

# LEGAL AND CONSTITUTIONAL AFFAIRS LEGISLATION COMMITTEE

## ANSWERS TO QUESTIONS ON NOTICE

Prime Minister and Cabinet  
October 2025

**Department/Agency:** Australian Public Service Commission  
**Inquiry:** Freedom of Information Amendment Bill 2025  
**Topic:** APSC Submission

**Senator:** Senator Jackie Lambie  
**Question reference number:** N/A  
**Type of question:** Written  
**Date set by the committee for the return of answer:** Friday, 24 October 2025

**Number of pages:** 2

### Question:

In the promotion of the need for these changes and through the course of this inquiry, the topic of officials being constrained in their ability to give ‘frank and fearless advice’ has been a significant topic. Furthermore, section 10 of the Public Service Act [the Act] states that the Public Service is “professional”, “trustworthy and acts with integrity”, is “open and accountable to the Australian community” and must always do their best in giving advice. These statements are in effect, claiming that public servants are essentially not complying with the law.

1. When did the Commission become aware of this behaviour?
2. Aside from awaiting a decision about changes proposed by the Bill. What is the Commission doing to remedy this situation?
3. How many APS staff have been counselled or reminded of their obligations under section 10 of the ACT?

### Answer:

1. The independent reports, *Learning from Failure: Why large government policy initiatives have gone so badly wrong in the past and how the chances of success in the future can be improved* published by Professor Peter Shergold AC in 2015, and *Our Public Service Our Future* published by David Thodey AO in 2019, included observations that the operation of the FOI framework has had unintended negative consequences on actual transparency, integrity and record keeping.
2. The Australian Public Service Commissioner’s statutory functions under the *Public Service Act 1999* include the promotion of high standards of accountability, effectiveness, performance, integrity and conduct in the APS. As part of its stewardship role, the Australian Public Service Commission partners with APS agencies to deliver practical initiatives that build and support a pro-integrity culture across the APS.

Bolstering Integrity across the APS is a primary focus within the Government's APS Reform Agenda and the APS Integrity Action Plan: *Louder than Words*. Initiatives under both of these plans contribute to delivering whole of APS transformation by promoting and uplifting integrity across all levels of the public service.

The APS Reform agenda includes 19 initiatives aimed at building an APS that embodies integrity in everything it does. These initiatives collectively contribute to delivering two specific outcomes: 1. that public sector employees act with and champion integrity, and 2. that public service employees are stewards of the public service. Key achievements from across the APS that are contributing to these outcomes include:

1. Adding the new APS value of Stewardship reflecting the important role that all APS employees play in ensuring that the APS serves the Government, the Parliament, and the Australian community, now and into the future.
2. Establishment of the National Anti-Corruption Commission in July 2023, deterring, detecting and preventing corrupt conduct involving Commonwealth public officials.
3. Introducing a new Commonwealth Fraud and Corruption Control Framework from 1 July 2024, introducing requirements for accountable authorities of both non-corporate and corporate Commonwealth entities to take all reasonable measures to prevent, detect and deal with corruption in addition to fraud.
4. Delivering staged reforms of the *Public Interest Disclosure Act 2013* (PID Act) to strengthen protections for public sector whistleblowers and ensure the PID Act is fit for purpose.
5. Delivering, promoting and implementing the SES Performance Leadership Framework which provides an overarching set of requirements that apply across the APS to embed a culture of transparency and accountability for SES Performance.
6. Delivering, promoting and implementing guidance to support the identification and management of actual, potential or perceived conflicts of interests through the APS Conflict of Interest Management Framework.

The APS is also delivering on the *Louder than Words: An APS Integrity Action Plan*, endorsed by the Secretaries Board in November 2023. The Action Plan comprises 15 recommendations and 52 actions to strengthen culture, systems and accountabilities to build a pro-integrity culture.

Some examples of pro-integrity initiatives led or co-led by the APSC – under the APS Reform agenda are the stewardship value, SES Performance Framework, and Conflict of Interest Management Framework. .

3. Counselling or reminding staff of their obligations under the *Public Service Act 1999*, including section 10, is a matter for agencies.

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Prime Minister and Cabinet  
October 2025

**Department/Agency:** Australian Public Service Commission  
**Inquiry:** Freedom of Information Amendment Bill 2025  
**Topic:** APSC Submission

**Senator:** Senator David Pocock  
**Question reference number:** N/A  
**Type of question:** Written  
**Date set by the committee for the return of answer:** Friday, 24 October 2025

**Number of pages:** 2

## **Question:**

Thank you for your appearance at the Legal and Constitutional Affairs Legislation Committee's public hearing into the Freedom of Information Amendment Bill 2025.

Senator David Pocock has placed the following written questions on notice to the Commission:

1. Both the Shergold and Thodey reviews suggested any change of the kind your submission supports should follow a comprehensive inquiry into FOI. Do you agree with that position? If not, why?
2. How do you view the Thodey Review's broader recommendations and the Robodebt Royal Commission's findings about appointment and tenure systems driving subservience? Are these not the real causes of reluctance to give frank and fearless advice?
3. When did you first become aware of the amendments contained in the FOI Amendment Bill? Were you informed by AGD or PM&C?
4. Your submission quotes observations by David Thodey and Peter Shergold about FOI's impact on frank and fearless advice. What evidence supports preferring their views over those of Allan Hawke and Andrew Podger, who have argued differently?
5. Since 1 May 2022, how many code of conduct investigations have there been into SES regarding not providing frank and fearless advice?
6. At 14:05:30 of the hearing ([https://www.aph.gov.au/News\\_and\\_Events/Watch\\_Read\\_Listen/ParlView/video/3984386?startTime=11725](https://www.aph.gov.au/News_and_Events/Watch_Read_Listen/ParlView/video/3984386?startTime=11725)), Ms McIntyre read out a quote from an email. I have been sent a copy of that email. Please provide the email for the benefit of the committee.

## **Answer:**

1. Whether to conduct an inquiry is a matter for government.

2. The Shergold and Thodey reviews contain observations of unintended negative consequences on actual transparency, integrity and record keeping (refer *Independent Review of the APS, 'Our Public Service Our Future'*, led by David Thodey AO, 2019, page 24, page 121; *Learning from Failure: Why large government policy initiatives have gone so badly wrong in the past and how the chances of success in the future can be improved*, led by Professor Peter Shergold AC, 2015). The APSC brings this material to the attention of the Parliament to assist with its consideration of the Bill.
3. The Attorney-General's Department engaged with the APSC in June 2025 in respect of the *Freedom of Information Amendment Bill 2025*.
4. The evidence the APSC provides is to assist the Parliament in its consideration of the Bill. The APSC's evidence by reference to the Shergold and Thodey reviews is focused on the proposed amendment to the deliberative exemption.
5. Departments and agencies are each responsible for their own code of conduct investigations, including investigations into SES staff.

The APS Commissioner's functions in this regard are limited. In the Commissioner's functions case load since 1 May 2022, 8 SES officers were alleged in Notices of Suspected Breach to have failed to provide frank advice or provided misleading advice that was alleged to breach the Code with respect to the APS Value, Impartial (section 10(5) of the Act).

In relation to the APSC as an agency, there are no records of code of conduct investigations of this type.

6. The APSC is not in possession of a copy of the email. The document that Ms McIntyre read contains a quote. This document is attached.





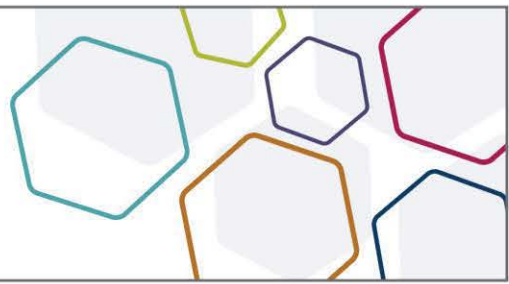
## Attachment A – examples

### Behaviours:

- Sending repeated emails to Agency staff of an inappropriate and harassing nature, including communication which has contained sexually explicit allegations;
- Posting personal information, including photographs, of Agency staff and their children on a publicly available blog, in posts that appear to be designed to distress and 'dox' them;
- Seeking out family members of Agency staff on social media; and
- Threatening to, and actually attending, Agency events, and Agency offices;
- Partner of a staff member found threatening notes in their private residence letterbox. These notes identified that the writer was aware that there were children in the staff member's family
- A staff member received call from an FOI applicant who claimed that the staff member, and the processing of the FOI request, has caused the applicant to become suicidal. The applicant proceeded to ask the officer whether they 'wanted him to kill himself' repeatedly.
- Online stalking staff members and raising aspects of their private lives in future requests

### Use of names

- After making an FOI request, and receiving the Agency's standard acknowledgement (containing the first name of the FOI Coordinator, and the team standard signature block, including a contact number) an FOI applicant used the signature block to send doctored emails to a large number of recipients including various Commonwealth and State agencies, and media outlets making it appear as though the Agency (and specifically the named FOI Coordinator) was endorsing the individuals' complaint, and instructing other entities to take action in response. The named staff member



received a number of calls from recipients of the doctored email, asking questions about the ‘tasking’ causing unnecessary stress and anxiety

- FOI team employees have received correspondence from the Applicant direct to their individual email account or addressed to them using their last names where they have never been provided in a manner designed to intimidate the FOI officer
- Searching for details of an Agency staff members’ previous employment on the internet and through Australian Public Service gazette and then submitting an FOI request for documents relating to their job application
- Applicant has proceeded to submit further access requests and make privacy complaints that specifically name and target Agency employees who have been involved with matters. Specifically named and targeted Agency employees in approximately 70 access actions
- Stalking staff on social media platforms and undertaking extensive internet searching to find information decades old on the internet about staff members;
- Using metadata in documents to send emails direct to staff where they have not provided their last name
- Release of Agency staff member’s name into the public, the staff member became the target of hate emails. This resulted in the staff member’s personal information being published on websites, including a partially pixelated photo of the staff member, address and Google maps images of their home. As a result, security assessments of the home were undertaken, the staff member, partner and children were briefed by the Australian Federal Police and a security system with a back-to-base alarm was installed in their home. Further investigations were conducted in relation to the pixelated photo published on the website, revealing it was a photo of the staff member and children on a family holiday

#### **Making anonymous/ pseudonymous requests**

- Have lodged FOI requests using names of FOI officers or their family members (including deceased family members)



## Threats

- *"I now have the name of one of your hateful practitioners and with this, Agency can no longer protect these individuals from accountability"*
- *"You on the other hand have a lot to lose, therefore I recommend that you start preparing";*
- *"The reality is, I can personally name every bloody individual without risk of defamation or any other undesirable consequence."*

## Harassing statements:

- *"Just because your feelings are hurt doesn't absolve you of your legislated obligations. I could (not that I would do this, this is not a threat I would not do this, I'm just trying to explain the concept) come around and stab any one of you, and you would still have to action my claim as per the legislation. Being offended, or getting stabbed or anything like this is not a reason to fail to perform your duties."*
- *"What you are doing here is attempting to play silly games with me. Do you really want to start playing games with me? I would not advise it, but if you want to play games with me, I can do something like make the scope 1 week, and then put in 12 FOI requests all 1 single week each, and you are forced to treat each FOI separately as each covers a different date range. There is no limit to the number of FOI requests I can put in, so if you want to start playing games with me then continue down this path that you are heading and games we shall play. You will be constantly fulfilling FOI requests from me, for the rest of your life, if you want to start playing games with me"*
- *"your reasons are self-serving unsubstantiated assertions"*
- *"It is plain stupid of you..."*
- *"Your sheer disregard to these statutory provisions also warrants your sacking"*
- *"I will not be intimidated by a dud public servant..."*



- *"...you are another failed lawyer who could not practice the profession but took sanctuary at the Australian public service as an easy way out"*
- *"...a classic case of dud leading duds or the blind leading the blind"*
- *"Please pass on my very best regards to your Head Clinical Panel Gimp..."*
- *"I ask that the OAIC review this performance for what it is, and it is the work of a malicious twit employed by Agency FOI".*

***Insults (profanity)***

- *"If you don't like the way I am communicating with you, then go and bitch to the AFP"*
- *"I will not accept any further Bullshit from you bunch of dickheads",*
- *"...give me the fucking documents sought without any of the FOI Bullshit";*
- *"Thanks Shitforbrains"*
- *And yes I say some rude things to you and I have zero concerns about it, you deserve it 100% you are a c\*\*\* and I stand by what I am saying to you.*
- *Fk my dog, you are so thick, I cannot believe it, I would get a better response sending emails addressed to a brick wall. What a dunce.*

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Prime Minister and Cabinet  
October 2025

**Department/Agency:** Australian Public Service Commission  
**Inquiry:** Freedom of Information Amendment Bill 2025  
**Topic:** APSC Submission

**Senator:** Julie Collins  
**Question reference number:** N/A  
**Type of question:** Hansard Page 25  
**Date set by the committee for the return of answer:** Friday 24 October 2025

**Number of pages:** 1

### **Question:**

Senator COLLINS: One of the Public Service values is impartiality, which requires public servants to give frank, fearless and evidence based advice. Is it fair to say that if a public servant is not giving frank, fearless and evidence based advice they're not complying with their statutory obligations?

Dr Bacon: That's correct. It is the duty of public servants, as you say, to provide frank and evidence based advice, and that is set out in section 10(5) of the Public Service Act. It's clear from the legislation that when those duties are not met and when the values are not followed and complied with by public servants then consequences do flow from that. They can be consequences in the form, for example, of performance processes and performance management. They can also be consequences that take the form of code-of-conduct processes that are also set out in the legislation.

Senator COLLINS: Are you aware of any instances of this occurring as a result of FOI?

Dr Bacon: We'd need to take that on notice, I think.

Senator COLLINS: Thank you. Also, if any disciplinary or administrative actions were taken in relation to the failure of those public servants to comply with their obligations, that would be great. Thank you.

Dr Bacon: The one thing that I would clarify is that, under the Public Service Act, agency heads essentially set up code-of-conduct processes and policies within their own departments and agencies. The thing we would be able to provide you with on notice is whether any of the commission's case load, which is a certain smaller subset of matters across the Australian Public Service that focus, for example, on agency heads—we'd be able to provide you with that information on notice and take a look at that. Other departments and agencies would be better placed to provide you with information in relation to their case loads.

### **Answer:**

Nil cases in the APSC's case load records including the Commissioner's functions case load, have alleged a breach of the Code of Conduct for failure to provide frank advice because of concerns regarding FOI obligations.

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October 2025

**Department/Agency:** Australian Public Service Commission  
**Inquiry:** Freedom of Information Amendment Bill 2025  
**Topic:** APSC Submission

**Senator:** Senator David Shoebridge

**Question reference number:** N/A

**Type of question:** Spoken

**Date set by the committee for the return of answer:** Friday, 24 October 2025

**Number of pages:** 10

## **Question:**

Senator SHOEBRIDGE: Where is any of this in your submission? All you put in writing to this committee, to support changes to FOI that are pretty much uniformly opposed in civil society are statements such as the one on page 4 where you say that robodebt highlights that 'the current exemptions for deliberative material have made it harder for public servants do that their duty, and the consequences of avoiding written voice about serious risks in the robodebt and the home insulation royal commission reports.' I've put it to you most people who have a fair reading of the royal commission would not support your conclusion on the robodebt royal commission, but where is it in your submission that you point to these other efforts to actually deal with those integrity issues so that we can have a proper balanced view of what's going on in the public service? Surely your job is to give this committee a balanced view, and I don't see it here.

CHAIR: Thank you, Senator Shoebridge, that was your final question.

Dr Bacon: I'd be very happy to provide that information on notice. Thanks, Chair.

Senator SHOEBRIDGE: No, Chair—the question was: why wasn't it provided? Your obligation is to assist this committee and to, I would have thought, provide frank and fearless advice to this committee as much as anything else. So why did we not get any of that material, and why did we only get one side of the argument when you had all that material to hand when I simply asked the question? Can you explain that?

Dr Bacon: We've focused on the particular provisions in the bill that we understood were the focus of this committee. We're very happy to provide further detail of the type I've described and more on notice so that the committee has access to all of that information.

## **Answer:**

The Australian Public Service Commissioner's statutory functions under the *Public Service Act 1999* include the promotion of high standards of accountability, effectiveness, performance, integrity and conduct in the APS. As part of its stewardship role, the Australian Public Service Commission partners with APS agencies to deliver practical initiatives that build and support a pro-integrity culture across the APS.



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- Adding the new APS value of Stewardship reflecting the important role that all APS employees play in ensuring that the APS serves the Government, the Parliament, and the Australian community, now and into the future.
- Establishment of the National Anti-Corruption Commission in July 2023, deterring, detecting and preventing corrupt conduct involving Commonwealth public officials.
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The APS is also delivering on the *Louder than Words: An APS Integrity Action Plan*, endorsed by the Secretaries Board in November 2023. The Action Plan comprises 15 recommendation and 52 actions to strengthen culture, systems and accountabilities to build a pro-integrity culture.

Listed below are some examples of pro-integrity initiatives led or co-led by the APSC – under the APS Reform agenda including the stewardship value, SES Performance Framework, and Conflict of Interest Management Framework; and also as part of the Commissioner's functions.

### Psychological safety and speak up culture

### [Workforce Strategies]

Background:

- In February 2023, the APS Integrity Taskforce was established against the backdrop of the Royal Commission into the Robodebt Scheme. The Taskforce's [\*Louder than Words: An APS Integrity Action Plan\*](#) made a number of recommendations aimed at bolstering the capability of the APS to lead with integrity, with recommendation 4 focussing specifically on ethical decision making and fostering psychological safety.



- The Secretaries Board agreed to this recommendation in November 2023, and asked the Capability and Workforce Committee to oversee a project to develop a whole-of-APS approach to building psychological safety.
- The project commenced in early 2024 and concluded with the release of new, non-mandatory guidance in May 2025 to help APS employees, managers and leaders build a speak up culture.

#### Key messages:

- [Speak up culture in the APS](#) is based on the academic definition of psychological safety: “*the belief that one will not be punished or humiliated for speaking up with ideas, questions, concerns or mistakes, and the team is safe for interpersonal risk taking.*” (Amy Edmondson, 1999).
- Building speak up culture is essential to embedding integrity in the APS, and delivers a range of other benefits for individuals, teams and the APS, including:
  - improved ethical decision making
  - enhanced innovation and teamwork
  - increased employee engagement and performance.
- There are 4 key practices to build speak up culture in the APS:
  - Listen with **compassion**
  - Act with **courage**
  - Speak with **candour**
  - Show **curiosity**
- Guidance is available through the APS Academy to help all APS employees, managers and leaders build speak up culture. The materials include:
  - introductory guidance to help all APS employees, managers and leaders understand the importance of speak up culture, how it contributes to a culture of integrity, and practical actions they can take to help build and sustain it
  - a manager playbook that guides managers at all levels through the essential principles and actionable steps to build speak up culture in their teams.
- The 2025 APS Employee Census included new questions to measure psychological safety/speak up culture. Census data was released to APS agencies in August 2025 and provides agencies with an opportunity to establish a baseline and monitor change over time.



- The project was devised in response to recommendations from the *Independent Review of the Australian Public Service* (Thodey, 2019).
- The SES Skills Lab and Mentoring Program is led and delivered by the APS Mental Health and Suicide Prevention Unit within the APSC.

Key messages:

- The project utilised the Unit's existing paradigm, the 6R Relational Leadership Capabilities Self-Reflection Tool, to design a skills-based model of learning that would embed psychologically safe leadership behaviours in SES Staff (Band 1-3).
- Building relational leadership capabilities in our APS SES leaders supports the APS value of Stewardship, reinforces a pro-integrity culture, strengthens psychosocial safety, and encourages high performing teams.
- The Skills Lab and Mentoring sessions use a reflective practice approach and leverage peer-based learning, creating networks of senior leaders who can support each other to sustainability implement relational leadership and better enable psychological safety across the APS.
- The 6Rs comprise self-regulation and reflection as the foundation to relatability, reciprocity, repair and reliability.

APS Academy Integrity capability products

[APS Craft & Learning]

**SES Integrity Masterclass – 2025 course refresh**

The *Louder than words: An ASP Action plan* report recommended Secretaries support all their SES to undertake the *SES Integrity Masterclass*. The *SES Integrity Masterclass* is aimed at providing SES leaders with access to current thinking and practical applications towards embedding pro-Integrity cultures across the APS. Given the speed of change in the APS integrity ecosystems, the APS Academy updated the design, structure and resources of the course to ensure SES audiences continue to be exposed to the most up to date content, and current integrity thinking. An improved version of the course was implemented in January 2025 following extensive consultation with APS Academy Faculty, representatives from APS integrity agencies and experienced practitioners.

Adopting a flipped learning model prepares participants to fully engage in peer-to-peer discussion during the facilitated workshop. At enrolment participants are provided with an interactive digital handbook and a recorded panel discussion to engage with in their own time. The resources provide an engaging, modern experience that covers integrity issues, the role of leaders, integrity frameworks, case studies and provides opportunity for self-reflection. The resources are available for participants to continue to engage with after the course.

By working through the resources learners are better prepared for the facilitated, discussion-based workshop. The workshop uses multiple contemporary case studies and provides opportunity to discuss realistic situations and learn from the experiences of peers. This is a regularly reported highlight for SES course participants.

Although the *SES Integrity Masterclass* was already a highly respected learning opportunity, its recent changes have ensured that the significant number of SES completing it are actively engaged in the content, gaining exposure to current integrity issues in a safe way (therefore building their muscle memory) and providing a common experience within and across agencies.

### **APS Foundations – Integrity in the APS**

At the Foundational level, the APS Academy provides the *APS Foundations: Integrity in the APS* eLearning course to inform employees of their responsibilities in maintaining integrity and the associated legal frameworks. This course meets the obligations under the *Australian Public Service Commissioner's Directions 2022* for all APS employees to complete mandatory integrity training.

### **Other Integrity activity supported by the APS Academy**

In addition:

- There is integrity content included in the Graduate Development Programs and integrity is a significant focus for APS Leadership Programs. EL2 Leadership Edge and SES immersive leadership programs provided by the Academy, as well as the recently developed SES welcome sessions.
- The expectations of our leaders are enshrined in legislation, including the APS Values.
  - Codified in Secretaries Charter of Behaviours – **DRIVE**.
  - Capabilities described in the APS Capability Framework endorsed by Secretaries Board – **VICEED**.
- Together with the *SES Performance Leadership Framework*, the values, behaviours, and capabilities articulate the expectations of our SES leaders and are embedded in Academy leadership programs.
- Each program has a specific audience and emphasis, which have been created following deep engagement with APS leadership practitioners, consideration of the APS reform agenda requirements and consideration of practices beyond the APS in other sectors and jurisdictions. The programs are:
  - **Graduates** – Event series focusing on integrity.
  - **Leadership Edge** – a social learning at scale program and community across 11 months for EL2s with one of the four learning sprints dedicated to leading with integrity and another on live learning event on psychological safety, critical to creating an environment where people feel safe to raise concerns.
  - **SES Orientation** – for new SES leaders provided over 3 months to establish expectations of SES with emphasis on legislative responsibilities, impartiality, accountability, ethics, integrity and enabling leadership. A specific section on APS Accountabilities and Decision Making including the APS Act and PGPA accountabilities is included:



- **SES Band 1** – Provided over 6 months with an emphasis on self-awareness and valuing others, collaboration, enabling and influencing capabilities – all critical to SES leaders creating the workplace cultures where integrity can flourish.
- **SES Band 2** – The program focuses on fostering integrity across the APS system to better serve our community. It has an emphasis on respect and commitment to serving others, enabling and entrepreneurial capabilities and is run in partnership with Cranlana Centre for Ethical Leadership.
- **SES Band 3 (Senior Executive Program)** – The most senior program of the suite has an emphasis on systems leadership, stewardship and the dynamism to lead and empower at scale, and collective leadership
- **SES Integrity** – The Academy also offers a 3-part program specifically designed to support SES to strengthen integrity cultures within their organisation as well foundational elearning for new starters and information about the NACC and access to ATO's gamifies integrity learning.

#### Deputy Secretary Talent Council

#### [Leadership & Talent Development]

In addition the APSC SES Talent programs overseen by Talent Council and offered to high potential Band 1 and Band 2s and all Band 3 involve rigorous and objective assessment and the opportunity for deep self-reflection and understanding of their leadership.

- All critical to psychologically safe, effective, ethical and productive workplaces.

The cross-SES Talent Councils have taken a proactive approach to supporting leaders to build pro-integrity cultures. In 2023-24 the Councils added an additional coaching instrument to their assessments designed to provide participants with insight into behaviours that can emerge under pressure, including those that may have an impact on integrity. Participants work with a coach to understand the results and identify thinking patterns that drive their behaviour and develop strategies ahead of time that can be deployed when under pressure. These conversations continue at regular intervals with a coach and with more senior APS leaders to support a continued focus on pro-integrity behaviours.

#### Recent Integrity scores in the APS Employee Census

#### [People Insights]

The APS Employee Census is an annual employee perception survey of the APS workforce. All eligible personnel employed under the *Public Service Act 1999* are invited to participate. The APS Employee Census has been conducted since 2012 and collects APS employee opinions and perspectives on a range of topics, including employee engagement, wellbeing, leadership and general impressions of the APS.

The APS Employee Census has a range of measures supporting a pro-integrity culture across the APS. Results from the most recent survey conducted between May and June 2025 illustrate the utility of this information to better understanding integrity within the APS.

An increased proportion of respondents in 2025 agreed that the culture in their agency supports people to act with integrity (**81% in 2025; 77% in 2024**) and said they felt supported to use their expertise to provide frank and fearless advice (**70% in 2025; 65% in**



2024). Just over three-quarters of respondents in 2025 and 2024 agreed the people in their workgroup demonstrate stewardship (77% in 2025; 77% in 2024).

To further work supporting a pro-integrity culture, the 2025 APS Employee Census included questions for measuring psychological safety. The results have supported the APS and agencies to monitor and build a speak up culture. In 2025:

- 89% of respondents agreed people in their workgroup are comfortable checking with each other if they have questions about the right way to do something.
- 83% agreed people in their workgroup value others' individual skills and talents.
- 80% people agreed people in their workgroup are able to bring up problems and tough issues.
- 67% disagreed that if they made a mistake in their workgroup, it tended to be held against them.

In addition to the above results, the APS Employee Census asks employees about their experiences of unacceptable behaviours.

In 2025, 2.0% of respondents said that, during the previous 12 months, they had observed a public official engaging in conduct within their agency that they considered to be corruption. The definition of corruption and corruption-related questions in the 2025 APS Employee Census were revised to align with the *National Anti-Corruption Commission Act 2022* and the Commonwealth Fraud and Corruption Control Framework. Applying the previous definition of corruption, 3.1% of respondents in 2024 had witnessed another employee engage in potentially corrupt behaviour.

The proportion of respondents perceiving experiences of discrimination declined to 8.4% in 2025. This proportion is at the lowest levels since the beginning of the APS Employee Census in 2012. In 2024, 10.0% of respondents had perceived discrimination.

The proportion of respondents perceiving experiences of bullying and harassment is also declined to the lowest level since 2012. In 2025, 9.5% of respondents said they had experienced bullying and harassment. This proportion was 10.5% in 2024.

#### Stewardship as an APS Value

#### [Integrity, Performance & Employment Policy]

On 11 December 2024, the new APS Value of Stewardship under the PS Act commenced to reflect the vital role that all APS employees play in ensuring that the APS serves the Government, the Parliament and the Australian community now and into the future. The PS Act has been amended at subsection 10(6) to provide that: *The APS builds its capability and institutional knowledge, and supports the public interest now and into the future, by understanding the long term impacts of what it does.*

The *Australian Public Service Commissioner's Directions 2022* also set out the scope and application of the APS Values, including Stewardship at section 17A. Under the Directions, demonstrating Stewardship requires the following, having regard to an employee's duties and responsibilities:



- a. having proper regard to known and reasonably foreseeable implications of advice, decisions, and other actions
- b. having proper regard to Agency goals and responsibilities and the way in which the individual's work contributes to the achievement of those goals and responsibilities
- c. supporting and contributing to a workplace culture that sustains core knowledge, expertise, and standards of professionalism to deliver intended results with integrity
- d. reflecting on and learning from past experience and institutional knowledge, including through robust evaluation, to inform operations, advice, and decisions
- e. ensuring complete, accurate, and appropriately accessible record keeping of key actions and decisions
- f. representing the Agency and the APS in a way that maintains trust and confidence in the integrity and professionalism of the APS.

In practice, the ways in which APS employees demonstrate these behaviours will depend on a range of factors, including: their job type (e.g. whether they are in a policy, regulatory, service delivery, or program role); the particular duties of their position; their skills and experience; the extent of their supervisory, management, or leadership responsibilities; the extent of their engagement with external stakeholders; and their seniority.

The APSC's guidance, published in advance of the Value's commencement in October 2024, outlines each of the requirements of the Directions on Stewardship and provides further interpretation, advice, and case studies on the application of the Value across the APS.

#### Conflict of Interest

#### [Integrity, Performance & Employment Policy]

The APSC has partnered with a range of agencies across the Commonwealth to develop the *APS Conflict of Interest Management Framework* published on 9 September 2025, including a Better Practice Model, in response to recommendations of the *Louder than Words: An Integrity Action Plan* report and recent Parliamentary inquiries. The Framework is a comprehensive suite of guidance and practical tools to support agencies and employees to identify and manage potential conflict of interest risks, including those which may arise after separation from APS employment.

The Better Practice Model provides operational guidance and practical information to support APS agencies to implement consistent and effective conflict of interest processes and policy arrangements for their employees, by establishing a spectrum of practice expectations via tangible and practical requirements, tailored to the nature of each agency's responsibilities and risk appetite. The Model is complemented by separate but integrated guidance for all Commonwealth public sector officials developed by the Department of Finance and the National Anti-Corruption Commission in relation to their respective resource management policy and corruption prevention education remits. Together the 3 key resources establish Commonwealth public sector-wide policy and operational expectations as a principles-based Framework.



## Performance Frameworks

## [Integrity, Performance & Employment Policy]

The initiative to strengthen behaviour and outcomes-based performance management establishes an overarching set of requirements all APS agencies must adopt to strengthen behaviour and outcomes-based performance management. The initiative was designed to embed a culture of transparency and accountability for performance by delivering an *SES Performance Leadership Framework* which was launched in August 2023 and APS agencies are required to fully implement the Framework by 2025. A *Non-SES Performance Framework* is being developed and subject to approval will be published by the end of 2025. These frameworks will build consistency across the APS, and provide assistance to managers to meet the formal requirement that behaviours must be considered equally with outcomes. It reinforces the standards of behaviour expected of APS leaders, as expressed through the APS Values and the *Secretaries Charter of Leadership Behaviours*. The increased emphasis on workplace behaviour supports psychological safety in the APS which is a key foundation to establishing a speak up culture where integrity concerns can be raised early.

## Changes to Regulations

## [Integrity, Performance & Employment Policy]

The APSC made amendments to the *Public Service Regulations 2023* in 2024. These were significant amendments designed to support a pro-integrity culture in recruitment. The changes amended the framework within which the Merit Protection Commissioner (MPC) undertakes promotion reviews to consider whether the entire selection process was merit-based, rather than only considering decisions to engage or promote individual candidates. The changes also create ‘own motion’ powers for the MPC to enable audit and investigation of agencies’ hiring practices. These amendments will create greater transparency of agency recruitment practices, strengthen service-wide regulation of agencies compliance with the merit principle and provide sustained opportunities to educate and uplift recruitment practices across the APS.

## APSC 200 event series

## [Engagement & Communications]

The APS200 is a leadership community that brings together the most senior leaders from across the APS to strengthen collaboration, capability, and integrity at the highest levels of public administration. By connecting leaders who play a pivotal role in shaping culture and driving transformation, the APS200 fosters a shared commitment to ethical leadership and accountability.

Through its focus on stewardship and collective responsibility, the APS200 reinforces integrity as core to the APS. Regular events strengthen collective leadership and helps embed integrity as key a driver of an effective and trusted public service.

Events facilitate open discussion of cross-APS issues and priorities, foster transparency, collaboration and a shared commitment to excellence in public administration. This proactive engagement among senior leaders reinforces a culture where integrity, professionalism and high performance are consistently demonstrated and expected throughout the APS.



The APSC State of the Service Roadshow events bring the latest insights from the annual *State of the Service Report* directly to APS employees and leaders across the country. These sessions provide a valuable opportunity to discuss the performance, challenges, and future direction of the APS — including workforce trends, reform priorities, and examples of innovation and collaboration. By engaging staff at all levels, the roadshows create a shared understanding of how the APS is evolving to better serve the Australian community and uphold the values that define public service.

Travelling nationwide, and livestreamed across the country, the Roadshow ensures that public servants—regardless of location—can connect with senior decision-makers, ask questions, and contribute to discussions on improvement and reform. This open dialogue strengthens trust, shared accountability and a culture of continuous improvement across the APS.

These events also play an important role in strengthening public service integrity. By openly sharing data, lessons, and progress, the APSC reinforces transparency and accountability. Frank and honest conversations at the roadshows help leaders and employees reflect on their role in maintaining integrity through their everyday work, decision-making, and stewardship responsibilities. In doing so, the State of the Service Roadshow supports a culture where integrity is not only understood, but actively lived across the APS.

By sharing insights from the annual *State of the Service Report* and APS Employee Census, the Roadshow encourages transparency around performance and priorities and reinforces a collective understanding