



# **Public Sector Commission, Western Australia**

Review of the arrangements to  
prevent and manage bullying in  
Western Australian public  
authorities

**September 2017**

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## Acknowledgements

KPMG wishes to acknowledge the contribution made by the staff of the PSC and each of the agencies included in the sample of this project who willingly gave their time and shared their knowledge and insights. The contribution of all the stakeholders has been invaluable to the project.

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# 1. Executive summary

## 1.1. Background

As part of its remit to enhance integrity, effectiveness and efficiency, the Public Sector Commission (“PSC” or “the Commission”) evaluates and reports on public sector management across Western Australian public authorities, which includes public sector agencies, local government, government trading enterprises and universities. The Commission has four strategic priorities of which one is “broadening and enhancing evaluation and reporting of public sector management and administration”.

KPMG was engaged by the PSC to undertake a review into the management and prevention of bullying across selected agencies within Western Australia (“WA”). KPMG reviewed five sample agencies, through a series of interviews with leadership and staff and a desktop review of key documents. The PSC reviewed one agency, using a consistent methodology.

The review provides practical recommendations designed to improve the governance and management of these matters, while concurrently improving the capacity and capability of the public sector to ensure the health and well-being of its workforce now and into the future.

## 1.2. Focus of the review

### The nature of bullying

There is no one universally accepted, clear and concise definition of “bullying”. However agencies may draw from guidance referred to by key bodies such as the PSC, Worksafe WA (“Worksafe”), Safework WA and the Fairwork Commission; each referencing bullying as having the following characteristics:

- repeated, unreasonable behaviour;
- directed towards a worker or a group of workers; and,
- that creates a risk to health and safety.

These characteristics were considered appropriate to describe ‘bullying’ for the purpose of this review.

### Elements of effective behavioural management

The following seven elements, considered key to a robust environment to prevent and manage unacceptable behaviour such as bullying, were used for this assessment, as detailed at Appendix 4.1.

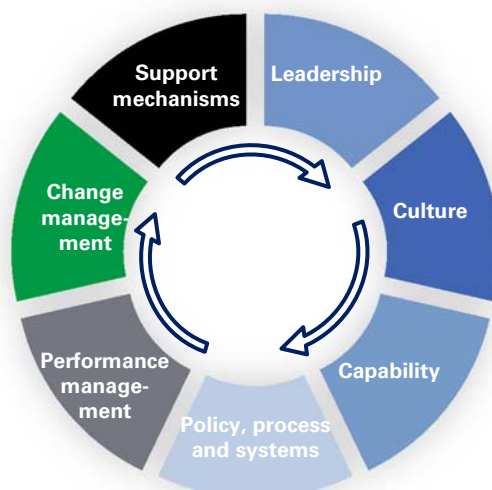


Diagram 1: Review Elements

## 1.3. Key observations

In summarising the review outcomes across the agencies considered, the following observations were made:

### 1. Agencies tend to focus behaviour management on certain elements rather than holistically

Few of the sample agencies appeared to have a strong balanced focus on all the elements contributing to effective behavioural management. Agencies have a tendency to rely more heavily on leadership, cultural and capability dimensions; or on policies, processes and formal frameworks.

### 2. Tone from the top matters

Leadership in some agencies were more proactive and transparent than others in demonstrating 'tone from the top' in relation to behaviour standards. Managers and employees in these agencies appeared more comfortable in having difficult discussions.

### 3. Effective performance management assists in minimising real and/or perceived bullying

All agencies had a structured performance management process, although management capability to undertake effective conversations was inconsistent in some cases. Both managers and staff need clarity on what is effective performance management and what is considered bullying.

### 4. Proactively considering the management of change as it impacts upon behaviour matters

Poor change management effectiveness is likely to lead to an increase in allegations of bullying. In the majority of agencies formal, documented change management planning frameworks did not exist; and change capability was considered immature, with high reliance on human resources ('HR') in cases.

### 5. Appreciation of situational risk factors can be enhanced

Situational factors often significantly contribute to the prevalence of perceived or actual instances of bullying and/or to bullying not being effectively managed. It was noted that there were mixed levels of proactivity and maturity in assessing, monitoring and managing situational risk factors.

### 6. Learning and Development can be enhanced

Induction training typically covers behavioural standards, but often does not guide managers on how to identify bullying and manage potential incidents. Refresher training is relatively uncommon.

### 7. Support from human resources functions can be strengthened

There is significant inconsistency in the role the human resource function plays, and the level of support provided to employees and management across agencies, and in some cases within agencies. Some agencies acknowledge gaps in capability across their HR teams; whilst in other agencies HR are heavily relied upon for respected advice.

### 8. Gaps in policies and procedures exist

There are some opportunities to improve robustness and consistency of processes across the sector, such as recording and reporting alleged bullying, amongst others.

## 1.4. Overall assessment of sample agencies

For the sample of six agencies, each was rated on maturity against the review elements as described in *Appendix 4.1*. The results of this maturity assessment are summarised in the table below, which shows the number of agencies in each category.

<b>Maturity Assessment</b>					
<b>Review elements</b>	<b>INITIAL</b>	<b>DEVELOPING</b>	<b>ESTABLISHED</b>	<b>WELL EMBEDDED</b>	<b>OPTIMAL</b>
<b>Leadership</b>		<b>2</b>	<b>1</b>	<b>3</b>	
<b>Culture</b>		<b>2</b>	<b>2</b>	<b>2</b>	
<b>Capability</b>		<b>3</b>	<b>3</b>		
<b>Policies, processes and systems</b>			<b>5</b>	<b>1</b>	
<b>Performance management</b>		<b>4</b>	<b>1</b>	<b>1</b>	
<b>Change management</b>		<b>6</b>			
<b>Support mechanisms</b>			<b>4</b>	<b>2</b>	

## 1.5. Suggested improvements

Suggestions for participating agencies, and other public authorities, to enhance effectiveness include:

### **Focusing behaviour management on all elements holistically**

- Agencies should consider the impact of culture, leadership and behaviour in balance with structured policies, procedures and frameworks, to best prevent and manage bullying.
- Agency leadership forums and agendas should include periodic strategic coverage of culture and values; and outcomes being achieved (i.e. focussing on all elements; and beyond reporting of conduct cases/ matters).

### **Setting the tone from the top**

- CEOs should confirm that they have an up to date set of behavioural values, which reinforce that inappropriate behaviour is not tolerated.
- Leaders should 'back up' value statements by clearly articulating their personal commitment to an environment that is free of bullying.
- Leaders should regularly and directly engage with teams to understand how well commitments are being translated into outcomes for employees.
- Leaders should directly engage with their HR team to seek feedback on how they can build upon 'tone from the top', including monitoring the 'tone' of the work environment and being attune to risk indicators; and ensuring sufficient accessibility across all workforce locations.

## **Enhancing performance management**

- Agencies should consider how they execute performance management processes to ensure that performance feedback is delivered appropriately and in a timely manner. Particular focus areas should include ensuring feedback is clearly linked to an individual's role; ensuring feedback includes a balanced focus on results and behaviours; and focussing on the level of understanding of the distinction between performance management and bullying.

## **Proactively considering the management of change as it impacts upon behaviour**

- Change management planning should be formalised and should explicitly include re-iterating behavioural values, monitoring the 'tone' of the work environment and being attune to risk indicators; and extending the support mechanisms available where appropriate.
- As agencies work through change, a key element of the change management process should be consideration of the requirements of management and staff in relation to communication; and adequate resourcing and support mechanisms such as the human resources function.

## **Enhancing appreciation of situational risk factors**

- Agencies should consider the risk of bullying (and broader poor behaviour), and identify contributing factors in their workforce in a structured way.
- Agencies should develop tailored strategies to best prevent and manage bullying, including both quick wins (such as acknowledgement with employees and creating opportunities for engagement in problem solving); and longer term strategies (such as more flexible workforce models and strategies such as staff rotation, coaching and mentoring).

## **Extending further Learning and Development**

- Agencies should ensure training coverage includes guidance for managers on how to identify bullying and manage potential incidents.
- Agencies should schedule refresher training on a periodic basis.
- Where practicable, agencies should ensure training is tailored to address particular situational risk factors and related strategies, in order to best equip managers and employees for difficult conversations.

## **Enhancing support from human resources functions**

- Agencies should consider whether their HR function can be better resourced, trained and empowered to better support managers and leaders to build extended capability in culture and conduct matters. The focus should be upon reducing heavy reliance on HR and building broader organisational capability.

## **Addressing gaps in policies and procedures**

- Agency documentation should specifically include a reference to bullying in addressing conduct, examples of what is and isn't bullying; the agency's stance on bullying; and clear reference to the channels for reporting. Agencies should ensure documentation is made available in a range of formats and forums to maximise accessibility.

# 2. Approach

## 2.1. Basis and authority for the review

Following a request from the Public Sector Commissioner (“the Commissioner”), a review was undertaken under section 45A (2) of the *Corruption, Crime and Misconduct Act 2003* (“CCM Act”) of the arrangements used by “public authorities”<sup>1</sup> to prevent and manage bullying. KPMG was engaged to carry out this review following a request for quote process. Through this review, the PSC wished to further understand current agency practice and potential areas of good practice and suggested improvement areas, particularly in the context of increasing expectations of, and pressures on, the WA public sector.

A sample of six agencies was selected for the evaluation, which focussed on:

- Arrangements to prevent bullying;
- Arrangements to manage alleged bullying incidents when they are reported; and
- The time taken to manage alleged cases of bullying.

The observations from the review provide thematic insight into the approaches used by public authorities to prevent and manage bullying, good practice and areas of improvement. The observations are not intended to be address all matters in relation to the appropriate management and prevention of bullying; and the review was not a compliance review. This approach was designed for the purpose of advising and building capability in public authorities.

## 2.2. Scope

The PSC identified six agencies to form the sample for the evaluation, and for the purposes of this report, these agencies have been de-identified. This sample included a selection from local government, government trading enterprises, and public sector bodies covered by the legislative provisions in the *Public Sector Management Act 1994* (“PSM Act”) and/or the *CCM Act*.

To deliver upon the review objectives, there were six main components to the approach:

- Desktop review of documentation requested from the sample agencies;
- Analysis of PSC public sector employee survey data;
- Targeted consultations with stakeholders;
- A comparative analysis of examples of best practice through a literature scan;
- Development of an ‘Review Framework’; and
- Analysis of agency practice, leveraging the framework, in order to distil key thematic observations and suggestions for improvement.

A Request for Information was sent to all agencies to enable desktop review of documentation and a standard set of questions were developed and used as the basis for stakeholder consultations.

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<sup>1</sup> Public authority’, as defined in the *Corruption, Crime and Misconduct Act 2003* (WA) includes public sector bodies, government trading enterprises, public universities and local governments.



## 2.3. Limitations

- The desktop review relied heavily on information from agencies, and it is noted that in some cases, not all requested information was provided.
- In the majority of cases, agencies nominated specific stakeholders for us to meet with to inform this review, based upon recommended advice to ensure diverse perspectives. For four of the six agencies, CEOs were directly consulted enabling their perspectives to be considered in the analysis. Notwithstanding the diverse mix of interviewees, it is not possible to determine whether staff who participated in interviews are representative of the broader workforce.
- Agencies noted that it would be difficult to accurately determine time taken to deal with bullying allegations, as the beginning and end of the process are not always transparent. In addition, bullying allegations often coincide with performance management or other matters such as stress leave, so it can be difficult to isolate the time taken to deal with the bullying aspects specifically. As a consequence it was not possible to determine the amount of time that management of bullying allegations consumes. Anecdotally however, agencies indicated that managing behavioural related matters is generally very time consuming.

## 2.4. Terminology

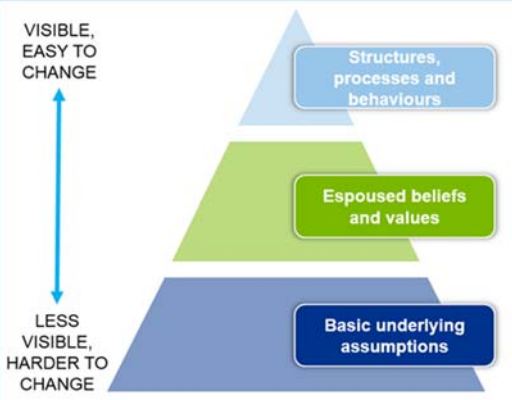
Given the thematic nature of the review, agencies within the sample have been de-identified and are not named in this report.

To ensure consistency across agencies, the following terminology has been standardised within the observations:

<b>Agency</b>	For simplicity this report uses “agency” to describe public authorities.
<b>CEO</b>	Refers to the individual leading the agency.
<b>Manager</b>	An individual within an agency who has responsibility for managing another individual’s work.
<b>Leaders</b>	A broad term, typically including the CEO and Corporate Executive team; and potentially senior management for larger agencies.
<b>Review</b>	Refers to the scope of work carried out by KPMG, which has similar attributes as an evaluation but does not constitute a “review” as referred to in section 24B of the <i>PSM Act</i> .

# 3. Key observations

## 3.1. Tendency to focus behaviour management on certain elements rather than holistically

Observations and impact	Suggestions for improvement
<p>The seven elements identified as contributing to the successful management and prevention of bullying (as shown in <i>Diagram 1 – Review Elements</i> and <i>Appendix 4.1</i>) are each interlinked. These include the ‘visible’ elements that are relatively easy to change (such as policies, processes and systems); and the ‘softer’ elements that influence the underlying assumptions, beliefs and values (such as leadership tone and role modelling).</p> <p>In considering bullying, assumptions will be made by employees as to whether bullying is tolerated or not based on leadership, culture and management interaction; with more visible elements reinforcing the tone.</p> <p style="text-align: center;"><b>A model of culture</b></p>  <p style="text-align: center;"><i>(Source: Edgar Schein - Organisational Culture and Leadership, 1992)</i></p> <p>From consultations with agencies, it was noted that agencies have a tendency to rely more heavily on one dimension than another, i.e. some agencies rely heavily on leadership, cultural and capability elements such as tone from the top, role modelling, holding people to account, and having difficult conversations; whereas others rely more on policies, processes and formal frameworks.</p> <p>Few of the sample agencies appeared to have a strong balanced focus on all elements holistically; and there were varied degrees of completeness in coverage of the elements.</p>	<p>Agencies should consider the impact of culture, leadership and behaviour in balance with structured policies, procedures and frameworks, to best prevent and manage bullying.</p> <p>Agency leadership forums and agendas should include periodic strategic coverage of culture and values; and outcomes being achieved (i.e. focussing on all elements; and beyond reporting of conduct cases/ matters).</p> <p><i>The good practice examples noted in this report could be utilised to assist.</i></p>

Good practice identified from sample agencies

- The agency has a diverse workforce operating from multiple locations. In order to demonstrate commitment to cultural goals, senior leaders host appropriate forums across all locations ensuring openness and accessibility. They back this up with structural elements, such as the inclusion of cultural KPIs and development plans for each team.

# 3.2. Tone from the top matters

Observations and impact	Suggestions for improvement
<p>Within the sample agencies, some agency CEOs and executive teams were identified as being more proactive and transparent than others in demonstrating strong leadership in relation to behaviour standards.</p> <p>These agencies tended to have executives who strongly and clearly communicated the agency’s values including no tolerance for bullying, often creating opportunities to communicate this to teams in person.</p> <p>The leaders (CEOs and Executives in this scenario) were also cognisant of the importance of strong support structures and visibly supported the human resource function to ensure this commitment carried through to how HR engaged with employees (this is further elaborated in Observation 3.7).</p> <p>Leaders in these organisations also demonstrated a deliberate focus on monitoring the ‘tone’ of the work environment and being attune to risk indicators, enabling timely interventions to occur to maintain standards.</p> <p>Managers and employees in these agencies appeared more comfortable in having difficult discussions; and felt that leaders were more accessible and open to concerns being raised.</p>	<p>CEOs should confirm that they have an up to date set of behavioural values, which reinforce that inappropriate behaviour is not tolerated.</p> <p>Leaders should ‘back up’ value statements by clearly articulating their personal commitment to an environment that is free of bullying.</p> <p>Leaders should regularly and directly engage with teams to understand how well commitments are being translated into outcomes for employees.</p>
<p><b>Good practice identified from sample agencies</b></p>	
<ul style="list-style-type: none"> <li>• The CEO has recruited new resources to facilitate good practice HR involvement in managing performance and inappropriate behaviour. Visibly investing in more mature HR capability signalled to employees that managing performance and inappropriate behaviour was seen as a priority by leadership.</li> <li>• The CEO has created an environment, both physically and culturally, where he/she is interacting on a regular basis with employees, monitoring the ‘tone’ of the workplace; and extending support in times of visible stress. This role-modelling of collegiate behaviours conveys his/her personal commitment and support; and creates an open environment where it is ‘safe’ to raise concerns and/or ask for support.</li> </ul>	<p>Leaders should directly engage with their HR team to seek feedback on how they can build upon ‘tone from the top’, including monitoring the ‘tone’ of the work environment and being attune to risk indicators; and ensuring sufficient accessibility across all workforce locations.</p>

# 3.3. Effective performance management assists in minimising real and/or perceived bullying

Observations and impact	Suggestions for improvement
<p>Clear differentiation between performance management and bullying is essential to effectively prevent and manage real and perceived bullying.</p> <p>Both managers and staff need clarity on what is effective performance management and what is considered bullying. Employers must be able to manage poor performance effectively without being accused of bullying, and yet individuals should not feel unfairly targeted in performance discussions. Regardless of how structured the process is, effective execution is essential to avoid unnecessary allegations of bullying.</p> <p>It can be difficult for employees to distinguish between performance management and bullying, where there are differing perceptions of an individual’s performance effectiveness in their role. Interviews highlighted performance management is often perceived as bullying, particularly if a change in management or focus leads to more proactive performance management. The following diagram highlights these different dimensions.</p> <div data-bbox="247 1008 1093 1904" style="text-align: center;"> <p><b>Dimension of Performance Management</b></p> </div>	<p>Agencies should consider how they execute performance management processes to ensure that performance feedback is delivered appropriately and in a timely manner. Particular focus areas should include ensuring feedback is clearly linked to an individual’s role; ensuring feedback includes a balanced focus on results and behaviours; and focussing on the level of understanding of the distinction between performance management and bullying.</p>

Observations and impact	Suggestions for improvement
<p>The risk of real or perceived bullying can be reduced where management are equipped with the guidance and capability to provide feedback in a timely, structured way that is explicitly linked to an individual’s role. Where this is not the case, the risk of perceived unfair treatment is heightened.</p> <p>All agencies had a structured performance management process, although management capability to undertake effective conversations was inconsistent in some cases, affecting the level of confidence that feedback points were appropriately linked to an individual’s role and goals.</p>	
<p><b>Good practice identified from sample agencies</b></p>	
<p>Better practice included three agencies where the performance management tools made specific reference to values alignment as an integral performance element.</p>	

# 3.4. Proactively considering the management of change as it impacts upon behaviour

Observations and impact	Suggestions for improvement
<p>Change is a necessary and expected element of contemporary business management. Most agencies reviewed had experienced some significant change to their leadership, structural or operating model in recent times.</p> <p>Research and consultation indicated that, regardless of the scale of change, poorly managed change exacerbates stress and uncertainty. This can occur for a number of reasons including:</p> <ul style="list-style-type: none"> <li>• new leadership or management uplifting effective performance management, bringing greater accountability than previously achieved;</li> <li>• increased internal competition/ job insecurity influencing behaviour; and/or,</li> <li>• loss of a sense of identity, creation of ‘subcultures’ or inconsistencies in behaviours arising from structural change.</li> </ul> <p>Whilst these risk factors were intuitively understood by most leaders, some interviewees indicated that the risk factors were often not explicitly catered for in change management planning. In the majority of agencies formal, documented change management planning frameworks did not exist; and change capability was considered relatively immature, with a high reliance on HR in cases.</p>	<p>Change management planning should be formalised and should explicitly include re-iterating behavioural values, monitoring the ‘tone’ of the work environment and being attune to risk indicators; and extending the support mechanisms available where appropriate.</p> <p>As agencies work through change, a key element of the change management process should be consideration of the requirements of management and staff in relation to communication; and adequate resourcing and support mechanisms such as the human resources function.</p>
<p><b>Good practice identified from sample agencies</b></p>	
<ul style="list-style-type: none"> <li>• One agency recognised the impact of a major structural change; and hosted internal workshops across the entire agency to re-align values.</li> </ul>	

# 3.5. Appreciation of situational risk factors

Observations and impact	Suggestions for improvement
<p>In each of the agencies sampled, there were particular situational factors that were more influential than others to the risk of bullying. Leaders generally demonstrated a good appreciation of these situational risk factors and were attempting to address them.</p> <p>Examples of risk factors included:</p> <ul style="list-style-type: none"> <li>• Real and/or perceived bullying based on power or status in dichotomous workforces, where highly educated/qualified professionals work alongside less educated/ qualified team members. Consultations indicated some employees felt they were treated differently depending on their profession and status in the workplace. In turn they were reticent to raise concerns and/or felt voiced concerns were not taken seriously.</li> <li>• The risk of poor behaviour escalating or being tolerated during stressful work peaks with few opportunities for “down time”. Consultations indicated some employees felt reluctant to raise concerns, either due to a sense of obligation to ‘bear the load’ or a fear of being singled out.</li> <li>• Under-reporting risk in highly professionalised environments where career progression and professional standing lead to hesitation to report for fear of impacting career opportunities.</li> <li>• Unique elements of workforce composition/ diversity which require greater focus on managing vulnerability to poor behaviour.</li> </ul> <p>Situational factors are often the root cause of bullying occurring or not being effectively managed. They often require tailored management strategies across each of the elements in the Review Framework; however there were mixed levels of proactivity and maturity in assessing, monitoring and managing situational risk factors.</p>	<p>Agencies should consider the risk of bullying (and broader poor behaviour), and identify contributing factors in their workforce, in a structured way.</p> <p>Agencies should develop tailored strategies to best prevent and manage bullying, including both quick wins (such as acknowledgement with employees and creating opportunities to engage employees in problem solving); and longer term strategies (such as more flexible workforce models and strategies such as staff rotation, coaching and mentoring).</p>
<p><b>Good practice identified from sample agencies</b></p>	
<ul style="list-style-type: none"> <li>• One agency built in an annual opportunity for employees to engage with leadership one level above their direct report, to create an additional avenue for feedback to leadership.</li> <li>• The CEO of another agency demonstrated a mature appreciation of nuances in the contributing risk factors in differing areas of the agency; and tailored strategies accordingly. Strategies for parts of the business were focussed on confidential ‘open door’ support to employees; whereas in other areas strategies centred on up-skilling managers in the monitoring and reinforcement of expected behaviours.</li> </ul>	



# 3.6. Learning and Development

Observations and impact	Suggestions for improvement
<p>Almost all agencies include some form of appropriate behaviour content within their induction training, with the scale of content, and the level of specific coverage of bullying, being varied. Mandatory attendance for initial induction is typically monitored, with some using online Learning Management Systems, enabling automatic reminders; whilst others rely on HR or management to manage attendance.</p> <p>A limited number of agencies provided workshops and or ad-hoc sessions on a variety of topics including behaviour, but these are usually not enforced or attendance monitored.</p> <p>In most cases, the induction training, or ad-hoc workshops did not cover training for managers on how to identify bullying and manage potential incidents.</p> <p>Refresher training is relatively uncommon. In some cases, interviewees who had been with an agency for a number of years cannot recollect having any training on the topic at all.</p>	<p>Agencies should ensure training coverage includes guidance for managers on how to identify bullying and manage potential incidents</p> <p>Agencies should schedule refresher training on a periodic basis.</p> <p>Where practicable, agencies should ensure training is tailored to address particular situational risk factors and related strategies, in order to best equip managers and employees for difficult conversations.</p>
<p><b>Good practice identified from sample agencies</b></p>	
<ul style="list-style-type: none"> <li>Some agencies used specialist external resources to run behavioural training sessions for them; although it is acknowledged that such training needs to be tailored and built upon by the agency rather than delivered on a once off basis.</li> </ul>	

# 3.7. Support from human resources functions

Observations and impact	Suggestions for improvement
<p>Through interviews, it was noted that the role of the human resources function in the management and prevention of bullying is inconsistent across agencies.</p> <p>The type of service that human resources (“HR”) functions provide to both the individuals who feel they are being bullied, and to managers who need to manage their staff through the process, varies both across agencies, and in some cases, can also vary within the same agency. Some HR departments act as mentors for individuals providing hands on support, while others appear to be more focused on development of, and reference to, policies and procedures.</p> <p>In better practice agencies, HR’s mandate extended to coaching managers and leaders to build extended capability in culture and conduct manners.</p> <p>Some agencies acknowledge gaps in capability across their HR teams, including the skills to navigate difficult situations, while others have gaps in their ability to deal with people in the most effective way. This in turn creates an inconsistent experience for individuals, and in some cases, a lack of confidence in the system.</p>	<p>Agencies should consider whether their HR function can be better resourced, trained and empowered to better support managers and leaders to build extended capability in culture and conduct matters. The focus should be upon reducing heavy reliance on HR and building broader organisational capability.</p>
<p><b>Good practice identified from sample agencies</b></p>	
<ul style="list-style-type: none"> <li>The CEO of this agency introduced the concept of “one team” for human resources and specially recruited more experienced resources to provide a stronger, central capability. The human resource team operates to a business partnering philosophy, with human resource team members well known to key contacts in the business and able to engage effectively to promote good corporate standards.</li> </ul>	

# 3.8. Gaps in policies and procedures

Observations and impact	Suggestions for improvement
<p>Improvement areas with regards to robust policies and procedures are outlined below.</p> <ul style="list-style-type: none"> <li>• Specific reference to bullying in conduct material: Practices varied from no specific reference to bullying in conduct policies and procedures, to a stand-alone bullying policy. Not all agencies publicise a definition of bullying, and through interviews it was noted that staff rarely describe bullying as per the guidance set by the organisation, and most do not differentiate between an individual instance of inappropriate behaviour and systematic, repeated behaviour. It would be useful for agency documentation to specifically include a reference to bullying in addressing conduct, examples of what is and isn't bullying; the agency's stance on bullying; and clear reference to the channels for reporting.</li> <li>• Accessibility of material: In some cases this was raised as a concern for staff in non-head office locations and/or without ready access to the internet; particularly with an increasing tendency to publish on-line only.</li> <li>• Recording allegations of bullying: Most agency human resources functions treat informal and formal allegations of bullying similarly, however not all agencies record the same level of detail, with some recording all informal allegations of bullying and others not. The inconsistent approach to recording information makes it difficult to easily identify trends within data across agencies.</li> <li>• The extent to which behaviour matters, bullying and other, were tracked, analysed and reported to executives varied across agencies.</li> </ul>	<p>Agency documentation should specifically include a reference to bullying in addressing conduct, examples of what is and isn't bullying; the agency's stance on bullying; and clear reference to the channels for reporting. Agencies should ensure documentation is made available in a range of formats and forums to maximise accessibility.</p>

# 4. Appendices

## 4.1. Review Framework

The current maturity of bullying prevention and management at each of the six agencies was assessed using the following review framework developed by KPMG.

### Review elements

Based on a review of current literature, coupled with KPMG insight from similar reviews, the following seven elements were considered essential when attempting to manage and prevent bullying, with balance across all seven best enabling positive workplace behaviour.

Element	Key areas considered
<b>Leadership</b> "Do as we do"	<ul style="list-style-type: none"> <li>• Leadership commitment and "tone from the top" on values and behaviours.</li> <li>• Demonstrable action taken by leadership to reinforce their commitment.</li> <li>• Leadership engagement with employees to ensure commitment is being met.</li> </ul>
<b>Culture</b> "The way we do things"	<ul style="list-style-type: none"> <li>• Articulation; awareness and demonstration of behavioural standards.</li> <li>• Cascading of behavioural and culture elements into agency and individual goals and key agency initiatives.</li> </ul>
<b>Capability</b> "We invest in our people"	<ul style="list-style-type: none"> <li>• Training and guidance provided to management and employees.</li> <li>• Structured approach to developing the right capabilities.</li> </ul>
<b>Policy, process and systems</b> "We do things transparently and consistently"	<ul style="list-style-type: none"> <li>• Documented policies and procedures and accessibility/communication mechanisms.</li> <li>• Measurement systems and processes.</li> </ul>
<b>Performance management</b> "We take responsibility"	<ul style="list-style-type: none"> <li>• Monitoring and management of individual performance.</li> <li>• Focus on activities and results, behaviour and conduct.</li> <li>• Competence in handling difficult conversations.</li> </ul>
<b>Change management</b> "We are ready, willing and able to change"	<ul style="list-style-type: none"> <li>• Change management frameworks, tools and capability.</li> <li>• Management of impact of change on behaviour in the workplace.</li> </ul>
<b>Support mechanisms</b> "A problem shared is a problem halved"	<ul style="list-style-type: none"> <li>• Capacity and capability that exists to support employees and management.</li> <li>• Provision of tailored advice and coaching to leadership and management.</li> </ul>

## Maturity Assessment

The following maturity scale, developed by KPMG, has been used to evaluate agencies against the above seven elements, as they relates to bullying prevention and management.

<b>Initial</b>	The agency does not currently have a targeted focus, structure and/or capability; or it is very limited in nature. The agency tends to be reactive in its actions with a lack of planned strategies, control or oversight.
<b>Developing</b>	Some focus and capability exists, but there is a lack of discipline, and/or or inconsistency in application. The agency relies heavily on the best intentions and the skills of individuals versus proactive control and oversight.
<b>Established</b>	Steady state capability exists and processes are implemented, with leadership focus and oversight; however there is still likely to be room for improvement in awareness, integration and/or adoption across the agency.
<b>Well embedded</b>	There is integrated focus, structure and capability led from the top and tailored to agency needs. There is strong, consistent delivery to expectations, in a proactive, strategic manner. Performance is measured and managed.
<b>Optimal</b>	The agency is seen as exemplary by peer agencies. Leadership is proactively engaged; and there are specific, often innovative, strategies to address underlying issues and to build agency resilience and capability.

## 4.2. Document Request for Information

The following information was requested from each agency to inform the review.

#	Policies / documentation
1	Current Organisation Structure including total number of employees. Detailed org chart for HR (to facilitate arranging interviews)
2	CEO & HR Leads availability for interviews between 22 May and 9 June
3	Agency Code of Conduct
4	Bullying / unacceptable / ethical behaviour guidelines & associated management processes
5	Ethical behaviour / bullying training available to all employees (if different from the Accountable & Ethical Decision Making training where applicable)
6	Performance management process
7	Mandatory compliance training – format, record keeping of attendance/completion
8	HR policies and processes covering employee lifecycle
9	Statements of agencies values, desired behaviours etc. including information on how they are communicated
10	Public Interest Disclosure Policy including PID Officer numbers, levels and gender
11	Breach registers relevant to bullying / unacceptable behaviour – nature of breaches recorded, record keeping practices, reporting processes and outcomes
12	Copy of any employee/agency surveys that have taken place
#	Data to cover period 01 July 2013 to 31 May 2017
13	# of employees who have reported bullying
14	# of Investigated instances of bullying and time taken from opening to closing the investigation
15	# of investigations that were found to not be bullying

## 4.3. External documents reviewed

The following documentation was reviewed during the literature scan to assist inform the review.

#	Document Name	Produced by
1	Prevention of workplace bullying in the WA Public Sector	PSC
2	Dealing with bullying at work	WorkSafe
3	Psychologically Safe and Healthy Workplaces: Risk Management Approach Toolkit	WorkSafe
4	WorkSafe Code of Practice: Occupational Health and Safety in the WA public sector	WorkSafe
5	WorkSafe Code of Practice: Violence, aggression and bullying at work	WorkSafe
6	WorkSafe Checklist for Inspecting Workplace Bullying	WorkSafe
7	WorkSafe Plan	WorkSafe
8	PSC Commissioner's Circular: Code of Practice: Occupational Safety and Health in the WA public sector	PSC
9	Aggression in the workplace - risk management toolkit	WorkSafe
10	WA Health Code of Conduct	WA Health
11	WorkSafe & PSC – Bullying guidance/instruments	WorkSafe & PSC
12	State of the Sector Bulletin 2016	PSC
13	State of the Sector Bulletin 2015	PSC
14	Preventing Bullying Guide	PSC
15	Public Sector Commissioner's Circular – Code of Practice: occupational Safety and Health in the WA Public Sector	PSC
16	Preventing and Reporting Bullying at Work	WorkSafe
17	Guide for Preventing and Responding to Workplace Bullying	SafeWork
18	Workplace Bullying Checklist	WorkSafe
19	Code of Practice – Occupational Health and Safety in the WA Public Sector (2007)	WorkSafe
20	Code of Practice – Violence, Aggression and Bullying at Work	WorkSafe
21	Guidance Note – Dealing with Bullying at Work: A Guide for Workers	WorkSafe
22	WorkSafe Plan: Information and Workbook	WorkSafe
23	Psychologically Safe and Healthy Workplaces: Risk Management Approach Toolkit	WorkSafe
24	File Note: Evaluation of arrangements to prevent and manage bullying	WorkSafe
25	Bullying and Harassment at Work: A Guide for Employees	ACAS
26	Bullying and Harassment Policy: Managers' Guide	Sheffield Health and Social Care
27	Dignity at Work – Good Practice Guide and Procedure on Dealing with Bullying and harassment in the Workplace	University of Huddersfield
28	Public Sector Commission Surveys (EPS, PSES, ICS)	PSC