PSA Feedback to the Environment Protection Authority Change Management Plan

General

- With the reduction in staff, which tasks and functions will be stopped?
- Impacted staff are disproportionately women
- Current timeframe has internal matching process to begin by 4 December. Will this timeframe be adjusted to allow for the full consideration of feedback?
- There is a broad perception that the SES Band were largely spared from the impacts of these changes.
- In the change management plan, it is stated that there is a reduction in senior executive roles from 33 to 27. However, the pre-restructure org charts provided by the EPA only show 4 delimited director positions and 1 newly created director giving a net reduction of only 3. Is the EPA non-compliant with the Government's 15% reduction of senior executives?
- 4.1 The change management plan does not discuss how these requirements have been met;
- 4.2 Information about Ministerial approval is not contained;
- 4.2 Sections 6.8 to 6.10 mentions these groups, but it does not provide information about the impacts. It just states impacts have been considered and additional support will be provided;

Rationale

- The restructure is inconsistent with earlier reviews highlighting the need for additional Unit Heads in the Operations Division. The rationale for these changes in light of reviews outlining the need for additional staffing for the EPA to function effectively and efficiently.

Staff Wellbeing

- PSA members have identified the communication by the EPA throughout the consultation period as unclear, confusing and at times misleading. The PSA notes some of these concerns have been raised with and addressed by the Executive through the consultation process to clarify communications.
- EPA Town hall meetings relating to the change were not recorded, excluding staff who were on leave from being able to listen directly to the announcement after the fact.
- Common feelings expressed were humiliation, devastated, angry, hurt.
- there is loss of morale being felt in the EPA in general. There has been a general disheartenment caused by the shock of job cuts. In particular, the reason for the wholesale deletion of EO12 positions is difficult to understand given the importance of this role and the level of experience held by the staff who have been affected.

4.3 Summary Changes to Operating Model

- Some positions appear in this summary table (Sr Admin Officer Level 8, Divisional Coordination SPP at bottom of pg20) but not in the proposed Organisational Chart, others appear in the proposed structure but not in the change management plan (Principal Partner Learning & Capability EO11 and Senior Talent Partner EO10)

6.5 Proposed Means for Filling Roles

- The opportunity to apply for promotional opportunities should be open to all staff where there are more roles than individuals at grade to fill them, not just directly impacted staff. For example all EO12s should have the opportunity to apply for newly created EO14s, not only the directly impacted EO12s, and any vacancies created by that process could in turn be filled with directly impacted EO12s. The same process should apply at each grade where there are additional roles. This would allow the EPA to reduce the impact and retain more staff.
- There is typically a hiring and advertising freeze prior to the Government shutdown period. The pause of the Mobility Program should reflect this freeze and not just the shutdown period
- The Workplace Mobility Policy implies that capability matching is a 'desktop' process, no EOIs, no interviews etc. If the WMP process is applied concurrently to Steps 2 - 4 it creates the perverse outcome of some employees getting matched in a simple desktop process, but others have to go through an EOI, or application + interview,

Alternatives

- Circular Economy has largely been 'ring-fenced' through this restructure. The regulation of greenhouse gases aligns with the broader regulatory functions of the EPA, however much of the remaining functions of the Circular Economy branch could be adopted by DCCEEW to be funded more securely to deliver on Government commitments to those programs and allow the EPA to focus on its core regulatory mission.

Branch Specific

Operations

- The reduction of EO3 and EO4 Admin staff in Operations will increase the burden of admin work on operations staff, countering the stated intention of centralising licensing and assessment functions. These staff are critical to the functioning of Operations
- Typical span of control across the public seector for directors is 5-7
- Ways of Working in 2024 identified the need and funding available for additional Unit Heads, what has happened in the approximately 18 months
- In Operations, in most Field Operations branches and the Operational Coordination Branch, you have the teams, with high highest grade being a Senior Field Operations Officer grade 10, reporting to a Manager Field Operations Grade 14, with the unit heads gone. In the Western Field Operations branch there are Compliance Program Coordinators reporting to the Managers, but the coordinators do not have direct reports in their role descriptions (RDs).
- Other areas have retained a unit head grade between non-management staff and the manager grade, e.g.:
    - In Corporate affairs there are two leads reporting to the Manager Campaigns and Creative. Both of these leads have direct reports. This is similar for many other Engagement teams
    - In the Circular Economy Branch in Policy, there are Policy Leads that report directly to a Manager. These Policy leads have direct reports in their role descriptions. In this structure you have only one unit head reporting to one manager (as below)
- The proposed structure for the OCU will reduce its ability to manage workload, which will subsequently need to be managed by EO10 and EO14 in the absence of EO 12 role.

- If the EO12 role will not be reinserted into the team, the duplicate EO8 and EO10 roles in the current structure need to be retained. This will address the anticipated increase in workload and provide redundancy for leave periods.
- Removal of the EO12 will create a heavy reliance on the single EO10 and EO8 and increased workload for less experienced officers. The new structure will make it difficult for EO 8 and EO 10 to take leave due to increased workload and no alternative EO10 or EO8. There is a significant risk of overload and burnout to officers in the EO8 and EO10 positions.
- Acting up assignments and career progression - there is no clear role progression for the EO10 position with the removal of the EO12 from the structure. Acting up roles will be diminished for lower grades, for example it is difficult to see the EO10 jumping grades to act in the EO 14 role as manager.
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Strategy & policy

- ESD Branch is not adequately represented in the restructure process as there is no ongoing Director or ED in place. The siloing of the Circular Economy Branch within both the current and proposed new EPA structure reflects the lack of integration of this work with the rest of the EPA
- The ESD Branch maintains and reforms many of the legislative frameworks that EPA is charged with administering, including contaminated land, pesticides, industrial chemicals (including IChEMS and PFAS), dangerous goods transport, radiation. protection, noise and water. ESD is being slashed from 18 to 5 positions, none of which are clearly identified in the new structure.
- The proposed changes don't take account of the loss of statutory functions provided by ESD or the value of its individuals' collective specialised knowledge and experience. Acquired over many years, this knowledge and experience has served the EPA well to demonstrate leadership in Government and national forums, in responding to environmental threats and establishing proportionate evidence-based environmental standards.

Container Deposit Scheme

- Is CDS work externally funded and if so, why are positions in this team being cut while the program is being expanded?