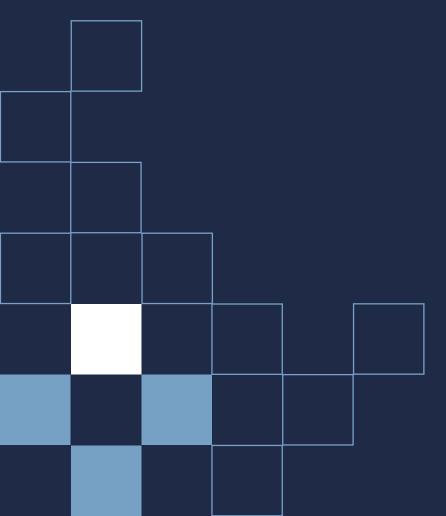




QPS Response to QHRC Recommendations

March 2025





Foundations for change

Recommendations	Description	QPS Position
Recommendation 1 Respond to report and develop plan for	 Within three months, QPS should publish a formal response to the report confirming whether it accepts or does not accept each recommendation. 	Accepted.
implementation	 Within six months, QPS should publish a comprehensive action plan for implementing the recommendations, aligned with the Workplace Equality Strategy. The action plan should: be led and owned by the Executive Leadership Team, with a Deputy Commissioner assigned responsibility to coordinate implementation include measurable, time-bound goals be regularly monitored and evaluated, with progress reported publicly and also internally through QPS governance frameworks. 	Accepted subject to funding.
Recommendation 2 Develop a vision for change through a new Workplace Equality Strategy	 Within six months, QPS should publish a strategy that outlines the long-term vision for becoming a diverse and inclusive organisation and achieving workplace equality. The strategy should: make the case for diversity and inclusion as core to QPS's mission, improving policing outcomes, and achieving the organisation's strategic priorities be led and owned by the Executive Leadership Team, with a Deputy Commissioner assigned responsibility to coordinate implementation be linked to other organisational strategies and plans, including the QPS strategic plan set out objectives and organisational priorities for progressing QPS along the inclusion continuum allocate resources for implementation of the strategy be designed and evaluated with the active participation of QPS members, particularly police from diverse backgrounds incorporate an outcomes framework and establish performance indicators to monitor progress be regularly monitored and evaluated, with progress reported publicly, and internally through QPS governance frameworks. 	Partially accepted subject to funding.
	 QPS should establish minimum diversity targets for QPS members at each rank, including for sworn members in the Executive Leadership Team. In reporting on and communicating these targets, QPS should make clear that these targets are a minimum requirement and that QPS's approach to increasing diversity should be aspirational. These targets should be regularly reviewed and progressively increased to achieve QPS's objective of workplace equality. QPS should review and update all organisation-level strategies and plans to align with the Workplace Equality 	Declined. Accepted subject to
	Strategies and plans to aligh with the workplace Equality Strategy and require that annual operational plans at each level of the organisation incorporate actions to implement the strategy, with guidance on suggested processes and potential actions.	funding.

Recommendations	Description	QPS Position
Recommendation 3 Communicate the vision for change	■ The Communications, Culture and Engagement division should develop a whole-of-organisation plan for communicating the vision for change through the new Workplace Equality Strategy. The plan should include indicators to monitor the impact of communications activities on knowledge, attitudes and behaviours.	Accepted subject to funding.
	 The plan should integrate all recommendations from this report as they relate to communicating with the QPS workforce, including: redefining core values and harnessing resistance utilising champions for change providing clear and accessible guidance on discrimination. 	Accepted subject to funding.
Recommendation 4 Audit and refine policy and governance environment	QPS should systematically audit all existing human resources and recruitment policies and procedures to identify barriers to workplace equality, systemic factors contributing to discrimination, and areas for improvement to progress diversity and inclusion and fulfil the organisation's obligations under Chapter 2 of the Public Sector Act 2022 (Qld).	Accepted subject to funding.
	When organisational policies are developed, reviewed or updated, QPS should actively engage QPS members, including police from diverse backgrounds, in their design and evaluation and identify any implications for workplace equality.	Accepted.
	 QPS should review and update terms of reference for the following governance bodies to outline their functions in relation to workplace equality (including preventing discrimination), ensure diversity in their membership, and provide that the Commissioner must promote diversity when appointing members: Board of Management Demand & Capability Committee Audit, Risk and Compliance Committee. 	Accepted.
	As part of the review, QPS should consider including the Executive Director of the First Nations Division as an ex officio member of the Board of Management.	Accepted.
Recommendation 5 Redefine core values and harness resistance	• After finalising the Workplace Equality Strategy, QPS should develop a comprehensive action plan, owned by the Executive Leadership Team, aimed at engaging with and harnessing resistance to diversity and inclusion initiatives. The action plan should focus on redefining and communicating core values that underpin resistance, including merit and fairness.	Accepted subject to funding.

Recommendations	Description	QPS Position
	 The action plan should stipulate specific measures that QPS should take to harness resistance, including: measures for leadership to secure workforce alignment and address and manage resistant views forming partnerships with police from diverse backgrounds to identify how resistance manifests and understand its impacts communicating the rationale for diversity and inclusion measures, including ensuring managers are equipped with talking points to address common points of resistance developing techniques to address unconscious bias and leverage proximity throughout the workforce, including storytelling and the use of narratives supporting and endorsing recompletion of the Commission's Workplace Fairness Survey during the Review evaluation phase to monitor and evaluate progress. 	Accepted subject to funding.
Recommendation 6 Work with internal champions for change	QPS should identify and engage a network of credible and influential leaders from within the organisation as champions of diversity and inclusion initiatives. QPS should provide champions with specific training, including on harnessing and managing resistance, calling out inappropriate behaviour and championing inclusion.	Accepted subject to funding.
Recommendation 7 Embed workplace equality in industrial arrangements	 QPS should work with the Queensland Police Union of Employees and Queensland Police Commissioned Officers' Union to inform their members about the organisation's response to the report and its recommendations. 	Accepted.
	 QPS should review the Queensland Police Service Certified Agreement 2022 to identify systemic factors contributing to discrimination or barriers to workplace equality, including: • potential drivers of gender pay gaps • barriers to accessing flexible working arrangements • access to leave, including for reproductive health, cultural purposes, and other relevant areas. Outcomes from the review should inform negotiations of the next certified agreement. 	Accepted.
Recommendation 8 Provide external stakeholder support	■ The Queensland Police Union of Employees and Queensland Police Commissioned Officers' Union should publicly affirm their commitment to improving workplace equality in QPS and encourage their members to support it.	Declined.
	■ The Queensland Government should take opportunities to publicly express that improving workplace equality and addressing discrimination in QPS is a priority and core to improving policing outcomes, including in relation to family violence. This should be reflected in the ministerial charter letter issued to the Minister for Police and Emergency Services.	Declined.

Recommendations	Description	QPS Position
Recommendation 9 Leverage data	 QPS should uplift its capacity to record, analyse and report on datasets related to diversity and inclusion, including: workforce demographics career progression of diverse QPS members, including in relation to recruitment, promotion, higher duties and retention whole-of-workforce access to flexible work arrangements workforce complaints. 	Accepted subject to funding.
	■ The Executive Leadership Team should receive regular briefings on key datasets, including facilitated sessions to discuss trends and collaboratively identify steps to improve short-term and long-term outcomes.	Accepted subject to funding.
Recommendation 10 Monitor and evaluate progress and provide oversight	 QPS should regularly report on progress to facilitate monitoring and evaluation, including: ensuring that progress on the Workplace Equality Strategy is a standing agenda item for all community advisory groups and other expert groups relevant to workplace equality providing quarterly updates for the Board of Management on implementation of the report, including the action plan and Workplace Equality Strategy, and progress against the outcomes framework establishing a dashboard that tracks progress on performance indicators for workplace equality and is accessible to the entire workforce reporting progress on workplace equality, including status of performance indicators in the outcomes framework, in QPS's annual report. 	Accepted subject to funding.
	 During the Implementation Phase of this Review, QPS should maintain the QPS Diversity Review Advisory Panel to provide expert guidance and oversight of implementation of the recommendations and at a minimum: provide secretariat support to the panel facilitate meetings at least twice a year provide half-yearly updates on implementation. These updates should at least include minutes of meetings with community advisory and expert groups on discussions about the Workplace Equality Strategy and an annual report on progress against the outcomes framework. 	Declined.

Leading change

Recommendations	Description	QPS Position
Recommendation 11 Make leadership support visible	 Within three months of this report, the Commissioner and the Executive Leadership Team should publish and deliver a joint statement, in both written and video format, to all QPS staff. The statement should outline: their commitment to cultural change that will improve workplace equality, including by implementing recommendations from this Review the case for change and how it benefits policing outcomes and QPS's core mission that there is zero tolerance for all forms of discrimination in the workplace. 	Accepted subject to funding.
	 Within 12 months of the report, the Commissioner should carry out a series of in-person engagement activities across QPS sites in Queensland to communicate the commitment to diversity and inclusion. 	Accepted.
	The Commissioner and the Executive Leadership Team should show their continued commitment to cultural change related to the Workplace Equality Strategy through communications to QPS members on this topic at least four times per year.	Accepted subject to funding.
	Within two years and before commencement of the Evaluation Phase, QPS should have made significant steps towards meeting diversity targets for sworn Executive Leadership Team members, which will be set in the Workplace Equality Strategy.	Declined.
Recommendation 12 Lead by example	 To improve capability in driving cultural change through professional development of the Executive Leadership Team, QPS should use an external provider to implement feedback mechanisms for members of the Executive Leadership Team within six months, which include: input from multiple sources, including peers and subordinates an assessment of members' respectful and inclusive conduct, leadership for diversity and inclusion, and track record in fostering a safe, respectful and inclusive workplace culture for all. 	Partially accepted subject to funding.
	 QPS should require each Executive Leadership Team member to develop and implement a personal leadership action plan, which can be contained in members' performance development agreements, addressing their capability to: model respectful and inclusive conduct lead others in promoting respect and inclusion foster a safe, respectful and inclusive workplace culture. The plan should incorporate measurable indicators of progress and be in place within 12 months. 	Accepted.
Recommendation 13 Hold leaders to account for change	QPS should identify and implement performance indicators that prioritise diversity and inclusion for individual Executive Leadership Team members within nine months of this report. In identifying indicators, QPS should consult with diverse members. The indicators should measure members' contributions to achieving key objectives of the Workplace Equality Strategy.	Declined.

Recommendations	Description	QPS Position
	 QPS should publish in the annual report (commencing in 2024–25) and communicate to all QPS members: year-on-year Working for Queensland results about staff perception of QPS leaders and flexible work what actions have been taken to improve those results each year. 	Partially accepted.
Recommendation 14 Establish performance indicators for managers that prioritise diversity and inclusion	 Within 12 months, QPS should implement performance indicators for managers that prioritise diversity and inclusion. QPS should consider indicators that: articulate a focus on respect and inclusion in the management framework ensure that modelling respectful and inclusive conduct and fostering a safe, respectful and inclusive workplace culture are listed as criteria for performance evaluation and promotion for all manager roles measure ongoing professional development in managing diverse teams measure effective staff performance management and development, including through the performance management system, to ensure substantive and not just procedural adherence measure genuine consultation with QPS members under managers' supervision, as direct reports, to understand what strategies managers could use to build team and workplace culture in an inclusive way. 	Accepted in principle subject to further analysis, consultation and funding.

Preventing harm and addressing risk

Recommendations	Description	QPS Position
Recommendation 15 Establish a plan to prevent discrimination	 Within six months, QPS should establish an organisation-wide prevention plan, owned by a designated unit, to prevent workplace discrimination. The prevention plan should: build upon existing legislative frameworks to include all forms of discrimination and address intersectionality be designed with the active participation of QPS members particularly police from diverse backgrounds identify risks within QPS's working environment that could increase the likelihood of discrimination, including through using data and intelligence outline the control measures being implemented to mitigate these risks and clearly allocate key responsibilities to specific units indicate the resourcing that will be allocated to all work units tasked with preventing workplace discrimination document the consequences for members who engage in discrimination be regularly monitored and reviewed annually. 	Accepted subject to funding.
	 QPS should ensure that prevention of workplace discrimination is a standing item on the Executive Leadership Team and Audit, Risk and Compliance Committee agendas. 	Accepted subject to funding.

Recommendations	Description	QPS Position
Recommendation 16 Develop clear and accessible guidance on discrimination	 QPS should develop guidance materials tailored for: the general workforce, with a focus on people who experience and witness discrimination, on how to identify discrimination, internal and external options to seek support, and options to report and address the behaviour supervisors on how to identify discrimination, where they can seek guidance and advice, and options to address the behaviour, including when informal resolution may be safe and appropriate. 	Accepted subject to funding.
	 The materials should be easy to understand and clearly communicate to the workforce: definitions and examples of workplace discrimination and associated consequences the implications of different reporting and response options, including timeframes, processes and how information would be handled, and their potential outcomes details on specific support services available to QPS members. 	Accepted subject to funding.
	 QPS should develop compulsory in-person training sessions to set the standard for QPS members in relation to workplace conduct and build knowledge of ways to prevent and respond to discrimination. 	Partially accepted subject to funding
Recommendation 17 Improve trust in support services	 QPS should review support services available to members who experience discrimination and develop and implement an action plan to increase access to and utilisation of services. The action plan should include: providing services tailored to culturally diverse and First Nations officers increasing trust in support services, including through strengthening confidentiality requirements for service providers. 	Accepted subject to funding.
Recommendation 18 Review mandatory reporting requirements	• QPS should review internal policies and frameworks concerning QPS members' mandatory reporting obligations under Part 6 of the Police Service Administration Act 1990 (Qld), including exemptions provided by the Commissioner, and put in place changes to ensure people who experience and witness discrimination are able to seek support and guidance while preserving control over whether a matter is formally reported. QPS should seek any legislative changes that it finds are necessary to give effect to that objective.	Accepted subject to further consultation.
	 QPS should update and provider clearer guidance for QPS members on their mandatory reporting obligations, including exemptions that can apply where a member seeks guidance or support. QPS should provide training for 	Accepted subject to further consultation.

Recommendations	Description	QPS Position
Recommendation 19 Strengthen organisational systems to prevent harm	 QPS should develop a new organisational system to detect and respond to risks and reports of discrimination within the workplace. The system should be independent from units responsible for investigating and responding to formal complaints and disciplinary matters. It should include: capability to use data and intelligence to identify risks of discrimination relating to work units or individuals mechanisms to proactively assess risks and work with work units and managers to address the systemic factors contributing to discrimination anonymous reporting pathways informal resolution pathways, including the use of professional, trained mediators to address discrimination and other negative workplace behaviours capacity to receive informal reports of discrimination and provide initial support and guidance on available support services and response pathways for people who experience and witness discrimination. 	Accepted subject to funding.
Recommendation 20 Embed victim- centred and trauma- informed practices	 QPS should review and update all policies relating to workplace behaviour, complaints and disciplinary proceedings to embed victim-centred and trauma-informed practices, including through: empowering people who report discrimination to exercise choice and control in how a matter is handled by the organisation ensuring support for people who report or experience discrimination is integrated throughout complaints and disciplinary processes. 	Accepted.
Recommendation 21 Monitor and improve response systems	QPS should develop indicators to monitor the performance of organisational systems for responding to discrimination. Indicators should include measures of timeliness, consistency, and satisfaction and safety of people who experience and witness discrimination. QPS should report on the status of indicators in its annual report.	Accepted subject to funding.
Recommendation 22 Improve accountability of organisational response to discrimination	 In its annual report QPS should publish information on organisational responses to discrimination in the workplace, including matters resolved informally, complaints relating to discrimination, disciplinary outcomes, and systemic improvements made in response to issues. QPS should share de-identified case studies with all QPS members on the impacts of, and organisational responses to, workplace discrimination, to build awareness of the steps the organisation is taking and acceptable standards of behaviour. 	Accepted subject to further consultation. Accepted subject to funding.

Recruiting the talent needed for a modern police service

Recommendations	Description	QPS Position
Recommendation 23 Review physical assessments in recruitment standards	 QPS should engage an external expert to undertake a review of QPS's recruitment standards to ensure they do not unlawfully discriminate against applicants. The expert should evaluate whether the standards reflect the genuine occupational requirements of: the role of a general duties police officer specialist roles in QPS which have less than 20% representation of women. 	Partially accepted subject to funding and further industrial consultation.
	 The genuine occupational requirements review of recruitment standards should: evaluate whether the physical assessments in QPS's recruitment standards reflect the genuine occupational requirements of these roles, including those required to be passed for entry into specialist units recommend any changes to the standards to ensure they do not unlawfully discriminate against women, First Nations people or culturally diverse people consider whether the requirement to be able to swim 100 metres is a genuine occupational requirement of a police officer and, accordingly, whether it should form part of the recruitment standards. 	Partially accepted subject to funding and further industrial consultation.
Recommendation 24 Ensure the psychological assessment process is culturally valid	 QPS should engage a First Nations and/or culturally diverse psychologist with expertise in the cultural validity of psychological testing to review QPS's psychological assessment processes and standards to ensure recruitment standards are not discriminating against women, First Nations or culturally diverse applicants. The review should apply to the psychological assessments and standards for the recruitment of general duties police officers and specialist units. 	Accepted in principle.
	 The review should: consider whether QPS should appoint First Nations or culturally diverse psychologists to undertake assessments of, and give advice in relation to, the psychological suitability of First Nations and culturally diverse applicants review QPS's psychological assessment processes to ensure they are culturally valid for culturally diverse and First Nations applicants. 	Accepted in principle.
Recommendation 25 Enable a more holistic assessment of potential police recruits	 QPS should consider the current recruitment standards and decision-making to incorporate a holistic consideration of an applicant's suitability and capacity to meet those standards. This may include ensuring an appropriate member of the Executive Leadership Team can make a final decision on their suitability having considered all relevant information. 	Accepted in principle.

Recommendations	Description	QPS Position
Recommendation 26 Amend the Police Service Administration Act 1990	 Within 12 months, the Queensland Government should introduce legislation amending the Police Service Administration Act 1990 (Qld) to: align with the principles underpinning recruitment and selection and the requirements for employment on merit and for equity and diversity set out in the Public Sector Act 2022 (Qld) allow police officers of all ranks to be appointed to a police officer 'rank' and also to a police officer 'position'. Depending on the final wording adopted in the legislative 	Subject to further consultation.
	amendment recommended above, the Queensland Government should also consider whether section 5.2(2) (b) of the Police Service Administration Act 1990 (Qld) is consistent with the Anti-Discrimination Act 1991 (Qld), and the extent to which it requires amendment.	to further consultation.
Recommendation 27 Consult with the Public Sector Commission following legislative changes	• If the recommended amendments to the Police Service Administration Act 1990 (Qld) are made, QPS should update relevant directives, policies and any other internal governance documents in consultation with the Public Sector Commission.	Subject to further consultation.
Recommendation 28 Bring career advancement into alignment with the Public Sector Act 2022	As part of the systematic audit of policies and procedures (see recommendation 4), QPS should undertake a review of its selection criteria, policies and guidance materials that relate to career advancement, including recruitment, promotions, higher duties and performance, in line with its obligations under Chapter 2 of the Public Sector Act 2022 (Qld).	Accepted in principle subject to funding.
	 The review should consider: ensuring QPS selection criteria recognise skill sets of police from diverse backgrounds ensuring selection processes are equitable for police from diverse backgrounds ensuring selection criteria and processes consider both positive and negative past performance options to improve recruitment and selection processes to ensure accessibility, inclusion and cultural safety throughout the process - for example, by providing adjusted processes and procedures for police from diverse backgrounds ensuring selection panel diversity has appropriate gender balance and cultural competency, and addresses panel members' unconscious biases how processes can be improved to increase self-identification of protected attributes during a promotion process how the number of police from diverse backgrounds being offered development opportunities through relieving and higher duties could be increased. 	Accepted in principle subject to funding.

Recommendations	Description	QPS Position
Recommendation 29 Improve the use of performance	 QPS should implement strategies to increase the level of meaningful engagement with the performance management system. 	Accepted subject to funding.
management processes	 QPS should review and consider ways its performance management system can be improved to: better equip managers and leaders to have difficult conversations prioritise and recognise respectful and inclusive conduct identify ways the skill sets of police from diverse backgrounds can be recorded and rewarded align relieving and higher duties opportunities with reward and incentive programs. 	Accepted subject to funding.
Recommendation 30 Align performance and selection processes	 QPS should review its performance and selection processes, including for relieving and higher duties, to consider ways performance metrics recorded in the performance management system can be provided to panels as part of selection processes. 	Partially accepted subject to funding.
Recommendation 31 Create transparent structures for acting and relieving opportunities	• QPS should review its policies and procedures around appointment to acting and relieving opportunities, to ensure appointments are transparent, equitable and non-discriminatory. This review should consider ways the transparency of decisions can be increased by requiring work units to capture and appropriately report on information about who is relieving or appointed to higher duties, as well as who is eligible to be appointed to relieve or be appointed to higher duties.	Accepted in principle subject to funding.

Enabling flexible and inclusive workplaces

Recommendations	Description	QPS Position
Recommendation 32 Normalise flexible work	 QPS should retain the current policy approach that does not require a reason for requesting flexible work. 	Accepted.
	 Within 12 months of this report, QPS should implement trial sites to test different forms of flexible work in different operational environments. 	Declined.
	 QPS should educate and train all QPS members with supervisory responsibilities and provide dedicated human resources support in: explaining the benefits of flexible work for individuals, teams and QPS how to manage flexible teams what are 'reasonable business grounds' as a basis for refusal. 	Accepted in principle subject to funding.
	 As part of the general communications about diversity and inclusion, QPS should profile success stories of officers accessing flexible work. 	Accepted.
	When next considering the QPS rostering system, managing flexibility should be a key criterion in deciding which product to adopt.	Noted subject to rostering review trial/ findings.

Recommendations	Description	QPS Position
Recommendation 33 Strengthen flexible work governance structures	 QPS should initiate a Community of Practice with at least two other agencies that are also implementing flexible work in 24/7 work environments and should meet at least twice a year. 	Noted subject to rostering review trial/ findings.
	 QPS should review the Flexible Work Committee's terms of reference to re-orientate the focus of this governance structure toward taking a more proactive, future focused and strategic approach to embedding flexibility across the workforce, particularly sworn police. The terms of reference should confirm that it: can deal with all forms of flexible work, not just part-time hours is responsible for monitoring progress on uptake of flexible work arrangements and evaluating whether flexible work arrangements are having positive effect on metrics such as staff turnover, absenteeism and staff wellbeing. 	Partially accepted subject to funding.
	Commencing within 12 months of this report, the Flexible Work Committee should report to the Commissioner every six months on whether stations, districts and regions are increasing the overall uptake of flexible work and, if they are not, what actions the Committee recommends for improvement.	Partially accepted subject to funding.
	 QPS should ensure collection of data and reporting to the Deputy Commissioner who is responsible for workplace equality on: number of applications for flexible work arrangements and approvals/refusals type of flexible work arrangements being applied for demographic breakdown and station/work unit breakdown of applications/refusals type of work being done prior to a flexible work arrangement and type of work done under the flexible work arrangement (to see if a flexible worker is being disadvantaged) number of promotions and training opportunities given to officers on flexible work arrangements whether Working for Queensland results in relation to flexible work have improved. 	Partially accepted subject to funding.
Recommendation 34 Improve flexible work policies	• QPS should update the Flexible Working Arrangements policy, including to clarify that applications can only be refused based on 'reasonable business grounds'. The policy should articulate in more specific detail considerations that should apply and include a checklist for managers to complete to assist with decision-making.	Partially accepted.
	 QPS should draft and implement guidelines about flexible work arrangements other than part-time hours. 	Accepted.

Recommendations	Description	QPS Position
	 QPS should update the Flexible Hours Agreements (Part Time) Guidelines with a view to: highlighting that any extra hours above the part-time arrangements are only to be done by mutual agreement between the officer and their manager clarifying that applications can only be refused based on 'reasonable business grounds' allowing approval of applications to be done by the applicant's manager but that any refusal be signed off by the next level in the chain of command and then decided by the relevant committee if a dispute remains including a mandatory review of flexible work arrangements every 12 months. 	Accepted.
Recommendation 35 Improve workforce planning	 QPS should improve workforce planning by: acting on the assumption that a significant proportion of the workforce will require flexibility and/or extended leave at some point in their career forecasting what proportion of the workforce will require flexibility and/or extended leave at any point in time embedding workplace flexibility and extended leave into future workforce planning mechanisms. 	Accepted subject to funding.
	 QPS should trial a reliever pool or other mechanism that allows for backfilling of members on extended leave. 	Declined.
Recommendation 36 Make workplaces more inclusive	 QPS should ensure that annual operational plans for stations include strategies to build team and workplace culture in an inclusive way, developed in consultation with members. 	Accepted.
	 QPS should ensure that, in any future construction or renovation of physical spaces, the needs of a diverse workforce should be considered. 	Accepted.