

# Final Report

## - *Executive Summary*

**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



## 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)

# 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.<sup>1</sup> 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.

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<sup>1</sup> 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.<sup>2</sup> 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,<sup>3</sup> the Diversity and Inclusion (D&I) Branch,<sup>4</sup> and D&I Representatives<sup>5</sup> 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.

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

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

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

<sup>5</sup> 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)<sup>6</sup> 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

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<sup>6</sup> 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".<sup>7</sup>

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<sup>7</sup> 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"> <li>• Rates of sexual harassment have dropped to below the national average</li> <li>• Changes in rates of sex discrimination and predatory behaviour are inconclusive at this time. Future evaluation needs to be planned to ensure comparable timeframes</li> </ul>
Inaction on sex discrimination and sexual harassment matters	<ul style="list-style-type: none"> <li>• Organisation-wide training was undertaken to raise awareness and confidence to call out inappropriate behaviour and report, but this is not always occurring</li> <li>• Establishment of the D&amp;I Branch</li> <li>• Perception that taking action makes "no difference" remains</li> </ul>
Employees not confident to report sexual harassment	<ul style="list-style-type: none"> <li>• Employees report increased confidence to address inappropriate behaviour</li> <li>• Under-reporting rates have not improved within SAPOL but remain consistent with the national average</li> </ul>
SAPOL not supporting complainants of sex discrimination or sexual harassment	<ul style="list-style-type: none"> <li>• The new D&amp;I Branch is perceived more positively by employees</li> <li>• Clear and effective communication of consequences for perpetrators still needs work</li> </ul>
Lack of access to and support for flexible working arrangements	<ul style="list-style-type: none"> <li>• Significantly increased approval rates for FWAs</li> <li>• Challenges to the accessibility of FWAs remain especially in regional environments where staffing may be more limited</li> </ul>
Susceptibility to bias in selections/promotions and training & development	<ul style="list-style-type: none"> <li>• Unconscious bias training for selection advisory committee personnel and reviewing of position information documents</li> <li>• Women participating in training &amp; development proportionate to female personnel in SAPOL</li> </ul>

## 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'.<sup>8</sup>
  - 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.

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<sup>8</sup> 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 capacity<sup>9</sup> 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.

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<sup>9</sup> 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.