



Queensland Fire Department

Implementation Status of Recommendations

August 2025

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Background and Context

In 2023, Queensland Fire Department (QFD) commissioned an independent review of its complaints management process by Prominence Consulting (the Prominence Review). The final report published in September 2024, identified significant systemic challenges across six key areas:

- 1/ Cultural and performance challenges: Ongoing cultural and performance issues within QFD that affect workplace conduct, including bullying and harassment.
- 2/ Under-reporting of complaints: Staff under-report complaints due to concerns about victimisation or reprisals, hampering the department's ability to address issues effectively.
- 3/ Inefficiencies in the complaints management system: The system fails to meet the needs of QFD's large and geographically dispersed workforce, leading to delays and inconsistencies in complaint handling.
- 4/ Inadequate support for complainants and subject officers: Neither complainants nor subject officers receive sufficient support throughout the complaints process, affecting both individual wellbeing and system effectiveness.
- 5/ Limited data collection and reporting: Enhanced data collection and reporting mechanisms are needed to monitor trends and inform prevention strategies.
- 6/ Leadership capability gaps: Leaders lack the capability and attention required to prevent and respond to conflict and poor conduct effectively.

The Prominence Review provided 34 recommendations across six themes: Leadership, management and culture; Governance and performance; Policy and process; People; Training and education; and Technology, data and reporting.

Appointment of Kristen Hilton Advisory

In November 2024, Kristen Hilton Advisory (KHA), an independent consultancy specialising in human rights, equality and organisational change, was appointed as independent Assurers to assess and report on the implementation of the recommendations over a two-year period. Under the assurance process, QFD has committed to publishing three 6-monthly progress reports with a final report in December 2026.

KHA's role as Assurers encompasses:

- › providing guidance on best practice prevention and response strategies
- › bringing an independent perspective to QFD and its progress
- › ensuring reporting is rigorous and transparent
- › encouraging genuine change and impact.

This first assurance report examines QFD's progress in implementing the Prominence Review recommendations. The Assurers acknowledge that QFD has undergone multiple reviews over the past decade focusing on harmful conduct and complaints management systems. We commend QFD's approach to not only implement the Prominence recommendations but to leverage this Review as an opportunity to establish a new vision for effective prevention and response to harmful conduct, supported by a transparent, trustworthy, and person-centred complaints system.

Executive Summary

The Assurers have assessed QFD's progress of implementing the recommendations as follows:

Progress	Recommendations	Summary
● Not yet commenced	R3, R5, R6, R9, R10, R13, R15, R16, R17, R18, R19, R22, R29, R30, R32, R33, R34	17 recommendations not yet commenced
● In planning and development	R2, R7, R11, R12, R14, R20, R27, R28, R31	9 recommendations in planning and development
● Implemented to a moderate extent	R1, R8, R21, R24, R25, R26	6 recommendations implemented to a moderate extent
● Implemented to a significant extent	R4	1 recommendation implemented to a significant extent
● Implemented and embedding		0 recommendations implemented and embedding

Achievements

- › Demonstration of committed leadership by the Commissioner and other key leadership roles to a program of transformation.
- › Establishing the Complaints Management Review Implementation Program, including a governance framework, an implementation plan, temporary resourcing, and a transparent approach to progress.
- › Improving workforce communication by providing quarterly reports to staff on new complaints, closed complaints and the type of management and disciplinary action taken.
- › Developing the *Everyday Respect Framework* and committing to training programs to uplift management and leadership skills when it comes to ethical decision-making and inclusive leadership.
- › Launching a Sexual Harassment Contact Officer Network.
- › Developing a Sexual Harassment Prevention Plan.

Challenges and opportunities to accelerate change

- › Ensuring there is a comprehensive plan for change management, communication and consultation with the workforce in relation to the redesign of complaint processes and procedures.
- › Engaging with the volunteer base of the Rural Fire Service about the reforms to the complaints management system and ensuring they benefit.
- › Fully resourcing the Complaints Management Review Implementation Program to accelerate change and funding ongoing roles identified in the investment brief to embed change.
- › Using the Assurance Framework and relevant legislation to draft overarching guiding principles for the complaints management system.
- › Prioritising the end-to-end review of the complaints processes and the redesign of policies and procedures with a person-centred, trauma-informed lens.

Assurance Framework

The Assurance Framework, including indicators of good practice, is set out in detail at Appendix 1. The table below provides a summary of the outcomes that QFD is working towards.

Safe and Supportive	People feel safe to report, and participants can access end-to-end support, information, advice and counselling.
Fair and Consistent	QFD ensures a fair approach to managing complaints, and outcomes are seen to be impartial, proportionate and consistent.
Flexible and Proactive	There are a range of resolution pathways, with a focus on early intervention, flexible approaches, and timely communication and responses.
Accountable and Transparent	Organisational leaders are held accountable for preventing and responding to harmful and unlawful behaviours. QFD holds perpetrators of harmful and unlawful behaviour accountable, with all parties having a clear understanding of the reasons for decisions and outcomes.
Measured and Preventative	QFD uses data, reporting and evaluation to measure the performance of complaint processes, drive improvements, manage risk, and take preventive action to address systemic issues.
Capable and Efficient	Complaints are managed by highly capable and skilled individuals and leaders who are adequately resourced and equipped with an effective and efficient information technology system.

Implementation Status of Recommendations

QFD provided the Assurers with a progress update against each recommendation, as well as a range of documents to substantiate the progress report.

KHA acknowledges that QFD had not planned to commence a number of recommendations in the first phase of the assurance process but to sequence the work.

Key

- Not yet commenced
- In planning and development
- Implemented to a moderate extent
- Implemented to a significant extent
- Implemented and embedding

Recommendation	Assessment
1 / Restoring trust in QFD complaints management Implement organisational initiatives to restore trust in the CMS, including leaders and managers communicating regularly with the workforce on the outcomes of this Review and other proactive preventative measures being taken. This will cultivate a ‘speak up’ culture. Status Assurance Framework Measured and Preventative	Progress – Implemented to a moderate extent <u>Program Establishment:</u> In November 2024, QFD established a Complaints Management Review Implementation Program (the Program) to begin implementation of the recommendations made by Prominence Consulting. The Program has a vision, which is for ‘safe, transparent and prevention focused complaints management at QFD.’ A governance framework is now in place. Under the governance arrangements, work is overseen by a board, with representatives from all divisions at QFD, and chaired by the Chief Human Resource Officer. QFD has established an independent assurance process with KHA, to encourage transparency, genuine change and impact. <u>Implementation Plan:</u> In March 2025, the Executive Leadership Team endorsed an implementation plan outlining actions and deliverables to achieve the recommendations. While the plan is comprehensive, the Assurers have recommended QFD: › use the Assurance Framework and indicators of good practice (Appendix 1) to deliver on the recommendations › embed timeframes in the implementation plan and sequence the work › clarify the consultation, change management and communication planning that will be required to engage with the workforce to redesign complaint processes and procedures › address any barriers to engaging with volunteers. <u>Communication platforms and artefacts:</u> QFD is communicating about the intent and progress of the Program through a new Gateway page (internal SharePoint site). Resources include an infographic and PowerPoint program overview, which was presented in June 2025 to Exec Connect (director level and above). The program overview is intended for dissemination to the broader workforce and volunteers.

The Assurers have not seen evidence at this stage of the way in which leaders are using these resources to actively inform the workforce of the proposed reform of the complaints management system. Internal and external dashboards depicting progress are in development.

More broadly, the Assurers saw two videos supporting a 'speak up' culture at QFD – the Commissioner Smith's 'Call to Action' video about the behaviours and values expected at QFD, and an 'Everyday Respect Introduction' video with staff and senior leaders talking about the importance of creating a safe and inclusive workplace.¹ The Assurers understand that the Commissioner's video has received at least 2,450 views, and anecdotal feedback suggests that the video has been a powerful piece of communication. The 'Everyday Respect Introduction' video has received at least 662 views and Complaints Management Review Implementation Program Gateway page has been used by 280 different users.

Building trust in QFD's complaints management will take time. QFD has laid a number of the necessary foundations by establishing a program for reform and the mechanisms to transparently communicate outcomes to employees, volunteers and the community.

Next steps

The next steps in QFD's implementation plan are as follows:

- › publish internal and external dashboards
- › design and deliver a change program to rebuild trust
- › report regularly to the workforce on initiatives and outcomes
- › survey the workforce to assess satisfaction with complaints management at QFD.

¹ The video also details the introduction of an Everyday Respect Framework to foster inclusion and respect across QFD. The framework includes the establishment of four 'Communities of Inclusion' who will report to the Everyday Respect Council chaired by Commissioner Smith.

Recommendation

2 / Strengthening warnings about victimisation and reprisals

Implement changes to policy, procedure and process with a view to strengthening warnings about victimisation and reprisals in letters, correspondence, training programs and at meetings, etc.

Status



Assurance Framework

Safe and Supportive

Assessment

Progress – In planning and development

One of the indicators of a safe complaints process is that individuals who report do not suffer victimisation or reprisals as a consequence. Reprisals and victimisation are illegal under a range of legislation, including the *Public Interest Disclosure Act 2010* (Qld) and the *Anti-Discrimination Act 1991* (Qld).

The Assurers assess the implementation of R2 as in a stage of planning and development. In summary:

- › QFD engaged the Queensland Ombudsman's Office and Crime and Corruption Commission in October/November 2024 to undertake awareness training in public interest disclosures and corruption, including protection from reprisals. This was for senior and executive leaders, Relations and Standards staff and the senior team in the People and Culture Directorate.
- › QFD seconded a person from the Queensland Ombudsman's Office in June 2025 to strengthen warnings about reprisals relating to public interest disclosure procedures, templates, training and practices.

Next steps

To realise the intent of this recommendation, QFD should ensure that the policy uplift and training includes clear information about and examples of victimisation under the *Anti-Discrimination Act 1991* (Qld).

Once QFD's policies, procedures, processes and practices are updated with warnings around victimisation and reprisals, the next step in the implementation plan is to publish relevant policy documents on the Gateway. The Assurers note the importance of QFD communicating 'no victimisation' to the workforce through a range of mechanisms to encourage speaking up and reporting.

Recommendation 3 / Providing regular updates on complaint progress and outcomes Ensure dedicated and separate case managers (adopting a single point of contact model) are appointed for both complainants and subject officers. These case managers should provide regular updates on progress, timeframes and outcomes, etc. Status  Assurance Framework Flexible and Proactive	Assessment Progress – Not yet commenced
Recommendation 4 / Reporting quarterly on total complaints and disciplinary actions Provide a de-identified (and brief and very high-level) update once a quarter on total complaints and disciplinary actions taken so that all believe that there is ‘perpetrator accountability’ and that employees and volunteers understand that behaviours (good and bad) have consequences. Status  Assurance Framework Accountable and Transparent	Assessment Progress – Implemented to a significant extent One of the indicators of an accountable and transparent program is the provision of a regular, de-identified and high-level update to the workforce on the number and type of complaints received, disciplinary actions taken and preventive action. QFD is to be commended for developing and publishing a new quarterly report to implement R4. The quarterly report details the following information: › new complaints and allegations opened within the quarter › top three allegation types › complaints and allegations closed during the quarter › number and type of management and disciplinary actions taken. The first report was launched via the Commissioner’s June workforce communication and published on the Gateway. It provides a transparent combination of data and insights to the leadership team and workforce. Next steps The next steps in QFD’s implementation plan are to: › investigate automation of data extraction for quarterly reporting and providing real-time, accurate complaints data › identifying the best way to communicate complaints information to the rural contingent within QFD.

Recommendation 5 / Creating a single point of contact for customer complaints Create a ‘customer care’ manager or concierge role for customer complaints, so customers have a single point of contact for any complaints. Status  Assurance Framework Capable and Efficient	Assessment Progress – Not yet commenced
Recommendation 6 / Identifying customer complaint themes and trends Review and monitor customer complaints for trends/themes that might inform future prevention plans Status  Assurance Framework Measured and Preventative	Assessment Progress – Not yet commenced
Recommendation 7 / Managing mental health issues related to complaints Develop greater awareness and management of mental health issues related to the complaint process and complaints themselves, focusing on what is required for all stakeholders including fact finders. Status  Assurance Framework Safe and Supportive and Capable and Efficient	Assessment Progress – In planning and development QFD has taken the following steps to progress R 7: › Engaged KPMG to review the current wellbeing and mental health supports in order to uplift capability and performance as well as address future workforce needs. › Commenced a review of the QFD Mental Health Strategy 2022. › Developed a tool to identify and mitigate psychological risks, with consultation planned for the broader organisation and union. › enhanced the promotion of Fire and Emergency Services Support Network (FESSN) services for public interest disclosure complaints.

The tool for mitigating psychological risks includes the risk of harmful behaviours such as bullying, sexual harassment, workplace violence and conflict. Importantly, the review of the complaints system is part of the future controls to mitigate those risks.

The Assurers take the view that to fully implement R7, QFD needs to ensure that its complaint-handling processes are safe for participants. This involves embedding a person-centred and trauma-informed approach to complaint handling, at least for sexual assault, sexual harassment, bullying and discrimination matters. We note that QFD has committed to this for sexual harassment complaints only (see R 20).

Next steps

Providing accessible, tailored and trauma-informed support services during and after the complaints process is critical. However, QFD should also consider other good practice indicators in the Assurance Framework (Appendix 1) as set out below. This will support the management of mental health issues related to the complaints process.

Examples of good practice indicators:

- › People impacted by harmful behaviours are listened to in a caring, non-judgemental and sensitive manner, and are empowered with options.
- › People impacted do not need to retell their story multiple times to multiple people.
- › All those involved in a report have clear information about the process for dealing with the report and when there is an obligation for QFD to act.
- › Cultural safety for First Nations people is embedded through each part of the complaints and reporting process.
- › Support is available to a person even if they do not choose to formally report an incident.

Finally, QFD should also be committed to addressing psychosocial risks for workers managing and investigating complaints, including workload and vulnerability to vicarious trauma.

Recommendation 8 / Uplifting management and leadership skills Identify management and leadership skills gaps (and develop a plan to address as part of the performance management system). Status Assurance Framework  Capable and Efficient	Assessment Progress – Implemented to a moderate extent QFD has taken the following steps to implement R 8: - Released a Positive Performance Management Policy in December 2024, which applies to all QFD employees, except for senior executive roles. - Released a new Achievement and Development Plan (ADP) process, with a new template and guides for employees and supervisors published on the Gateway in June 2025. - Commenced the roll out of the ADP process, including a new system for storing, recording and reporting on the completion of the plan and performance discussion. - Commenced developing a Business Skills for Leaders program and accompanying portal of resources to equip leaders to make effective and ethical decisions. The new performance policy and process is comprehensive and includes accessible guidance for supervisors and employees. The ADP template has four sections: Strategic alignment, Achievement objectives, Development objectives and Career objectives. All achievement and development plans have objectives for modelling values and leadership competencies. The Assurer has reviewed the leadership competencies, which are also comprehensive and apply with different levels of responsibility across all levels of the workforce, covering vision, results and accountability. The competencies include fostering healthy and inclusive workplaces with helpful behavioural indicators for each leadership stream. In summary, the new performance process appears to be an effective vehicle for identifying management and leadership skills gaps and addressing those gaps through performance planning and professional development. Next steps Future assurance reports will: - examine the extent to which the new performance process is operating successfully in practice - review the Business Skills for Leaders program, once it is completed and materials are shared - identify how volunteers are supported to uplift leadership and management capabilities. Finally, the Assurers also consider that the Everyday Respect Framework, which is detailed below in relation to R 28 is also relevant to R 8. The framework includes an inclusive leadership capability and development program, the Courageous Respect Everyday program.
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	QFD describe the program as follows: <i>'The Courageous Respect Everyday initiative is an inclusive leadership capability and development program that aims to not only deliver the opportunity to build an enhanced culture of respect in QFD through the lever of leadership mindset and behaviour change but will also enable our leaders to understand the criticality around the appropriate mindset and skillset required from leaders to role model respect everyday, and to also embody the courage to act when it comes to navigating and addressing observable disrespect from others.'</i>² This program is intended to be delivered to station officers and above in the first tranche, followed by delivery to AO7's and above in Corporate Services in the second tranche.
Recommendation 9 / Managing unreasonable complainant behaviour Relevant personnel and mid-to-executive management to undergo training and education on identifying and managing unreasonable complainant behaviour and conduct Status  Assurance Framework Capable and Efficient	Assessment Progress – Not yet commenced
Recommendation 10 / Training frontline managers in psychological safety and conflict resolution Ensure frontline managers receive training in business skills including 'Having difficult conversations', conflict resolution and psychological safety awareness and management incorporating psychological first aid training. Status  Assurance Framework Capable and Efficient	Assessment Progress – Not yet commenced

² Everyday Respect Framework Overview. See also the Bendelta proposal for the Courageous Respect Everyday Program.

Recommendation 11 / Introducing refreshed complaints management governance Establish a refreshed governance framework for the complaint management system with an emphasis on high-level oversight and monitoring at the executive level or a steering committee with an emphasis on prevention and management. Status  Assurance Framework Measured and Preventative	Assessment Progress – In planning and development As noted in R 1, QFD has established governance arrangements to oversee the implementation of these recommendations but is yet to develop an ongoing governance framework for the complaints management system. In terms of oversight and monitoring of complaints at the executive level, QFD has implemented quarterly reporting of complaints data as detailed above at R 4. The first report for January–March 2025 was provided to Senior Leadership Team and Executive Leadership Team members and published for the workforce on the Gateway. Next steps The Assurers recommend that overtime, quarterly reporting at the executive level includes the following: › demographic data of complainants and respondents › data related to regions that may be ‘hot spots’ › complaint trends and preventive strategies › timeliness for the resolution of complaints and according to benchmarks.
Recommendation 12 / Implementing monthly case management reviews Implement a monthly case management meeting between various key stakeholders in the complaints management system process (such as People and Culture Division, Safety, Injury Management, Legal) to provide updates on each case, timeframes and matters of risk. Meeting should be chaired by Director, Relations and Standards. Status  Assurance Framework Flexible and Proactive	Assessment Progress – In planning and development According to the Assurance Report, a monthly complaints report is currently in development. The Assurers look forward to receiving the report. In its implementation plan, QFD intends to: › introduce a governance mechanism to monitor all complaint cases and uplift oversight of complaint management › develop monthly reporting to executive and senior leaders on the status of open complaints – this seeks to ensure timeliness of complaint handling and inform prevention strategies specific to service areas and regions › automate the tracking of complaints status. Next steps As mentioned in R 11 with reference to quarterly reporting, monthly case management meetings should review: › demographic data of complainants and respondents › data related to regions that may be ‘hot spots’ › timeframes and high-risk matters.

Recommendation 13 / Streamlining oversight of complex and serious investigations For consistency, timeliness and streamlining of processes, ensure that only one responsible senior executive with the appropriate delegation is appointed for oversight for complex and serious investigation outcomes. Status  Assurance Framework Flexible and Proactive	Assessment Progress – Not yet commenced
Recommendation 14 / Continuously overseeing complaints for serious matters No serious matters should be managed with a single point of failure in the event of an officer or delegate being on extended leave. It is noted, however, that discipline cases are often voluminous and any replacement has to fully appraise themselves of the entire case. Therefore, responsible executives (delegates) must ensure active oversight on these matters at all times. Status  Assurance Framework Safe and Supportive	Assessment Progress – In planning and development Under current arrangements, the QFD HR Delegations Framework assigns decisions on disciplinary outcomes to the Executive Leadership. The delegation is assigned to a position not an individual. In the instance an executive leader is on extended or other leave, the interim replacement also holds the appropriate delegated authority as outlined in the QFD HR Delegations Framework. Next steps In its implementation plan, QFD intends to review the current complaints management framework to ensure the above is clearly articulated as it relates to complaints management. The Assurer notes that the intent of R14 is also to ensure active oversight of serious matters, which goes to the governance and reporting processes outlined in R11 and R12.

Recommendation 15 / Assessing QFD legislation changes for volunteers Undertake a detailed impact analysis of the new QFD legislation including the development of an implementation and resourcing plan which contains 'how and who' is responsible for the provision of procedural fairness and natural justice and how QFD commitments to the volunteer community and stakeholder groups will be met. Status  Assurance Framework Fair and Consistent	Assessment Progress – Not yet commenced
Recommendation 16 / Liaising with First Nations Strategy and Partnership Branch Where a person engaging with the complaints management system in any capacity, identifies as Indigenous, liaise with the new First Nations Strategy and Partnership Branch within QFD on cultural capability and awareness matters and obligations to ensure compliance with the new <i>Public Sector Act 2022</i> and relevant Directives. Status  Assurance Framework Safe and Supportive	Assessment Progress – Not yet commenced

Recommendation 17 / Training managers to support culturally diverse peoples Develop training for all levels of management to employ and support culturally diverse peoples, starting with the ability to identify cultural differences and handle them appropriately. Status  Assurance Framework Capable and Efficient	Assessment Progress – Not yet commenced
Recommendation 18 / Developing guiding principles for complaints management Develop overarching guiding principles for the complaints management system such that these principles are embedded throughout the entire system and publicly available. These principles should also reflect the requirements of the QFD Commissioner as per Section 32 of the <i>Public Sector Act 2022</i> to develop and promote a workplace culture of respect and inclusion. Status  Assurance Framework Measured and Preventative	Assessment Progress – Not yet commenced
Recommendation 19 / Developing a prevention plan and activities Develop a three-year prevention plan to rebalance priorities with a greater focus on prevention rather than management of complaints. Status  Assurance Framework Measured and Preventative	Assessment Progress – Not yet commenced We note that QFD has developed a Sexual Harassment Prevention Plan (R 20). The Assurers expect that this will form a part of more comprehensive prevention plan for all complaints which is yet to be commenced. Next steps The Assurers encourage QFD to prioritise the development of the prevention plan using data and knowledge already available to help guide current and future initiatives.

Recommendation 20 / Implement a person-centric, trauma-informed and gender-informed approach for complaints Develop and implement a person-centric, trauma- and gender-informed approach for sexual harassment complaints including ensuring multiple pathways (such as informal complaints) to make a complaint or report sexual harassment and conducting training for relevant personnel who are involved in coordinating, managing and deciding sexual harassment (or sexual harassment like) complaints. Status  Assurance Framework Safe and Supportive <i>and</i> Capable and Efficient	Assessment Progress – In planning and development QFD has taken the following steps to implement R 20: › Launched a Sexual Harassment Contact Officer Network in September 2024. The stated purpose of the network is to provide an additional avenue for information, support and resources for all QFD staff and volunteers for preventing and responding to inappropriate behaviour. The network consists of three members appointed via an expression of interest. These members have received training from the Queensland Human Rights Commission and Queensland Public Sector Commission and have a dedicated Gateway page. Regular network meetings are in place with the Relations and Standards Branch leadership team to ensure oversight, support and information is regularly provided. › Developed a draft Sexual and Gender-Based Harassment – Prevention and Response Policy, which applies to employees, volunteers, contractors and subcontractors. › Developed a Sexual Harassment Prevention Plan, which is an appendix to the policy. Next steps The Assurers commend QFD for establishing a Sexual Harassment Contact Officer network but strongly recommend increasing the network and ensuring it is adequately resourced. We note this is part of QFD's prevention plan. The Assurers make the following comments on the draft policy: › The final version should be updated to align with the Public Sector Directive 02/25 (dated 9/05/2025) as well as the Queensland Government's model policy template.³ › The policy references victimisation but should include examples of behaviours that could amount to victimisation. › In the section on prevention, QFD should consider and draw together the seven standards published by the Australian Human Rights Commission. These standards outline what the Commission expects organisations to do to satisfy the positive duty under the <i>Sex Discrimination Act 1984</i> (Cth).⁴
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³ Queensland Government, [Preventing and responding to sexual harassment and related conduct at work \(Directive 02/25\)](#)

⁴ Australian Human Rights Commission, [Positive duty – Guidance materials](#)

- › In the section on resolution:
 - QFD should provide more information and clarity for complainants on the different resolution pathways that are available as well as the possible outcomes.
 - QFD should ensure the process for lodging employee grievances is accessible – for example, via a template and with appropriate support. The Assurers note that these procedure-based reforms and associated plain English resources are likely to be contemplated in the review/redesign of QFD's complaints procedures.
 - It is unclear in the policy how volunteers are to make a complaint given the individual grievance process appears to only apply to public service employees.
- › The policy should address the role of 'upstanders' in safely calling out and reporting inappropriate and unlawful behaviour as well as the support that is available to those who witness those behaviours.
- › Consistent with its obligations under s21 of the *Public Sector Act 2022*, QFD should ensure the policy promotes the cultural safety of Aboriginal and Torres Strait Islander workers.
- › More broadly, QFD should ensure the policy takes account of intersectionality and how a person's experience of sexual harassment can be compounded by other forms of inequality. This includes highlighting any specific/tailored support services available.

In relation to the prevention plan, the Assurers commend QFD for identifying a significant program of policy work, resource-development and training to mitigate the following risks:

- › *'Poor understanding among workplace leaders of the nature, drivers and impacts of sexual and gender-based harassment*
- › *workers unable to identify behaviours consistent with definition of sexual harassment or gender-based harassment which may lead to increased exposure and harm to workers*
- › *workers unaware or uninformed of how to address or report allegations of sexual harassment*
- › *inconsistent actions accommodated that condone behaviour that may constitute sexual harassment*
- › *People and Culture Directorate do not have consistent protocols, understanding and knowledge to effectively manage allegations or reported incidents of sexual or gender-based harassment.'*

Given the breadth of R20, the Assurers have assessed the implementation of this recommendation as in planning and development. For the next audit, we recommend QFD prioritise the review of complaint procedures to ensure a person-centred and trauma informed approach.

Recommendation 21 / Refreshing processes for categorising complaints Develop and implement a revised and refreshed process for the categorisation of complaints using the CAPE model, with greater input from the SAWS roles and operational roles (where applicable). Status  Assurance Framework Flexible and Proactive	Assessment Progress – Implemented to a moderate extent QFD has taken the following key steps to implement R 21: › The Relations and Standards Branch (RSB) has improved the way in which complaints are assessed and triaged by clarifying the role of the Workforce Liaison Unit as the team responsible for receiving, triaging and preparing complaints for assessment. These matters are then presented to the Complaints Assessment Team (CAT), whose membership has been broadened to inform assessment outcomes. › QFD is to be commended for resolving all assessment backlogs. The RSB is now working towards documenting the assessment processes and procedures. › All RSB staff have been trained in Public Interest Disclosure as detailed in R 2 and an additional resource has been provided in the Workforce Liaison Unit to develop PID assessment processes and procedures. Next steps For the next audit, the Assurers look forward to reviewing the new assessment processes and procedures when they are documented. In addition, the Assurers would like to see how reports are dealt with through 'local action' and when and how those matters are escalated by managers and oversighted more generally.
Recommendation 22 / Updating terminology to describe the workforce Update the QFD Management Action Guide so it reflects current terminology and practice and ensure QFD policies and procedures use consistent terminology to describe its workforce. Status  Assurance Framework Fair and Consistent	Assessment Progress – Not yet commenced

Recommendation 23 / ‘Stop the clock’ for matters outside of QFD control Have a ‘stop the clock’ concept built into the QFD policy and procedures for both complaints and disciplinary matters so that circumstances that occur outside of QFD management control are recognised and factored into compliance within statutory timeframes. Status  Assurance Framework n/a	Assessment This recommendation was not accepted by QFD due to legislative constraints.
Recommendation 24 / Follow up matters raised during exit interviews Report all exit interview data and statements to the Relations and Standards Branch (where applicable) for analysis and consideration as to whether follow up action is required with a particular focus on the reporting of sexual harassment and/or discrimination matters. Status  Assurance Framework Measured and Preventative	Assessment Progress – Implemented to a moderate extent QFD has taken the following key steps to implement R 24: › Exit questionnaires have been updated, and if any participants state they are leaving due to poor conduct (sexual harassment and/or discrimination), the Workforce Experience Team forwards details to RSB for action via email. The process is manual and not currently documented. › QFD is currently investigating options for deploying to volunteers. Next steps The Assurers commend QFD’s action on R 24 and encourage QFD to ensure there is an efficient and reliable method to record this data. The Assurers also note the importance of capturing data from volunteers who leave the organisation particularly where the exit has been triggered by poor conduct.

Recommendation

25 / Reviewing SAW role descriptions and skill sets

Review the SAWS role description, including undertaking a job analysis with evaluation and review of the role classification level – ensuring it is pitched at the right level to attract and retain the right people with the right skills.

Status



Assurance Framework

Capable and Efficient

Assessment

Progress – Implemented to a moderate extent

QFD has taken the following key steps to implement R 25:

- › Following a restructure, Senior Adviser and Principal Adviser, Workplace Standards, roles (SAWs and PAWs) report centrally to the Relations and Standards Branch, instead of regionally. This is intended to ensure consistent service delivery, balanced workload and improved collaboration for the SAWs and PAWs.
- › There has been increased resourcing of these roles – an additional SAW role and a temporary additional PAW role. This has provided additional case management support to the 8 state directorates.
- › A workload analysis process has commenced to ensure the workload of these roles is balanced going forward, and to address deviations from their role description and core purpose.

Next steps

For the next audit, the Assurers would like to see the role description and level for these roles to ensure the intent of R 25 is realised and sustained.

Recommendation 26 / Reviewing Relations and Standards Branch resourcing Undertake a resourcing review of the Relations and Standards Branch based on workload and not just a full-time equivalent (FTE) allocation. Specific acknowledgement should be given to the management of a large number of growing issues and complexity due to a large volunteer base (approximately 27,000) across a geographically dispersed state. Status  Assurance Framework Capable and Efficient	Assessment Progress – Implemented to a moderate extent QFD has taken the following key steps to implement R 26: › QFD has prepared a comprehensive and realistic investment brief that details the temporary and ongoing roles required to deliver the Complaints Management Review Implementation Program as well as the ongoing functions of complaint management at QFD. › QFD has supported a temporary addition of 5 roles for six months: a temporary AO7 Principal Investigator, AO7 Principal Adviser (PID Coordinator), AO7 Principal Project Officer (Prevention/projects), AO7 Principal Adviser Workforce Support (PAWS Regional) and AO6 Senior Adviser Discipline. These roles sit across the Relations and Standards Branch and the Discipline team. Next steps The Assurers note that the Executive Leadership Team has approved the investment brief, which is to be commended. However, QFD has only provided some of the resources, and only temporarily for 6 months. The Assurers note that the success of this program of work and the ongoing transformation of the complaints management system require adequate resourcing, including ensuring that work is driven in a timely way. We strongly recommend that QFD remain committed to and implement the investment brief.
Recommendation 27 / Establishing two yearly refreshers for conduct-related training Establish two yearly (biennial) refreshers for all QFD employee and volunteers on Understanding and Prevention of Sexual Harassment, Workplace Bullying and Discrimination and Code of Conduct training. Status  Assurance Framework Accountable and Transparent	Assessment Progress – In planning and development QFD has taken the following key steps to implement R27: › Commenced the development and implementation of a Mandatory Training project. The mandatory training will include an online one-hour program that covers the code of conduct and workforce behaviour among other themes. It is intended for new employees, existing employees and volunteers. › The Mandatory Training project is the first tier of a three-tier approach to training, which will also include position-specific and location-specific training. Next steps The Assurers encourage QFD to develop a simple feedback mechanism to understand how effective the training has been and any areas for improvement.

Recommendation 28 / Raising awareness and respect for Indigenous Cultures Implement an online cultural capability and awareness and anti-racism short course for all employees and volunteers on First Nations issues to provide foundational knowledge and genuine awareness with respect to Indigenous cultures. Status  Assurance Framework Safe and Supportive	Assessment Progress – In planning and development QFD has taken the following key steps to implement R28: › A program of work has been initiated to drive cultural transformation at QFD. As part of this program, an Everyday Respect Framework has been developed and endorsed by the Commissioner and an Everyday Respect Council is currently being established. Council chairs have been engaged and expressions of interest for members of four Communities of Inclusion (COI), including First Nations, have been issued, closing on 11 May 2025. › The First Nations COI will be run in conjunction with the First Peoples' Consultative Group (FPCG) and it is anticipated appointments to the COIs will be confirmed early June 2025 and the inaugural meeting held July 2025. › The design of a Gateway landing page is being finalised and external coaches have been engaged.
Recommendation 29 / Training frontline managers to manage workplace issues involving First Nations peoples Frontline managers need to be trained in specific cultural awareness and capability in terms of managing workplace issues involving First Nations peoples. Status  Assurance Framework Capable and Efficient	Assessment Progress – Not yet commenced
Recommendation 30 / Providing training and materials for case managers Provide Fact Finders with training on standards of proof, evidence gathering, note-taking and key legal concepts relevant to the role. Status  Assurance Framework Capable and Efficient	Assessment Progress – Not yet commenced

Recommendation 31 / Replacing the complainant management system Replace the Nexus software with a more fit-for-purpose system that supports end-to-end case management. Status  Assurance Framework Capable and Efficient	Assessment Progress – In planning and development QFD has taken the following key steps to implement R 31: › A project team has been stood up to develop requirements and initiate a program of work to deliver the replacement complaints management system. The program is being led by the Director, Enterprise IT Solutions & Services in the Information Technology Directorate. › To date, the following activities have been completed: – a preliminary business case has been drafted and being socialised for review – the Office of Assurance initiative and required forms have been drafted and are ready to be submitted – the establishment of project board is in progress, for kick off in June – recruitment of a project manager is in progress – business and systems requirements gathering has begun and a system requirements specification document is in progress – a ServiceNow technology solution has been approved – an RFQ for a ServiceNow Implementation and Delivery partner is in market, with responses due by 1 July 2025. Next steps The Assurers commend the thought and rigour that has gone into the ServiceNow platform requirement specification document. The platform, if properly resourced and implemented, has the potential to be transformation for QFD.
Recommendation 32 / Introducing a record retention framework Develop a records management framework to ensure compliance with the <i>Public Records Act 2002</i> at a minimum, this policy will address retention, archiving and disposal of all complaints management records. Status  Assurance Framework Capable and Efficient	Assessment Progress – Not yet commenced

Recommendation 33 / Dashboard reporting on complaints trends and insights Revise the reporting dashboards to meet Steering Committee or Senior Executive requirements for timely, accurate complaints information. This should highlight trends as well as provide insights into discipline and stakeholder satisfaction. Status  Assurance Framework Measured and Preventative	Assessment Progress – Not yet commenced
Recommendation 34 / Analysing root causes of complaint trends and themes annually Undertake a high-level root cause analysis of complaints each year to identify trends and themes over time and implement preventative strategies based on science, data and facts. Status  Assurance Framework Measured and Preventative	Assessment Progress – Not yet commenced

Complaint Management System – Assurance Framework

Expectations	Indicators of Good Practice for QFD	Review Recommendations
Safe and Supportive People feel safe to report and participants can access end-to-end support, information, advice and counselling.	› There are multiple ways a person impacted may report concerning behaviour to QFD, including anonymously. › People impacted by harmful behaviours are listened to in a caring, non-judgemental and sensitive manner, and are empowered with options. › People impacted do not need to retell their story multiple times to multiple people. › All those involved in a report have clear information about the process for dealing with the report and when there is an obligation for QFD to act. › Information provided by those who make a report or complaint will be dealt with confidentially as far as possible. › Individuals who report do not suffer victimisation and/or any adverse action as a result. › Complaints processes and communications are designed to meet the needs of a diverse workforce. › Cultural safety for First Nations people is embedded through each part of the complaints and reporting process. › Support is provided for everyone impacted by disrespectful or unlawful workplace behaviours, including during the reporting process and afterwards. › Support is accessible, trauma-informed and tailored to the needs of the individual, ensuring their physical, psychological, cultural and emotional safety. › Individuals involved in an investigation (including complainants, respondents and witnesses) have access to trained confidantes / peer support advocates / professional counselling as appropriate. › QFD actively provides information on available external support services to employees and volunteers. › Support is available to a person even if they do not choose to formally report an incident.	2, 7, 14, 16, 20, 28

Fair and Consistent QFD ensures a fair approach to managing complaints, and outcomes are seen to be impartial, proportionate, and consistent.	› QFD policies and procedures relating to behaviour, misconduct and managing complaints are kept up to date with legislative requirements, contain consistent terminology and definitions, and there is clarity about their application to employees and volunteers. › Clear and practical information is provided to all parties on procedural fairness › QFD remains impartial and unbiased throughout its responses to reports and complaints and in its interactions with investigation participants and stakeholders. › QFD responds to reports of alleged misconduct in a consistent and equitable manner so that those involved in QFD's responses understand what to expect throughout the process. › To the extent possible, QFD manages reports and complaints confidentially and ensures those involved in QFD's responses also adhere to their confidentiality obligations. › Disciplinary outcomes are proportionate and consistent.	15, 22
Flexible and Proactive There are a range of resolution pathways, with a focus on early intervention, flexible approaches, and timely communication and responses.	› There are anonymous, informal, formal and external options to choose from. Both paid staff and volunteers are able to access up to date complaints and reporting information. › People impacted by disrespectful or unlawful behaviours are aware of the options for resolution. › As far as possible, the person impacted is involved in the decision about how to handle the issue. › Early intervention and flexible approaches are prioritised wherever possible to resolve complaints and reports before they escalate. › Complaints are centrally triaged and categorized to allow for appropriate and proportionate responses, including obtaining further information if required. › Investigations are conducted as quickly as possible while ensuring the approach prioritises the ethical over the expedient. › The parties involved are well informed and updated throughout the process. › There is an intentional post-resolution plan to help teams and individuals recover from incidents of disrespectful or unlawful behaviours at work.	3, 12, 13, 21

Accountable and Transparent Organisational leaders are held accountable for preventing and responding to harmful and unlawful behaviours. QFD holds perpetrators of harmful and unlawful behaviour accountable, with all parties having a clear understanding of the reasons for decisions and outcomes.	› All workers, including organisational leaders, understand what constitutes safe, respectful and inclusive conduct, and their role in preventing and responding to harmful and unlawful behaviours. › Senior recruitment and promotion processes include criteria on fostering a safe, respectful and inclusive organisational culture, and modelling this conduct. › Following an investigation, QFD conducts debriefings with a complainant, respondent, witnesses and stakeholders as appropriate. › A complainant is notified of the outcome of an investigation and given information about whether the allegations were established, not established or inconclusive. The complainant should also be given information about possible next steps and offered support at this time. › A respondent is notified of the outcome of an investigation and, if applicable, any disciplinary action. › QFD provides a regular, de-identified, and high-level update to the workforce on the number and type of complaints, disciplinary actions taken and preventive action. › QFD shares de-identified case studies from complaints and reports with the workforce to demonstrate accountability, including action to address systemic issues raised in the complaint or report.	4, 27
Measured and Preventative QFD uses data, reporting and evaluation to measure the performance of complaint processes, drive improvements, manage risk, and take preventative action to address systemic issues.	› QFD can show that it learns from incidents to help manage risk, improve processes and prevent reoccurrence. › QFD has processes to monitor the long-term impacts to retention and progression of people impacted by disrespectful or unlawful behaviours. This includes the analysis of exit surveys and interviews to address risk and systemic concerns.	1, 6, 11, 18, 19, 24, 33, 34

	› Benchmarks for measuring the performance of the complaints management system include: – timelines for key steps and actions in the process – satisfaction with the complaints process and outcomes for those involved (complainants, respondents, witnesses) – quality measures, such as the ease of using the complaint system, the fairness of the process, and the clarity of communication. › QFD regularly reviews reports and complaints data to identify patterns, trends, systemic issues and measures to continuously improve efforts to prevent and respond to harmful behaviour. › QFD has dashboards to report to senior leaders and committees with timely and accurate complaints and performance information, including trends and insights. › Regular workforce and public reporting is conducted to track the progress of the Complaints Management System Review and communicate outcomes. This includes publishing and promoting guiding principles for the complaints management system.	
Capable and Efficient Complaints are managed by highly capable and skilled individuals and leaders who are adequately resourced and equipped with an effective and efficient information technology system.	› Organisational leaders, frontline leaders and HR personnel are trained and equipped to receive disclosures and respond to complaints, including by ensuring confidentiality, and using a trauma-informed and person-centred approach. › Frontline leaders are trained and equipped to manage conflict and grievances, have difficult conversations and create psychological safety within their teams. › Frontline leaders are trained and equipped to manage grievances and complaints involving First Nations peoples. › Issues are managed by highly capable individuals, who are trauma-informed, skilled facilitators of supported conversations and competent investigators.	5, 7, 8, 9, 10, 17, 20, 25, 26, 29, 30, 31, 32

	› Staff with complaint-handling and management responsibilities have the right skills and training to undertake root cause analysis of organisational and systemic issues. › QFD is committed to addressing psychosocial risks for workers managing and investigating complaints, including workload and vulnerability to vicarious trauma. › Processes and roles are in place to efficiently manage external customer complaints, including a clear point of contact for timely communication, care and follow-up.	
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Definitions

Person-centred

Being 'person-centred' means putting the individual who has experienced or reported the disrespectful or unlawful behaviour at the centre of any response to the behaviour. It is about listening to and supporting people. A person-centred approach keeps the person at the centre of decision-making and planning and gives that person choices about how the organisation should respond.

It respects the wishes and best interests of the person impacted, but does not mean they solely decide the organisation's response or consequences for the respondent, as the organisation still owes a duty of care to keep everyone in the workplace safe.

A person-centred approach also recognises that the affected person will share their experience when they feel comfortable, and that it may take them time to process what has happened to them and feel ready to talk.

Prevention focused

A prevention-focus requires organisations to elevate the prevention of unlawful behaviours and early resolution as a leadership priority. This involves proactive communication about prevention and developing prevention plans. It requires leaders to role model standards of behaviour and be accountable for creating safe, respectful and inclusive environments.

Trauma-informed

A trauma-informed response means understanding how exposure to emotionally disturbing and/or physically threatening events can affect a person psychologically.

A trauma-informed response prioritises making people feel safe to disclose their experience and offers choice and control over the process.

It requires moving away from processes that focus primarily on whether the unlawful behaviour has or hasn't occurred, and toward ones that address and remedy the impact of the behaviour on people, acknowledging that past and present trauma inform that impact.

A trauma-informed approach is respectful of cultural background and aware that aspects of a person's identity – such as age, First Nations background, ethnic background, sex, gender, class or disability – may affect how they respond to workplace harm.

Workforce

Employees and volunteers.

| Kristen
| Hilton
| Advisory