

Response to the Russell Review by the Department of Climate Change, Energy, the Environment and Water

Australian Antarctic Division

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Content note

This response may contain references to bullying, sexual harassment and discrimination. As a reader, you may experience various emotions, particularly if you have directly experienced or witnessed these types of harmful behaviours yourself. We encourage you to consider what support and care might be needed for you and those around you.

Disclaimer

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Acknowledgement of Country

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

Leadership Acknowledgment

I thank Leigh Russell for her comprehensive Independent Review of Workplace Culture and Change.

I and the executive of the Department of Climate Change, Energy, the Environment and Water (DCCEEW) have a responsibility to ensure that DCCEEW is the best possible workplace – a place that is safe, inclusive, without judgement, and where people feel comfortable to be their best self.

The Australian Antarctic Division is an extraordinary part of DCCEEW delivering science and Antarctic stewardship critical to Australia's national interests.

The review has told us that we must do significantly more in the Australian Antarctic Division to put our people first and to make our workplaces safe. The review found bullying, exclusion, sexual harassment, systemic sexual discrimination and workplace stress have occurred in AAD workplaces over many years, through to the present day.

These behaviours and experiences are unacceptable. They are not consistent with Australian Public Service (APS) Values and the APS Code of Conduct. They are not consistent with my, or the Executives', expectations.

The review drew on the experiences of a great number of Australian Antarctic Division staff, more than 40% in fact – and we are listening.

The review spoke of people who have not felt safe to raise concerns because they feared the consequences of speaking up: reprisals, opportunities being withheld and bullying.

The review found cultural change is required to drive diversity and inclusion and overcome deeply entrenched practices and behaviours.

The review also found there was very little confidence in current departmental reporting systems, combined with a lack of cultural leadership within the Australian Antarctic Division.

This cannot continue. It is disappointing. It will change.

Our leaders must place people at the centre of the work of the Antarctic Program. A safe, respectful and positive culture is required.

I, and the Executive of DCCEEW, acknowledge that workplace practices and behaviours within the Australian Antarctic Division have contributed to unacceptable workplace harm. We acknowledge

that cultural leadership failures and departmental policies and processes have contributed to unacceptable workplace harm.

We have acted, and continue to act, in response to the issues raised. We commit to implementing, with our staff, all the findings of the Russell review and taking the action required. We also commit to ongoing cultural reform and improved accountability, consistent with the positive culture and practices we are building across DCCEEW.

This statement is one of a series of immediate steps the department has taken in response to the review and to drive broader cultural change. Other immediate steps include: a comprehensive departmental response plan to deliver the recommendations to be published on our intranet and website, ensuring transparency and accountability; dedicated people centred staff support services and facilities to create a safe workplace including independent, confidential and Hobart-based counselling; the creation of a dedicated taskforce and people operations function – also recommended by the review – to implement recommendations; a refreshed leadership team as an outcome of selection processes currently underway; and, expeditioner and divisional training in diversity, equity and inclusion and bystander awareness.

In the medium to longer-term, I and the DCCEEW executive, will work with staff to actively support a safe, diverse and inclusive workplace. We will monitor this closely.

We are in this together to ensure necessary cultural change is realised. I am determined to enable our people to do their best work. This will only be achieved by placing our people at the centre of our mission to deliver world leading science and Antarctic stewardship.

David Fredericks

Secretary

Department of Climate Change, Energy, the Environment and Water

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Context of the Russell review

In October 2022 the Department of Climate Change, Energy Environment and Water (the department) engaged Russell Performance Co, led by Leigh Russell (the Reviewer), to conduct the *Independent Review of Workplace Culture and Change at the Australian Antarctic Division* (the Review).

The Review followed a study into diversity, equity and inclusion in the Australian Antarctic Program by Professor Meredith Nash that was released last year (the Nash study). This study identified serious cultural issues, and findings of concern including incidents of sexual harassment, gendered inequality, and people from underrepresented groups feeling excluded and diminished.

Given the substance of the Nash study and its recommendations, it was important that a comprehensive independent cultural analysis was undertaken with recommendations to ensure that staff feel safe at work, that they can be themselves at work, and that the right systems, processes and protocols are in place to support staff who may experience harmful behaviour. The Review was commissioned in 2022 to provide that independent consideration.

The Review has now been delivered to the department. It provides advice in relation to:

- Actions taken to date to address the findings and recommendations of the Nash study;
- Progress on cultural change and creating an inclusive workplace where staff in Antarctica and working in head office feel safe and valued; and
- The adequacy of the systems, policies and processes in the department to:
 - support AAD staff who may experience bullying, harassment and other forms of inappropriate behaviour;
 - be accessible and well-known to AAD staff; and
 - make confidential complaints in a way that staff feel safe, that their complaints will be responded to in a timely way, and they are confident that their concerns will be treated seriously.

The Terms of Reference for the Review are in Appendix B of this response.

People are the Australian Antarctic Division's greatest asset

The Australian Antarctic Division (AAD) has important responsibilities as Australia's representative and steward for Antarctica, Heard Island and McDonald Islands and the surrounding waters. The people from within the AAD and partner organisations who lead and support this work, contributing their expertise, commitment and effort to our shared mission, are our greatest assets. They are what makes the Australian stewardship of Antarctica successful, and we must place them at the heart of our consideration and care.

To continue this essential work, the department must acknowledge and respond to the reviews and outcomes that have identified areas of concern. The AAD has been on a path of cultural reform over recent years, with a focus on diversity, equity, inclusion and leadership, however it is clear that staff continue to experience bullying, discrimination, and sexual harassment, with many feeling the AAD is not a psychologically safe working environment. These findings, and other concerning findings contained within the Review, are of the utmost importance to the department and to the people and mission of the AAD. As we respond to the Review, we must and will ensure that people's safety and wellbeing are at the forefront of our actions and consideration.

There are further areas for concern which relate to the findings of the Review and should also be considered in our response. Operational and science outcomes have not been on track, with the *2021 Leading Australian Antarctic Science – Review of Australian Antarctic Division Science Branch* report finding Antarctic science is limited by a lack of planning, resource constraints and leadership changes, exacerbated by the COVID-19 pandemic.

In this critical time for our scientific understanding and sustainable stewardship of Antarctica, it is essential that the AAD be equipped and aligned to accomplish its mission. We must provide greater clarity of shared purpose, and provide the clear protocols and systems needed to support the work.

The Review has identified seven guiding principles to underpin the action required to bring about the culture the AAD people deserve. The Review is clear that 'strong, inclusive and courageous leadership' will be required.

As we implement changes in response to the Review, including immediate steps, we will consult and listen deeply to AAD staff to ensure that we are taking into account their experience, knowledge and ideas. We will provide meaningful and informed support to staff to ensure our decision making is supportive of the people and partners who are our greatest asset.

This is a journey we will continue together, building on actions already taken, to ensure the AAD has a culture that enables our vital mission and makes our department the best place to work for everyone.

Overview of the department's response to the Review

Having made careful preparation and put in place support for staff, the department is now releasing the Review and our response.

The department accepts all the findings and commits to implementing the changes required.

Our response will be guided by the principles that actions and implementation must be real, achievable and start from today, that changes must be owned and driven together for the benefit of the whole department and that leaders and decision makers operate with transparency and respect.

Drawing on these principles the department has developed a comprehensive plan to respond to the Review and ensure the AAD has a culture that enables the mission. The plan will be delivered over a period of at least 18-24 months, with immediate phases marking the commencement of key activities that will then continue to be designed, implemented and embedded over time.

The response is also informed by and consistent with the Respect@Work legislative reforms and learning from the recently established Parliamentary Workplace Support Service.

The indicative timeframes for these initial phases of delivery are as follows:

- **Immediate (within Month 1):** Actions commencing upon release of the response.
- **Phase 1 (Months 2 – 3):** Actions commencing as soon as practical after the release.
- **Phase 2 (Months 4 – 6):** Actions involving longer lead time to design or seek staff input.
- **Ongoing (beyond Month 6):** Further actions as determined necessary, along with ongoing implementation and improvement of all actions to achieve sustainable change.

The plan includes and incorporates all the recommendations of the Review. Over the coming weeks and months, the department will engage with AAD staff and leaders to consult, confirm, and agree the actions within the plan and its implementation.

As per the first recommendation of the Review, this response begins by acknowledging the workplace practices and behaviours, alongside the leadership and departmental processes that have contributed to unacceptable workplace harm at the Australian Antarctic Division.

The following sections provide both overview and detail on the comprehensive plan.

1 The department’s response in detail: A comprehensive plan

The following pages detail the department’s comprehensive plan to respond to the review and ensure the AAD has a culture that enables the mission, including ongoing actions and a series of immediate steps.

Table 1, below, provides a summary of the plan that forms the core of the department’s response.

Table 1. Comprehensive plan to deliver a culture that enables the mission

Stream	Key Change	Immediate Month 1	Phase 1 Months 2-3	Phase 2 Months 4-6	Ongoing Month 6+
1. Leadership commitment to a culture that enables the mission					
Commitment	a. Leadership acknowledgement of issues and ongoing commitment to change	█	█	█	█
	b. Leadership commitment to safe, respectful, diverse and inclusive workplaces	█	█	█	█
	c. Reformed AAD leadership structure and Executive Committee arrangements	█	█	█	█
Governance	d. A dedicated People Operations function equipped to support leaders and teams	█	█	█	█
	e. A new Respect and Equality Reform Council to guide and oversee the change	█	█	█	█
Accountability	f. Leadership accountability through reporting, 360-degree feedback and appraisal			█	█
2. Ensuring everyone is safe and supported					
Expectations	a. Reinforcing the obligation to prevent unacceptable behaviour and workplace harm	█	█	█	█
	b. Expanding risk management to include workplace harm and psychological safety	█	█	█	█
	c. Creating a safe reporting culture, ensuring support and no adverse consequences	█	█	█	█
Reporting	d. More flexible options to report unacceptable behaviour and workplace harm	█	█	█	█
	e. Facilities to support “Independent Safe Space”	█	█	█	█
Supports	f. Additional resources in Hobart to provide advice, support and incident response		█	█	█
	g. Diverse, experienced mentors available to support expeditioners in Antarctica			█	█
Follow through	h. Accountability and consequences for both harmful behaviour <u>and</u> inaction		█	█	█
3. Building awareness and practical skills					
Awareness	a. Raising awareness of the nature and impacts of bullying, harassment and discrimination	█	█	█	█
	b. Training for all staff in unconscious bias and bystander obligations	█	█	█	█
Leadership capability	c. Training for all leaders to address unacceptable behaviour and provide support	█	█	█	█
	d. Coaching for all people leaders to reinforce inclusive and collaborative leadership		█	█	█
Contextual skills	e. Specialised training for expeditioners tailored to the Antarctic context	█	█	█	█
4. Working together to deliver results					
Collaboration	a. A more supportive relationship between AAD and DCCEEW	█	█	█	█
	b. Working with our contractors and partners to help prevent workplace harm		█	█	█
	c. International collaboration to prevent workplace harm in Antarctica			█	█
Inclusion	d. Breaking down barriers to progression based on gender or background		█	█	█
	e. Antarctic workplace facilities and equipment designed for safety, inclusion and respect		█	█	█
	f. New expectations for on-station leadership and alternative avenues for support		█	█	█
5. Ongoing measurement and improvement					
Measurement	a. Team pulse checks and surveys to track collective performance and progress	█	█	█	█
	b. Standardised psychological assessments and debriefings for all expeditioners		█	█	█
	c. Measuring diverse group representation in leadership and leadership pipeline			█	█
Continuous improvement	d. KPIs and dashboards to monitor workplace harm, reporting and action taken	█	█	█	█
	e. Ongoing evaluation of implementation, year-1 audit and year-2 independent review			█	█

The pages following provide more detail on this comprehensive plan and how we will implement it.

2 Leadership commitment to a culture that enables the mission

Stream	Key Change	1 month	2-3 months	4-6 months	6+ months
Commitment	a. Leadership acknowledgement of issues and ongoing commitment to change				
	b. Leadership commitment to safe, respectful, diverse, and inclusive workplaces				
Governance	c. Reformed AAD leadership structure and Executive Committee arrangements				
	d. A dedicated People Operations function equipped to support leaders and teams				
	e. A new Respect and Equality Reform Council to guide and oversee the change				
Accountability	f. Leadership accountability through reporting, 360-degree feedback and appraisal				

2.1 Commitment

a. Leadership acknowledgement of issues and ongoing commitment to change

Russell: 1A

Leaders at all levels set the tone and expectations that shape culture, but ultimately it starts at the top. The Secretary and senior leadership of the department have no tolerance for workplace harm and are fully committed to the delivery of the plan outlined in this response.

To provide this acknowledgement and signal ongoing commitment to permanent and lasting reform, the following actions will be taken:

- The Secretary has released a statement acknowledging the failures of cultural leadership, processes, workplace practices and behaviours that have contributed to unacceptable workplace harm at the AAD. This statement committed to implementing the recommendations of the Review and to demonstrate commitment to cultural reform and ongoing accountability. The statement was delivered by the Secretary in person at Division headquarters.
- The Deputy Secretary, Head of Division and Executive team of the AAD will provide a signed statement to staff committing to building a safe and inclusive workplace, including addressing sexual harassment, bullying, and other forms of discrimination. This statement will also outline the case for change and commit to implement the recommendations of the Review.

- The Secretary and DCCEEW Executive will continue to demonstrate visible and ongoing commitment to the AAD and delivery of the plan through regular communications, engagement, and opportunities for dialogue with staff.

As a result of these actions, all staff in the AAD should have full confidence in the department's commitment to reform and the establishment of a culture that enables the mission.

b. Leadership commitment to safe, respectful, diverse and inclusive workplaces

Russell: 2A

A safe workplace requires trust and respect and must be inclusive of different perspectives. Leadership at all levels should support this and enable individuals to speak up and challenge inappropriate behaviour. Leaders, as key role models and drivers of change, must be seen to visibly and sincerely champion this culture and commit to a safe, respectful, diverse, and inclusive work environment.

To demonstrate this commitment, the following actions will be implemented, working with the Executive of the AAD and then cascading to all leaders:

- Responsibilities and performance metrics for the Head of Division and Executive team will be updated to include cultural reform and the successful delivery of all elements of this plan.
- Branch Heads will have day to day accountability for implementing diversity and inclusion strategies, including the delivery of this plan, which will be allocated between all members of the Executive.
- All members of the Executive team will signal their strong and visible commitment to culture reform by undertaking leadership development and executive coaching around collaborative leadership, trauma informed approaches, psychological safety, and unconscious bias, and will encourage and enable their direct reports and teams to do the same as programs become available.

The outcome of these actions is to provide staff with the assurance that will allow staff to see and believe in the commitment of the Executive of the AAD leadership to deliver the plan and ensure that all staff experience and benefit from being part of a safe, respectful, diverse, and inclusive workplace.

2.2 Governance

c. Reformed AAD leadership structure and Executive Committee arrangements

Russell: 1D

Effective reform starts with effective leadership. A new AAD leadership will collectively drive the reform, with the AAD Executive Committee providing strong and effective oversight. Changes to the AAD leadership structure and formal governance arrangements will reinforce the role of leadership.

Reforms will include (but not be limited to) the following changes:

- The Deputy Secretary of the department will be included on the AAD Executive Committee and additional members (beyond AAD Branch Heads) will be considered to enhance governance and oversight.
- The newly established Program Management Board will continue as a mechanism for oversight of key activities, focusing on risk and strategic alignment of activities. The Program Management Board will meet monthly.
- A Planning Committee will be established and will agree an integrated planning outlook for all major activities, including for Antarctic summer seasons, across a three-year planning horizon. The Planning Committee will meet quarterly to track progress.
- The three-year integrated planning outlook will be finalised on an annual basis ahead of the AAD business plan, by 1 July.
- The Executive Committee, Program Management Board and Planning Committee will issue regular meeting schedules and agendas, will document decision-making, and transparently report outcomes to staff.

These governance functions will be responsible for overseeing implementation and maintaining cultural reform and the performance reviews of each member will consider the effectiveness of their contribution.

These changes will formalise the departmental leadership's ownership of reform, establish effective governance and oversight, and provide accountability to key stakeholders.

d. A dedicated People Operations function equipped to support leaders and teams

Russell: 2B

The department recognises the unique people requirements of the AAD. A human-centred people operations function will be established, initially as a taskforce to work with staff to implement the response to the Russell review and subsequently as a core part of the department's people support offering.

- This people support function will be separate from the integrity complaints handling function currently in the Integrity Unit of the Department

e. A new Respect and Equality Reform Council to guide and oversee the change

Russell: 1B

Effective governance arrangements are required to ensure the reform is fully delivered and consistent with the intent of the Review principles and recommendations.

Actions to be taken include:

- A new AAD Respect and Equality Reform Council will be created immediately to oversee and contribute to AAD's reform and ongoing culture, replacing the Culture Diversity Equity & Inclusion Steering Committee.
- Council membership will be appointed with different perspectives, gender balance and diverse backgrounds.
- Consideration will be given to the best approach to ensure independent representation and governance oversight, including independent representation from outside AAD and the department.
- The first task of the Reform Council will be to review the draft AAD Diversity Equity & Inclusion Action Plan to align it with this implementation plan.

The Council will act as an advisory board to the reform and oversee its implementation in the short term and serve as the shepherd for AAD's culture in the long term.

The Respect and Equality Reform Council will provide further governance and oversight alongside AAD leadership to ensure delivery of this plan and the establishment and embedding of a safe and inclusive culture.

2.3 Accountability

f. Leadership accountability through reporting, 360-degree feedback and appraisal

Russell: 2A.5, 3A.2

AAD leaders at all levels will be held to account for their actions and attitudes to enable culture reform.

Accountability will be achieved by adopting the following measures as soon as practicable:

- Each Executive will report twice a year to the Respect and Equality Reform Council on their actions to ensure a safe and respective work environment.

- Performance expectations for all people leaders will incorporate metrics around culture reform and workplace safety. Performance evaluations will be informed by 360-degree staff feedback and KPIs from a new internal *Harmful Behaviours Report* (see Section 5.2, d).

The ongoing nature of these actions will ensure that progress on culture reform is actively tracked and managed. Leaders will be recognised for their positive influence, or held to account where necessary, and staff will feel safe to speak up and provide structured feedback about their leaders, reinforcing an inclusive and psychologically safe workplace culture for all.

3 Ensuring everyone is safe and supported

Table 2. Streams and key changes relating to ensuring everyone is safe and supported

Stream	Key Change	1 month	2-3 months	4-6 months	6+ months
Expectations	a. Reinforcing the obligation to prevent unacceptable behaviour and workplace harm				
	b. Expanding risk management to include workplace harm and psychological safety				
	c. Creating a safe reporting culture, ensuring support and no adverse consequences				
Reporting	d. More flexible options to report unacceptable behaviour and workplace harm				
	e. Independent "Safe Space" for reporting and access to trauma-informed support				
Supports	f. Additional resources in Hobart to provide advice, support and incident response				
	g. Diverse, experienced mentors available to support expeditioners in Antarctica				
Follow through	h. Accountability and consequences for both harmful behaviour and inaction				

3.1 Expectations

a. Reinforcing the obligation to prevent unacceptable behaviour and workplace harm

Russell: 4B

Consistent with Respect@Work legislation, every employer has a positive obligation to prevent and address unacceptable behaviour and workplace harm.

To set expectations and ensure lasting reform, the following actions will be taken. Where appropriate, these steps will build on relevant activities such as recent Diversity Equity and Inclusion training sessions conducted on-station:

- Leaders will role model, encourage, and reinforce desired behaviours to help demonstrate and communicate all-staff expectations.
- Policies and practices will be updated and regularly reviewed to ensure those who commit harmful behaviour receive consistent and proportional outcomes.
- All staff will receive training on the importance of reporting harmful behaviours and the mechanisms in place to protect those making reports.

As a result, all staff and leaders will have clear expectations and awareness of the necessary skills and relevant policies to prevent and address unacceptable behaviour and workplace harm.

b. Expanding risk management to include workplace harm and psychological safety

Russell: 4C.2

Feeling safe and supported at work underpins psychological safety. Open communication about potential hazards must be treated as an integral workplace health and safety matter.

Psychological safety will be embedded into the AAD's risk assessment, management, and hazard control processes, in the same way that physical hazards and risks are managed. Updates to work health and safety policies and processes will be undertaken immediately, with reference to, and building upon, any relevant risk assessments that have recently been undertaken.

Incorporating workplace harm and psychological safety into work health and safety policies and processes will embed safety, respect and inclusion and build a person-centred approach to all aspects of the AAD's operations.

c. Creating a safe reporting culture, ensuring support and no adverse consequences

Russell: 4B.3, 5A

Reporting incidents of harmful behaviour is critical to understanding how incidents occur, who is committing them, and initiating action to stop unacceptable behaviour. When reporting incidents, everyone should feel safe and supported with confidence that their report will be actioned where requested and that there are no negative repercussions experienced that discourage reporting.

Significant updates to reporting processes will be made as soon as practicable:

- Upfront and consistent messaging around the importance of reporting harm and reinforcing that workers will be supported when they report and will not be subject to negative repercussions.
- Incident reporting and response systems updated consistent with the findings the review, including providing human centred people support separate from reporting and response systems.
- Training for all staff on the new systems and updated web-accessible instructions and policies.
- Monitoring of incident reporting and action KPIs through the *Harmful Behaviours* Report.

Upgrading incident reporting and response systems will protect those reporting harmful behaviours and improve identification and termination of unacceptable behaviours.

3.2 Reporting

d. More flexible options to report unacceptable behaviour and workplace harm

Russell: 5B

Reporting systems frame the type of information that flows to decision makers and those with authority to stop harmful behaviours. Reporting channels must be accessible to a diverse workforce and for all complaints while providing actionable information to those responsible for acting. A fit-for-purpose reporting system must also account for tracking incidents that when viewed in aggregate indicate a systemic issue that demands a response.

Work will commence immediately to design and implement a new reporting system with appropriate channels catering to all workforce groups and complaint types. Consideration will be given to independent and anonymous reporting, accessibility, and user experience, balancing legal duty of care obligations and natural justice, and the collection of aggregated metrics and insights.

The creation of the system will take into account learnings and expertise from the Parliamentary Workplace Support Service, an expert, trauma-informed support and resolution service for current and former parliamentary staff launched in 2021. The design will be guided by the intent of the recommendations of the Review.

A fit-for-purpose incident reporting system will improve access for all staff and provide better information to decision makers to take decisive action on individual and systemic issues.

e. Facilities to support “Independent Safe Space”

Russell: 5D

Confronting, reporting, and responding to harmful behaviours can be distressing and painful. Those who have experienced or witnessed harmful behaviour may require specialised supports specific to their needs.

DCCEEW will dedicate “independent bookable safe space” to provide specialised support to AAD staff, as needed, in a phased way in Hobart and Antarctica.

As a first step, DCCEEW will enhance existing facilities to ensure there is better access for staff to have private conversations. These facilities will support staff access to training, connecting with family and friends, reporting or seeking confidential support including to the dedicated independent counselling support being established in response to this review.

These facilities are a critical first step and an integral part of creating Safe Spaces for independent reporting and support options for those who have experienced or witnessed harmful behaviour.

Following this action, more permanent tailored facilities and services will be developed to create an external, independent reporting and response option for people to report current or past harm and seek support. The design will begin immediately through engagement with other support service providers, including the Parliamentary Workplace Support Service.

3.3 Supports

f. Additional resources in Hobart to provide advice, support and incident response

Russell: 5C

More supportive and accessible reporting channels may encourage more people to come forward with reporting of historical or recent issues, and the department commits to responding to these in a timely and appropriate manner. This may require additional and more local resourcing.

If that proves necessary, additional department resources will be provided for reporting historical or current issues, with a focus on how to extend the support of these resources to teams in expedition environments and the longer-term support arrangements for the AAD.

These additional resources will ensure the right advice and support is available to appropriately respond to incidents and to resolve matters raised in a timely manner.

g. Diverse, experienced mentors available to support expeditioners in Antarctica

Russell: 6C

Deployment to Antarctica is a unique endeavour and opportunity that few have experienced. It is essential to undertake deployment with full and accurate understanding of what to expect and have someone to talk to when confronted with challenging or sensitive interpersonal situations in these environments.

As soon as practicable, a panel of mentors will be established for the purpose of supporting expeditioners throughout their deployment including pre and post deployment. The panel will consist of previous expeditioners who exemplify the Expeditioner Personal Qualities by being a positive and active contributor to the community and team environment and can speak as a peer particularly on topics of equity, diversity, and inclusion.

The mentor panel will improve the mental preparedness of expeditioners and better support them while on deployment in a way that differs from and is additional to the support of expedition colleagues, supervisors, the AAD leaders and friends and family.

3.4 Follow through

h. Accountability and consequences for both harmful behaviour and inaction

Russell: 2A.6, 4B.5

Realising genuine change means holding everyone accountable for preventing harmful behaviours and promoting positive behaviours. Those whose behaviour is harmful or who stand idly by in the face of harmful behaviour are not meeting their obligations as APS employees.

To ensure accountability for addressing harmful behaviour when it occurs and inaction in the face of harmful behaviour, the following steps will be taken as soon as practicable:

- Policies and practices will be updated to ensure those who commit harmful behaviour receive consistent and proportional outcomes.
- All leaders will be expected to take appropriate action on incidents and reports of harmful behaviours and hold to account those who fail to take appropriate action, or in turn be held accountable themselves.

As a result of these actions, all staff can be confident that those who perpetrate or fail to prevent harmful behaviour will be held accountable.

4 Building awareness and practical skills

Table 3. Streams and key changes relating to building awareness and practical skills

Stream	Key Change	1 month	2-3 months	4-6 months	6+ months
Awareness	a. Raising awareness of the nature and impacts of bullying, harassment, and discrimination				
	b. Training for all staff in unconscious bias and bystander obligations				
Leadership capability	c. Training for all leaders to address unacceptable behaviour and provide support				
	d. Coaching for all people leaders to reinforce inclusive and collaborative leadership				
Contextual skills	e. Specialised training for expeditioners tailored to the Antarctic context				

4.1 Awareness

a. Raising awareness of the nature and impacts of bullying, harassment and discrimination

Russell: 4C

People are the AAD’s greatest asset, and staff at all levels are responsible for ensuring a safe and supportive workplace culture. There is a prevailing belief among some staff that work health and psychosocial safety issues are mainly historical, and this fosters a ‘nothing to see here’ culture that can compound distress and trauma for individuals and allow harmful behaviours to continue.

To raise awareness of the nature and impacts of bullying, harassment and discrimination, the following actions will be taken immediately:

- The people operations taskforce will design and provide training to all staff on the nature and impacts of bullying, sexual harassment, and all forms of discrimination.
- Refresher training will be made available to all staff to ensure an ongoing awareness and understanding of the issues addressed.
- Training will also be provided to new staff joining the AAD.

As a result, all staff in the AAD should have a comprehensive understanding and awareness of the nature and impacts of bullying, harassment and discrimination, and should be equipped with the appropriate tools to ensure a safe and supportive culture.

b. Training for all staff in unconscious bias and bystander obligations

Russell: 3A, 3B

Ignorance is a significant obstacle to minimising inequity and harm in the workplace. Individuals with good intentions may still require training to understand and recognise unconscious bias in their own thinking and behaviour, and in that of their colleagues.

All of the leadership cohort will complete bystander training as a priority.

The following actions will be taken to educate AAD staff on harmful behaviour prevention:

- The people operations taskforce will design and provide training to all staff on the role of the bystander and unconscious bias.
- The people operations taskforce will design training with input from diverse groups on the role of the active bystander and upstander. This training will be provided to all staff annually.

These actions will mitigate unconscious bias within the AAD and will ensure that staff know how to respond appropriately when they experience or witness workplace harm.

4.2 Leadership capability

c. Training for all leaders to address unacceptable behaviour and provide support

Russell: 4A, 4B, 5A

Leadership is essential to create a safe and inclusive culture within the AAD. Leaders have a responsibility to support their teams, be a role model for change and inclusion, and make sure everyone is included and supported.

To enable leaders to best fulfil these expectations, the following actions will be taken:

- All leaders will undertake leadership development coaching and training to support culture reform and will have the capacity to hold themselves, one another and their staff responsible for implementing culture reform.
- All leaders will be provided with training in inclusive leadership, including how to recognise and respond to bullying, harassment, and discriminatory behaviour and how to demonstrate zero tolerance for bullying and sexual harassment.
- All leaders have been provided with initial training in trauma-informed incident response.

This training will enable leaders in the AAD to respond to unacceptable behaviour in the workplace and to support staff in an appropriate and informed manner.

d. Coaching for all people leaders to reinforce inclusive and collaborative leadership

Russell: 3A

While all staff are obliged to be inclusive and to treat others fairly, people leaders have greater responsibility to ensure that staff under their management are not subject to prejudice, exclusion or harm in the workplace. All people leaders must be equipped to manage this responsibility.

All people leaders will be provided with coaching or training on collaborative leadership. This will cover how to have constructive two-way conversations and provide positive and critical feedback, being aware of bias, demonstrating empathy and developing high-level listening skills. Training will also cover unconscious bias and trauma informed approaches to managing workplace harm, including creating psychological safety for teams.

This training will enable the AAD's leaders to be more aware of how their behaviour impacts staff. They will understand that more inclusive, attentive and collaborative leadership will ultimately improve the wellbeing and performance of their teams.

4.3 Contextual skills

e. Specialised training for expeditioners tailored to the Antarctic context

Russell: 4C

Antarctica is a workplace like no other, and specialist training is essential to support good workplace culture in such an isolated and confined environment. Expeditioners must be adequately prepared for a myriad of contexts and events, while ensuring strong relationships with their colleagues.

Specialised training will be provided immediately to all embarking expeditioners (with consideration about making this available to all staff). The design, content and application of this training will be developed in close consultation with staff and experts, to ensure training aligns with the values and expectations of the AAD and follows best practice for the Antarctic context.

As a result, expeditioners will be better equipped to apply contextual skills and address the full range of challenges and risks to workplace safety within the unique Antarctic working environment.

5 Working together to deliver results

Table 4. Streams and key changes relating to working together to deliver results

Stream	Key Change	1 month	2-3 months	4-6 months	6+ months
Collaboration	a. A more supportive relationship between the AAD and the department	■	■	■	■
	b. Working with our contractors and partners to help prevent workplace harm		■	■	■
	c. International collaboration to prevent workplace harm in Antarctica			■	■
Inclusion	d. Breaking down barriers to progression based on gender or background		■	■	■
	e. Antarctic workplace facilities and equipment designed for safety, inclusion and respect		■	■	■
	f. New expectations for on-station leadership and alternative avenues for support		■	■	■

5.1 Collaboration

a. A more supportive relationship between the AAD and the department

Russell: 1C

The AAD’s role is central to meeting the department’s vision and purpose, including through advancing scientific interests and learning, providing evidence for climate action, and protecting our environment and oceans in the Antarctic. Collaborative connections between the AAD, the broader department and the wider APS are essential to share knowledge, deliver programs and improve outcomes. Simultaneously, the AAD cannot operate without support and close partnerships from other divisions in the department.

In the past, the AAD culture has been seen as distinctive from the department. Conversely, other divisions have not always been able to provide the support the AAD needs to perform at its best. For the AAD to achieve its mission, more productive engagement and integration into the department is essential.

The following actions will be taken to promote more constructive and supportive relationships:

- Better staff networks will be created between the AAD and the rest of the department to increase integration, build relationships, and better align values, policies, and processes. This integration will be collaboratively co-designed by the AAD and other departmental work areas to foster greater understanding and connection.

- Across the AAD, signs, letterheads, templates, and other symbols will be updated to better reflect the reality that AAD is part of the department.

The effectiveness and outcomes of the above actions will be assessed to promote an ongoing culture of improvement. Consequently, staff in both the AAD and other areas of the department should feel that they have – or can develop – supportive relationships that promote better outcomes for the AAD, the department, and the wider APS.

b. Working with our contractors and partners to help prevent workplace harm

Russell: 1E

Antarctic missions and operations require extensive partnerships with different organisations and people providing specialist skills. The mix of organisational cultures and personal backgrounds can lead to unproductive ‘us versus them’ mindsets and sub-cultures, and in certain circumstances can introduce practices that diverge from values, standards and obligations to prevent workplace harm.

The department recognises that its obligations extend to the safety of contractors and partners, including but not limited to the expedition environment. It is also essential that all contractors and partners understand their requirements and obligations when working alongside AAD.

The following actions will be implemented to ensure everyone who works alongside DCCEEW’s Antarctic program staff understands their obligations and is adequately equipped to prevent workplace harm:

- DCCEEW will create policies to ensure contractors demonstrate compliance with the Workplace Gender Equality Act (2012) and alignment with the AAD cultural reform in Antarctic and Hobart.
- Options will be explored to require Work Health and Safety plans and codes of conducts for contractors that incorporate the prevention of workplace harm, sexual harassment, and discrimination.

This will ensure that all contractors and partners have a deep understanding of DCCEEW values, expectations to ensure they can work side-by-side with the AAD to prevent workplace harm, and implications of failing to meet these requirements.

c. International collaboration to prevent workplace harm in Antarctica

Russell: 1F

International research conducted on other polar workplaces and isolated environments highlights pervasive issues with workplace culture and harm. With Antarctica already representing a unique example of international collaboration, the department recognises that

change could be facilitated through a co-designed, trauma-informed response across all stations and workplaces in Antarctica.

To facilitate this collaboration, learn from other countries, and promote international efforts to address workplace harm, options will be explored for appointing and overseeing a working group that focuses on engagement with other international Antarctic programs. This engagement will occur through various forums, depending on international interest and viability. Once created, the working group will allow interested parties to share best practices for preventing and responding to workplace harm including psychosocial harm, and help increase diversity, equity, and inclusion across all stations.

The AAD will continue to seek opportunities to share lessons and knowledge with other international government and non-government organisations that work in Antarctica and in polar environments. As a result, partnerships will be strengthened, and organisations can share resources and improve support for staff.

5.2 Inclusion

d. Breaking down barriers to progression based on gender or background

Russell: 3B

An inclusive and equitable organisational culture is reflected in representation at all levels, especially in key leadership positions. The department is committed to increasing the representation of women and others from diverse and under-represented groups in leadership and in the leadership pipeline.

The Review highlights the AAD's historical difficulty in recruiting and promoting staff with diverse qualities and backgrounds into leadership roles. Achieving representation requires the removal of barriers to progression, including the proactive identification of barriers that may be unseen.

Commencing as soon as practicable and subject to the review and design of policies and procedures, we will:

- Review and update recruitment policies, job roles and employment policies to attract more diverse applicants. These will reference Expeditioner Personal Qualities where applicable.
- Provide training to all staff to understand the nature and impact of unconscious bias.

These actions will help to attract a more diverse candidate pool for leadership positions within the AAD and address the structural and unseen barriers to progression and success. The result will be an organisation that is more representative and a culture that is more inclusive and equitable that is better suited to carry out AAD's mission through high performance.

e. Antarctic workplace facilities and equipment designed for safety, inclusion and respect

Russell: 6A

Well-designed, safe and inclusive workplace facilities and equipment are essential for all staff to carry out their work. This includes consideration of environmental factors affecting both psychological and physical safety and making sure that every person has a thorough understanding of the role of workplace design in protecting workers' dignity and safety and ensuring they are able to contribute to the mission to their full potential.

To achieve this, steps will be taken to establish or update existing policies relating to the design, operation and upgrades of facilities and equipment, to ensure they support a diverse workforce. This will be carried out in consultation with other functions and facility users.

This will result in facilities and equipment that enable all workers to do their best work, with dignity, respect and inclusion.

f. New expectations for on-station leadership and alternative avenues for support

Russell: 6D

On-station leadership is highly influential in creating an inclusive and supportive culture in isolated and confined environments. It is also essential to have alternative avenues for support to ensure staff feel safe to raise any issues or concerns while on expedition.

To design this, the following steps will be taken through a collaborative and inclusive process:

- Review the station leadership model to align with best practice for leadership in Isolated and Confined Environments (ICE) and to provide alternative avenues for staff to raise any concerns while on expedition.
- Explore options to provide a people operations presence in Antarctica, where possible. Different options will be considered with input from ICE experts and in consultation with staff, leadership, and the people operations taskforce.

As a result, expeditioners will have access to more avenues for support and resolution, helping to address harmful behaviours before harm can occur, and promoting an inclusive and zero-harm workplace.

6 Ongoing measurement and improvement

Table 5. Streams and key changes relating to ongoing measurement and improvement

Stream	Key Change	1 month	2-3 months	4-6 months	6+ months
Measurement	a. Team pulse checks and surveys to track collective performance and progress				
	b. Standardised psychological assessments and debriefings for all expeditioners				
	c. Measuring diverse group representation in leadership and leadership pipeline				
Continuous improvement	d. KPIs and dashboards to monitor workplace harm, reporting and action taken				
	e. Ongoing evaluation of implementation, year-1 audit and year-2 independent review				

6.1 Measurement

a. Team pulse checks and surveys to track collective performance and progress

Russell: 2A

All people leaders will be expected to contribute to an inclusive and collaborative culture. To provide visibility and ensure accountability around performance and progress, we will establish permanent mechanisms to measure leader performance, staff sentiment and other key attributes over time.

The following measurement mechanisms will be designed and implemented immediately:

- Regular climate surveys to measure team-level satisfaction, wellbeing, health and inclusion.
- A 360-degree anonymous feedback system which will apply to all people leaders.

The outputs of both the 360-degree feedback system and the regular climate surveys will be incorporated into individual performance reviews for people leaders to ensure that they are fulfilling their responsibility to implement the reforms. These measures will provide visibility around the overall rate of progress and will enable all people leaders to be held to account for creating the right culture and ensuring the success of initiatives.

b. Standardised psychological assessments and debriefings for all expeditioners

Russell: 6B

Beyond ensuring the psychological wellbeing of expeditioners for the full duration of time on voyage and on station, the department is committed to providing appropriate support and learning from the experiences of returning expeditioners.

Commencing soon and to the extent possible to cover upcoming returning expeditions, the department will:

- Undertake standardised psychological assessments and 1:1 debriefings with all returning expeditioners held in a safe and appropriate location and format.
- As part of the debrief process, guide expeditioners towards appropriate supports if necessary.
- Develop a “debrief summary report” after each mission including a summary of feedback, any issues raised, Work Health and Safety reports and a plan to address issues. These reports will be provided to the DCCEEW Executive and the Respect and Equality Reform Council and drafted to protect the privacy of staff.

This standardised approach will ensure that the experiences of all returning expeditioners can be heard in a safe and supportive environment and that they are appropriately supported. It will also provide critical data and insights to enable DCCEEW to act upon and learn from the experiences of all expeditioners, regardless of gender, background or position within the organisation.

c. Measuring diverse group representation in leadership and leadership pipeline

Russell: 3B

The department is committed to increasing diverse group representation in division leadership.

In addition to actions described elsewhere in this plan (recruitment policies and unconscious bias training), we will measure key diversity metrics across the leadership cohort and progress through the leadership pipeline over time, to ensure visibility and accountability for improvement.

These metrics will be reported to the DCCEEW Culture and People Committee and the AAD Executive Council, and insights from trends will guide future actions to further improve diverse representation in leadership and the leadership pipeline.

6.2 Continuous improvement

d. KPIs and dashboards to monitor workplace harm, reporting and action taken

Russell: 1G, 5A

The department recognises that as an employer, it has a positive obligation to prevent workplace harm which includes psychological harm. This positive obligation extends to all people leaders and staff. Ensuring that this obligation is met requires monitoring instances of workplace harm and the actions taken to address them.

The following elements will be developed to establish an effective system to monitor workplace harm:

- A set of KPIs tracking critical indicators of incidents, responses and implementation progress, which will be co-designed with involvement from the Respect and Equality Reform Council, the department's people operations, Work Health and Safety specialists, and the Executive Committee.
- Additional indicators of employment pathways and outcomes for individuals following reporting of incidents or having previously been found to have engaged in harmful behaviour.
- A quarterly *Harmful Behaviours Report* to be provided to the Respect and Equality Reform Council and the DCCEEW Culture and People Committee, summarising the indicators above as a basis for insight and further action.

These KPIs and dashboards will enable the department to track the proper resolution and reduction of workplace harm over time and ensure that the objectives of this plan are successfully achieved.

e. Ongoing evaluation of implementation, year-1 audit and year-2 independent review

Russell: 7A

The department is committed to delivering on the objectives of this plan in full. It also recognises that meaningful and enduring change will require sustained effort and ongoing transparency around implementation progress and results.

Alongside implementation of the plan, the department will formally monitor and evaluate progress over the medium and long term and report openly about its overall status. This will include:

- A departmental review in 12 months of evidence of implementation, challenges and successes.
- An external independent review within two years to evaluate progress and outcomes achieved.
- A process of continuous improvement informed by program delivery metrics and progress against other organisational, safety and culture KPIs (as referenced elsewhere in this plan).

These evaluation and improvement mechanisms will maintain focus, attention and transparency throughout delivery and provide timely insights and further recommendations to ensure that the plan delivers on its intended outcome to create a culture that enables the mission.

Appendix A: Mapping Russell Review recommendations to the department's actions

Russell Recommendations	Departmental actions	Commencement timing
1A Leadership Statement of Acknowledgement	1.1(a)	Immediate
1B Establish the AAD Respect and Equality Reform Council	1.2(e)	Immediate
1C Develop a more transparent relationship between the AAD and the department	4.1(a)	Immediate
1D Reform AAD Executive Committee arrangements to clarify what the Committee does, how it makes decisions, and what are collective/individual responsibilities	1.2(c)	Immediate
1E Require all contractors and those tendering contracts for work with the Australian Antarctic Division to have (through evidence) satisfied the need to comply with the Workplace Gender Equality Act (2012)	4.1(b)	Phase 1
1F Establish an international working group to prevent workplace harm in Antarctica	4.1(c)	Phase 2
1G Develop a monitoring and evaluation framework to collect data on workplace harm, reporting and action within the AAD	5.2(d)	Immediate and into Phase 1
2A Leaders across the AAD should visibly commit to safe, respectful, diverse, and inclusive workplaces, including ensuring the prevention of sexual harassment, bullying, and systemic discrimination is a leadership priority	1.1(b)	Immediate
	1.3(f)	Phase 2
	2.4(h)	Phase 1
	5.1(a)	Immediate
2B Structure a people operations function to better support leaders in their people and culture responsibilities	1.2(d)	Immediate
3A Leaders drive inclusive and collaborative leadership practices that foster psychological safety	1.3(f)	Phase 2
	3.1(b)	Phase 1
	3.2(d)	Phase 1
3B Review and address the structural barriers for women and people from other diverse groups seeking appointment or promotion	3.1(b)	Immediate
	4.2 (d)	Phase 1
	5.1(c)	Phase 2
4A Provide leaders with the capability and practical skills to address unacceptable behaviour in the moment and then provide appropriate support	3.2(c)	Immediate
4B Address sexual harassment, bullying and systemic discrimination as a workplace health and safety issue	2.1(a)	Immediate
	2.1(c)	Immediate and into Phase 1
	2.4(h)	Phase 1
	3.2(c)	Phase 1
4C	2.1(b)	Immediate

Russell Recommendations	Departmental actions	Commencement timing
Ensure specialised education is available to all employees across the AAD and training for expeditioners tailored to the Antarctic context	3.1(a)	Immediate
	3.3(e)	Immediate
5A Making a report is taken seriously by leaders, who guarantee there will be no adverse consequences, including victimisation	2.1(c)	Phase 1
	3.2(c)	Phase 1
	5.2(d)	Phase 1
5B Strengthen the effectiveness of internal reporting systems and broaden options to report unacceptable behaviour and workplace harm	2.2(d)	Phase 1
5C Provide 'on the ground' Integrity unit resourcing at Hobart with increased, known support for worksites in Antarctica	2.3(f)	Phase 2
5D Create an external, independent reporting and response option for people to disclose any current or past harm and to seek expert trauma-informed support	2.2(e)	Immediate
6A Audit Antarctic workplace facilities and equipment to ensure safety, inclusion, and respect	4.2(e)	Phase 1
6B Standardise psychological assessments and debriefings for all expeditioners returning from Antarctica (including voyages)	5.1(b)	Phase 1
6C Establish a panel of mentors from diverse backgrounds available to support expeditioners while working in Antarctica	2.3(g)	Phase 2
6D Devise a new model of on-station leadership to decentralise power and have multiple avenues of leadership support for employees and the reporting of unacceptable behaviour	4.2(f)	Phase 1
7A Undertake an independent review within two years	5.2(e)	Phase 2

Appendix B: Russell Review – Terms of Reference

Context

In 2020 Professor Meredith Nash was contracted by the Australian Antarctic Division (AAD) to provide advice, support and project deliverables on gender equity diversity and inclusion in the Australian Antarctic Program. The outcomes of Professor Nash’s research were handed down to the AAD in 2022.

The research study points to a culture that has accepted incidents of sexual harassment, gendered inequality and people from underrepresented groups feeling excluded and diminished. This is consistent with recent reports indicating that the risks of sexual harassment are increased in isolated or remote environments and environments with an unequal gender balance. The study also found that women did not trust HR systems to make formal complaints about inappropriate behaviour given the fear of losing their positions or being stigmatised, including in relation to sexual harassment.

Independent specialists in organisational culture have been working with AAD to develop an action plan of training, policy and behaviour that will build a culture where everyone is respected and included.

Work has already been undertaken in relation to this, including the following.

- In the last 12 months, the AAD has gone from a senior executive cohort that was 100 percent male, to equality.
- Fifty percent of station leaders last season and for the next season are female.
- Revision of the expeditioner recruitment process, including a more rigorous assessment of behavioural patterns.
- Updates to the Field Manual and Expeditioner Handbook to provide more information around behavioural expectations and guidance on managing inappropriate behaviour.
- Leadership training began earlier this year and has been delivered to many of AAD’s Executive Level staff.
- Bystander training has been delivered since 2021 with more than 200 of our people having completed the training.
- Specialist advisors have been engaged to consider this report and provide advice on concrete next steps.

However, given the substance of the study, it is important that further independent consideration be given to ensuring that staff feel safe at work, they are able to be themselves at work, and that the right systems, processes and protocols are in place to support staff who may experience bullying or harassment, or other harmful behaviours.

Scope

1. Provide advice to the Secretary of the Department of Climate Change, Energy, the Environment and Water in the form of a written report setting out findings and recommendations in relation to:
 - a. Actions taken to date to address the findings and recommendations of the Nash Report;
 - b. Progress on cultural change and creating an inclusive workplace where staff in Antarctic and working in head office feel safe and valued; and
 - c. the adequacy of the systems, policies and processes in the department to:
 - support AAD staff who may experience bullying, harassment and other forms of inappropriate behaviour;
 - be accessible and well-known to AAD staff; and
 - facilitate confidential complaints in a way that employees feel safe, that their complaints will be responded to in a timely way and they are confident that their concerns will be treated seriously.
2. The independent person will consult with AAD staff to assess:
 - a. Any leadership capabilities or asymmetrical power relationships that are creating increased risk of inappropriate behaviours.
 - b. The specific work systems and job design issues that contribute to increased risk of sexual harassment, bullying and victimisation.
 - c. The arrangements, cultures and systems that make it difficult to report sexual harassment, bullying and victimisation.
 - d. The arrangements, cultures and systems that make it less likely that sexual harassment, bullying and victimisation will be appropriately addressed.
3. The independent expert will be supported by the Department's Integrity team to conduct the review and will consult to identify and assess sexual harassment, bullying and victimisation work hazards, and to identify potential controls, using a work health and safety risk framework.

Objectives

Taking a best practice approach, the Review will:

- a. Consider whether AAD has sufficient strategies and programs to prevent the occurrence of inappropriate behaviour, including sexual harassment, that target root causes, the responsibility of individuals for their actions and the responsibility of third parties to call out inappropriate behaviour.
- b. Consider the current impediments to reporting and levels of support available for those reporting sexual harassment and inappropriate behaviour including the fear of victimisation by those who make reports.

- c. Examine the adequacy, effectiveness, independence, resourcing and awareness of current supports available to enable a safe and respectful workplace, in particular preventing and responding to workplace bullying, sexual harassment and sexual assault.
- d. The recommendations of the Review should include clear accountabilities for implementation and, opportunities to prevent inappropriate behaviour and improve reporting and support those who experience it. The recommendations should also propose a process for regular monitoring and evaluation.
- e. Consider the specific work systems and job design issues that contribute to the risk of sexual harassment, bullying and victimisation.

This review will be informed by best practice mechanisms and processes including:

- The Research Study into diversity, equity and inclusion into the AAD undertaken by Associate Professor Meredith Nash
- Consultations with staff using the Australian Human Rights Commission [Have your Say - Conversation Toolkit](#) (or other appropriate resources)
- The Safe Work Australia [Model Code of Practice: Managing psychosocial hazards at work](#) of July 2022;
- The [Respect@Work Sexual Harassment National Inquiry Report 2020](#);
- The Champions of Change “Disrupting the System” Report
- Comcare’s [Guide for Preventing and Responding to Workplace Bullying](#);
- the Commonwealth Ombudsman’s [Best Practice Complaint Handling Guide](#); and
- Existing work health and safety mechanisms, staff survey results, complaints data, Health and Safety Representative reports, Employment Assistance Program (EAP) trend reports, information received during staff exit interviews, reports from stakeholders and regulators, and any data received from online reporting tools.