

27 February 2025

Trung Luu MLC  
Committee Chair  
Legislative Council's Legal and Social Issues Committee

Dear Committee Chair

### **Legislative Council's Legal and Social Issues Committee inquiry into Ambulance Victoria**

Thank you for inviting the Victorian Equal Opportunity and Human Rights Commission (the Commission) to contribute to the Legislative Council's Legal and Social Issues Committee inquiry into Ambulance Victoria. The Commission's [Independent review into workplace equality in Ambulance Victoria](#) (Review) addresses some of the Inquiry terms of reference, particularly:

- 1) the working conditions of paramedics;
- 4) governance and accountability;
- 5) the workplace culture within Ambulance Victoria, with a focus on occupational health and safety impacts, including to the morale and wellbeing of paramedics and employees.

This letter outlines the key findings and recommendations from the Commission's Review.

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## **The Commission's Independent Review into Workplace Equality in Ambulance Victoria**

In 2020 Ambulance Victoria requested that the Commission undertake an independent review pursuant to the Equal Opportunity Act 2010 (Vic) (EO Act) of workplace equality issues following reports of discrimination, sexual harassment, victimisation, and bullying. Please access the [Terms of Reference](#) for further information.

The Commission delivered the Review in three phases. During 2021 and 2022, the Commission undertook phase 1 of the Review by reviewing Ambulance Victoria's compliance with the EO Act and making 43 recommendations for improvement. Phase 2 of the Review occurred across 2022 and 2023, with the Commission providing expert advice to Ambulance Victoria to support implementation of phase 1 recommendations. In 2024, the Commission delivered the phase 3 Progress Evaluation Audit, assessing Ambulance Victoria's progress towards implementation of 25 priority recommendations from phase 1, to outline the extent to which Ambulance Victoria has moved towards EO Act compliance.

A summary of the key findings and recommendations from phase 1 of the review is set out below.

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## **Phase 1 - Examine the state of unlawful and harmful conduct and (in)equality and identify strategies to ensure the workplace is safe, equal and inclusive**

[Volume I](#) of the Phase 1 Report was published 30 November 2021. Volume I details widespread reports of incivility, disrespect, discrimination, sexual harassment, bullying and victimisation, and presents 24 recommendations detailing changes that can be actioned immediately by Ambulance Victoria to begin rebuilding a safe, respectful and inclusive workplace.

From the 2163 people who responded to the Commission's survey, it was found that:

- 47.2% of survey respondents reported experiencing discrimination;
- 17.4% reported experiencing sexual harassment;
- 52.4% reported experiencing bullying; and
- 34.5% reported experiencing victimisation.

The 24 recommendations in Volume I include actions focused on improving safety and harm prevention, developing a victim-centred and fair reporting and complaints system, engaging the workforce in developing and committing to new organisational values, and strengthening the organisational structures required to implement reform.

[Volume II](#) of the Phase 1 Report, published on 31 March 2022, details findings and recommendations relating to equality, fairness and inclusion. The phase 1 review found that whilst Ambulance Victoria has adopted a range of measures intended to ensure fair and inclusive attraction and recruitment efforts, there were ongoing barriers that impeded progression inside the organisation for women and workers from diverse backgrounds. There was a particular need to increase the representation of women in senior operational and specialist clinical roles and a need to increase broader diversity across the workforce as a whole.

Similarly, the Commission found that whilst Ambulance Victoria had trialled new ways of working flexibly, and made some progress in this area, systemic barriers to flexible work remained, particularly for operational staff which disproportionately impacted women and workers with parenting and caring responsibilities. Ambulance Victoria did not have dedicated policies and processes regarding reasonable adjustments for workers with disability, or transition to retirement strategies to ensure respectful and non-discriminatory treatment for older workers.

The Commission found that there were significant opportunities for Ambulance Victoria to strengthen its organisational capability (particularly management and leadership capability) to advance workplace equality, and to strengthen systems to enable ongoing monitoring, oversight and improvement of workplace equality and safety.

The Commission made 19 recommendations in Volume II. These recommendations focus on strategies to embed workplace equality, non-discrimination and inclusion across the employment lifecycle and across all levels of the organisation. Along with the 24 recommendations in Volume I and the Outcomes Framework contained at [Appendix E](#), the Commission provided Ambulance

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Victoria with a complete roadmap to prevent and respond effectively to unlawful and harmful workplace conduct and embed equality across the organisation.

Following the release of Volume II of the Phase 1 Report, Ambulance Victoria publicly committed to implementing all 43 of the Commission's recommendations.

## Phase 3 - Progress Evaluation Audit

The [Phase 3 Progress Evaluation Audit](#) represents the third and final phase in the Commission's Review. The Phase 2 report was published on 21 January 2025 in a digital format on the Commission's website. The Commission has assessed Ambulance Victoria's progress towards implementation of [25 priority recommendations](#) from Phase 1.

### Key Findings

#### *Complaints*

The Commission assessed that the priority recommendations related to the area of dealing with complaints are some of the most progressed by Ambulance Victoria. The establishment of the Professional Standards and Behaviours Department (PSBD) has been a significant improvement in addressing positive duty compliance across Ambulance Victoria's reporting and complaints system and, while the Commission found some gaps, work is continuing to address them.

Rebuilding trust and confidence in the complaints systems will continue to take sustained effort to demonstrate to the workforce that complaints will be consistently managed in a person-centred and trauma-informed way, that perpetrators will be held accountable and that complainants will not be victimised.

#### *Safety*

The Commission found that the priority recommendations relating to safety have not progressed as much as expected. Many of the recommendation activities have been commenced or completed but the intent behind the recommendation is not being realised and meaningful change is not being experienced by the workforce. For example, the Commission found Ambulance Victoria does not have a program of work to systematically address safety in isolated environments across the organisation. This means that risks and behaviours identified in Phase 1 are still occurring and the organisation may be non-compliant with its workplace safety positive duty obligations.

#### *Flexibility and career advancement*

The Commission found that Ambulance Victoria has made limited progress towards implementing the priority recommendations relating to flexible work. During the Progress Evaluation Audit, the Commission heard a strong desire from both operational and non-operational staff for improved workplace flexibility. The Commission consistently heard high levels of workforce dissatisfaction with Ambulance Victoria's slow progress on improving workplace flexibility. Within the areas of flexibility, Ambulance Victoria have made most progress on workplace equality education and training, which is being positively received throughout the organisation.

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### *Leadership and governance*

The Commission was pleased that recommendations relating to leadership and governance at Ambulance Victoria have been implemented at a broad level. Reflective practice appears to be a part of Board and Executive meetings and there is an acknowledgement that reflective practice and progress has been made toward diversification of the board. There is a strong commitment to organisational change, however workforce trust in leadership and in reforms being achieved remains low.

### **Barriers and enablers to workplace equality reform**

Throughout the Progress Evaluation Audit, themes emerged that connected many of the priority recommendations. The Commission identified four current Ambulance Victoria organisational practices or features that are barriers to workplace reform and four current organisational practices or features that enable workplace reform. The Commission believes that considering these barriers and enablers will support Ambulance Victoria to address the intent of the recommendations through the connected implementation of each of the recommendations.

#### *Barriers to workplace equality reform*

- A focus on compliance over intent in change management
- Investment in an identified paramedic archetype
- An inconsistent approach to workplace flexibility
- A rigid structural environment

#### *Enablers of workplace equality reform*

- Enhancing communication
- Building a culture of prevention
- Utilising distributed leadership
- Harnessing workforce commitment

Thank you again for the opportunity to contribute to the Legislative Council's Legal and Social Issues Committee inquiry into Ambulance Victoria. I hope that this letter and the Commission's Review provides helpful insight to the Committee's consideration of the core issues impacting the management and functions of Ambulance Victoria.

Yours sincerely

