



Workplace Culture Reform (WCR) program

Action plan and status of implementing each recommendation

Updated: 25 November 2025

1. WCR program – action plan

Key activities	Development and delivery period	Month completed or scheduled to finalise	Status
1. Establish WCR program Action Plan, Engagement Plan and Reporting Framework endorsed to roll out with continual review, streamlining and adjustments as required, with consideration to appropriate scheduling, risk management, ongoing staff consultation and alignment with broader organisational change management activities. Establish monthly updates to all staff on progress and develop a Culture and Wellbeing Hub for staff communications.	October 2023 to February 2024	February 2024	Completed
2. Statement of Intent established in response to Government's Statement of Expectations Include PC's commitment to implementing all recommendation of the Intersection Review, and plans to strengthen the PC's culture and governance arrangements.	November 2023 to February 2024	February 2024	Completed
3. Increase counselling support – including through HCO and EAP reviews Provide role review and fill vacant roles via an EOI, provide ongoing training and establish quarterly HCO meetings. Include updates to HCO role/procedures in Workplace Behaviour Policy and Procedures. Provide EAP accessibility refresh, seminars and improved promotion of services and toolkits. Provide Mental Health First Aid Training to interested staff via an EOI process.	November 2023 to February 2024	February 2024	Completed
4. Review/streamline WCR Action Plan and finalise policy review schedule and WCR risk management plan (risk register) Align policy schedule and organisational change projects in progress. identify risk management priorities and approach to inform and establish a risk register. Conduct a review of the policy schedule to ensure that relevant policies are updated as per review recommendations and implementation timelines. Prioritisation of key policies including the Workplace Behaviour Policy, WHS policy and Performance management policies for SES and Non-SES employees as well as strategies – Workforce Strategy and Inclusion and Diversity Strategy.	February to March 2024	March 2024	Completed
5. Workplace culture engagement plan Develop an engagement plan to enable staff interaction and visibility of progress during implementation and to improve connections between aligned efforts across the PC. Launch via new Culture and Wellbeing Hub, with revisions over time as required.	December 2023 to February 2024	March 2024	Completed
6. Workplace culture reporting framework Development of a workplace culture reporting framework, outlining all relevant reporting streams inclusive of dates and forums. Report on workforce analytics, staff wellbeing and behaviours, workforce engagement, capability and development. Launch via Culture and Wellbeing Hub, and revise Framework over time as required.	December 2023 to March 2024	March 2024	Completed
7. Bystander intervention training (all staff and leaders) Workshops offered to all staff, including SES and Commissioners.	November 2023 to March 2024	March 2024	Completed
8. Procurement to outsource breaches of the code Two providers (fee for service) identified and contracted to use when/if required.	February to April 2024	April 2024	Completed
9. PC Values (organisational / behavioural attributes) Co-creation of new organisational values with all staff (PC Values: Inclusive, Collaborative, Influential, Respectful, Supportive).	March to May 2024	May 2024	Completed
10. Unconscious bias training (all staff and leaders) Provide workshops to all staff, including SES and Commissioners.	April to June 2024	June 2024	Completed
11. Inclusion and Diversity Strategy 2024–28 Co-creation with staff via focus groups, drafting and gathering extensive feedback to finalise and launch strategy with all PC staff.	November 2023 to July 2024	July 2024	Completed

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12. Speak up campaign – launch / announcement of various activities Head of Office update/s; develop new resources including launch of Speak up hub; seminars; mandatory compliance training modules for all staff; managers toolkit updates, staff surveys, trauma informed practice training for HR team and establishing a Commissioners Charter.	April to August 2024	August 2024	Completed
• Trauma informed response training for HR team	March to May 2024	May 2024	Completed
• Building respectful working relationships TELUS Health lunch and learn seminar.			Completed
• Open staff survey: 2024 APS Employee Census Survey feedback to inform workforce indicators relating to wellbeing, behaviours and culture.	May to June 2024	June 2024	Completed
• Emotional Intelligence TELUS Health lunch and learn seminar.	June 2024		Completed
• Mandatory compliance training program (e-learning) APS and Comcare modules on key learning topics including WHS, Inclusion and Diversity and Integrity in the APS.	September 2023 to June 2024		Completed
• Managing difficult conversations TELUS Health lunch and learn seminar.	July 2024	July 2024	Completed
• Manager's Toolkit review & update Revamp existing resources for currency and to provide greater clarity. Added new resources: psychological safety, promoting a positive workplace culture, supervisor tip-sheets informed by EAP resources.			Completed
• Commissioners Charter Chair and Commissioners work together to develop and sign off Charter and launch with all staff.	March to August 2024	August 2024	Completed
• Open staff survey: 2024 PC Culture Survey (1/2) Co-design and administer culture survey through an external third party, and use results to establish a baseline score/assessment of culture.	July to August 2024		Completed
• Release survey results: 2024 APS Census and 2024 PC Culture Survey (1/2) Management and group/team discussions to discuss results, SES sponsor allocated for action planning process.	August 2024		Completed
13. External anonymous complaints service Procure service and provide training to relevant key personnel (reviewers/delegates). Launch with all staff, apply intranet updates.	April to August 2024	August 2024	Completed
14. Project management capability uplift (Terrace Services) New project management methodologies adopted by teams, agency-wide adoption of Asana commenced, templates and processes being embedded. Project Management Oversight Committee (PMOC) established. Uplift informed by the Independent Review and staff feedback received from pulse surveys and Census results discussions about project management practices, including impacts on behaviour and wellbeing.	April to August 2024	August 2024	Completed
15. Succession plan for complex case management Review of HR team structure and associated recruitment activities to backfill vacancies at the EL2 and EL1 levels, and sufficient coverage and expertise for complex case management.	March to August 2024	August 2024	Completed
16. Include workforce/culture focus in Corporate Plan 'Investing in our organisational culture and capability' section added to Corporate Plan 2024–2028, including achievements following the release of the Intersection Review.	July to August 2024	August 2024	Completed
17. Establish the Workplace Improvement and Culture Committee (WICC) via an EOI process Purpose: To bring a diverse membership of staff together to collaborate and contribute to the delivery of actions under the Inclusion and Diversity Strategy and other workplace initiatives to improve the workplace and actively foster a safe, inclusive and productive culture.	May to September 2024	September 2024	Completed
18. Quarterly culture reporting commences	April to September 2024	September 2024	Completed

Key activities	Development and delivery period	Month completed or scheduled to finalise	Status
Provide quarterly culture reports to leaders, Committees and all staff, in accordance with the workplace culture reporting framework. A culture reporting page launched for all staff to access updates.			
19. Work Health and Safety (WHS) Policy and WHS management system update Updated for best practice and currency with WHS and related legislation, including psychosocial safety and positive duty requirements.	April to September 2024	October 2024	Completed
20. Report on progress of implementing the Independent Review recommendations after 12 months Provide an update to the Treasurer on the progress of implementing the Intersection Review recommendations and share the action plan. Share the update to all staff and publish the update for transparency.	October 2024	October 2024	Completed
21. PC Culture Survey (2/2) The Survey is scheduled for late November 2024 and will continue to run annually in November (six months from the APS Census).	November 2024	November 2024	Completed
22. PC Workforce Strategy / Workforce Planning Project (TMS Consulting) Development of a PC Workforce Strategy is underway, following extensive review of the PC's workforce planning and capability needs, including a skills survey conducted with all staff. The strategy intends to reflect future workforce capability needs and provide alignment with the latest organisational structure. Aurion configuration is also in progress to establish a position based organisational structure for improved reporting capability.	2023 to 2026	Q3 2025-26	In progress
23. Consultation and action planning on survey results Develop the 2024 APS Census Action Plan for public release in November 2024, with consideration to 2024 Census results and PC Culture Survey (1/2) results, and progress against the 2023 Census Action Plan.	August to November 2024	November 2024	Completed
24. Operational plan development (for I&D strategy implementation) via co-design process Engage consultant with expertise in Inclusion and Diversity and working with diverse groups. (completed) Meetings with WICC and key staff to plan and schedule activities, and develop operational plan. (completed) Management Committee endorses operational plan, followed by launch with all staff and oversight by the WICC. (completed)	July to December 2024	December 2024	Completed
25. Review governance arrangements for workplace culture and broader organisational transformation <ul style="list-style-type: none"> Review organisation-wide governance arrangements including sub-Committees of the Management Committee, reporting arrangements, Committee functions, etc. and review and develop terms of reference as needed – WICC, PMOC, etc. (completed) Improve role clarity/purpose for Committees and staff networks through review/development of terms of reference (as required), I&D Operational Plan, intranet page updates (including PC Communities page) (completed); and development of a visual placemat of PC wide governance arrangements and authorising environment (in progress). 	July 2024 to December 2025	Q2 2025-26	In progress – mostly completed
26. Learning and development bundle <ul style="list-style-type: none"> a. Leadership sponsorship opportunities (SES and EL2) and cohort development days provided. A review of HR delegations to provide additional delegation at the EL2 and SES Band 1 levels, and prepare a forward plan for agency-wide training (L&D calendar) for 2024-25. (completed) b. Training sessions for all staff (and leaders workshops as required) in the areas of bystander intervention, unconscious bias, cultural capability, giving and receiving feedback, emotional intelligence, building respectful workplace relationships, having difficult conversations. Trauma informed victim-centred response workshop for HR practitioners. (completed) c. Training workshops and internal information sessions for all staff to promote and embed the revised workplace behaviour policy and procedures, including custom briefings as required (for leaders, HR practitioners, HCOs, etc.). Training session for SES and Commissioners on bystander intervention (completed), and training sessions for leaders (Commissioners, SES and EL2s) on providing a trauma informed, victim-centred approach (scheduled). Update Managers Toolkit and Induction resources for managers to include relevant guidance materials, as available, following delivery of these training programs to ensure consistent leadership practices. (in progress) 	October 2023 to March 2026	Q3 2025-26	In progress – mostly completed
27. Workplace behaviour policy and procedures (WBPP) update and supporting procedures roll out <ul style="list-style-type: none"> a. Undertake staff consultation process to inform WBPP update. (completed) b. Obtain Management Committee endorsement of final WBPP update. (completed) c. Release updated policy with all staff; apply intranet updates for alignment with WBPP. (completed) d. Promote WBPP in practice through release of subsequent training and information sessions (to be completed as part of bundled action 26 c.) 	April to November 2024	November 2024	Completed
28. SES Performance and Leadership Framework Update the SES Performance management policy and procedures to comply with mandatory APS-wide SES Performance <u>Leadership Framework</u> by 1 January 2025, and incorporate relevant leadership performance agreement practices as outlined in the Independent Review (completed).	August 2024 to January 2025	January 2025	Completed

Key activities	Development and delivery period	Month completed or scheduled to finalise	Status
29. Recruitment practices guidelines review / update a. All leadership positions advertised include behavioural and leadership capability attributes from the capability framework, and this is assessed during application and interview process (active, current process). b. Review/update HR delegations – with additional delegations provided to EL2s and SES Band 1s (completed). c. Review/enhance process for assessing leadership capabilities/skills during recruitment processes, with consideration to Independent Review recommendations relating to leadership capabilities, recruitment and performance procedures (active, currently in progress). d. Review selection reports/templates and scribe procedures; implement Aurion e-recruitment system and add new pages to the PC Careers Portal (completed).	May 2024 to July 2025	July 2025	Completed
30. Non-SES Performance and development policy and capability framework (review/update) Following the updated SES Performance and Leadership Framework and the PC Workforce Strategy, update the performance and development policy and procedures for non-SES level employees, including ratings and performance agreement processes – including to effectively capture and assess leadership performance and providing corporate contributions. Review capability framework to align with new groups and streams and required capabilities (leadership behaviours, technical skills, etc.) as identified in the PC Workforce Strategy, Statement of expectations for the PC, the Independent Review of Workplace Culture recommendations, and the anticipated APS wide performance and development framework for non-SES employees to be released in 2025-26.	January to June 2026	Q4 2025-26	In progress
31. Workplace behaviour training (all staff) Schedule and deliver workplace behaviour policy training workshops and information sessions to all staff, including any customised sessions required for HR personnel, HCOs, managers and leaders. These sessions may be delivered in-house and/or with assistance of an external provider.	August 2025 to March 2026	Q3 2025-26	In progress
32. Bystander intervention training (additional session for Commissioners and SES) With assistance of an external provider, deliver bystander intervention training workshop for leaders – SES and Commissioners (if not already completed).	March to June 2025	June 2025	Completed
33. Trauma informed response training for leaders (Commissioners, SES and EL2s) With assistance of an external provider, deliver trauma informed, victim-centred response training for leaders – Commissioners, SES and EL2s.	August 2025 to March 2026	Q3 2025-26	In progress

2. Status of implementing each recommendation (in accordance with the action plan)

Recommendations	Action plan #	Implementation Status
1. The Chair confirms the Commission's commitment to providing a safe, respectful and inclusive workplace. The Chair, Commissioners and senior leaders develop a plan for the implementation of these recommendations.	1, 2, 4, 5, 6, 16, 20	Completed
2. All leaders actively and consistently message expectations of workplace behaviour and corresponding consequences for breaches.	5, 7, 9, 11, 12, 26a,b,c, 27a,b,c,d 28, 29, 30, 31, 32, 33	In progress – mostly completed
3. All leaders understand their role in setting and reinforcing a positive workplace culture and are held accountable for this through the inclusion of behavioural indicators in performance agreements.	5, 6, 7, 9, 11, 12, 19, 26a,b,c 27a,b,c,d, 28, 30, 31, 32, 33	In progress – mostly completed
4. All leaders and managers are provided with leadership and people management training appropriate to their level and access to ongoing leadership development to ensure leadership practice is contemporary.	7, 10, 12, 19, 26a,b,c, 27a,b,c,d 31, 32, 33	In progress – mostly completed
5. All leaders be trained in trauma-informed, victim-centred approach so they can respond to disclosures of inappropriate behaviour in a manner that ensures complainants are supported and no further harm is caused.	33	In progress – mostly completed
6. Development of the updated Diversity and Inclusion Strategy be prioritised with a focus on creating a safe, respectful and inclusive workplace and the recruitment and retention of employees with diverse skills, experience and background.	7, 17, 24	Completed
7. Actions to address the risks identified in this report, and any others that may be subsequently identified, are documented including appropriate mitigations and reported to Commission Meetings on a quarterly basis.	4, 6	Completed

Recommendations	Action plan #	Implementation Status
8. Recruitment for leadership positions prioritises people and leadership management skills and experience in addition to technical knowledge and skill.	22, 29a,b,c,d	Completed
9. Project delivery model and consequent workload issues be reviewed to understand the impact and pressures on Commission staff insofar as these relate to instances of inappropriate workplace behaviour.	14, 25	Completed
10. The Chair, Commissioners and senior leaders ensure respectful challenge and contestability processes with inappropriate and disrespectful behaviours being actively called out and addressed.	6, 7, 12, 14, 26a,b,c, 27a,b,c,d 31, 32, 33	In progress – mostly completed
11. The Workplace Behaviour Policy be updated to include a section to clearly define what constitutes the workplace, and the responsibilities and expectations of staff socialising outside of work hours and off-site. In addition, the following recommendations are made to strengthen the policy and ensure alignment with leading practice: a. That sexual harassment be a distinct section of the policy, and as such separated out from sex-based harassment within the discrimination section of the policy. This new section should also include a comprehensive list of sexual harassment behaviours. Additionally, given a number of the reported incidents of inappropriate workplace behaviour were undertaken with or through technology, there should be a clear reference to the use of technology in perpetrating sexual harassment and other inappropriate workplace behaviours. b. The discrimination section be amended to include definitions and examples of indirect and direct forms of discrimination, and align with efforts to address these proactively.	27a,b	Completed
12. All HR personnel be trained in trauma-informed, victim-centred response so that no further harm is caused to complainants.	12	Completed
13. The role of the Harassment Contact Officer (HCO) role is clarified and communicated to all Commission staff including ensuring there is: • a clear role description • an organisation-wide, transparent Expression of Interest (EOI) process is used to advertise the HCO positions • a skills-based approach is used to select the HCOs including assessment of suitability • ongoing professional development and support is provided to those appointed, and • consideration of a set-term for HCOs to avoid burn-out.	3, 12	Completed
14. Increased counselling support is available for staff who have experienced significant psychological impacts from inappropriate workplace behaviour.	3, 12	Completed
15. Complainants are appropriately and sensitively supported through a complaint process.	6, 8, 12, 13, 19, 26a,b,c 27a,b,c,d, 31, 33	In progress – mostly completed
16. The Commission consider the adoption of an external anonymous complaint handling service.	13	Completed
17. Complainants are kept informed of the process and its progress at regular intervals.	6, 8, 12, 13, 15, 19, 26a,b,c 27a,b,c,d	Completed
18. Complainants are informed of the outcomes of their complaint.		
19. Informal complaints/reports are dealt with in real time and managers are responsible for informing HR (de-identified if so requested) so that they can be added to the Central Workplace Behaviour Register.		
20. Where complaints are not found to have breached the APS Code of Conduct but are still found to be incidents of inappropriate behaviour, that proportionate action is taken which may include for example, group/team/individual level training and discussion about behavioural expectations.		
21. In addition to the APS Census, the Commission (through an independent third party) undertake a workplace culture survey to establish a baseline against which future progress can be measured, that specifically looking at the nature, impact and prevalence of inappropriate workplace behaviour, and any barriers to reporting.	12, 18, 23	Completed
22. That the above survey data as well as de-identified data on complaints and actions taken be shared with the workforce to build confidence and trust in reporting mechanisms. (Given the small size of the workforce this may be once a year to ensure confidentiality.)	6, 12, 18	Completed
23. That reports of inappropriate behaviour (de-identified) are shared with the Management Committee as the most senior governance mechanism on a regular basis (e.g. a standing item each quarter) in line with the risk management process outlined in Rec. 7.	4, 6, 18	Completed