style="list-style-type: none"> - capacity to process and manage requests - ability to identify backfilling options <p>Feedback from employees, supervisors/managers and FW team on areas for improvement</p>

Data Source/s for Monitoring Measures (data collection tool, who to contact)	<i>To be completed by SAPOL</i>		
Reporting purpose (frequency & who to)	<p><i>Operational level (quarterly reports to Service Head or manager of the business unit responsible for day-to-day operationalisation)</i></p> <p>Reporting by the role/team responsible for day-to-day operationalisation of flexible working arrangements focusing on</p> <ul style="list-style-type: none"> - utilisation of FWAs (highlighting variances between type of FWA, gender, sworn/non-sworn, rank/level, Service/Branch) - utilisation of IT infrastructure to support working flexibly - summary of processing time with explanation for those not processed in timely manner - actions/challenges for progressing request that are pending - summary of reasoning for declined requests - summary of (positive and negative) findings from feedback - areas for attention with suggested ways forward <ul style="list-style-type: none"> * improvements in FWA request process * potential capability building needs * potential workload/service requirement delivery issues 	<p><i>Strategic level (6 monthly reports to role responsible for gender equality in SAPOL)</i></p> <p>Reporting by the role/team responsible for day-to-day operationalisation of flexible working arrangements focusing on</p> <ul style="list-style-type: none"> - utilisation of FWAs (highlighting variances between type of FWA, gender, sworn/non-sworn, rank/level, Service/Branch) - summary of processing time with explanation for those not processed in timely manner - actions/challenges for progressing request that are pending - summary of reasoning for declined requests - summary of (positive and negative) findings from staff feedback - areas for attention <ul style="list-style-type: none"> * improvements in FWA request process * potential capability building needs * potential workload/service requirement delivery issues - summary of actions completed and/or underway to address the areas for attention 	
Recommendation 36	Train staff and managers in domestic violence intervention, including risk audits and safety planning.		
Intention of Recommendation	Ensure employees are confident and capable to support fellow colleagues if they are at risk or experiencing domestic violence. In addition, confident and capable to support fellow colleagues if they are using violence in their domestic or family relationship.		
Focus for monitoring and evaluation	Extent that training is effective in achieving the training course/module knowledge and skill outcomes		
Monitoring Measures	<p>Participation</p> <ul style="list-style-type: none"> - # employees required to complete the training - # (%) employees who have completed the training - # (%) employees who have not completed the training - hot spots for incomplete training (highlighting those that have not been completed for extended time) - action/s taken to have training completed 	<p>Rating of completed training based on the following aspects [rating categories: <i>excellent/very good/good/fair/poor</i>]</p> <ul style="list-style-type: none"> - Reinforced or improved knowledge of [insert relevant training outcomes] - Reinforced or improved skills to [insert relevant training outcomes] - Reinforced or improved confidence to [insert relevant training outcomes] - Engaging training delivery - Training facilitator's knowledge in the training topic - Training facilitator's use of useful examples and explanations - Training materials - Training content useful for my job or role - Overall training course/module - Feedback for areas for improvement 	<p>Feedback</p> <p>Feedback from the training participants, training facilitators and role/team responsible for operationalisation of the training with what is working well and areas for improvement for the training related to SAPOL's response to family and domestic violence</p>
Data Source/s for Monitoring Measures (data collection tool, who to contact)	<i>To be completed by SAPOL</i>		

<p>Reporting purpose (frequency & who to)</p>	<p><i>Operational level (quarterly reports to Service Head or manager of the business unit responsible for day-to-day operationalisation)</i></p> <p>Reporting by the role/team responsible for day-to-day operationalisation of the training related to SAPOL's response to family and domestic violence focusing on</p> <ul style="list-style-type: none"> - completion vs non-completion rate - hot spots for incomplete training (including those that have been incomplete for extended time) - action/s taken to have incomplete training completed - areas for improvements (if any) - summary of progress and achievement of training objectives measured through staff satisfaction (highlight variation by gender if significant) 	<p><i>Strategic level (6 monthly reports to role responsible for gender equality in SAPOL)</i></p> <p>Reporting by the role/team responsible for day-to-day operationalisation of the training related to SAPOL's response to family and domestic violence focusing on</p> <ul style="list-style-type: none"> - completion vs non-completion rate - hot spots for incomplete training (including those that have been incomplete for extended time) - action/s taken to have incomplete training completed - summary of progress and achievement of training objectives measured through staff satisfaction (highlight variation by gender if significant) - areas for improvement & suggested ways forward for addressing hot spots (especially for those that have been incomplete for extended time) - areas for improvement & suggested ways forward for improving the progress & achievement of the training objectives based on feedback from participants and facilitators those responsible for day-to-day operationalisation of the training related to SAPOL's response to family and domestic violence
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