



Addendum

Impact Analysis Changes to the Workplace Gender Equality Act 2012
and Associated Instruments

Office for Women





Introduction

On 9 February 2023, the Department of the Prime Minister and Cabinet published an Impact Analysis (IA) regarding the changes to the *Workplace Gender Equality Act 2012* (WGE Act) and Associated Instruments. The IA discussed the regulatory impacts of implementation of a number of recommendations made in the *Review of the Workplace Gender Equality Act 2012* (the Review) conducted on December 2021. This IA addendum provides further information in regard to the implementation of additional recommendations of the Review.

This addendum focuses on recommendation 3.1.a of the Review. The implementation of this recommendation would require relevant employers with 500 or more employees to commit to, achieve and report on genuine, measurable targets that will improve gender equality in their workplace against three of the six gender equality indicators (GEIs) currently in the legislative scheme.

The Workplace Gender Equality Agency Review 2021 (Review) considered the regulatory reporting burden for employers a key factor in its report and recommendations. The implementation of the Review in full reflects this consideration.

Policy options

As noted in the IA, there are three main elements to the problem with the current regulatory framework which governs Agency's reporting: gaps in the current data set, the burdensome nature of some reporting requirements and that current regulation is not ambitious enough to drive change in achieving gender equality. Reforms in 2023 address these issues in part, but further changes are needed to achieve the desired outcome of accelerating the rate of progress towards gender equality in Australia. The Review proposed reforms to address these elements based on consultation with stakeholders.

Three options will be considered in response to the problems identified in the IA.

Option 1: Maintain status quo;

Option 2: Accelerate the rate of change on gender equality through action by requiring designated relevant employers to set three targets from a select list of targets related to gender equality and achieve (or at minimum improve on) these targets in a three year period. This will implement Review Recommendation 3.1.a.

Option 3: Accelerate the rate of change on gender equality through action by requiring designated relevant employers to set at least three targets from a menu of targets and achieve (or at minimum improve on) these targets in a three year period. This will implement Review Recommendation 3.1.a.



Option 2 and 3: A list or menu of targets

The difference between option 2 and 3 lies in the way ‘targets’ are provided for employers. Under option 2 a select list refers to a narrow set of targets, which would be a target under each of the GEIs for employers to achieve, mainly numeric targets. A ‘menu of targets’ provides a broader list of targets for employers to select from, offering multiple targets under the GEIs where possible. See an example of the menu of targets at attachment A.

Why were these recommendations not implemented before?

Although changes were made to the legislative scheme in 2023, further consultation was required to implement recommendation 3.1a in the most effective manner to achieve the policy outcomes. This allowed a collaboration with stakeholders to inform targets, rather than imposing potentially burdensome or ineffective measures on business.

The Workplace Gender Equality Agency (the Agency) developed a draft targets list during stakeholder consultations in 2023, and provided stakeholders with opportunities to provide feedback. This approach increases the likelihood targets are able to be implemented and supported by relevant employers. Making these changes now in the legislative scheme offers a more robust approach than would have been possible earlier without a clear list of targets, with stakeholder consultation. That is, the list can now be included in the legislation, and offers transparency and assurance to stakeholders that any material changes or updates are carefully considered as they would require legislative amendment. The list of targets will be authoritative because they are included in a disallowable legislative instrument and transparent, being available for employers and the public to view.

Who will be impacted?

The implementation of Recommendation 3.1.a will introduce new requirements for large businesses/community organisations. These are organisations employing 500 or more employees, which are referred to as designated relevant employers as set out in section 6 of the Workplace Gender Equality (Gender Equality Standards) Instrument 2023 (GES Instrument). Designated relevant employers and their employees are the main stakeholders considered as part of this analysis.

As identified in the IA, designated relevant employers must currently achieve minimum standards in relation to gender equality. This includes the requirement to have policies or strategies in place to address only one of the GEIs.

From 1 April 2023, designated relevant employers are required to have in place policies or strategies to support the six GEIs in the WGE Act. The GEIs are

- Gender composition of the workforce
- Gender composition of governing bodies
- Equal remuneration between women and men



- Availability and utility of employment terms, conditions and practices relating to flexible working arrangements for and to working arrangements supporting employees with family and caring responsibilities
- Consultation with employees on issues concerning gender equality in the workplace
- Sexual harassment, harassment on the ground of sex or discrimination.

The proposed implementation of 3.1.a will require designated relevant employers to set targets to achieve within the specified time period. Employers that do not achieve their target in the specified time period may demonstrate improvement against a target or provide a reasonable excuse for not showing improvement to the Agency to avoid non-compliance.

The Review found all designated relevant employers complied with the 2014 minimum standards and almost every company had a policy or strategy in place on sex-based harassment and discrimination. It is therefore likely designated relevant employers are well placed to take further action to support gender equality through the targets setting scheme.

Option 1: Maintain the status quo

Maintaining the status quo will entail no changes to the current regulatory framework under the WGE Act, noting the recent partial implementation of the Review in 2023 which changed the regulatory burden. This is outlined in the IA.

Option 1 will not progress the efforts to address problems identified in the IA beyond the impacts of the earlier changes.

Maintaining the status quo will not accelerate the progress towards gender equality as it imposes no further requirements for stakeholders, and nor does it incentivise employers to set more ambitious targets. Designated relevant employers would only be required to continue to meet the minimum standards noted above and nothing further.

Option 2: Implementation of target setting (narrow list of targets)

The IA outlines the impacts of implementing recommendation 3.1.a of the Review. This will require certain employers with obligations under the WGE Act to commit to genuine and measurable gender equality targets set against the GEIs. Following additional consultation, it is proposed that employers will have three years to achieve selected targets.¹ Employers will need to report progress, through their public reporting, and set three more targets every three year period. This measure can address the problem that the current regulation is not ambitious enough to drive change in achieving gender equality.

¹ Note this position has moved from the thinking presented in the previous IA, which suggested variable times for achieving certain targets. The new approach requires employers to commit to, achieve and report against at least three targets within a three year period.



A key finding of stakeholder consultation conducted for this recommendation was that targets have the potential to motivate action and drive change. Targets have the potential to embed intervention in real cultural change as they are linked to leadership behaviours and other actions.

Currently, there is no other country which requires businesses to commit to gender targets. Australia would be pioneering the path to accelerate gender equality through targets, and asking large Australian businesses to be global trend setters. In 2021, the Global Institute for Women's Leadership (GIWL) comparative research on gender pay gap reporting recommended that action plans are essential for change, finding that 'employers should be mandated to create time-bound targets to redress pay gaps, setting out clear and measurable goals'.²

Further, companion research by GIWL recommended that Australia introduce 'outcome-based' minimum standards.³ In this research, targets act as the outcome based minimum standard which can hold business accountable for the data they report to the Agency. Despite the currently high level of transparency in reporting to the Agency, less than 68 per cent of organisations analyse their pay gap data, and overall, only 75 per cent of organisations took action to close the identified gap. Requiring organisations to set targets can drive real change, as employers will be accountable for improving their results. This would apply to figures that contribute to the gender pay gap, through targets that relate to the GEs in the legislative scheme.

A scheme with a clear target under each gender equality indicator will prompt employers to take action. As identified in the IA, section 5.3.4, the current standard is out of step of community expectations. Targets will allow for a more ambitious scheme in line with community expectations and in line with the broader momentum towards gender equality in Australia.

Under this option, targets will be legislated to ensure the target scheme is mandatory for designated relevant employers and provide transparency about employer practices and employee outcomes. Because employers would report to the Agency on the targets selected, employees can use information about employers' commitments to take specific actions to achieve gender equality to inform decisions about who they choose to work for and can see the aspirations of the organisations which they are working for.

Option 3: Implementation of target setting (menu of targets)

Option 3 works to resolve the same problem as option 2, and will operate in a similar manner. The difference is the list of targets offered to employers. Under option 3, the Agency would provide organisations with a menu of targets that offers multiple targets under each gender equality indicator

² Global Institute for Women's Leadership 'Bridging the Gap: An Analysis of Gender Pay Gap Reporting in Six Countries' (2021) <https://www.kcl.ac.uk/giwl/assets/bridging-the-gap-full-report.pdf>

³ Global Institute for Women's Leadership 'Gender pay gap reporting in Australia Time for an upgrade' (2021) <https://giwl.anu.edu.au/sites/default/files/docs/2021/10/Gender%20pay%20gap%20reporting%20in%20Australia%20-%20time%20for%20an%20upgrade.pdf>



where appropriate. Employers would be able to select at least three targets to achieve within the given time frame. See Appendix A for the draft menu of targets.

Academics participating in consultations suggested that providing the broadest level of target setting protocols, policy and progress contexts to be key for engagement and that a highly prescriptive framework of targets could undermine employer adherence and the success of the policy. A broader set of targets would focus on quantifiable (numeric) targets related to gender pay gaps and composition, as well as extend metrics to action-oriented targets to provide opportunities to go beyond imbalances in representation or pay to influence employee experiences.

Under this option, while there is a broader list of targets to select, there would be reasonable parameters on the type of target selection to prevent employers committing only to the action-based targets that may be perceived as easier and quicker to accomplish. This is to support real change in workplaces, and minimise the risk of tokenistic goals being set by employers.

Net benefit of each option

As per the IA, given the nature of the changes, it is appropriate to consider the economic and social impacts of the options. Additional calculations have not been conducted as the costs for recommendation 3.1 were included in the IA. There is a qualitative discussion of the implications of the implementation in some further detail of the options identified in this addendum.

Option 1: Maintaining the status quo

Maintaining the status quo will not impact stakeholders beyond their already existing obligations. This will result in no greater economic and social costs and benefits than those identified in the IA. Maintaining the status quo will continue to close the gender pay gap and improve gender equality at the current pace. This will lead to benefits for individuals and large employers (refer to 7.1.1 – 7.1.2 of the IA).

The minimum standards in the legislation came into effect over ten years ago. These might have been appropriate at the time, but community expectations have moved forward from the initial thinking. In light of other reforms occurring across Australia to progress gender equality, no change may stall the momentum, thereby further distancing the overall legislative scheme from community expectation. In maintaining the status quo, there is an economic and social opportunity cost in not supporting momentum for change and more equal outcomes in the workplace in larger employers.

Options 2 and 3: Introducing target setting

The target setting scheme will introduce additional requirements only for designated relevant employers, which are organisations employing 500 or more employees. These are relatively large employers who are likely to already have well developed internal systems for workforce planning. The IA noted that target setting only carried initial set up costs, related to an additional four hours per organisation to consider and implement targets. Further timing considerations to achieve selected



targets would be variable and dependent on the target selected and the ambition of the target. The Agency will work with employers to support the setting of targets, which will offer employers assurance that targets are achievable in line with their circumstances and the level of maturity of their organisation. This will reduce undue burden on employers.

The Agency will assist employers in setting targets by developing tools and resources for target setting, providing accessible analyses of gender equality data, and providing practical guidance on the steps to take to achieve the targets. Over time, the Agency will work with employers to ensure they are on the right path and will take into consideration the specific circumstances of employers where there might be any difficulty in achieving any of the intended goals.

Option 2 and 3 provide employers flexibility. Where they are unable to achieve their selected targets within the targets cycle. The Agency will allow employers to demonstrate improvement against targets. This will ensure that employers are still compliant with the legislative requirements where they have made efforts against targets. This will encourage employers to be ambitious with targets.

Some additional costs will be placed on organisations in tracking and reporting on progress of targets in their annual reporting. The burden will depend on the targets selected and the way in which they can be measured. Administrative costs associated with setting new targets once existing committed targets are achieved present a relatively low burden. This is because all targets will be available in the legislation, where employers can consider their next set of targets well before committing to them.

Benefits for employers, employees and government

Workplace target setting for gender equality is an evidence-based strategy which is proven to promote gender diversity and inclusion.⁴ Gender equality benefits employees, but also employers with improved retention, productivity, safety, and enhanced reputation.⁵

Under the proposed implementation, targets are a mechanism for accountability, and will ensure a genuine attempt by larger employers to work towards workplace gender equality in Australia. This can also motivate better practices within organisations, in leadership behaviours and accelerate the pace of gender equality in a workplace. Targets are also a critical for managing organisational performance and can provide focus to employers. Genuine, time-bound, and realistic targets would therefore be an effective mechanism by which organisations can articulate the change that they want to see within their organisation and show their commitment to gender equality. Targets can effectively promote gender equal organisational culture and employee experience beyond direct impacts to improving the gender pay gap.

⁴ Dr Leonora Risse 'Target Setting for Gender Equality: A Review of the Literature' (2024) https://www.wgea.gov.au/sites/default/files/documents/Target-Setting-for-Gender-Equality_A-Review-of-the-Literature-Dr_Leonora_Risse_March-2024.pdf.

⁵ Workplace Gender Equality Agency 'Workplace gender equality: the business case' (2018) <https://www.wgea.gov.au/publications/gender-equality-business-case>.



In implementing the scheme, it will ensure that the regulations are more ambitious in the drive to achieve gender equality and will motivate employers, to potentially improve their practices at an accelerated pace.

For Government, the target setting scheme aligns with the broader commitment to achieving gender equality, and the actions set under the *Working for Women: A Strategy for Gender Equality*. Additionally the Women's Economic Equality Taskforce supported the implementation of gender equality targets for employers and recommended it is implemented as an immediate action to ensure all Australian workplace practices support women's economic participation.⁶

Difference between option 2 and 3

Under options 2 and 3, the cost and benefits for employees and government remain the same, however, option 3 is marginally less burdensome than option 2 as it offers greater flexibility for organisations to choose targets which are appropriate for them.

Option 2 would list a target under each gender equality indicator, meaning that employers will have less of a selection to achieve targets under the indicators. Consultation findings noted the importance of having some parameters for targets, however, these should not be too prescriptive. Providing a menu of targets under option 3 offers employers the choice to select targets which are appropriate and achievable based on their organisations circumstances.

Consultation

As noted in the IA, comprehensive stakeholder informed the development and implementation of the Review's recommendations. Broader public consultations occurred in October and November 2021. More detail on the process and methodology of the consultations is available in the IA. More targeted consultations were conducted for recommendations in mid-late 2023 and mid-2024 to address any potential limitations of the initial consultation process.

Each of the options noted in this addendum is informed by these consultations. Consultations for the proposed recommendations implemented under option 2 and 3 were led by the Agency. The Agency is responsible for the collection of the data from relevant employers and publishes this information annually. The Agency was best placed to carry out consultation having the relevant stakeholder relationships and the role as the regulator for the proposed changes following the Review.

⁶ Women's Economic Equality Taskforce 'A 10-Year Plan to Unleash the Full Capacity and Contribution of Women to the Australian Economy' (2023)
<https://www.pmc.gov.au/sites/default/files/resource/download/womens-economic-equality-taskforce-final-report.pdf>.



Purpose and objectives of consultation

The primary objective of consultation was to better gauge the views and preferences of key stakeholders in the implementation Review recommendations. Consultation for recommendation 3.1.a included randomly selected employers from the Agency's database. This selection was audited to ensure a spread of industry representation and appropriateness of participation (for example ensuring the selected list were not leading practice on targets). The purpose of the consultation was to test the approach to target setting and the most effective way to frame targets for a broad range of employers. Section 10 of the IA provides more detailed information on the broader approach to consultations.

How consultations influenced the policy options

Draft targets were proposed for participants to react to. Emerging themes in the consultation highlighted some of the key challenges and risks the participants foresaw in the setting of targets for employers. This feedback was considered and applied to the final proposal for implementation of this recommendation.

Stakeholders criticised the current legislative framework for having standards that are too low, and only requiring data to demonstrate compliance without requiring employers to improve gender equality in their workplaces. The implementation of the target setting scheme under both option 2 and 3 responds to this criticism.

Participants noted particular challenges of targets needing to cater to a wide range of businesses, with differences in the size of the business, and the level of maturity of a business and its readiness to commit to and achieve these goals. Another concern raised related to the backlash associated with certain types of targets that might be perceived as tokenistic, but acknowledged there would be opportunities to drive change on gender equality, given the compulsory nature of the targets. In response to these concerns, options 2 and 3 seek to set 'measurable, genuine, targets' that are achievable for businesses. Further option 3, includes a broader set of quantifiable and action-oriented targets from which employers can select. While employers may still select the 'easier' options, each target will promote the drive toward gender equality and once the 'easier' target is achieved, more aspirational targets will need to be set. In selecting and committing to targets, the Agency will work with employers to support setting of reasonable targets based on the circumstances of the employers, further encouraging up-take of achievable, yet progressive, targets.

Consultations raised potential circumstances in which progress towards targets may not be feasible for employers despite best efforts. This could include, for example, a merger or significant change in company structure. The provision for employers to provide a reasonable excuse under the current legislation will apply to employers for targets. This will mean that where employers provide a reasonable excuse, the Agency may choose not to name them on the non-compliance list.



One of the strongest themes from stakeholders was the need for the Agency's guidance and education for employers. Multiple participants expressed a desire to better understand what best practice looks like so they can set 'stretch' targets. Some stakeholders also indicated a desire for metrics to be clearly defined, especially the gender pay gap. A list of targets will provide guidance and the Agency will work to educate employers on what is expected before the commencement of any changes.

Participants and particularly experts in the field noted that targets should be time bound to ensure sustained action on gender equality. Both options 2 and 3 will require employers to achieve targets within a 3 year period. Experts suggested that by encouraging employers to adopt a progressive roadmap of targets to be achieved at different intervals, employers will be encouraged to embrace progressive improvement and iterative learning by doing.

Participants generally felt confident that choosing from a set menu of targets would provide flexibility to align targets with their own business priorities. Option 3 would best facilitate this, by offering a broader menu of targets which offers multiple targets for employers to select under each gender equality indicator where possible.⁷ This option was made distinct from option 2 based on the feedback about the menu of targets. It has been the policy intent to go forward with the menu of targets approach with the set objective of giving employers more opportunity to set and meet the targets, thereby allowing greater buy in to the list of targets. While the set menu provides greater options, a list also allows an efficient way for employers to choose targets, reducing the burden on employers to have to define their own targets in line with the requirements to set targets under the GEIs.

Preferred option

Options 2 and 3 both work to address the problem identified in the IA. A target setting scheme will accelerate action towards gender equality as it will require large businesses to take a lead in progressing efforts. The preferred option is the setting of targets with a menu of targets (option 3) as it aligns most closely with consultation feedback of providing guidance for targets while offering some choice for employers to select targets which are achievable for them. This will cater for the broadest types of businesses, at varied levels of maturity and resourcing.

Overall, the target setting scheme seeks to return Australia to its status as a global leader in gender equality, and encourages more ambition within Australian business. Option 3 will enable designated relevant employers to select from a broad range of targets, offering flexibility for what is achievable in the stated time. As a result, there would be a greater up-take of a range of targets by employers depending on what is appropriate for their organisation without an extensive regulatory burden to have to achieve targets that are unrealistic within an organisation's context.

⁷ The Agency is responsible for drafting the menu of targets under each gender equality indicator. For some indicators, research resulted in only one target being appropriate to achieve. The full list of targets will be included legislation under both option 2 and 3. See attachment A.



Implementation risks

There are minimal implementation risks with the preferred option as employers would be offered a range of choices in the menu of targets. Each of the targets are drafted to drive change under the GEIs. These targets are ambitious as they require clear action, but are also achievable. There may be an initial risk employers select 'easier' targets, however, this will still require action to advance gender equality in the workplace. The Agency will work with employers to support the initial implementation requirements to further mitigate any risks of either failing to choose or to implement targets.

Noting that designated relevant employers currently comply with the minimum standards, there is a high likelihood that employers will meet their requirements to select targets and progress their achievement. The targets are varied enough to allow employers to select an option which is appropriate and achievable for their particular organisation. Additionally, as Australia is pioneering these changes, it is likely that employers will see the opportunity they have to be global leaders and trend setters in complying with the requirements.

Measuring success and future progress

Success for the implementation of recommendation 3.1a will see require designated relevant employers to select at least three targets in the first the Agency's reporting period after the changes are introduced. Longer term success will involve achievement of the initial targets and progressive commitment to more challenging, but still achievable, targets to drive change in their business. Successful implementation will see employers be more ambitious in the targets they select over time that drive gender equality in workplaces and better employment outcomes for all employees.

Progress towards achievement of targets will reported by employers in their annual public report to the Agency. This enables progress to be monitored and measured and could elevate the organisation's perception of what is achievable. Success will be measured through employer motivation to drive change in their organisations beyond setting targets, such as reflecting any leadership behaviours which indicate better gender equal practices. Annual employer reporting to the Agency could be used to identify broader trends in gender pay gap statistics.

A future review of the WGE Act could consider the successes and challenges of the target setting scheme and recommend improvements to the operation.



Attachment A: Gender Equality Targets

The following table is the proposed menu of targets from which employers will select their targets for the targets cycle.

Target	Type of target	Commitment
GEI1: Gender Composition of the Workforce		
Increase the representation of under-represented gender in a non-manager category.	Numeric	Representation of [underrepresented gender] in [non-manager category] increased by [_pp] in 3 years.
Increase the representation of under-represented gender a manager category.	Numeric	Representation of [underrepresented gender] in [manager category] increased by [_pp] in 3 years.
Increase the representation of under-represented gender in promotions to manager.	Numeric	Representation of [underrepresented gender] in promotions to manager increased by [_pp] in 3 years.
Increase the representation of under-represented gender in a pay quartile.	Numeric	Representation of [underrepresented gender] in [quartile] increased by [_pp] in 3 years.
GEI2: Gender composition of the governing body		
Increase gender diversity on the governing body.	Numeric	Representation of [underrepresented gender] on the governing body increased by [_pp] in 3 years.
GEI3: Equal Remuneration		
Reduce the employer gender pay gap towards 0%.	Numeric	[Median or average], [base salary or total remuneration] gender pay gap reduced by [_pp] in 3 years.
Reduce the gender pay gap in a manager or non-manager category.	Numeric	[Median or average], [base salary or total remuneration] gender pay gap for [manager or non-manager category] reduced by [_pp] in 3 years.



Target	Type of target	Commitment
Undertake regular payroll analysis and report results to Board.	Action	If payroll analysis has not been completed in the past two years, undertake payroll analysis annually. On completion report results to the governing body.
Improve employer equal remuneration/ gender pay equity strategy or policy.	Action	Add at least two of the following to existing policy or strategy: <ul style="list-style-type: none"> ensure no gender bias occurs at any point in the remuneration review process implement pay scale/salary band transparency guidelines and processes that ensure managers are accountable for pay equity outcomes.
GEI4: Flexible working arrangements and support for employees with caring responsibilities		
Introduce employer-funded paid parental leave.	Action	Introduce [universal or primary] employer-funded paid parental leave of [_weeks] within 3 years.
Increase the uptake of the under-represented gender taking parental leave.	Numeric	Representation of [underrepresented gender] taking primary carers leave increased by [_pp] in 3 years.
Improve employer-funded paid parental leave offering (universal and primary carer's leave).	Action	Add at least three of the following to existing employer-funded universal or primary carers paid parental leave policy or strategy: <ul style="list-style-type: none"> an 'opt out' approach where employees who do not wish to take their full paid parental leave entitlement must discuss this with their manager extend the length of your existing employer-funded paid parental leave available to all genders without using the primary/secondary carer definitions full salary replacement rate of pay, independent of any entitlement taken under the statutory paid parental leave scheme employees can take paid parental leave at any time within the 24 months from the birth or adoption of a child inclusive of still-birth, surrogacy, or adoption no service period qualifications apply superannuation contributions are paid for carers while they are on paid parental leave superannuation contributions for carers are paid while they are on unpaid parental leave.
Improve facilities and supports available to assist employees	Action	Add at least two of the following to existing policy or strategy:



Target	Type of target	Commitment
with carer responsibilities and/or managing work and care.		<ul style="list-style-type: none">• breastfeeding facilities• onsite childcare• employer subsidised childcare• internal support network for carers• support for employees by securing priority places at local care centres.
Improve flexible work offering for employees.	Action	<p>Expand or maintain existing policy or strategy to include six of the following for all employees:</p> <ul style="list-style-type: none">• flexible hours (start and finish times)• reduced hours/ or part-time work• job-sharing arrangements• compressed work weeks• purchased leave• time-in-lieu• remote working. <p>Additionally, add four of the following to existing policy or strategy:</p> <ul style="list-style-type: none">• managers are trained on how to manage flexible and remote/hybrid teams• all employees have access to training on how to work with flexible and remote/hybrid teams• a business case for flexibility has been established and endorsed at an executive level• leaders are held accountable for improving take up and approval of workplace flexibility• all employees are surveyed about whether they have sufficient flexibility• the impact of flexibility is measured and evaluated• usage metrics are captured and reported up to key management personnel and governing body• the ability to job share is incorporated into job design and advertising of new roles• flexible work arrangements are available to all employees, with a default approval bias (all roles flex approach)• all team meetings are offered online.
Increase the proportion of managers that are part-time.	Action	Proportion of managers working part-time increased by [Lpp] in 3 years.



Target	Type of target	Commitment
Improve supports for employees experiencing or at risk of domestic abuse or violence.	Action	Add four of the following to existing policy or strategy: <ul style="list-style-type: none">• protection from adverse action based on disclosure of domestic violence• unpaid domestic violence leave• emergency accommodation assistance• offer change of office location• financial supports• an employee assistance program• training for key personnel• engage in workplace safety planning• referrals for employees to appropriate domestic violence support services• protection from any adverse action or discrimination based on the disclosure of domestic violence• access to medical services.
GEI5 – Consultation with employees on issues concerning gender equality		
Improve employee consultation and input in gender equality practice and decision-making.	Action	Undertake annual consultation on gender equality using at least two of the following consultation methods: <ul style="list-style-type: none">• employee experience surveying• focus groups• exit interviews Additionally, establish one of the following: <ul style="list-style-type: none">• a diversity committee or• employee representative group/network.
GEI6 – Sexual harassment, harassment on the ground of sex or discrimination		
Improve and expand policy or strategy relating to the prevention, reporting and response to sexual harassment	Action	Add at least four of the following to existing policy or strategy: <ul style="list-style-type: none">• leadership accountabilities and responsibilities for prevention and response to sexual harassment• manager and non-manager training on respectful workplace conduct and sexual harassment



Target	Type of target	Commitment
and harassment on the grounds of sex or discrimination.		<ul style="list-style-type: none">• process to disclose, investigate, and manage any sexual harassment• processes relating to the use of non-disclosure or confidentiality agreements• the frequency and nature of reporting to the governing body and management on sexual harassment• access to trained, trauma-informed support staff/contact officers• confidential external counselling• protection from adverse action based on disclosure of sexual harassment and discrimination• a system for monitoring outcomes of sexual harassment and discrimination disclosures, including employment outcomes for those impacted by sexual harassment and the respondent.
Improve and expand mechanisms for reporting to key management personnel and the governing body on sexual harassment and harassment on the ground of sex.	Action	<p>Expand annual reporting to key management personnel and the governing body by adding three of the following:</p> <ul style="list-style-type: none">• identified risks of your workplace with regards to sexual harassment• measure prevalence of workplace sexual harassment• nature of workplace sexual harassment reported• analysis of sexual harassment trends and reporter/respondent profiles• organisational action to prevent and respond to sexual harassment• outcome of disclosures of sexual harassment• response to disclosures of sexual harassment• use of non-disclosure agreements or confidentiality clauses.