




Department of the Prime Minister and Cabinet

November 24, 2021

Dear 

 appreciates the opportunity to provide feedback on the Commonwealth's Review of the *Workplace Gender Equality Act 2012*.

For background, 

We employ around 1400 people nationally in a mix of office based support and administrative, customer facing and operational roles. While there is always more to do, we are proud of our efforts and focus on diversity and inclusion as well as our industry leading policies to support gender equality in the workplace. We set gender and pay gap targets, offer leading policies such as our superannuation policy, offer flexible working opportunities, provide inclusive leadership training, engage our staff on topics of gender equality, and measure progress via staff surveys.

We are therefore pleased to provide the following responses on the questions posed in the Review paper.

- 1. Are the functions and powers of WGEA appropriate for promoting and improving gender equality in the workplace? How effective is WGEA in achieving its functions to promote and improve gender equality in the workplace including by enabling relevant employers to report on the gender equality indicators, developing benchmarks and reports, undertaking research, education and leading practice programs and contributing to the public discussion on gender equality?*

Significant advances still need to be made in gender equality and the WGEA is critical to creating accountability and consistency, and educating workplaces.

While the benchmarking, research and education that is made available is useful for a senior or human resources audience, some more practical programs/toolkits to help educate and influence supervisors and team members at the frontline would be welcome. Our workplace has a high proportion of operational, technical and engineering based roles and as such is predominantly male dominated. Having readily accessible tools on current topics to upskill our workforce on improving gender equality would help to influence mindsets.

Like other organisations in similar male dominated industries, attracting women into non-traditional roles is an ongoing challenge, and is not improving quickly enough. Having the support and expertise of WGEA to tackle or incentivize these relevant challenges in a strategic way would help with gender equality on many fronts. For example, partnering with workplaces to improve the participation of women in STEM, programs to enable more structured female apprenticeship/trainee partnerships with industry.





Reporting on gender equality indicators is needed as part of holding organisations accountable, however to make a real difference it needs to be valued as a lever for change, rather than just a compliance exercise. More confidence is needed that the effort involved in reporting is translating to creating environments which supports gender equality (see response to Q6).

2. *What is your experience of what works to improve gender equality in your workplace? How do you currently engage with WGEA and use the reporting process and their resources to improve gender equality? What changes, if any, would you like to see in the areas of future focus for WGEA to further promote and improve gender equality over the next ten years?*

We have tackled gender equality in a number of ways and they have all played a part in improving the diversity of our workplace – our CEO leads from the top, we set gender and pay gap targets, offer leading policies, provide flexible working opportunities, provide inclusive leadership training, staff engagements on topics of gender equality, and measure progress via staff surveys.

Our interaction with WGEA is via the compliance reporting process and as a holder of the EOCGE citation. Having targets set as a result of our EOCGE citation has helped us keep focus on improving gender representation and our pay gap. However, given we already have a strong focus on gender equality, and a small People & Culture team, the time and effort that is required to submit WGEA data is viewed as excessive and a compliance exercise rather than value adding. Being engaged on the outcomes of the data, and the specific impacts and actions for our organisation would help us progress our gender equality agenda in a more targeted and impactful way.

████████████████████ and fully support progressing gender equality, however the requirements are becoming increasingly onerous. While we have had some success via setting gender targets, they need to be in line with our broader diversity strategy to get business buy in. Having the opportunity to agree the areas we want to target with WGEA, and the flexibility to tailor them to our business needs would allow for greater progress. It would also mean effort would be spent where it's most needed. Some requirements of EOCGE involve cost (eg. increasing secondary carer leave) and while we support the sentiment, the investment may be better spent elsewhere if the overall needs of the organisation were considered holistically. Other requirements are applied broadly and could be counter-intuitive to our strategy, for example being asked to increase men in clerical roles will ultimately be positive for gender equality, but it has a negative impact on our more immediate need to improve gender representation overall.

We also use the Competitor Analysis Benchmark report to review our performance against competitors. This data is useful, however the time lag between providing our company data and receiving the report means data becomes out of date quickly and makes it complicated to compare the same data over long timeframes when our organisational structures change regularly.

In terms of future areas of focus, improving the representation of women in non- traditional roles (see Q1), highlighting the role of organisations in supporting victims of domestic and family violence, and the role of men as carers are key to our diversity agenda. Policy work is where we see WGEA plays a key role in influencing organisations to get traction, for example the outcomes of the Respect@work report will make a material difference to the treatment of women in the workplace across all organisations and improve the experience at work for both women and men.

3. *Should the coverage of the Workplace Gender Equality Act be further changed? Specifically, should the definition of 'relevant employer' be expanded? If so, would additional considerations need to be factored in for new reporting employers?*

████████████████████ has no comment to make on these questions.

4. *Are the gender equality indicators (GEIs) in the Workplace Gender Equality Act, and the data collected with respect to the GEIs, appropriate to promote and improve gender equality? How could they be improved?*

The GEIs are appropriate, however system constraints in our workplace mean significant effort is required to analyse and manipulate data to meet requirements. Also having limited opportunity to contextualise the data makes it difficult to provide the full picture. As a result, the activity is viewed as transactional. A simpler, more streamlined reporting process would be welcome.

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5. *In addition to gender, should WGEA collect other data on diversity and inclusion criteria on a mandatory basis, to enable a more nuanced analysis of men and women's experiences in the workplace? If yes, please specify criteria (eg cultural and linguistic diversity, disability, age, location of primary workplace). If not, why not?*

While it may be useful to understand nuances, it would depend on the objectives, how the information is planned to be used, the effort required to provide the data and whether it is in line with an organisation's diversity journey. Given the nature of our business we have primarily concentrated on improving gender diversity over recent years and have only just begun to expand our diversity agenda. At this point in time we would not be able to provide meaningful data in the areas outlined above and it is difficult to gather this type of information accurately due to the sensitivity. We would also need to understand how our business would benefit from providing additional data given our comments on onerous reporting outlined below.

6. *How could data be better collected and/or used by WGEA to promote and improve gender equality? Should there be some form of pay transparency – should remuneration data in some form be public?*

Given organisations and industries are so different, and remuneration structures are complex it would be difficult to do this in a value adding way without detailed commentary. Perhaps it would be more beneficial to promote the ways that organisations are reducing their pay gap and provide practical tools/education on gender pay gap.

7. *Are there changes that could be made to the Workplace Gender Equality Act that would help reduce the regulatory burden on relevant employers while continuing to enable WGEA to promote and improve gender equality? Should other data sources, such as Single Touch Payroll data, be used by WGEA instead of employers providing the same data to two Government agencies?*

Single touch payroll is currently used for different purposes (eg. tax, Centrelink) and therefore manipulation is still required. Technology that reduces the regulatory burden would make a significant difference, however to properly leverage this the data requirements would need to be consistent across all agencies and able to be interpreted in different ways. In terms of reducing the regulatory burden, perhaps there could be a few key areas identified for organisations or industries to deliver on that would have the most impact based on workplace demographics and gaps.

8. *Could the minimum standards be expanded to improve the way they drive practical gender equality outcomes in workplaces? What would employers need to do to implement these changes in their workplace? Should Minimum Standards apply to all reporting employers, not just those with 500 or more employees?*

██████████ has no comment to make on these questions.

9. *Are the compliance mechanisms in the Workplace Gender Equality Act, and consequences for non-compliance, effective to promote and improve gender equality? If not, how could they be improved?*

The requirement regarding tendering for government contracts is effective given there is a tangible business impact. If consequences for non-compliance were to be expanded, we would support similar commercially based outcomes. It would also be helpful to be provided with feedback on best practices in other organisations and what we could be doing differently to bridge gaps where they exist.

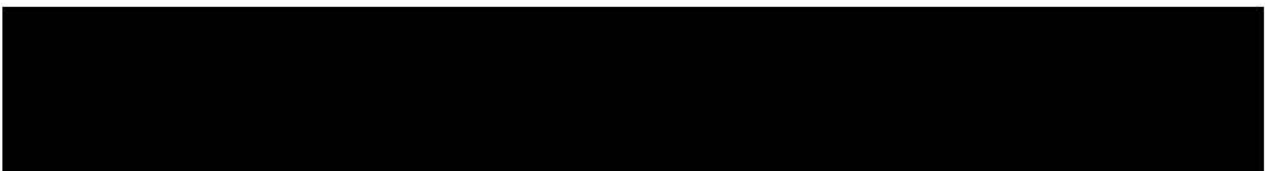
10. *Are there any other matters you want to comment on in relation to the Workplace Gender Equality Act and improving and promoting gender equality in the workplace in Australia?*

It would be useful to have a stronger partnership and two way engagement with WGEA in terms of understanding how we can improve gender equality for the unique needs of our workplace. At times the blanket approach to reporting data means we lose sight of the objectives and what we are ultimately providing data for. More feedback from WGEA on how our organisation's progress is viewed, opportunity to learn about best practice organisations and the issues that affect our industry would be meaningful and valued.



We would appreciate any additional opportunities to be involved in the consultation for the Review of the *Workplace Gender Equality Act 2012*. Please contact me in the first instance including any queries on the responses we have provided in this submission.

Yours sincerely,

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