

REVIEW OF THE HUMAN RESOURCES FUNCTION in the ACT HEALTH DIRECTORATE

November 2020

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EXECUTIVE SUMMARY

INTRODUCTION

This report presents the findings of a review of Human Resources functions in the ACT Health Directorate (ACTHD)¹. The review was undertaken to identify gaps in functions, capabilities and resourcing and to propose strategies to close those gaps within ACTHD. The review also considered opportunities for increased collaboration between the Directorate and the two other entities within the ACT public health system, namely, Canberra Health Services (CHS) and Calvary Public Hospital Bruce (CPHB). Additionally, the review considered the role of ACT Government Shared Services in providing HR services to ACTHD and considered opportunities for ACTHD to better integrate those services with its own offerings.

APPROACH

The review of the HR function in the ACTHD involved a series of information gathering activities comprising:

- Discussions with the former Director-General, ACTHD, Mr Michael De’Ath and the current Acting Director-General, Ms Kylie Jonasson
- A discussion with the Executive Group Manager, Corporate and Governance Division, Mr John Fletcher
- A discussion with the Deputy Director-General, Health Systems, Policy and Research Group, Ms Kylie Jonasson (in her previous role)
- A discussion with the Executive Group Manager, Health System Planning and Evaluation Division, Ms Jacinta George
- A discussion with the Senior Director, People Strategy Unit, Ms Julie Nolan
- A discussion with representatives of Shared Services including Mr Graham Tanton, Executive Director Shared Services, Ms Claire Harper, Executive Branch Manager Partnership Services, Mr Martin Bolton, Payroll and HR Systems, and Ms Karen Giovinazzo, Senior Program Director, HR Information Management Solutions
- A group discussion with staff of the People Strategy Unit
- A group discussion with staff of the Culture Review Implementation Branch
- Group discussions with clients of HR drawn from across the ACTHD
- A group discussion with consultants from the Australian National University engaged by the ACTHD to deliver a culture change model for the ACTHD
- A discussion with Mr Patrick Morgan, Business Analyst and contractor to ACTHD

¹ The scope of the review included similar examinations of the HR functions within Canberra Health Services and Calvary Public Hospital Bruce. The findings from these examinations have been reported separately.

- Examination of submissions received from unions invited to contribute to the review
- A review of a range of documentation provided by the ACTHD
- Examination of staffing numbers and FTE for ACT Directorates and relevant health service delivery organisations
- A review of the research literature on best practice HR service delivery (the reference list can be found at Attachment D).

FINDINGS OF THE REVIEW

The main findings of the review are outlined in detail in the body of the report. Information gathered was analysed and is presented in themes aligning with specific HR functions, as follows:

- Workforce planning
- HR metrics
- Recruitment, selection, secondments and staff movements
- Performance management
- Learning and development
- Work health and safety
- Workplace relations
- Diversity management
- Organisational development.

Against each function, a broad introduction / background based on a review of best practice approaches to the delivery of this function within organisations is presented. A description of the current approach to delivering each function within the Directorate follows, including discussion of issues identified during the course of the review.

Following this, the role of Shared Services in delivering HR functions to the Directorate is discussed, and then a benchmarking assessment against comparable organisations to inform appropriate HR resourcing requirements for the Directorate is presented.

Drawing together the information and analysis described above, an HR Maturity Assessment Model² provided by ACTHD and adapted by the review has been used to assess the current level of development of the HR function within the Directorate. This assessment identified a number of areas where current practice does not yet match best practice approaches. Specifically, the Directorate's workforce planning, performance management and organisational development functions were assessed as operating at a Baseline level of maturity and therefore represent the areas of highest need.

² See People and Culture Diagnostic (June 2018) – Appendix B (page 37). The model can also be found in this report at Attachment C.

The elevation and effective operation of these functions will need to be based on the use of a capable HR metrics data collection, analysis and reporting function. This function was assessed as operating at a Functional level at present and therefore also needs to become a focus for further development.

Based on this assessment, a roadmap for change is presented that outlines the sequenced implementation of recommended solutions in the following priority areas:

- **Recruitment**
- **Performance Management**
- **HR Metrics**
- **Strategic Workforce Planning.**

Specific recommendations in relation to each of these four priority areas are provided in the diagram below.

Leadership Development

- Develop a database of advice and online FAQs on recruitment and selection practices
- Consider an HR Business Partner model to support recruitment and selection activities within Divisions
 - Undertake longitudinal evaluations of the effectiveness of recruitment and selection activities and use this to inform practices
- Develop an effective onboarding program that is linked to the learning and development and performance management frameworks
- Lead the establishment of mechanisms to allow staff secondments to occur across the Territory's health system

Recruitment

Performance Management

- Review and revise current performance development templates and tools, ensuring a focus on learning and capability development
- Introduce formal and informal training in performance management for managers, with a strong hands-on, on-the-job component e.g. via a mentoring program
- Support training by developing a database of performance management and development case studies
- Ensure participation in performance development discussions is visibly modelled and promoted by senior staff

Metrics

- Establish an ongoing HR data analytics and reporting capability
- Initiate or improve the collection and analysis of data for:
 - Recruitment and selection activities, including probation
 - Tracking staff movements between roles
 - Participation in learning and development activities
- Develop a case management approach to recording and displaying staff data and make this available in real time to managers and staff
- Create an accurate representation of positions within the organisational structure and use this in the analysis of workforce data
- Ensure that data collection and reporting initiatives are integrated with new HRMS metrics functions

OD Initiatives

Strategic Workforce Planning

- Undertake an audit of existing specialist skills and identify skills gaps
- Use the analysis of skills gaps to identify target areas for active succession planning and knowledge transfer
- Develop pathways and interventions designed to prepare staff for progression to more senior roles (e.g. a mentoring program to improve preparation for SOG C roles)

INTRODUCTION

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BACKGROUND TO THE REVIEW

The ACTHD established the scope of the review as follows:

- Assess the functions, capabilities, and resources (including services and support provided by ACT Shared Services) currently provided or held by the HR functions within ACTHD
- Conduct a benchmarking assessment of other high performing, similar organisations to identify a methodology to determine best practice HR resourcing requirements within organisations in the health sector
- Articulate the HR function's desired 'future state' (the critical roles, functions, capabilities, and resources/capacity) that will be required within the HR function, with consideration given to the proposed role to be played by ACT Government Shared Services
- Identify the strengths and 'gaps' in HR functions between the 'current state' and ideal 'future state'
- Identify any barriers preventing the HR functions from transitioning to the desired future state
- Outline solutions to allow the HR functions to build on current strengths, close gaps between the current and future state, and address barriers to achieving the future state
- Identify a high-level plan that outlines the sequenced implementation of recommended solutions.

Based on these specifications, the review was undertaken to ensure that the ACTHD has the right capabilities, resources and functions to meet its current and future requirements and a staged plan to guide the implementation of proposed changes.

The HR functions delivered by ACTHD, CHS and CPHB operate independently to support their respective workforces and there is very little functional contact, co-operation or sharing of services between them.

Although this report focuses on the HR function and the delivery of HR services within the Directorate, as mentioned, consideration was also given to opportunities to achieve improved collaboration across the ACT health system as a whole.

³ The scope of the review included similar examinations of the HR functions within Canberra Health Services and Calvary Public Hospital Bruce. The findings from these examinations have been reported separately.

At present, there is no whole of health system strategy for the delivery of HR functions. The heads of HR functions across the health system's constituent organisations do not regularly meet, aside from some engagement currently in relation to the response to initiatives arising from responses to the cultural review⁴ (as members of the Cultural Review Executive Group). However, where opportunities for collaboration became apparent during this review, they have been noted and appropriate recommendations made.

STRUCTURE OF THE REPORT

The report is structured as follows: First, we present a brief overview of the current structure and functions of the People Strategy Unit that holds primary responsibility for the delivery of HR functions within the Directorate. We then present the findings of the review, categorised by HR function:

- Workforce planning
- HR metrics
- Recruitment, selection and secondments
- Performance management
- Learning and development
- Work health and safety
- Workplace relations
- Diversity management
- Organisational development.

Against each function, we present a broad introduction / background based on a review of best practice approaches to the delivery of this function within organisations. A description of the current approach to delivering each function within the Directorate follows, including discussion of issues identified during the course of the review.

Following this, we discuss the role of Shared Services in delivering HR functions to the Directorate, and then a provide benchmarking assessment against comparable organisations to inform appropriate HR resourcing requirements for the Directorate.

Drawing together the information and analysis described above, we have used an HR Maturity Assessment Model⁵ provided by ACTHD and adapted by the review to assess the current level of development of the HR function within the Directorate.

Finally, we present a roadmap for change that outlines the sequenced implementation of recommended solutions.

⁴ ACT Public Health Services Cultural Review Implementation Inaugural Annual Review (May 2020).

⁵ See People and Culture Diagnostic (June 2018) – Appendix B (page 37). The model can also be found in this report at Attachment C.

APPROACH

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- Examination of submissions received from unions invited to contribute to the review
- A review of a range of documentation provided by the ACTHD
- Examination of staffing numbers and FTE for ACT Directorates and relevant health service delivery organisations
- A review of the research literature on best practice HR service delivery (the reference list can be found at Attachment D).

Further detail in relation to each of these activities is provided below.

EXECUTIVE CONSULTATIONS

As mentioned, one-on-one interviews were conducted with the former Director-General, ACTHD, Mr Michael De’Ath and the current Acting Director-General, Ms Kylie Jonasson, the Executive Group Manager, Corporate and Governance Division, Mr John Fletcher, the Deputy Director-General, Health Systems, Policy and Research Group, Ms Kylie Jonasson (in her previous role), the Executive Group Manager, Health System Planning and Evaluation Division, Ms Jacinta George and the Senior Director, People Strategy Unit, Ms Julie Nolan.

These interviews focused on discussion of the following issues:

- Responsibilities and the full scope of work undertaken by the HR function and its key deliverables
- Current planning and business processes and the rationale behind them
- Communication channels and current working relationships with other business units and areas within the ACTHD
- Functions delivered by ACT Government Shared Services, and the effectiveness and impact of this mode of delivery
- Features of the current state that facilitate the effective and efficient delivery of the HR functions
- Features of the current state that impede the effective and efficient achievement of the function's outcomes
- Areas of duplication or overlap as well as any gaps in critical, desired functions
- Future state requirements in terms of critical roles and functions required to deliver the HR function now and into the future, as well as identified capability gaps
- Options regarding the HR function's structure, responsibilities, capabilities, resourcing, and management of relationships.

GROUP DISCUSSION WORKSHOPS

A group discussion workshop was held with HR staff from the People Strategy Unit. The group discussion focused on the issues listed above under 'Executive Consultations'.

STAKEHOLDER CONSULTATIONS

Group discussion workshops were held with stakeholders from across ACTHD to whom the People Strategy Unit and Shared Services provide services. These sessions focused on

- The scope and nature of HR functions received from the People Strategy Unit and Shared Services
- What is currently working well in relation to these services and the way in which they are delivered
- What could be improved in relation to HR services and the way in which they are delivered.

At the end of each of the discussions described above, participants were invited to provide further information directly to Workplace Research if they had additional input that they would like considered. A small number of staff took up this option.

REVIEW OF RELEVANT DOCUMENTATION

A review of relevant documentation was undertaken. This documentation included:

- A review of the research literature on best practice HR service delivery (the reference list can be found at Attachment D).
- Structural chart for the ACTHD
- Structural chart for the People Strategy Unit
- People Strategy Branch Priority Action Plan 2019-20
- ACT Health Directorate Strategic Plan 2020-2025
- ACTHD Complaints and Grievances Process Map (July 2020)
- ACTHD Available Training Courses
- Metrics and data relating to workforce profile and annual leave
- Directorate Shared Services Report Catalogue
- Directorate sample Shared Services Monthly Report
- ACT Health Workforce Strategy 2018 - 2027
- ACT Health and CHS Statement of Expectations (March 2019)
- Canberra Health Service and ACT Health Directorate Information Pack (2018)
- People and Culture Diagnostic (June 2018)
- Final Report on the Independent Review into Workplace Culture (March 2019)
- ACT Public Health Services Cultural Review Implementation – Inaugural Annual Review (M Reid & Associates, May 2020) and Terms of Reference (February 2020)
- Report of the ACHS National Safety and Quality Health Service (NSQHS) Standards Survey – ACT Health (March 2018)
- NSQHS Standards Survey Not Met Report – ACT Health (March 2018)
- ACT Auditor-General’s Report on the Shared Services Delivery of HR and Finance Services (Report No. 1/2020)
- HR/P&C Maturity Assessment Model
- Services Partnership HR Services Collaboration Forum Terms of Reference
- ACT Government State of the Service Report 2018-19
- Services Partnership Agreement (September 2013)
- Draft Services and Performance Measures Catalogue for HR, Finance, Records and Related Customer Support Functions (August 2019)
- Shared Services charges - ACT Health
- Response and Resolution Timeframes - Shared Services
- Shared Services Customer Service Charter (July 2019)
- Submission received from the Australian Salaried Medical Officers Federation (August 2020).

This documentation was used to supplement the information gathered through the other consultations described above.

OVERVIEW OF THE CURRENT STRUCTURE AND FUNCTIONS OF THE HR FUNCTION

Below, we present a brief overview of the current structure of the People Strategy Unit within the Directorate that holds primary responsibility for the delivery of HR functions.

The People Strategy Unit was formed in October 2018 following a split between the ACT Health Directorate and Canberra Health Services. Immediately following the split, People Strategy began providing HR services to the Directorate with only three staff and now have 13 positions (including temporary and unfunded positions), delivering a range of HR services across the organisation. Below, the current structure of the People Strategy Unit is presented.

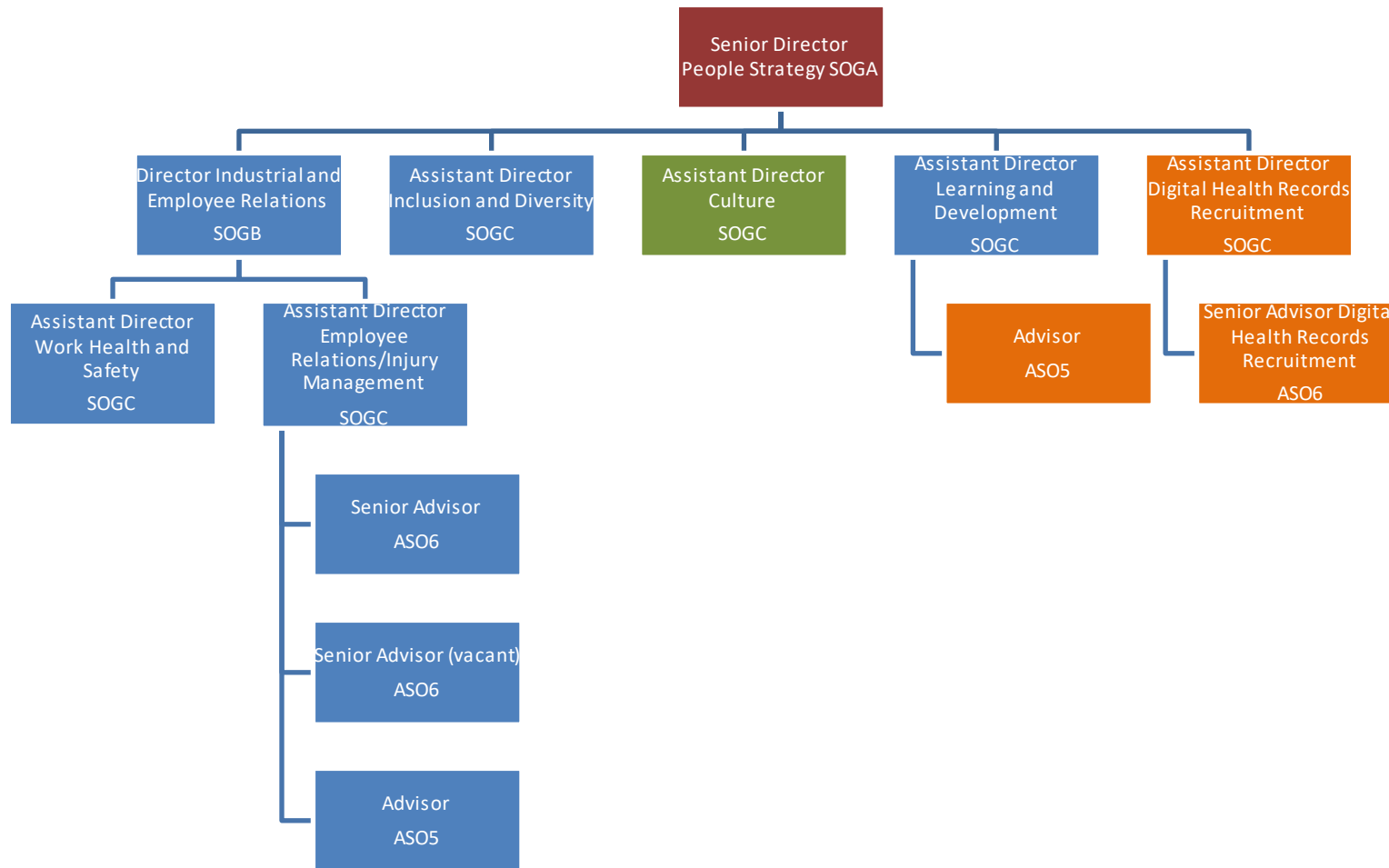


Figure 1: Current structure of the ACT Health Directorate's People Strategy Unit (Orange indicates an unfunded position; Green indicates a Cultural Review funded temporary position).

The functions delivered by People Strategy are listed in the table below.

		CORE FUNCTIONS
PEOPLE STRATEGY TEAM	Industrial and Employee Relations	<ul style="list-style-type: none"> ▪ Employment policy ▪ Injury management ▪ Performance management policy and systems ▪ Preliminary assessments of misconduct and performance issues ▪ Liaison with CMTEDD Case Managers ▪ Assistance with union and staff consultation on workplace matters ▪ Enterprise Agreement negotiations and management Advise staff on EA and entitlements ▪ Work health & safety ▪ Injury prevention and management ▪ Dispute resolution ▪ Recruitment advice and reporting ▪ Contract management
	Inclusion and Diversity	<ul style="list-style-type: none"> ▪ Diversity and inclusion planning, governance, policies and programs
	Learning and Development	<ul style="list-style-type: none"> ▪ Orientation/induction ▪ Co-ordination and delivery of learning and development programs

FINDINGS OF THE REVIEW

Feedback received during consultations indicated that the Directorate's People Strategy Unit is positively regarded and is seen by its clients as a highly supportive team that provides timely advice. There is a recognition that the Unit is making progress in developing and implementing improvements across many of the HR services that it delivers. The dedicated focus on the Directorate's needs and on providing assistance with the resolution of long-standing people management and industrial issues was also strongly appreciated by all clients consulted.

ISSUES ARISING FROM THE REVIEW: SPECIFIC FUNCTIONAL AREAS

The review, however, identified a number of issues that have implications for the structure, delivery and distribution of HR functions across the Directorate, and to some extent, across the health system. We have grouped these issues and present the main findings of the review against specific functions. As mentioned, these functions are:

- Workforce planning
- HR metrics
- Recruitment, selection and secondments
- Performance management
- Learning and development
- Work health and safety
- Workplace relations
- Diversity management
- Organisational development

WORKFORCE PLANNING

Background

Workforce planning is a proactive process of identifying the workforce capacity and capability required by an organisation to meet its current and future objectives. It aims to ensure that the right people (those with the skills and capabilities necessary for the work) are available in the right numbers, in the right employment types, in the right place and at the right time to deliver business outcomes. When done well, workforce planning delivers dividends beyond this. In providing a reliable evidence base for recruitment decisions, it can steer investment to areas where the greatest impact will be felt and it reduces reliance on ad hoc, reactive recruitment decisions.

Best practice in workforce planning has the following foundations:

- WFP activities are supported by the capture and analysis of sound data e.g. from activities such as (but not limited to) capability needs analyses, skills audits, and analyses of relevant employment markets

- WFP integrates with other HR strategies and practices that make it possible to attract and retain capable staff e.g. through informing the targeting and delivery of learning and development opportunities, as well as practices to support succession planning and knowledge retention (De Bruecker, Van den Bergh, Beliën, & Demeulemeester, 2015)
- To inform a WFP plan for a workforce, the organisation should ensure a high degree of stakeholder involvement and engagement in the following:
 - Horizon scanning – define future issues and challenges that may affect the workforce
 - Scenario generation – identify *how* future issues could occur
 - Workforce modelling – consider the workforce needs across the scenarios and the potential impact of future issues
 - Policy analysis – define policies and processes for the workforce to face the proposed scenarios (Willis, Cave, & Kunc, 2018)

To develop and implement meaningful workforce plans that will ultimately deliver required capability, organisations need to be mindful of the foundational HR capabilities on which workforce planning depends, such as effective data collection, analysis and reporting of workforce data, sound recruitment and selection practices, and an effective learning and development function.

The APSC Workforce Planning Guide (2011), which is of relevance to public sector agencies, also makes the following recommendations for best practice:

- Incorporate WFP into strategic and business planning processes
- Ensure WFP is supported by a strong governance process
- Focus on key workforce risks to achieving business outcomes
- Seek to understand the organisation’s workforce in the context of the wider economic and business environments
- Focus on strengthening the workforce capability and capacity, now and in the future
- Ensure WFP responds to internal and external changes that affect the organisation
- Utilise WFP to reduce the number of quick, reactive, and ad hoc recruitment decisions
- Ensure WFP provides a reliable evidence base for managers to make decisions about the workforce and guide investment to areas where it has the greatest impact.

Issues

Within the Directorate, the following issues were identified:

- The review found consistently that strategic workforce planning is perceived to be a significant gap in the suite of HR functions delivered by the Directorate. A concomitant gap in skill and knowledge in relation to workforce planning in staff employed in the Directorate was noted. Additionally, data tracking staff movements (such as those relating to promotions, transfers and departures) is incomplete and at a basic level, meaning that interventions designed to improve workforce planning and preparedness cannot currently be meaningfully evaluated and responsible managers are not able to fully appreciate or be held accountable for workforce

trends and forecasts. In combination, these factors mean that insufficient attention is also paid to succession planning across the Directorate.

Participants noted that this was particularly evident in relation to movement between SOG level roles and Executive leadership positions. Staff made the observation that planning needs to be undertaken to identify potential gaps at this level well in advance and to prepare capable staff for progression to higher levels through informal development opportunities, such as mentoring, as well as formal training with a focus on leadership skills. The identification of career pathways within the Directorate was also suggested as a way of providing a level of clarity and structure that could guide a program of staff development

- The gap in relation to succession planning is exacerbated by the fact that the Directorate requires specialist skills that are difficult to recruit externally, such as staff with clinical skills, expertise in public health and data analytics experts. Additional planning and preparation is needed to ensure that these skills are grown within the organisation (where needed) through the provision of formal and informal professional development opportunities to suitable staff, so that they can be drawn on when gaps arise.

HR clients noted that specialist skills held within the Directorate are not well quantified at present, meaning that the current availability of relevant capabilities within the organisation is unknown and therefore cannot be easily identified and drawn on. Participants commented that, to remedy this, the People Strategy Unit could undertake a specialist skills audit to generate information about current capabilities in the organisation and that could also be used to identify skills gaps. This kind of analysis could inform workforce planning activities as well as the identification of learning and development interventions to address capability gaps

- Participants noted that the People Strategy Unit (headed by a Senior Director) does not have membership of the Executive Leadership Committee (comprising staff at the Executive Group Manager level (or equivalent) and above) and therefore does not 'have a seat at the leadership table'. One consequence of this lack of representation is that People Strategy is not involved at an early stage in decisions that have short or long term workforce consequences e.g. decisions about budget. To some degree, this may contribute to the lower profile that workforce planning has within the Directorate. There may be merit in changing the composition of the Executive Leadership Committee to include the Senior Director People Strategy Unit in its deliberations
- At present, the Directorate holds responsibility for strategic workforce planning⁶ for the health system workforce. The Directorate also holds responsibility for health system service planning e.g. determining which services are needed, where they should be delivered, and what should be delivered by non-Government services. Given the synergies between these areas, workforce planning for the health system workforce and health system service planning sit together in the Directorate. These functions are both located in the Health System Planning and Evaluation Division, outside the Corporate and Governance Division. This is appropriate as People Strategy staff do not have the capability nor the charter to take on workforce planning for a specialised workforce external to the Directorate and their role is to provide enabling services internal to the organisation. However, participants reported that, within the Directorate, there is a lack of clarity in relation to who holds responsibility for workforce planning for its own workforce and this needs to be resolved

⁶ Strategic workforce planning is distinguished from operational workforce planning which would be expected to occur within the hospitals (CHS and CPHB).

- While the Directorate holds responsibility for high level, cross-Territory planning with a longer-term, strategic focus, a workforce planning team in CHS undertakes planning for its workforce at an operational level. HR participants from both CHS and the Directorate stated that the split of health system workforce planning functions between the two organisations is not well articulated. HR participants reported that there was little direct engagement between these two areas, meaning that opportunities for mutual co-operation, influence and feedback are limited
- In 2018, the Directorate commissioned KPMG to complete a health workforce plan (the ACT Health Workforce Strategy 2018 – 2027), however, its main focus was on the clinical workforce and the delivery of acute clinical services. The Health System Planning and Evaluation Division has recently acquired responsibility for determining the response to this, however, we understand that no resources have been provided to support this work at the present time. There is a need to build both policy capacity/ capability and a modelling capacity/ capability to support workforce planning for the Directorate itself and for the broader health workforce.

HR METRICS

Background

HR metrics addresses how efficient, effective, and impactful an organisation's HR practices are (Boudreau & Ramstad 2007; Cascio & Boudreau, 2011). The use of HR metrics allows an organisation to diagnose workforce issues, to track and assess the effectiveness of HR functions and interventions, and to prepare business cases to support the value of HR initiatives. The analysis of HR metrics can also inform efforts to improve the quality, relevance and delivery of HR services, and can help managers to make more effective decisions (e.g. in relation to staff management, capability development, and budget management). Metrics can be both qualitative (e.g. responses to open-ended survey questions) or quantitative (e.g. workforce demographics) in nature and a combination of both is optimal. Examples of HR metrics, in addition to workforce demographic data, are numerous but can include (Edwards & Edwards, 2019):

- Staffing rates
- Workforce tenure
- Unscheduled absences
- Turnover data
- Diversity numbers
- Outcomes of recruitment decisions
- Retention rates
- Employee engagement
- Training effectiveness.

Best practice in the use of HR metrics has the following foundations:

- The use of HR metrics should be differentiated from basic HR reporting. Specifically, HR reporting reflects numbers (e.g. overall headcount), but does not add value regarding judgements and evaluation of the performance of functions. On the other hand, HR metrics can assist HR (and the organisation) to *evaluate* their HR systems, programs, and processes (Fink & Sturman, 2017)

- Organisations can collect and utilise three primary HR measurements, and a combination of these gives insights into the synergies among HR functions and their overall value:
 - Efficiency – measuring the resources used by HR programs (e.g. cost-per-hire)
 - Effectiveness –the outcomes produced by HR activities (e.g. learning from training)
 - Impact – measuring the business or strategic value created by the activity (e.g. greater reach in services) (Lawler, 2012)
- The following four elements are necessary for effective HR metrics:
 - Logic - clear connections between employees and organisational success, as well as the principles and conditions that predict individual and organisational behaviour
 - Analytics - tools and techniques to translate data into relevant insights
 - Measures - the numbers calculated from an information management system
 - Process- (communication and knowledge transfer mechanisms through which the information becomes accepted and acted upon by key organisational decision makers (Lawler, 2012).

Issues

The review identified the following issues:

- The Directorate generates monthly reports on a subset of HR metrics which are provided to the Directorate Leadership Committee. These reports include information about annual leave and diversity and inclusion statistics. WHS incident reports are also generated that summarise total incidents and provide a breakdown by mechanism of incident i.e. the circumstances in which the injury occurred.
- The review found that, aside from collection of and/or reporting on the information mentioned above, there are gaps in the Directorate’s data collection and/or reporting systems. These primarily relate to:
 - Recruitment and selection: There is currently no data gathering on a number of aspects of recruitment activity that would inform effective workforce planning and the monitoring of the effectiveness of recruitment activities (for example on the number of actual vacancies, applications per vacancy, the success of recruitment processes and decisions)
 - Probation data: At present, there is no collection of information about compliance with the requirement to submit probation reports. New employees are automatically confirmed after six months, regardless of whether or not probation reports were submitted by the relevant managers. Improved visibility in this area would allow the assessment and reduction of risk to the organisation
 - Establishment information: There is no single, accurate record of positions within the organisational structure. This makes it difficult to analyse other datasets by FTE (e.g. lost-time injuries in a given period of time worked) or to generate accurate HR reports for separate work areas. While data can be broken down by cost centre, costs centres do not match or represent the organisational structure
 - Participation in learning and development activity across the organisation is not recorded in a coherent way

- Current skills and capabilities held across the organisation, and future capability requirements across role types or work areas, are not assessed
- The nature and response to enquiries and complaints received by HR are not documented.

Data gaps in these areas reduce the Directorate's capacity to manage its workforce effectively and to plan, implement and evaluate the impact of HR initiatives in a proactive, contemporary, evidence-based way. In addition to improved data collection, there is a need for more sophisticated analyses and reports that examine trends over time. For example, there is a need for an improved system of data tracking and reporting on WHS matters, such as claim types, so that the Directorate can have a better sense of how it is progressing in this area. There is also a need for improved analysis and reporting of data in relation to staff movements over time. HR staff note that work has begun to establish a WHS dashboard but that additional work will also be required to establish WHS targets and measures

Improved data collection, analysis and reporting would not only assist senior decision makers but also increase the accountability of these staff. Ideally, access to key workforce metrics would be readily available to managers on the intranet

- Shared Services prepares monthly and quarterly reports for the Directorate e.g. a monthly report is provided showing leave balances, headcounts etc. Monthly reports are presented in the form of Excel spreadsheets with data provided at the individual employee level and with no analysis. This means that these reports are not suitable for direct provision to work areas or managers. Data of this type are typically only accessed by HR staff to assist in the preparation of quarterly summary reports.

Quarterly reports provided by Shared Services do include basic, aggregated reporting of data (e.g. commencements by month) but these data are mostly presented at the agency level only (except for Divisional and Branch breakdowns of FTE) and so are of limited use in supporting decision-making at the business area level. As a result, to date little workforce information has been available for managers

- In an effort to address the gap in information provision to managers, the Directorate has initiated the development of a dashboard style report that includes workforce, staffing, leave, separations, diversity, age, length of service, and above salary payment profiles for the Directorate as a whole. Breakdowns are included at the cost centre level (due to the lack of accurate establishments information about the composition of work group units). There is an intention that this information will be made available to senior staff on a regular basis, via an online HR portal. This facility will significantly improve managers' access to workforce data.

The review was advised that these dashboards are not designed to provide managers with content to guide day to day operational decision-making - they show trends over time rather than providing real time information such as, for example, current excess leave balances. Therefore, there are still opportunities to provide information of this kind and to assist managers to make effective use of it

- The review noted that development of the dashboard reporting described above is being undertaken by a staff member within the Culture Review Implementation Branch. The work of this team is project based and is therefore time limited, however, there will be an ongoing need for the Directorate to retain a data analytics capability. This includes a need to ensure that work done to date on the development of metrics and reporting can be integrated with the metrics functions available under the new HRMIS being developed by Shared Services. The Directorate should consider how the work on metrics can be maintained after the work of the Culture Review Implementation Branch is complete

- At present, business areas are responsible for developing a response to the Directorate's staff survey findings and for monitoring the impact of any interventions. To achieve consistency and to ensure that interventions are informed by the right priorities and are in alignment with the strategic plan, it would be preferable for this work to be guided by People Strategy
- The review found that there is a need to extend the Directorate's case management systems. At present, the Directorate uses a case management approach to track injury management only, but there is a need to adopt this type of approach in relation to all staff data to improve its coherence and accessibility for HR, managers and staff
- The Digital Solutions and Performance Division employs a staff member who has some responsibility for HR reporting but it was suggested that this duplicates the work already done by Shared Services. Shared Services prepares some reports for the Directorate, as mentioned above, but structural changes within the Directorate have meant that these reports are not current. The review suggests that there is an opportunity to resolve this area of duplication.

RECRUITMENT, SELECTION AND SECONDMENTS

Background

Recruitment and selection processes represent a targeted search for a pool of potential candidates from which an organisation can select people with the desired knowledge, skills and experience to fill well-defined job vacancies. Recruitment and selection processes are most effective when they are strategically guided, proactive, structured and based on sound decision-making (Taylor & Collins, 2000). Effective recruitment and selection strategies and practices:

- Ensure the organisation has the necessary skills, knowledge and attributes to meet current and future strategic and operational requirements - therefore they must articulate with workforce plans and be based on good quality information
- Ensure that supply meets demand requirements - therefore they must be timely, well informed and based on efficient processes
- Result in the selection of suitable candidates who will become productive and effective members of the organisation⁷ (McGraw, 2016)

In contrast, ineffective recruitment and selection practices can be very costly, resulting in demotivated teams, decreased productivity, interpersonal tension, and financial implications for the organisation. Good selection processes must not only deliver effective and productive new employees, they must also be fair and equitable and, in the public sector, be merit-based (Taylor & Collins, 2000).

Best practice in recruitment and selection has the following foundations:

- A thorough job analysis to identify role and person requirements for effective performance
- Determination of any mandatory or inherent job requirements e.g. qualifications, licences, citizenship, medical standards etc. ensuring these are essential to performance of the job
- An appropriately targeted approach to market
- Identification of reliable and valid selection techniques against which to assess candidates

⁷ To achieve this, panel members must be trained in designing sound processes and in making good shortlisting and selection decisions.

- The conduct of rigorous, structured, objective and comprehensive assessments of candidates that enable the identification of those most suited to the role
- The use of tests are void of any potential biases or discrimination
- An assessment and selection process that involves several stages occurring over time, measuring specific and well-defined criteria
- Conduct of assessment processes by trained and qualified assessors / panel members
- Decisions based on all information provided (e.g. application, interview, referee reports etc.)
- The recording of detailed records and provision of constructive feedback to unsuccessful applicants on their performance
- Periodic evaluation of the reliability and validity of selection processes (Anderson & Cunningham-Snell, 2000; Taylor & Collins, 2000).

In the ACTPS, recruitment and selection activities are guided by centrally established policies. Before commencing a selection process, Directorates are advised to consider every vacancy as an opportunity for workforce planning and activities should also be informed by a classification check conducted against the relevant Work Level Standards. The recruiting area should then prepare a position description that outlines the responsibilities of the role and the capabilities required to perform this role. To assess the required capabilities, the selection process should make use of more than one selection method that is designed to gather behavioural and other job-relevant information (Anderson & Cunningham-Snell, 2000).

Issues

The review identified the following issues:

- In line with the People Strategy Branch Priority Action Plan 2019-2020, over the past year the Directorate has offered training in best practice recruitment and selection for staff and this has been well received. Participants who have attended the training reported that they had developed a better understanding of how to undertake recruitment as a result and had updated their knowledge of policy and procedural changes that have occurred over the last 12 months across the ACTPS and in the ACTHD. Training provided in this area was regarded as a 'step in the right direction' and a means to improve consistency of practice and the quality of recruitment decisions
- Clients noted that, although HR staff are approachable and welcome requests for advice, the recruitment and selection advice they receive is not always accurate or consistent. To some extent, inconsistency in advice was attributed to the diversity of roles across the Directorate and a lack of understanding within People Strategy of how to adapt selection processes and policies to accommodate job types that are not the more familiar administrative roles. Some reported that sometimes advice appears to be inconsistent with the Public Sector Management Act, particularly with respect to the correct approach to making employment decisions e.g. some participants reported that they had been told that all current Directorate employees must be given preference in consideration over external applicants i.e. considered before external candidates are assessed. Participants felt that HR staff may need to ensure that they are referencing current policies and legislative instruments when providing advice to ensure accuracy and confidence in the advice provided. Since the consultation period, during which the above observations were made, People Strategy have made progress in this area. This has included the development of revised recruitment guidelines and policies, increased staff training in best practice recruitment and selection, the addition of reference material on the intranet (including FAQs) and the introduction of a pre-recruitment checklist for recruiting

managers to use (in line with practices in other Directorates). These changes have been aimed at improving the accessibility, consistency and clarity of information about recruitment and selection in the Directorate, and the effectiveness of its recruitment practices

- Some clients of People Strategy reported that some staff need to have a better understanding of specific work areas and roles to be able to provide effective assistance with recruitment and selection activities. As an example, some participants commented that they would appreciate being able to access tailored advice on the best approach to recruiting for specialist roles like toxicologists and environmental biologists, given that a high level of technical skill and knowledge is needed but qualifications cannot be mandated. People Strategy staff noted that opportunities for this kind of engagement to build a better local understanding of business needs had been offered by them but not acted on by a number of business areas. Clients of People Strategy indicated that they favour a business partner model for the delivery of HR services, to ensure that HR understands the work done locally (at the Branch level)
- In relation to recruitment and selection activities, both HR staff and clients noted that there is a need to develop a central source of information to allow People Strategy to respond consistently to enquiries. This resource should include an accessible database of the advice that has been provided to clients previously, which will require staff to document enquiry types and responses provided. This, in turn, could provide content, and inform priorities, for the development of additional online FAQs on recruitment and selection practices and processes⁸, as well as on other HR topics. These FAQs could be available for the use of both People Strategy staff and its clients. As mentioned above, People Strategy have begun a process of developing these materials and of making them available to staff
- To some degree, the generation of inconsistent advice relates to clients' practice of 'shopping around' for answers, or failing to seek out the current, central source of advice on a matter. HR staff reported that, despite efforts to direct clients to a central number, Directorate staff continue to directly contact the person they know when seeking a response to a query. To alter this behaviour, HR staff need to respond to this uniformly and consistently by transferring the staff member through to the individual within People Strategy who is responsible for the relevant function, rather than responding to and resolving the query themselves. This approach would need to be supported by the establishment of a functional directory for the use of People Strategy staff, and more widely in the Directorate, to ensure that enquiries are consistently transferred to the designated expert
- Some recruitment functions are performed by Shared Services rather than the Directorate. Shared Services was established in 2007 as the ACT Government's provider of HR, finance and information, communication and technology (ICT) services. Participants reported that, in relation to recruitment activities, letters of offer are slow to be sent out at times, although for other recruitment processes this happens swiftly. Participants found it difficult to understand why this process is inconsistent. In relation to this, Shared Services noted that the Directorate imposes some unnecessary approval steps during the recruitment process and that delays were often due to a failure to pass the required information on to Shared Services in a timely way
- Some participants noted that they would like to see the People Strategy Unit take on more of a problem solving and enabling role, rather than what was described as a 'gatekeeping' role, particularly in relation to recruitment and selection activities. For example, participants suggested that HR staff could facilitate transfers-at-level across areas as a way of supporting career growth and development. Some Directorate staff also felt that they are subject to impediments that staff in other Directorates do not have to comply with. This principally related

⁸ The review is aware that a number of FAQs and other procedural information is already available on the Directorate's intranet.

to the requirement to complete the Intention to Recruit form which is an additional step in the process particular to the Directorate. However, some staff did note that the process had become more efficient (involving fewer steps) in comparison to requirements that existed prior to the Directorate's separation from CHS

- At present, there is no evaluation of the effectiveness of recruitment and selection activities e.g. numbers of applications, information about applicant type or quality, satisfaction with the outcome, whether job expectations have been met, exit interview data etc. The Directorate currently lacks tools that would allow the straightforward collection, recording and analysis of this kind of data, but additionally there is a lack of data analytic capability within the People Strategy team. Together, this means that the Directorate is missing an opportunity to use evidence to inform decision-making with respect to its recruitment and selection activities (for example, to assess its ability to attract and retain talent). Logically, this gap extends to Directorate's inability to ensure the accountability of managers for effective planning and leadership in relation to attraction, recruitment, and retention
- At present, there is no formal induction program for new staff and initiatives in this area are identified as a goal in the People Strategy Branch Priority Action Plan 2019-2020, beginning with a focus on new starters. Participants advised the review that, to be effective, the onboarding and induction pathway needs to go beyond addressing the administrative practicalities associated with moving into a new workspace. It also needs to assist new staff, and staff in new roles, to learn their role effectively and to become fully integrated within their work area. An effective induction/onboarding program needs to be long-term in its focus and linked to the Directorate's learning and development and performance management frameworks
- Employees who are new to the ACTPS must complete a 6 month probationary period before becoming permanently employed. During this time, managers are required to complete and submit probation reports. At present, if no probation report is received at the 6 month point, a new employee is automatically considered to have successfully completed probation. Underperformance in the organisation is generally not well managed (see the section on performance management below). When this occurs during a probationary period and is combined with a failure to submit a probation report, it can result in the subsequent permanent engagement of an unsuitable employee. This outcome stems from a confluence of issues associated with reporting practices, probation policy and manager capability and compliance
- Many participants commented that secondment pathways are valuable for career development while allowing staff to retain job security, but it was noted that secondments were difficult to access for staff wishing to move between the Directorate and other arms of the health system. This issue was referred to repeatedly by participants across all groups consulted in the review. It was seen to be a risk to the retention of highly competent staff. There was a view that HR staff should play a role in facilitating secondments and there was frustration that a mechanism for this did not seem to be available
- When recruitment activities occur, Shared Services checks for copies of mandatory qualifications/registrations as part of a new appointee's employment paperwork. For roles where it is required, the Directorate then undertakes its own credentialing. Initially, this had been a function adopted by Shared Services but due to the complexity of verifying the diverse range of qualifications, experience and professional attributes of specialist staff, the function has been returned to the Directorate. However, staff in the Directorate do not feel well equipped to undertake this task, reporting that the process was not well understood. It was felt that the creation of a FAQ document on credentialing processes would be beneficial.

PERFORMANCE MANAGEMENT

Background

Performance management systems comprise a suite of practices that include discussions about performance, remuneration, promotion and termination decisions, probation outcomes, disciplinary procedures, transfers and approaches to addressing development needs within an organisation (Pulakos, 2004). Used effectively, performance management provides organisations, work areas and individuals with a regular opportunity to monitor, review and evaluate progress toward the achievement of their objectives (Gerrish, 2016). A comprehensive, effective, and well-executed performance management system has the potential to contribute significantly to the development of staff and the effective functioning of organisations.

Best practice suggests that a successful performance management system typically has the following foundations:

- It has structures to support the effective functioning of the performance management system, for example, a performance management policy as well as performance appraisal and disciplinary processes and procedures
- It is linked to interventions that can lead to behaviour management, performance improvement and the development of teams and individuals (Fletcher, 2000)
- It ensures that employees:
 - Know and understand what is expected of them in their job role (i.e. performance objectives and performance standards)
 - Have the skills and knowledge required to deliver on these expectations
 - Are given feedback and an opportunity to discuss their work performance
 - Are rewarded for their performance through reward and/or recognition practices (which can be informal in nature)
 - Are counselled for underperformance and/or behaviour which is out of alignment with organisational values and/or inconsistent with achievement of organisational goals
 - Are given the opportunity to work in an environment that makes it possible to achieve optimum performance (Kramar, 2016).

The effective management of underperformance is an essential component of performance management, and is an area that is often identified in staff surveys as an area of dissatisfaction (for example, in the 2019 Australian Public Service Employee Census, only 20% of respondents agreed that their agency dealt with underperformance effectively, a finding consistent with that obtained in previous iterations of the survey). Underperformance can pose significant risks to the organisation and is harmful in a number of ways that include decreased productivity and work quality, poor team morale, reputational damage to the organisation, and a loss of resources (financial or time). Therefore, it is critical that organisations are proactive in preventing, managing and addressing underperformance issues by implementing relevant strategies at the organisational and individual levels.

Drawing on research findings, the following strategies can be used by organisations and managers to establish and perpetuate a best practice approach to performance management:

- *Setting goals and expectations:* Organisations should identify and define goals and competencies that underpin effective performance and managers should discuss the values of the organisation with all staff, including their implications for behaviour in the work area. This

provides clarity for managers (as well as their staff) and gives them a baseline against which to communicate work expectations. Managers can set goals collaboratively at the team and individual levels, encouraging staff to explain their understanding of how these goals align to those of the broader organisation or work area (Fletcher, 2001)

Expectations about the performance management system itself also need to be clear. It is important that staff at all levels have performance plans in place that will allow the supervisor to observe and assess performance, and that will allow the employee to self-assess. The performance plan should incorporate standards or competencies that are shared with the employee so they understand what they are being assessed against. Reviews should follow an established, organisation-wide cycle that is well publicised and promoted at the most senior levels, and that is supported by straightforward, accessible and relevant tools (such as performance agreement templates, capability frameworks and work level standards) (Fletcher, 2000)

- *Delivering well timed feedback:* It is important that feedback about performance is given frequently enough to both reinforce and motivate desired behaviour and to allow performance problems to be identified and addressed. Employers can establish a set plan for performance discussions on, for example, a weekly or fortnightly schedule. However, project and task-based deadlines also provide clear points for informal performance feedback to occur. Such an approach strengthens the linkages between performance feedback and specific instances of work performance. When underperformance occurs, it is important to address it immediately and directly in order for a valid and legally defensible decision to be made about continuing employment. A timely approach also means that employees have the opportunity to remedy underperformance issues before further action is required (Schultz & Schultz, 2018)
- *Supporting managers with skill development:* Organisations need to ensure that managers are skilled in providing feedback that motivates and supports the development of their staff and that addresses underperformance when it occurs. Supervisors' skill is particularly critical, both in providing managers with the confidence and ability they need to initiate productive conversations with their staff about performance matters and to ensure that discussions have the desired impact. Supervisors often report that they feel uncomfortable or unprepared to give feedback, especially if performance is poor. Therefore, it is essential that supervisors are given opportunities to develop their own skills and confidence as feedback providers and motivators. Research has shown that supervisors who are empowered to develop and use effective skills in giving feedback are likely to experience better long-term relationships with their employees, as well as improving the performance of their staff. Ideally, all managers supervising employees should receive training in giving effective and timely feedback. Managers may also need development and encouragement (as well as norm setting by more senior managers) to give praise and to openly discuss and celebrate individual and team successes (Fletcher, 2001)
- *Ensuring that opportunities for development are made available and accessible to managers and staff:* Managers need to be able to access and act on opportunities to develop staff. This requires the availability of activities and schemes that can be drawn on when the need arises, for example, career planning seminars, mentoring schemes, a performance review scheme that facilitates and integrates discussions about learning and development, and through ensuring the transparency and visibility of offerings provided through the learning and development function. Organisations may also consider developing a rewards and recognition system that is not dependent on the provision of monetary rewards (for example, that has a focus on public recognition, awards ceremonies or the provision of development opportunities) (Kramar, 2016)

Recognition schemes and practices can be considered as a component of an organisation's performance management function. They are designed to motivate and encourage staff and to reinforce positive behaviours by publicly acknowledging effective and exceptional performance and accomplishments. Recognition can be provided as part of the normal feedback processes described above, or in a more formal way such as through the use of one-off awards or ceremonies. Reward schemes differ from recognition schemes in that they aim to provide a material benefit in return for a high level of performance and effort. Formal reward and recognition programs signal to employees that the organisation values them and, when effective, they define and encourage shared behaviours that contribute to a positive and healthy workplace culture by acting as a reinforcement tool. Well-designed schemes can result in increased workplace satisfaction, higher productivity and longer tenure (Gerrish, 2016). However, if the nature of awards and the selection of successful recipients is not clear to employees or perceived as fairly distributed, a reduction in motivation can occur. To mitigate these risks, the organisation should ensure that award categories are clearly defined, that examples of awardable actions are provided for staff, that the criteria guiding decision making are transparent and the reasoning behind the recipients' selection is explained (Bartol & Durham, 2000).

Issues

Many participants noted shortcomings with the Directorate's performance management system. The following issues were identified:

- The Directorate follows the approach to performance management that is set out in the ACT Public Service Performance Framework Policy and Guidance Statement which provides very broad direction on the application of the policy. At the beginning of 2020, the Directorate stated an intention to introduce a uniform, formal cycle for the establishment of performance agreements across the organisation, with a cycle aligned to the financial year. The intention was that all staff would have agreements in place by 1 July 2020, however, take up has been patchy with only 4.3% of staff having completed Performance Development Plans as of 6 June 2020. The Directorate has historically had a low level of participation in its performance management system (for example, only 28.1% of staff had established agreements in the 2019-2020 period although this is likely to have been heavily influenced by the workplace impact of the 2020 COVID-19 pandemic) and has previously allowed managers and staff to establish their own annual cycle for these discussions. As a consequence, formal annual plans and appraisals have typically been generated in an ad hoc way.

The lack of a formal performance management cycle has also hampered the Executive's ability to hold middle managers to account for engaging their staff in and completing performance and development discussions. Participants expressed the view that there needs to be a push from the top to support the take-up of performance-based discussions that includes highly visible Executive participation, as well as Executive support for the introduction of the formal annual cycle. Participants also suggested that tools such as the ACTPS Capability Framework and Work Level Standards could be promoted in terms of their potential for use in performance discussions. Reference is made to the Capability Framework in the ACTPS guidance documents and forms (e.g. a hot link is provided on the Performance and Development Plan template) but managers and staff are not well versed in how to use it in discussions about work performance and development

- There is a lack of confidence across the organisation in the capability of middle managers to conduct effective performance discussions. Participants reported that a number of managers in the Directorate did not have the skills needed to give good feedback, to talk about performance effectively, to plan a program of work with a development focus, to identify and act on development opportunities for staff or to address underperformance. Managers' lack of

capability in these areas also translates into a reluctance to address underperformance issues as soon as they become apparent, meaning that these issues are able to progress and escalate until a more robust intervention is required. As mentioned above, this can have significant consequences, including allowing new staff to complete probation and enter into a permanent employment arrangement despite serious underperformance issues

- The ACTPS Performance Framework that is used within the Directorate includes a one page Performance and Development Plan template to guide performance management discussions. Participants commented that this template is too simple and focuses primarily on the identification of outputs and tasks for completion and too little on setting annual goals that relate to the development of knowledge, skills and capabilities. Participants suggested that the template needs to be reviewed and revised with a stronger emphasis on capability development. They noted that such a shift would make it easier to clearly articulate the relationship between performance management and accessing learning opportunities, where building capability is the common thread between the two. Once this link is made, managers and staff can be prompted to focus to a greater extent on identifying and addressing capability gaps, and information in relation to development plans can be provided to People Strategy to assist them to plan the delivery of learning and development offerings designed to meet the identified needs of staff
- Some participants noted that the performance management advice given by People Strategy is inconsistent across individuals or varies over time e.g. in relation to when and how it is appropriate to counsel a staff member on a performance matter. There may be a need for the generation of FAQs for the use of HR staff in providing advice in relation to performance management, in addition to the development of a database or library of enquiries and the advice given in their resolution
- The Directorate operates a recognition scheme in the form of the Director-General Awards, which is appreciated by staff. Staff commented that they would like to see the introduction of other forms of recognition which may include:
 - Social events or celebrations to honour achievements
 - A peer-nominated award scheme
 - An employee recognition wall
 - Team celebrations for project completions.

LEARNING AND DEVELOPMENT

Background

Organisations are responsible for ensuring that their employees have the appropriate skills and knowledge to work productively and to perform tasks to a high level of quality. The achievement of this requires an organisational commitment to learning and development.

Best practice approaches to learning and development have the following foundations. They:

- Begin with effective induction and onboarding processes that have a development focus
- Align learning priorities with organisational objectives (now and into the future)
- Are based on an understanding of capability gaps at the individual and organisational levels (which depends on a capacity for data capture, analysis and interpretation)

- Focus on the business application of training (rather than the type of training), creating a learning culture that integrates learning with day to day work experiences and requirements at the points of acquisition and application of new skills and knowledge (Kegan & Lahey, 2016; Marsick & Watkins, 2003)
- Make use of a spectrum of appropriate learning modalities and delivery modes (van Dam, 2017) that may include on the job training, internal and external courses and workshops, mandatory training, opportunities to achieve professional development requirements, supported external study, coaching and mentoring (Smith, 2016)
- Address cultural barriers to learning and consider the psychological principles of learning including: individual differences in ability, motivation, active practice of the material, massed versus distributed practice, whole versus part learning, transfer of training and reinforcement
- Have managers that invest in, and are accountable for, the learning and development of their staff (Schultz & Schultz, 2018)
- Evaluate learning and development formally, systematically, and rigorously (Patrick, 2000).

The APSC's (2003) Framework for Managing Learning and Development in the APS specifies that HR practitioners play a key role in the development and implementation of an organisation's successful learning and development program. HR practitioners do this when they:

- Understand organisational objectives (short-term and long-term) for learning and development
- Ensure learning and development initiatives are integrated into all people management strategies (such as recruitment, performance management, career management)
- Involve representatives from all business functions in planning and review of overall learning and development strategy
- Provide specialist advice to clients within the organisation in areas that support good practices, such as performing capability needs analyses, selecting appropriate learning interventions and delivering an evaluation strategy
- Are creative in designing and/or brokering timely and appropriate interventions to best suit the learning requirements of the agency and are prepared to take risks with new ways of learning
- Respond to business unit requests for tailored programs in a timely way
- Are accountable for reporting on the organisation's investments in, and outcomes from, learning and development
- Share learning with their HR colleagues
- Maintain up-to-date knowledge of issues, trends and good practice in learning and development.

Issues

The review identified the following issues:

- The Directorate's learning and development function has been minimally resourced for some time, however, two positions have recently been created within People Strategy to provide a dedicated focus for this function. Significant opportunities exist to build the Directorate's learning and development strategy, capabilities and offerings. HR staff are well aware that learning and development is an area that currently is less than optimal and that needs work, for example, the development of a new L&D system is in the Directorate's work program. Specifically, there is a need for a comprehensive learning and development framework that can

articulate the Directorate's learning model, strategies and approach to delivering effective services in this area – this, of course, requires an associated budget

- Participants noted that there is a need to develop a structured program of training for the Directorate that is oriented more towards the public service rather than a health service. We note that, as of July 2020, this program is in progress with a number of Directorate-specific training offerings publicised or listed as under development on the intranet. Staff also made the observation that training options for 'technical' staff are still needed, including access to clinical courses (including online options) that can contribute to meeting CPD requirements. It was commonly observed that CHS has withdrawn or reduced support for Directorate access to health-based training programs that had previously been available. Although CHS has noted that courses may still be accessed on a fee for service basis, this is still difficult in practice for Directorate staff as funding is not readily available. Additionally, CHS have indicated that there are frequently not enough available places on their courses to allow access to Directorate staff, even on a fee paying basis.

Difficulties with access to CHS courses extend beyond the clinical or health realm. For example, Directorate staff indicated that they can no longer attend management development courses that CHS make available to their own staff and that were previously also available to Directorate staff

- Participants also commented on the availability of access to training provided through other ACTPS avenues, which has not been strongly promoted, with the exception of access to ACTPS-wide recruitment and selection training. HR staff noted that the Directorate is now taking steps to improve access to training through the whole of government training program (training available through the whole of government training calendar can be viewed at the link below⁹). The Directorate is also taking steps to expand the number of in-house training offerings available to staff and managers (see Attachment B which indicates the in-house training that is currently offered)
- It was widely reported that middle management needs to become a focus for development opportunities with an early emphasis on building capability in performance management. It was noted that there is also a significant need for formal training in leadership and management for clinicians – many senior specialist staff are well qualified technically but lack more rounded leadership and people management skills
- Staff noted that there were opportunities to boost informal and on-the-job learning and development opportunities as well, and a number noted that they would like to see the introduction of a Directorate mentoring program. Such a program would dovetail with a parallel focus on succession planning, particularly in relation to the development of leadership skills (as mentioned above). It would also assist with preparation for progression to executive leadership roles for identified staff (as mentioned previously in the section on *Workforce Planning*)
- A number of participants also commented that there could be more emphasis on skill development to support the adoption of the CMTEDD Digital Strategy that underpins the ACT Government's plan to adopt digital and smart technologies in providing services to the community. Amongst its aims, the strategy states an intention to move service delivery online, improve the accessibility of digital services and information for vulnerable members of the community and assist the community to participate in the co-design of digital services. At present, a number of staff feel that they do not have the skills or knowledge needed to implement these goals in the Directorate or in relation to the Directorate's engagement with the community

⁹ Training available through the whole of gov training calendar can be viewed at: <https://actgovlearn.act.gov.au/Course/Browse>.

- A number of staff also said they are not aware of the availability of resources to support access to formal training and they would like to be able to easily source information about this as well as records of the formal L&D activities they have completed.

WORK HEALTH AND SAFETY

Background

Workplace Health and Safety (WHS) policies and practices address the obligation for organisations to consider an employee's overall safety, health and wellbeing at work. Apart from the obvious personal, social, and financial costs associated with injuries and deaths, there are significant indirect costs when WHS systems fail. Poor performance of this function can have a critical impact on a business' operation and ongoing performance, often because of reduced productivity and low morale (Chmiel, 2000).

Below, some key best practice characteristics and elements of an effective WHS function are described:

- *Workplace Health and Safety Management Systems (WHSMS):* A WHSMS is a set of policies, procedures and plans that organisations can use to manage health and safety at work in a systematic way. Such a system:
 - Guides the identification, assessment, analysis and correction of risks in the workplace
 - Establishes accountabilities and governance structures for these functions
 - Establishes mechanisms to communicate WHS matters to employees
 - Includes mechanisms for employees to report, communicate and be consulted on WHS matters
 - Ensures access to WHS training for employees who require it
 - Includes control measures for the management of WHS hazards
 - Establishes mechanisms for the resolution of WHS concerns (Nordlöf, Wiitavaara, Högberg, & Westerling, 2017; Holte & Kjestveit, 2012)
- *Safety Culture:* A WHSMS is not effective unless it is accompanied by a positive safety culture (Hale & Hovden, 1998). A 'safety culture' comprises the shared beliefs employees hold in relation to WHS matters (Cooper, 2000) that drive their decisions and behaviours regarding safety (Health & Safety Executive, 2005). Practices that assist organisations to create and maintain a positive safety culture include:
 - Ensuring that a highly visible commitment to safety is displayed by senior management
 - Ensuring that safety is communicated clearly as a key organisational value
 - Decentralising decision-making for key groups responsible for operational safety
 - Educating employees about safety and providing mechanisms for them to contribute ideas on improved safety
 - Ensuring that safety considerations are integrated into high-level decision making within the organisation (Kim, Park and Park, 2016)

- *Health and Safety Representatives (HSRs):* HSRs are worker-elected and are only appointed when requested by staff. They facilitate and represent an employee voice for health and safety matters in the workplace. In the ACT the functions of a HSR are set out in the *Work Health and Safety Act 2011* and include:
 - Representing workers on health and safety matters
 - Making recommendations on health and safety practices and policies
 - Investigating complaints and risks to worker health and safety
 - Monitoring health and safety measures taken by the organisation
 - Giving feedback to the organisation about how it is meeting its duties (Frick, 2011; Walters & Nichols, 2007).

Research has shown that properly trained and supported HSRs can have a positive effect on work health and safety outcomes, particularly where their primary role is to give voice to employee concerns, and where the organisation already has a comprehensive and active work health and safety management system in place - meaning that the contributions of staff, via the HSR, are likely to be attended to and acted on (MacEachen et al., 2016)

- *Workplace Health and Safety Officers (WHS Officer):* A WHS Officer is an employee appointed by management who performs in a safety advocate role. WHS Officers complete regulator-approved training and undertake legislated work health and safety functions to assess and improve the performance of a workplace. They are a designated safety resource for a workplace with some organisations establishing WHS Officers as a dedicated full-time role, and others opting to integrate the WHS Officers role into a human resources, operational manager or other function. The WHS Officer role is focused on informing and influencing management and employees about the health and safety performance of the organisation and enacting improvement across the organisation, whereas HSRs are focused on providing an employee voice for work health and safety issues specific to the particular workgroup they represent (*Work Health and Safety Act 2011*)
- *WHS Reporting:* WHS reporting should provide management with relevant, valid, reliable and current information that can inform decision making, for example, covering events, event severity, identified hazards, elimination efforts, risk control activities, safety inspections undertaken, financial indicators, lost time (Chmiel, 2000)
- *Employee Assistance Programs:* Employee Assistance Programs (EAPs) provide counselling and psychosocial support to employees. To be effective, an EAP needs to be visible, promoted to staff, accessed from skilled providers, and subject to evaluation (Milne, Blum, & Roman, 2004).

Issues

The review identified the following issues:

- Both clients and HR staff are aware that WHS is an area that can be developed further within the organisation and there is an intention within the People Strategy Unit to address this. The People Strategy Unit Priority Action Plan 2019-2020 establishes, as a specific priority, the development of a WHSMS, including mechanisms for conducting baseline risk assessments and the establishment of a governance structure and an HSR network
- These positives notwithstanding, HR clients noted that there had been a hiatus in the presentation of comprehensive WHS data at the Executive level, meaning that staff at this level do not have a well developed sense of how the organisation is performing in this area. There

was seen to be a need to resume regular reporting on key metrics (such as claim types) and to ensure that information about trends was disseminated. There was a preference by clients for WHS reports to be automatically generated and available on the intranet. People Strategy staff noted that work had begun to establish a WHS dashboard but that this needed to be supported by the establishment of relevant WHS targets and measures

- Clients of HR reported that they valued the new emphasis on mental health that had emerged within the Directorate's WHS function. They also commented positively on the transition away from the tiered system of incident management that had been in use prior to the separation of the Directorate and CHS, saying that the new approach was simpler and easier to navigate. Participants also made the observation that staff with responsibility for WHS were knowledgeable and helpful
- Some participants reported that current WHS processes need to be tailored to improve their suitability for higher risk working environments, with particular reference to the laboratory facility where hazardous substances are handled. The observation was made that current policies and practices are mostly suited to work in an office environment. However, People Strategy staff noted that work had been done to develop guidelines and practices to support safe operations in the laboratory and in similar potentially hazardous environments (such as the creation of the Laboratory Safety Community of Practice and the Contractor Safety Management Plan for specific construction environments)
- Injury management is typically positioned as a component of a WHS function. Within the Directorate, injury management is closely aligned with the Employee Relations function at present. The review found that their proximity in the current structure means that synergies can be achieved between these two areas e.g. improved case management and reduced duplication. However, Directorate has a stated intention to pursue a shift towards prevention and early intervention (partly in response to an apparent rise in non-compensable injury cases) and this may have implications for the need for some separation between injury management/WHS and employee relations.

WORKPLACE RELATIONS

Workplace relations refers to the management of work-related obligations and entitlements between an organisation and its employees. According to the Australian Human Resources Institute (AHRI 'Workplace Relations', accessed August 2020), the responsibilities of an organisation's HR area include acting as a liaison between employees and managers and creating / advising on policies and procedures relating to working conditions, pay, compensation, benefits, contracts, work-life balance, and rewards and recognition. HR has two primary functions in this area: To prevent and resolve problems or disputes between employees and management; and to assist in creating and enforcing policies that are fair and consistent for all employees.

According to best practice, HR practitioners working in workplace relations must have strong foundations in:

- Knowledge of, and contribution to, current enterprise agreements covering roles in the workplace, as well as bargaining processes and mechanisms for granting approval for agreements (approval provided by the Fair Work Commission)
- A sound understanding of leave types available to employees, legal requirements relating to leave and processes for responding to applications for leave

- The ability to draft and assist in the implementation of policies and processes for managing employee behaviour, including bullying, discrimination and sexual harassment and prevention of incidents and the legal repercussions should an incident arise
- An understanding of employee records, for example, in relation to basic employment information, pay, overtime, leave entitlements, superannuation agreements, individual flexibility arrangements, guarantee of annual earnings and termination
- A sound understanding of Workplace Health and Safety policies, standards and practices
- Experience in the implementation of policies and processes for managing ill / injured employees, including return to work and the management of compensation claims
- In-depth knowledge of relevant industrial relations legislation governing employment terms and conditions (e.g. *Fair Work Act 2009* and *Fair Work Amendment Act 2013*), workplace health and safety (e.g. *Work Health and Safety Act, 2011* and *Work Health and Safety Regulations, 2011*), immigration (for the recruitment of staff from outside Australia) and anti-discrimination laws
- Experience with various negotiation and dispute resolution methods (Davis, 2007; Kaufman, 2001; Fair Work Commission, accessed August 2020).

Employee Advocates. To assist in the management and resolution of problems that arise between employees and management, some organisations engage Employee Advocates (EA), as is the case within the ACT health system. However, for advocates to perform their role successfully, they must be respected and considered ‘credible’ within the organisation and be able to provide accurate and objective information (Askew, Schluter, Dick, Rego, Turner, & Wilkinson, 2012; Duffy, 2009).

Best practice for the functions and responsibilities of the EA role includes the following. The EA:

- Aids staff who are subjected to negative behaviours
- Acts as a form of social and / or instrumental support for staff and assist them to take an active stance in addressing aversive situations
- Plays a role in the prevention of negative behaviour from occurring
- Handles complaints and grievances effectively in the short to medium term using informal methods of resolution
- Takes a longer-term approach focused on reducing the harmful consequences of behaviour that has occurred
- Supports management in the elimination of negative behaviours in the workplace (Budd & Colvin, 2008; Cortina & Magley, 2003; MacDermott, 2002).

Issues

The review identified the following issues:

- Participants reported that the People Strategy Unit has been supportive in assisting managers to resolve long-standing industrial relations cases that had originated as performance management issues. HR clients also reported that, on the whole, the Unit is helpful and timely in providing effective advice and practical assistance on IR matters. HR clients noted that the People Strategy team has developed a much better relationship with unions in recent times, leading to more effective communication and a more collaborative approach to resolving IR issues, and that efforts in this area were visible and valued

- People Strategy staff reported that they have the capability they need to give advice to managers on IR issues but that they are also able to access advice on more complex matters from the relevant area in CMTEDD, when needed. Accordingly, when management issues arise that clearly have the potential to escalate, the People Strategy Unit consults with the CMTEDD Professional Standards Unit. However, the Directorate reported that CMTEDD is not as responsive as it needs to be in giving timely assistance on the best approach to managing these cases, leading to delays in addressing them. Delays of this kind make it more likely that issues will in fact escalate and become more difficult to manage
- Participants noted that, as it was not uncommon for performance management cases to escalate to become ER matters, there is a need for the Directorate to develop and broaden its focus on early intervention. This may include prevention-oriented interventions that can be used by managers, potentially with the support of HR staff, at a stage prior to the point at which formal action is required - examples include coaching for managers in dispute resolution and alternative dispute resolution avenues. Increased capability in this area within the People Strategy Unit may be required to develop and disseminate an early intervention-based approach across the organisation
- Staff within the Directorate have access to an Employee Advocate (now the Workplace Resolution and Support Service), a position that was created to provide an avenue for both Directorate and CHS staff to have confidential discussions about workplace matters affecting them, with a focus on the early and informal resolution of these matters. The role was developed to:
 - Raise staff awareness about workplace issues and negative behaviours
 - Educate staff about options available to them
 - Facilitate early resolution of incidents
 - Provide a safe environment for staff to express concerns in a confidential manner
 - Make recommendations to management about ways to prevent further incidents
 - Assist in promoting a workplace free of discrimination, bullying and harassment.

The role sits outside HR and reports jointly to the Director-General of the ACT Health Directorate and the CEO of CHS. Although this role's responsibilities are well defined, some participants reported that there has in the past been a degree of tension between the role and HR teams. The observation was also made that some guidance needs to be provided on how and when the Employee Advocate should engage with HR teams in relation to issues brought to it by staff of the organisation. Resolutions, actions and opportunities that are offered to address specific types of issues should be consistent across organisations, as currently this is not the case

- Some staff in management roles indicated that they do not have a good understanding of some implications of Enterprise Agreements (EAs) (e.g. in relation to return to work procedures) or of the circumstances in which they need to take responsibility for union engagement rather than doing this through People Strategy. HR clients suggested that there needs to be some training in this area as well as the development of FAQs to assist managers to develop their understanding of relevant EAs and their operation and to clarify responsibilities for union engagement. Clients also noted that it would be useful for them to be able to access IR case studies that provide a guide to their roles in the management of common workplace relations issues

- Currently CHS is taking the lead in managing EA negotiations for doctors, although these are attended by the Chief Medical Officer (a Directorate position) at times. As the Directorate employs nurses and midwives, it has a high level of involvement in EA negotiations covering these roles (one EA covers both Nurses and Midwives). Some HR clients noted that EA negotiations for medical practitioners have been complicated by the lack of a coherent bargaining strategy across the three organisations comprising the ACT health system. Participants also queried whether EA negotiations covering roles (e.g. nurses and allied health) that span multiple entities should all be managed by CMTEDD to ensure that negotiation processes are consistent, that positions are coherent and negotiated outcomes are as broadly applicable as possible.

DIVERSITY MANAGEMENT

Background

In an organisational context, a focus on diversity recognises the wide range of unique traits and characteristics held by people. These characteristics can take many forms and may include (but are not limited to) gender, age, race, sexual orientation, disability, religious beliefs, geographic location and income level. Valuing and embracing diversity involves recognising individual differences in people, and providing relevant supports to benefit both the individual and the organisation. Diversity management refers to the implementation of different workplace practices that are suited to the needs of different groups within the workforce and that create respectful and fair workplaces. Organisations that use diversity management practices aim to maximise the engagement, potential, participation and productivity of their employees (Mor Barak, Lizano, Kim, Duan, Rhee, Hsiao, & Brimhall, 2016).

The ACT Public Service (ACTPS) has stated its commitment to creating a ‘positive, respectful, supportive and fair work environment where employee differences are respected, valued and utilised to create a productive and collaborative workplace’ (CMTEDD, accessed August 2020). In 2010¹⁰, the ACTPS introduced its Respect, Equity and Diversity (RED) Framework and introduced RED Contact Officers (REDCOs) to model and promote the ACTPS values, to raise awareness of the importance of respect, equity and diversity in the workplace and to assist in the development of a positive workplace culture across the service.

Primarily, REDCOs do not resolve issues but assist staff to make contact with the appropriate person, team or services to assist them in relation to the issue they have approached the REDCO about. The role of a REDCO is voluntary and is undertaken in addition to normal duties. A number of the Directorate’s staff operate as REDCOs.

Managing diversity and the implementation of diversity approaches operates at three levels:

- Organisational level e.g. change in terms of operating procedures, affirmative action and educational programs
- Interpersonal level e.g. relationship change in terms of better understanding the views of others
- Individual level e.g. attitudinal change in terms of interpersonal processes (specifically those that reside within the individual) (Lawthom, 2000).

¹⁰ This was reviewed in 2014/2015

Best practice in diversity management has the following foundations. The requirement to:

- Ensure policies are implemented with an understanding of how they align with overall organisational objectives
- Ensure policies / interventions are evaluated and assessed to determine their levels of effectiveness (Lawthom, 2000)
- Ensure diversity is embraced by top management and communicated to all
- Implement organisation-wide awareness training
- Individualise performance management models that align with work style preferences and motivation
- Focus on developmental needs and career aspirations of all
- Provide flexible working arrangements and employee assistance programs as required (Bartz, Hillman, Lehrer, & Mayhugh, 2009)
- Adherence to the following principles (outlined in the MOSAIC model of diversity management (Kandola & Fullerton, 1996)):
 - *Mission and Values:* Managing diversity needs to be dovetailed into business objectives, mission statements and vision to ensure it is seen as important by *all* employees
 - *Objective and Fair Processes:* Key processes and systems should be monitored to ensure fairness (e.g. recruitment, selection, induction and appraisal techniques and systems are potential areas of bias)
 - *Skilled Workforce:* Ensure the workforce is aware of diversity and developed and managed appropriately
 - *Active Flexibility:* Working patterns, policies and practices should be flexible, addressing the work / life needs of all employees
 - *Individual Focus:* Employees are considered and managed on an individual basis, not on a group basis
 - *Culture that Empowers:* Workplace culture should be consistent with the principle of managing diversity (e.g. devolved decision making, participation and consultation).

Issues

The review identified the following issues:

- Although the Directorate began 2020 without a formal diversity management framework, by July 2020 a Diversity Plan has been developed, however it is not yet available organisation-wide. The following initiatives have also been undertaken:
 - Executive Champions have been appointed to the LGBTQI and Aboriginal and Torres Strait Islander Networks
 - A staff member is now dedicated to this function within People Strategy
 - A governance framework has been developed (and now endorsed, following consultation)

- A Diversity and Inclusion Forum is being established. Steps are being taken to ensure that initiatives in this area link with other HR strategies, for example, the Aboriginal and Torres Strait Islander Staff Network Employment Action Plan 2021-2024. It is anticipated that further progress will be made in this area into the future
- HR clients made the observation that, even prior to the development of formal initiatives such as those described above, the Directorate's approach to diversity management was positive and had been effective in practice.

ORGANISATIONAL DEVELOPMENT

Background

Although there is debate surrounding the definition of organisational development (OD), most commonly it refers to the use of a systematic, evidence-based approach to the planned implementation of strategies, structures and processes for improving organisational effectiveness and performance (Cacioppe & Edwards, 2005; Cummings & Worley, 2014) and the quality of working life of its staff (Saunders & Barker, 2001).

McLean (2010) views organisational development as “any process or activity, based on the behavioural sciences, that, either initially or over the long term, has the potential to develop in an organisational setting enhanced knowledge, expertise, productivity, satisfaction, income, interpersonal relationships, and other desired outcomes, whether for personal or group/team gain, or for the benefit of an organisation” (p. 9). It is an “applied behavioural science approach to planned changes and development of an organisation because the emphasis on OD is more on improving organisation capabilities rather than the actual organisational processes and it is about large scale organisational change that is based on people's perception and behaviour” (Mullins, 2007, p. 720).

OD is the arm of HR that aims to deliver evidence-based change to improve an organisation's design, processes, capabilities, and functioning. In a health care context, workforces are complex and cost pressures are considerable and, if care is to be of higher quality and lower cost, the key to improvement lies in effective, well designed, interventions (Koeck, 1998) that draw on existing HR and organisational capabilities and that engage staff in their development and implementation. A capable, effective OD function can drive these changes.

Best practice in organisational development has the following foundations:

- It emphasises goals and processes, but with a particular emphasis on processes
- The need for change is supported by empirical evidence (Bushe & Marshak, 2014)
- The concept of organisational learning as a means of improving an organisation's capacity is implicit in most approaches
- It deals with change and improvement over the medium to long term and therefore may need to be sustained over an on-going period
- It involves the organisation as a whole, as well as its component parts
- It is participative, drawing on theory and practices of behavioural science
- It has management support and involvement from the top down

- It concentrates on planned change and improvement, but focuses on processes that are adaptable to changing situations (Senior, 2000)
- Interventions / approaches are guided by the following underlying values:
 - People should be treated with respect
 - There must be trust, openness and a collaborative organisational climate
 - Less emphasis should be placed on hierarchical structures
 - Confrontation: Issues concerning employees must be treated head-on
 - People who will be affected by the change must be included in the planning and execution of the change process (Odor, 2018)
- It is not a 'one off' event that ends when change has been implemented, rather it is an on-going process
- It is an iterative or cyclical process which is continuous, whereby interventions are evaluated, assessed, adjusted and re-introduced, comprising the following steps:
 - Diagnose the current situation / need for change or improvement (informed by relevant data)
 - Develop a vision for change / improvement
 - Gain commitment to the vision (at all levels of the organisation)
 - Develop an action plan
 - Implement the change / introduce the intervention
 - Assess and reinforce the change
- Decision-making relating to planned change and improvement involves staff at all levels, not just senior management (Senior, 2000).

Issues

The following issues were identified:

- At present, the Directorate does not have a designated organisational development function nor a strong capacity to deliver this within most of its core HR functions, including workforce planning, recruitment, learning and development, performance management, work health and safety and workplace relations. Progress has been made in the area of diversity and inclusion where recent development work has seen the design and partial implementation of longer term strategies, a framework and governance structures. However, the broad absence of capability in this area will need to be addressed, either by building a strategic capability within existing HR functional areas or through the creation of a dedicated, stand alone function that guides development work across all functions

- The Directorate has been required to develop a response to the 2019 *Independent Review into the Workplace Culture within the ACT Public Health Services* but, as mentioned, the organisation lacked a designated organisational development function. As direct result, the Directorate established the Cultural Review Implementation Branch (which is time limited) and commissioned the Australian National University (ANU) to develop a change framework for application within the health system. Implementation of the ANU model will become the Directorate's responsibility at the conclusion of the ANU consultancy. Consequently, there will be a need to determine where responsibility for the implementation stage of this project will lie within the Directorate.

ANU Change Framework

The change framework that has been developed by the ANU¹¹ will be used to assist leaders in the Directorate to respond effectively to the 2019 *Independent Review into the Workplace Culture within the ACT Public Health Services*. The ANU work focused on reviewing and making recommendations designed to effect change in the behaviour of leaders and staff. Its scope therefore differs from that of the current review reported here, which address the organisation's current HR function. Nevertheless, both analyses have identified common issues and themes, including the need to:

- Address deficits in the Directorate's approach to developing and using metrics to inform decision-making
- Improve the organisation's approach to and adoption of effective performance management activities
- Adequately resource and expand learning and development offerings with an emphasis on the development of leadership skills for managers.

In line with the scope of their project, interventions recommended in the ANU report focus on workplace behaviours, with the goal of building an inclusive and psychologically safe working environment. Recommendations address the need to:

- Develop an organisation-wide approach to measuring, analysing and reporting on workplace behaviours and using this to inform decision-making
- Establish effective systems and processes to support the prevention and management of poor workplace behaviours and the effective management of staff performance
- Improve people skills across the workforce through the development of a broadly applicable learning and development strategy and a toolkit to inform and support organisational change (including guidance fact sheets covering issues such as workplace civility).

Although the scope of both projects differ, they have a common basis in evidence. As a result, interventions recommended in the ANU report are consistent with those outlined in the current review, which also highlights, as critical priorities for the Directorate, the need to enhance the development and use of appropriate HR metrics, its approach to performance management and the development of leadership capabilities of managers.

¹¹ Documented in *Investing in Our People: A System-wide, Evidence-based Approach to Workplace Change Final Report, 2020*

Note: Shared Services did not have an opportunity to review the report prior to finalisation and has subsequently raised some areas for further review.

DELIVERY OF HR FUNCTIONS BY SHARED SERVICES

Background

Shared Services was established in 2007 as the ACT Government's provider of HR, finance and information, communication and technology (ICT) services. The services are available to all directorates and agencies and aim to improve the efficiency of these services and reduce duplication in their delivery across the Territory.

At present, the Directorate accesses a number of transactional HR services from Shared Services in support of recruitment (including Executive engagement and contracts), payroll activities, salary packaging, records management and reporting of HR metrics (discussed in the earlier section on HR Metrics).

In 2020, the ACT Auditor-General examined the delivery of HR and finance services by Shared Services¹² and, broadly, found that governance arrangements for the delivery of HR services had not been effective or consistently applied, that Shared Services did not have a current, finalised service catalogue (although a draft document was developed in 2019), that directorates found that it was often necessary to escalate complex issues within Shared Services to achieve a resolution and that, over time, measurement of KPIs shows declining levels of customer satisfaction.

In relation to governance arrangements, the Customer Council was initially established as the main mechanism for Shared Services' accountability but was replaced in 2019 by the Quality and Measurement Advisory Committee. In relation to HR services specifically, the original Services Partnership Agreement specified four collaboration fora, reporting to the Customer Council, to play a role in governance and oversight of Shared Services, including the HR Collaboration Forum. The HR Collaboration Forum was found by the Auditor-General to be a valuable forum for the discussion of issues and service initiatives and for the achievement of project outcomes. However, in 2019 this forum was replaced by the HR Directors Group that was given a reduced role (to monitor operational KPIs) and it is no longer part of the documented governance structure. Therefore, the Directorate's ability to participate regularly in discussions about Shared Services' policies, guidelines and standards appears to be limited at present.

Some issues relating to the delivery of functions by Shared Services identified as part of this review have already been noted and commented on in previous sections. Other issues are discussed below.

Issues

This review identified the following additional issues in relation to the delivery of HR services to Directorate staff and the functional relationship between Shared Services and the ACTHD:

- Shared Services staff reported to the review that there was a lack of clarity about the respective roles of Shared Services and the Directorate in relation to transactional processes such as the provision of advice on pay, and terms and conditions. They suggested that this was attributable, to some degree, to a reluctance on the part of Directorate HR practitioners to relinquish responsibility for assisting staff with straightforward queries

¹² ACT Auditor-General's Report: Shared Services Delivery of HR and Finance Services – Report No. 1/2020

- For some Directorates, Shared Services delivers more complex HR services that can be accessed by HR staff (such as services relating to financial statements and taxation, and the management of recruitment and employee relations), although the Auditor-General's recent examination of Shared Services found that HR and other staff are often unaware of this option. The current review found that the role of Shared Services in providing advice on complex matters is not well understood within the Directorate. Some participants (clients of HR) do seek advice from Shared Services on complex issues (such as performance matters) and reported that good support had been provided on these occasions. In contrast, other HR clients reported that they receive inconsistent advice from Shared Services when consulted on difficult EA matters. Participants also noted that Shared Services also provides inconsistent advice about pay and that front-line staff are not always well informed enough to answer queries - clients find that they need to wait while being put through to a supervisor.

HR staff are aware of these inconsistencies and maintained that Shared Services should be providing transactional services only, and not advice on complex matters such as policy advice or advice on the correct interpretation of EAs. HR staff expressed the view that, in the event that the Directorate could not resolve issues in these areas, advice on more complex matters should be sought from CMTEDD, not Shared Services. Consistent with this, HR clients indicated that they would prefer an arrangement where HR was the broker for dealing both with Shared Services and CMTEDD. It was noted that this would improve the consistency of the advice received by clients

- At present, Shared Services is in the process of making a significant transition to a Systems, Applications and Products in Data (SAP) based Human Resource Information Management System (HRIMS). A staged release is planned, with the release of modules for recruitment, payroll, workforce administration and onboarding at the end of 2020, and learning and development and performance management modules becoming available some 8 months later. In a third stage, the talent management suite and health and wellbeing modules are to be released.

Clients within the Directorate hold the view that the new HRIMS will improve the delivery of HR services by Shared Services, once this system is introduced. Shared Services told the review that the new HRIMS has the potential to lead to significant improvements in, for example, the reporting of HR metrics, identity checks, the avoidance of overpayments (which can occur where entitlement to allowances is unclear and poorly documented and accounted for), management of access to learning and development opportunities, and rostering (a service not currently accessed by the Directorate). Shared Services noted that the successful introduction of the new system for the Directorate was dependent on close collaboration between the two entities to establish the Directorate's specific needs and the best approach to fully meeting them.

BENCHMARKING HR FUNCTIONS

Background

Benchmarking techniques use quantitative and / or qualitative data to make comparisons between organisations that are alike in relevant ways, or between different sections of organisations. It can assist organisations to align functions and practices against other leading organisations who are considered 'best practice', and / or against wider best practice techniques e.g. techniques identified by leading researchers, academics, and advisors.

According to Stone (2014), in practice, external benchmarking can be time-consuming and hampered by the difficulty of obtaining relevant information and identifying comparable organisations to benchmark against. Both qualitative and quantitative data should be collected, and where possible, from within and outside the industry of interest, provided comparability on important dimensions can be established and maintained. It is important not to view HR practices in isolation from each other (e.g. examining recruitment practices may also require consideration of an organisation's staffing strategy) and to consider comparisons in terms of the context of the organisations from which the data originated.

Stone (2014) outlines several key practices to ensure that benchmarking is conducted appropriately, including:

- Keeping the goals of the benchmarking exercise specific e.g. choosing an HR function or activity to be improved, completing a thorough analysis of the 'current state' and carefully selecting a limited number of organisations that excel in the area
- Engaging managers, who will be involved in the changes, in the benchmarking process to ensure they are fully aware of what they need to do and whether it will work for the organisation
- Exchanging and sharing information – the organisation should be prepared to assist other organisations with their benchmarking or similar activities
- Seeking legal advice where necessary - discussions of intellectual property ownership and similar legal issues may require an organisation to obtain legal advice
- Respecting confidentiality – there is a need to maintain the privacy of other organisation/s information.

The scope of this review included a targeted benchmarking assessment with other similar organisations to examine comparative HR resourcing requirements, with a focus on the health sector where relevant. The number of HR staff an organisation requires is heavily dependent on the size of the organisation and its industry type. According to the Australian Human Resources Institute ('HR Audit Information Sheet', accessed August 2020), ideally, organisations would employ one HR professional to every 50 employees. However, this ratio is not a realistic expectation for many organisations, and a maximum ratio of one to 100 is a more commonly achieved goal for many organisations¹³. We note that these ratios generally refer to HR advisers only and exclude recruitment roles that process large volumes of work, as their inclusion can skew numbers for large organisations with high volume staff intakes. The AHRI comparison, therefore, is appropriate for the Directorate since it outsources this aspect of the recruitment function to Shared Services.

Issues

The Directorate identified the following organisation (highlighted) as being relevant for inclusion in the benchmarking comparisons, either in terms of the size of the organisation or its function. Other comparison organisations are presented for information only. The table below shows the HR to staff ratios for the ACT Health Directorate compared to nominated organisations.

¹³ It should be noted that ratios which approach 1:100 can only be achieved in large organisations where considerable economies of scale in HR service delivery can be achieved.

Organisation	Staff FTE	HR staff FTE	HR to Staff Ratio
ACT Health Directorate	613 ¹⁴	11	1:56
Environment, Planning and Sustainable Development Directorate	647	18	1:35
Canberra Health Services	6 672 ¹⁵	81	1:82
Calvary Public Hospital Bruce	1 421	20	1:70
John Hunter Hospital	Not available	Not available	Not available
Calvary Mater Newcastle	Not available	Not available	Not available

The comparisons above show that the HR to staff ratio is low in the Directorate compared to organisations delivering primary health care services and is in line with AHRI recommendations of a ratio of 1:50. However it is notably higher than a Directorate of a similar size (EPSDD).

Aside from staffing numbers, all organisations differ in their purpose, functions, the complexity of their operating environments and their stages of maturity / development, making benchmarking challenging. While the HR to staff ratio in the Directorate appears to be appropriate at present, it must be noted that the organisation's HR function is in the early stages of a period of development and maturity and this is likely to impact on the resourcing needs of this function. A number of capability gaps have been identified in this review, and are recognised by the Directorate. Bridging these gaps will require additional resources to support the further development of the HR function, to bring it into closer alignment with best practice, to enable People Strategy to operate in a flexible ways in response to business needs and to allow a focus on strategy development and implementation (including working with the Executive in this endeavour).

Should the Directorate increase its HR staffing complement to address various gaps and priorities identified in this review, it may, for a time, need to exceed 'business as usual' best practice benchmarking ratios. Establishment of the HR resources needed to address critical gaps should be done on the basis of a review of the structure of the HR function.

¹⁴ Pre-COVID-19 numbers

¹⁵ As at June 2020

ASSESSMENT AGAINST HR MATURITY MODEL

In 2018, prior to the split between the Directorate and CHS, ACT Health commissioned KPMG to undertake a review of the Executive Support, Employee Services and Organisational Development teams within the then People and Culture Unit. As part of this review, a model was developed in partnership with the Unit to allow the assessment of maturity of the existing HR functions. The model was known as the HR/People and Culture Maturity Assessment Model¹⁶. Using a 5-point scale extending from Baseline to Leading Practice, it provided a benchmark for the assessment of current HR functions against leading practice in 6 areas:

- Business and Alignment
- P&C Capabilities
- Governance and Process
- Enabling Technology
- Data Analytics
- Talent and Workforce Management.

For continuity and at the request of the Directorate, this model has been drawn on in this review to support a maturity assessment of the current HR functions within the Directorate. The six areas assessed in the original model do not span all HR functions of relevance to the current review, and so the model has been expanded to allow an assessment of the maturity of additional functions. The modified model, termed by this review the HR/People Strategy Maturity Assessment Model, allows an assessment of the maturity of HR functions spanning 12 areas:


- People Strategy Capabilities
- Governance and Processes
- Enabling Technology
- Strategic Business Alignment/Workforce Planning
- Data Analytics
- Recruitment, Selection and Secondments
- Performance Management
- Talent Management
- Work Health and Safety
- Workplace Relations
- Diversity Management
- Organisational Development

The information captured via consultations and document reviews, discussed above in this report, was used to inform the assessment of the current level of maturity of the Directorate's HR functions and is provided below.

¹⁶ See People and Culture Diagnostic (June 2018) – Appendix B (page 37)

HR/People Strategy Maturity Assessment Model – Key Area	WRA Identified HR Function	Baseline	Functional	Professional	Performing	Leading Practice
People Strategy Capabilities	All			People Strategy specialists are in place for key areas (e.g. Employee services, talent management, IR). The majority of People Strategy staff have relevant HR/People Management experience.		
Governance and Processes	All			Formal committees and processes are in place for key areas only (e.g. IR, Employee relations, recruitment). Efforts are made to identify wasteful activities and streamline processes.		
Enabling Technology	All		Basic HRIS transaction processing system is in place. Basic Employee Self-Service (ESS) is in place for several transaction types.			
Strategic Business Alignment and Workforce Planning	Workforce Planning	There is no formal strategy in place. Localised resource planning activities are in place.				

HR/People Strategy Maturity Assessment Model – Key Area	WRA Identified HR Function	Baseline	Functional	Professional	Performing	Leading Practice
Data Analytics	HR Metrics		The source of People Strategy data is the payroll system and the HRIS. Basic measures are in place and basic reports are made available relating to past and present.			
N/A	Recruitment, Selection and Secondments			There are formal recruitment and selection processes in place. Training is available in this area. Secondment pathways exist but may be difficult to access.		
N/A	Performance Management	There are low levels of participation in the performance management system, and a lack of a formal performance management cycle.				
Talent Management	Learning and Development		Basic hire, develop, engage, and retain processes exist and Talent practices are focused on the current workforce.			

HR/People Strategy Maturity Assessment Model – Key Area	WRA Identified HR Function	Baseline	Functional	Professional	Performing	Leading Practice
N/A	Work Health and Safety			A WHSMS is being developed as a priority. There are satisfactory processes and systems currently in place.		
N/A	Workplace Relations			People Strategy is supportive and effective in providing advice and assistance. There is a current Employee Advocate role.		
N/A	Diversity Management		 Strategies and frameworks are being developed and are soon to be implemented. Specific resources are dedicated to this function.			
N/A	Organisational Development	There is currently no designated organisational development function nor strong capability in this area.				

ROADMAP: PRIORITY AREAS FOR IMPROVEMENT

The review has identified a number of areas, under each of the nine HR service delivery functions, where current practice does not yet match best practice approaches. In this section of the report, we identify what the review regards as the **four most important** areas in which priority should be given to enhancing processes to build capability of HR staff and ACTHD managers and further develop the maturity and effectiveness of the services delivered.

The four priority areas were identified based on the analysis of the issues presented throughout this report, and on the basis of the HR maturity assessment described in the preceding section. This assessment identified that the Directorate's workforce planning, performance management and organisational development functions are currently operating at the lowest level of maturity (at Baseline) and therefore represent the areas of highest need. The elevation and effective operation of these functions will need to be based on the use of a capable HR metrics data collection, analysis and reporting function. This function was assessed as operating at a Functional level at present (noting that Functional represents the second lowest level of competence on the scale) and therefore also needs to become a focus for further development.

Drawing together these findings, the review has identified the need to develop the Directorate's HR function in the following priority areas:

- Leadership Development, comprising a focus on **Recruitment** and **Performance Management**
- Organisational Initiatives, comprising a focus on **HR Metrics** and **Strategic Workforce Planning**.

A focus on recruitment and performance management will support the development of the Directorate's staff and leaders, while a focus on metrics and strategic workforce planning will build its capacity to function in an informed way in preparation for future challenges.

Specific recommendations in relation to each of these four priority areas are provided in the diagram below. The review recognises that recommendations made in relation to the development of the Directorate's HR metrics function will need to be considered in the light of impending changes to the new HRMS system being developed by Shared Services, to ensure their compatibility.



Figure 2: Roadmap: Priority Areas for Improvement

OPPORTUNITIES ACROSS THE HEALTH SYSTEM

The review was asked to consider what opportunities might exist across the ACT health system (i.e. across ACTHD, CHS and CPHB) for the delivery of HR functions that would facilitate an across system, consistent and aligned approach that would enable the delivery of cost-effective HR support and services to staff and that would improve consistency and reduce duplication of effort.

The following observations are offered by the review, however, it should be noted that not one of the three organisations comprising the review expressed any strong desire to co-operate in a cohesive way in all of the areas nominated, each maintaining the need for their own independence and often citing the uniqueness of their operations and budgetary constraints as barriers to cross-system collaboration.

For some of the functional areas, noted with an asterisk *, there was acknowledgement that cross-system collaboration may warrant further consideration.

Areas of HR Service delivery that may benefit from an **across-system approach** identified (in no particular order) include:

- Integration (as far as is practicable) of the collection, analysis and reporting of HR metrics to support all facets of organisational planning and performance
- * The development and implementation of a leadership capability framework (this would incorporate clinical and non-clinical capabilities)
- A common and co-ordinated approach to the conduct of a learning needs analyses conducted regularly to identify and refresh priority areas for capability building
- A 'collaborative services' arrangement (led by one agency – preferably the ACT Health Directorate) on a 'fee for service' basis for shared learning and development services – this would include corporate training and common clinical training requirements
- * Co-ordinated initiatives to facilitate staff movements / secondments across the entities
- * Continuous improvement in common WHS initiatives including injury prevention and management
- System-wide access to employee advocacy services (subject to an evaluation of the effectiveness / success on the current arrangements)
- Diversity initiatives.

Areas where it may be feasible to establish **centres of excellence / communities of practice** that are jointly funded (as needed and on an agreed proportional basis) or simply operate as a collaborative arrangement between the entities and accessed by all:

- * Strategic workforce planning – it is suggested that responsibility for this planning reside in the ACTHD with operational WFP undertaken by each organisation to align with the broader strategic intent / objectives
- Succession planning and talent management
- Management of code of conduct matters including investigations (currently led by CMTEDD but there is general dissatisfaction about timeliness and efficiency of these arrangements)
- * Performance management including underperformance management

- * Best practice recruitment.

The review noted that the heads of HR do not currently have a forum / standing committee arrangement to meet on a regular basis to discuss, monitor and progress whole-of-system approaches – this is seen as a significant gap.

CONCLUSION

This report presents the findings of a review of Human Resources functions in the ACT Health Directorate (ACTHD). The review was undertaken to identify gaps in functions, capabilities and resourcing and to propose strategies to close those gaps within ACTHD. The review also considered opportunities for increased collaboration between the Directorate and the two other entities within the ACT public health system, namely, Canberra Health Services (CHS) and Calvary Public Hospital Bruce (CPHB). Additionally, the review considered the role of ACT Government Shared Services in providing HR services to ACTHD and considered opportunities for ACTHD to better integrate those services with its own offerings.

The report presents the findings of the review, categorised by HR function. Against each function, the issues identified during the course of the review are discussed. Following this, the role of Shared Services in delivering HR functions to the Directorate is examined, and then a benchmarking assessment against comparable organisations to inform appropriate HR resourcing requirements for the Directorate is presented. Drawing together the information and analysis described above, the review has used an HR/People Strategy Maturity Assessment Model to assess the current level of development of the HR functions within the Directorate.

Finally, the review presents a roadmap for change that outlines the sequenced implementation of recommended solutions.

The findings of the review are presented to the Directorate for consideration.

ATTACHMENT A: LIST OF PARTICIPANTS

Role	Participant
Former Director-General, ACTHD	Mr Michael De'Ath
Acting Director-General, ACTHD	Ms Kylie Jonasson
Executive Group Manager, Corporate and Governance Division	Mr John Fletcher
Deputy Director-General, Health Systems, Policy and Research Group	Ms Kylie Jonasson
Executive Group Manager, Health System Planning and Evaluation Division	Ms Jacinta George
Senior Director, People Strategy Unit	Ms Julie Nolan
Executive Director Shared Services	Mr Graham Tanton
Executive Branch Manager Partnership Services, Shared Services	Ms Claire Harper
Payroll and HR Systems, Shared Services	Mr Martin Bolton
Senior Program Director, HR Information Management Solutions, Shared Services	Ms Karen Giovinazzo
Business Analyst and contractor to ACTHD	Mr Patrick Morgan
Staff of the People Strategy Unit	
Staff of the Culture Review Implementation Team	
Directorate staff and clients of HR	
Consultants from the Australian National University Research School of Management	

ATTACHMENT B: CURRENT ACTHD SPECIFIC TRAINING AVAILABLE TO STAFF

Induction Programs		
ACTPS Induction Program	eLearning	New ACTPS staff
Respect, Equity and Diversity (RED)		
Being a Conscious Leader	Workshop	Managers/supervisors
Conscious Interactions	Workshop	Staff members
RED Reboot	Workshop Webinar	Staff members
Disability Awareness	eLearning	Staff members
Aboriginal and Torres Strait Islander Cultural Awareness	Coming soon	Staff members
Recruitment and Selection		
Best Practice Recruitment and Selection	Workshop	Staff members Managers/Supervisors
Domestic and Family Violence		
Domestic and Family Violence Awareness	eLearning	Staff members
Domestic and Family Violence Foundation Training for Managers	Workshop	Managers/supervisors
Governance		
Information Privacy	eLearning	Staff members
Procurement	Coming soon	Staff members
Record Keeping and FOI	eLearning	Staff members
Risk Management	Coming soon	Staff members
Security Awareness	Coming soon	Staff members
Leave and Attendance	Coming soon	Managers/supervisors

Workplace Health and Safety		
General Awareness Work Health and Safety	eLearning	Staff members
Work Health and Safety for Managers	Coming soon	Managers/supervisors
Performance and Development		
Performance & Development in the ACTPS	eLearning	Staff members
Performance & Development for Managers and Supervisors	Coming soon	Managers/supervisors

ATTACHMENT C: HR/ PEOPLE & CULTURE MATURITY ASSESSMENT MODEL ¹⁷

Key Area	Base Line	Functional	Professional	Performing	Leading Practice
Strategic Business Alignment	There is no formal strategy in place.	An informal Workforce strategy is in place covering limited areas and/or is short term focused.	A formal workforce strategy is documented and covers short and medium term objectives and links between business and workforce strategy.	A formal workforce strategy exists and includes key values and goals of the organisation and includes long term objectives.	A workforce strategy exists and is directly aligned with the value chain of the organisation and reflects clearly articulated mission, vision and values.
Key Area	Base Line	Functional	Professional	Performing	Leading Practice
P&C Capabilities	P&C is operated typically by people 'who like working with people'. There is little to no formal HR/People background in key P&C staff.	The P&C manager is in charge of the function where the P&C generalist role prevails. There are not areas of speciality supporting the business.	P&C specialists are in place for key areas (e.g. Employee services, talent management, IR). The majority of P&C staff have relevant HR/People experience.	Many staff in the P&C function hold relevant qualifications. All P&C staff have direct and extensive HR/People experience and have advanced knowledge of HR/People trends and leading practice.	P&C is an experienced unit and considered a trusted advisor to business leaders. P&C leaders and staff have a key links to the business strategies and have an innovative approach to HR /people outcomes creating tangible value to the business.
Key Area	Base Line	Functional	Professional	Performing	Leading Practice
Governance and Process	Decision making authority is adhoc and arbitrary and there is no formal governance structure in place creating large inefficiencies.	Decision making is overly cumbersome. There are a few oversight committees or frameworks in place that create inefficiencies and unnecessary process.	Formal committees and processes are in for key areas only (e.g. IR, Employee relations, recruitment). Efforts are made to identify wasteful activities and streamline processes.	There are organisation wide committees and formalised lean operating structures and processes in place. There is a focus on the voice of the customer to define value and there is incorporation of leading practice.	Lean governance is a 'way of working' and is embedded in day to day operations. Governance model can be quickly adapted to accommodate business change. Effective, efficient and customer led process with a strong focus on continuous improvement.

¹⁷ Source: People and Culture Diagnostic (June 2018)

Key Area	Base Line	Functional	Professional	Performing	Leading Practice
Enabling technology	There is no formal P&C technology and no HR Information system (HRIS) in place. P&C administration is manual in nature.	Basic HRIS transaction processing system is in place. Basic Employee Self-Service (ESS) is in place for several transaction types.	A basic P&C technology roadmap exists. Manager Self-Service (MSS) and ESS are in place for most basic P&C transactions.	A P&C formal technology strategy exists. Comprehensive workflow exists for most P&C transactions. MSS and ESS are used for all transactional P&C functions and embraced by staff. Emerging technologies are assessed and embraced to meet changing business needs.	A P&C formal and future focused IT strategy exists and is defined and updated regularly. MSS and ESS are used for all transactional P&C functions and embraced by staff. The P&C IT strategy considers emerging and disruptive technologies and the benefits/risks to the organisation.
Key Area	Base Line	Functional	Professional	Performing	Leading Practice
Data analytics	The source of P&C data is primarily the payroll system and there are no formal measures in place. Only basic reporting is available with a 'rear view mirror' focus.	The source of P&C data is the payroll system and the HRIS. Basic measures are in place and basic reports are made available relating to past and present.	The source of P&C data is the HRIS. There is a dashboard of agreed measures with are routinely reported with a focus on past and present. Limited self-service available for agreed list of reports.	The source of P&C data is the HRIS and a third Party system. A dashboard of measures is reported in real time focusing on past present and future. Reporting team provides dashboards and more complex reporting.	The source of P&C data is the HRIS and a third Party system. Data from all enterprise applications are linked. A real time, robust, complex and customisable reporting dashboard focused on past present and future exists.
Key Area	Base Line	Functional	Professional	Performing	Leading Practice
Talent management and Workforce planning	Basic hire, develop, engage and retain processes exist. Localised resource planning activities are in place.	Basic hire, develop, engage and retain processes exist and Talent practices are focused on the current workforce. Localised resource planning activities are in place.	Talent practices pay some consideration to the needs of the next generation of workers. Localised resource planning activities are in place coupled with a high level strategic workforce plan.	Talent practices are driven by an understanding of the business strategy. Strategic workforce planning is actioned organisationally and includes complete demand and supply forecasting.	Talent practices are a prioritised blend of current and future skills and capability requirements. Talent practices are articulated in a strategy and are aligned with areas of the organisation via uniquely configured talent interventions.

ATTACHMENT D: REFERENCE LIST

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