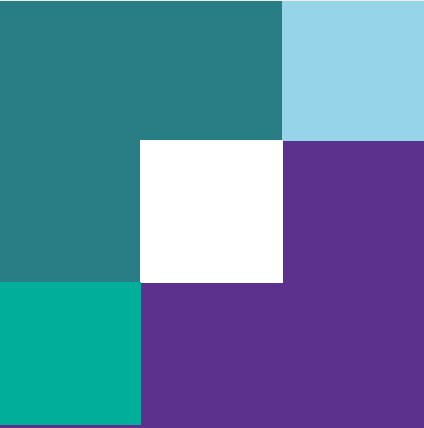
|  |
| --- |
| 2026 Progress report guidance |
| For duty holders under the *Gender Equality Act 2020* |



# Overview

## About

This guidance is for organisations that have obligations as duty holders under the *Gender Equality Act 2020*. Visit the Commissioner’s website for a [list of duty holders under the Gender Equality Act](https://www.genderequalitycommission.vic.gov.au/list-defined-entities).

The *Gender Equality Act 2020* (the Act) requires duty holders to submit a progress report every 2 years.

Monitoring, measuring and reporting on progress allows both you and the Commissioner to evaluate the success of your gender equality action plan (GEAP) and gender impact assessments (GIA).

This will help you understand whether your actions are achieving positive change towards workplace gender equality. This is measured by the workplace gender equality indicators in the Act.

It will also help you to promote gender equality in your public policies, programs and services.

The [Gender Equality Act 2020](https://www.legislation.vic.gov.au/in-force/acts/gender-equality-act-2020/) (the Act) requires [duty holders](https://www.genderequalitycommission.vic.gov.au/defined-entities-under-gender-equality-act) to submit a progress report to the Public Sector Gender Equality Commissioner (the Commissioner) every second year after submitting a GEAP. The next progress report is due on 1 May 2026.

## Why this work is important

Under the Act, you are required to report on your progress to the Commissioner.

However, reporting on progress also benefits your organisation and the wider community. Reporting helps your organisation:

* stay on track
* share knowledge and lessons learned
* celebrate achievements made towards gender equality
* contribute to the objectives of the Act, including:
  + promoting gender equality and improving the status of women
  + eliminating systemic causes of gender inequality in policy, programs and services, for both the workforce and the community
  + recognising that other forms of discrimination can compound gender inequality. This includes Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes
  + structural change to redress disadvantage, reduce stigma, stereotypes, prejudices and violence
  + improving economic and social participation
  + promoting the right to equality set out in the Charter of Human Rights and Responsibilities and the Convention on the Elimination of All Forms of Discrimination against Women.

## The pace of progress

Progress towards these goals is not always linear and immediate.

GEAPs are 4-year action plans. Strategies and measures may have short, medium and long-term implementation plans.

This means your organisation may not yet have seen big numerical shifts in data on the workplace gender equality indicators.

The progress report is an opportunity to explain these challenges. The Commissioner will take this into account when assessing progress reports for compliance with the Act.

## What you need to do

Completing your progress report can take time.

Start collecting the information you need to report on your progress as soon as possible.

Ideally, your organisation established a monitoring system during GEAP implementation to collect the information you need.

For example, this might include a whole-of-organisation GIA reporting system that collects the required information throughout the reporting cycle.

Before submitting your [progress report](https://www.genderequalitycommission.vic.gov.au/reporting-progress),[[1]](#footnote-2) ensure it complies with the [Gender Equality Act](https://www.genderequalitycommission.vic.gov.au/about-gender-equality-act-2020).

Use the checklist at the end of this guidance to check you have included all the required information.

This guidance corresponds with the 2026 progress report template. You will find guidance on:

* Cover page
* Part 1: Reporting on [gender impact assessments (GIA)](#_Submission_and_publication)
  + Confirming GIA exemptions
  + Describing policies, programs and services subjected to GIA
  + Describing actions taken as a result of a GIA
* Part 2: Reporting on progress against the [indicators](#_Workplace_gender_equality)
  + Completing your progress audit and analysing the data
  + Describing progress against the indicators
  + Describing factors contributing to or inhibiting progress
* Part 3: Reporting on [GEAP strategies](#_GEAP_strategies_and)
  + Explaining incomplete strategies
  + Describing achievements, challenges and learnings
  + Providing other updates on implementation
  + Describing resourcing allocation
* Part 4: [Submission and publication](#_Appendix_A)

For an accessible version of this guidance and/or template, please reach out to [enquiries@genderequalitycommission.vic.gov.au](mailto:enquiries@genderequalitycommission.vic.gov.au)

|  |
| --- |
| **Helpful resources**   * Explore the [gender impact assessments](https://www.genderequalitycommission.vic.gov.au/gender-impact-assessments) page for more details * Click on [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) to access further information. * Find more information about [GEAPs](https://www.genderequalitycommission.vic.gov.au/gender-equality-action-plans-2021). * Learn more about maintaining [employee privacy](https://www.genderequalitycommission.vic.gov.au/how-do-i-maintain-my-employees-privacy). * Access [leading practice resources](https://www.genderequalitycommission.vic.gov.au/leading-practice-resources) including, research, tools and guidelines across a range of areas. |

## Requirements under the Act

Progress reports must address the following 4 elements:[[2]](#footnote-3)

1. **Gender impact assessments** (GIA): report on the policies, programs and services that were subject to a GIA and the outcomes of each GIA.
2. **Workplace gender equality indicators**: demonstrate your organisation’s progress in relation to the indicators.
3. **Gender equality action plan** (GEAP): report your organisation’s progress in relation to the strategies listed in your GEAP.
4. **Gender equality targets and quotas**: demonstrate your organisation’s progress towards meeting any prescribed gender equality targets or quotas. Please note there are currently no prescribed gender equality targets or quotas in place. Therefore, you are not required to report on this in the current round of progress report.[[3]](#footnote-4) Guidelines to report on progress against targets and quotas will be published if they are prescribed by regulation.

### Privacy and confidentiality

It is important to ensure the privacy and confidentiality of your workforce is maintained throughout the progress report process.

Information provided to the Public Sector Gender Equality Commissioner will be managed in line with relevant privacy laws.

Duty holders (defined entities) are responsible for their own compliance with relevant privacy laws, including the *Privacy and Data Protection Act 2014* (Vic) (PDP Act).

The Information Privacy Principles (IPPs) that are contained in Schedule 1 of the PDP Act set out the minimum standards for how Victorian public sector bodies should manage personal information.

## Key dates

**You must submit your progress report by 1 May 2026 via the Commissioner’s reporting platform.**

**You will submit your GEAP at the same time. Visit the 2026 GEAP guidance for further help on how to develop your GEAP.**

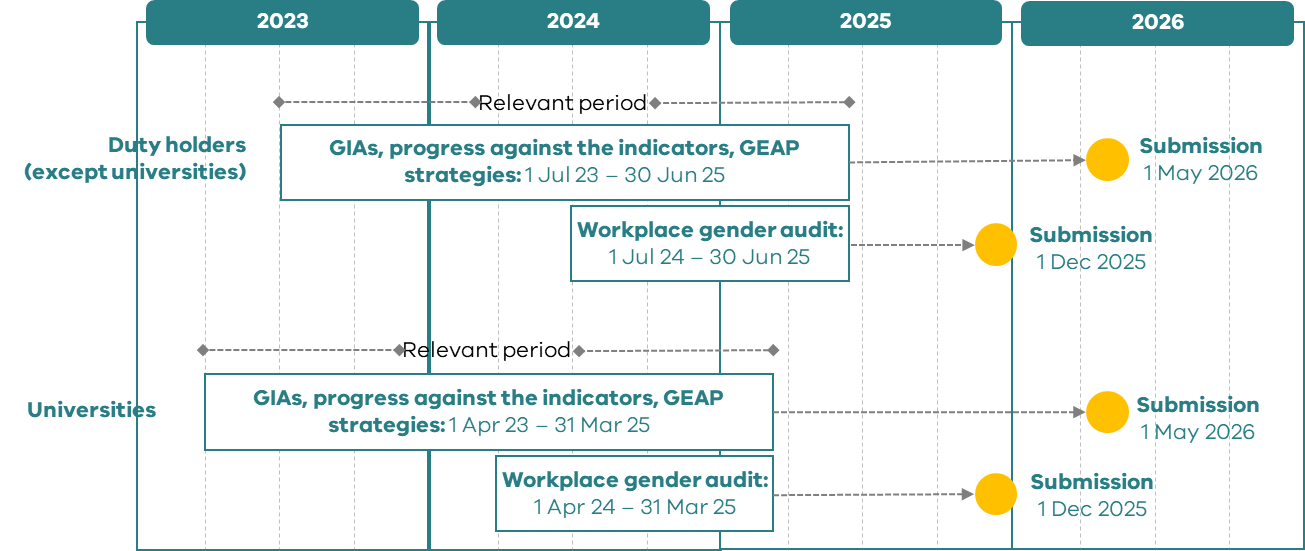
The relevant period for this progress reportis:

* 1 July 2023 to 30 June 2025 for all duty holders (except universities)
* 1 April 2023 to 31 March 2025 for universities.

Different components of a progress report may have different **reporting****periods** that fall within the **relevant period**. The relevant period is the time covered by a progress report, as specified in the Act. A reporting period is any shorter period within the reporting period where the Commissioner requests particular information.

Reporting periods for each component will be explicit throughout this guidance.

The figure below sets out the relevant period for duty holders and the reporting periods for different obligations.

****

## Using the 2026 progress report template and guidance

You must use the template provided by the Commissioner.

This is a requirement of the Gender Equality Regulations 2020. You can download the 2026 progress report template from the right-hand side of this guidance (online).

This guidance was developed to help your organisation meet its obligation to complete and submit a progress report as required under the [*Gender Equality Act 2020*](https://www.genderequalitycommission.vic.gov.au/about-gender-equality-act-2020) (the Act).

There are **required** and **recommended** items to include within each section of your organisation’s progress report. You must include required items in your progress report. The Commissioner strongly encourages you to include recommended items, but these are optional.

This information helps us identify whole-of-sector, industry and other trends across organisations.

It will also help the Commissioner to support duty holders to address systemic barriers to gender equality.

**Note that supporting documents will not be accepted in this reporting cycle. Please ensure you include all the information in the 2026 progress report template.**

If you would like to include additional information, you may do this in the ‘Any other additions or comments’ section at the end of the template.

Additional information you may wish to provide in this section includes:

* infographics or a more detailed analysis of your data
* additional details about GIAs undertaken
* further summary information.

Use the checklist at the end of this guidance to ensure your progress report complies with the requirements of the Act.

The appendices to this document include [advice for changed or new entities](#_Appendix_B).

### Designed version of your progress report

You may want to create a designed version of your progress report for publishing on your website. You do not need to submit this version to the Commissioner.

Your designed version can include additional information not required by the Commissioner.

However, you must include all the sections required by the Commissioner and you must not alter the wording you submitted to the Commissioner in the required sections (you may fix any spelling or grammatical errors).

Use the progress report checklist at the end of this guidance to ensure you have included all the required sections.

## Cover page

This section includes required and recommended sections.

Complete the cover page to provide important context. This will assist the Commissioner to assess your progress report.

This section includes:

* **Organisation name (required)**: insert your organisation’s full legal name (that is, not an abbreviation or shorthand) and trading name (the name you are most well-known by in your industry or publicly).
* **Total number of employees (recommended)**: insert the total number of employees and their full-time equivalent workload (FTE) in your organisation on 30 June 2025.
* **Response rate to employee experience survey (recommended)**:insert the People matter survey (or equivalent) response rate for your organisation. The response rate is the percentage of your total workforce who completed the survey.
* The Victorian Public Sector Commission (or alternative survey provider) should supply this with your survey results. This must be the survey that you used for your 2025 workplace gender audit.
* **Contextual information (recommended)**:describe anything that affected your progress towards gender equality and your ability to make reasonable and material progress on the workplace gender equality indicators in the Act. Factors can include structural changes to your organisation, responding to natural disasters in your region and economic downturn.
  + You may wish to discuss the factors in section 16(2) of the Act. These are the factors that the Commissioner considers when determining whether a duty holder has made reasonable and material progress. The ‘Factors affecting progress’ webpage has further information. You will also have an opportunity to discuss these in the ‘workplace gender equality indicators’ section of your progress report. If applicable, you may copy and paste some or all of the same information in both sections of the progress report.
* **Location (recommended)**: insert either metropolitan, regional or rural. Please use your organisation’s primary location or your central office. If you insert ‘other’, please explain.
* **Attestation by head of organisation (required):** your head of organisation (CEO or equivalent) shouldcomplete this section to:
  + show they have approved your progress report, and
  + confirm that your organisation has completed all relevant gender impact assessments.

Your CEO can also use this space to provide further comments for the Commissioner to consider when assessing your progress report. Your CEO will be your Secretary (for Victorian government departments), Vice-Chancellor (for universities) or equivalent.

# Part 1: Reporting on gender impact assessments (GIA)

**This part includes required and recommended action items.**

You are required to report on gender impact assessments (GIAs) that you undertook during the reporting period.

The Act requires organisations to conduct a GIA when developing or reviewing any policy, program or service with a **direct and significant impact on the public**. As part of your progress report, you must identify each policy, program or service that was subject to a GIA during the [relevant period](#_Strategies_and_measures).

**Do not report on any GIAs conducted on internal workforce policies or programs that did not have a direct and significant impact on the public** (for example, a flexible work policy or staff training program).

The *Gender Equality Act 2020* only requires organisations to undertake a GIA on policies that are new or up for review during the reporting period and that have a direct and significant impact on the public.

Only report on GIAs in this progress report if:

* it is clear how the policy, program or service will be, or has been, changed as a result of the GIA, **or**
* no change will be made (and this is clear).

Clear changes, or lack of changes, due to a GIA can include:

* all GIA recommendations were approved for action by the person responsible for making these decisions
* some GIA recommendations were approved for action by the person responsible for making these decisions
* all GIA recommendations were rejected by the person responsible for making these decisions.

If decisions have not been made yet, do not report on the GIA in this reporting period. Instead, report on them in the next reporting period, once the decisions have been made.

The table below sets out some example scenarios.

| **Scenario** | **Action** |
| --- | --- |
| A GIA was undertaken on a water corporation public policy during the reporting period.  Several recommendations were made.  All were approved for implementation by the CEO. | Report on this GIA.  Select ‘yes’ in column F.  Describe the actions in column G. |
| A GIA was undertaken on a Victorian Government department’s public program.  Several recommendations were made.  Some recommendations were approved, and some were rejected by the relevant Deputy Secretary. | Report on this GIA.  Select ‘yes’ in column F.  Describe the approved actions in column G. |
| A GIA was undertaken on a public health service’s public program.  Several recommendations were made.  No recommendations will be implemented due to resourcing decisions by senior leaders. | Report on this GIA.  Select ‘no’ in column F.  Describe why no actions were taken in column H. |
| A GIA was undertaken on a local government policy impacting the public.  Several recommendations were made.  No decision has been reached yet as to which recommendations will be approved. This is because Council has not yet considered the proposal. | Do not report on this GIA.  If the GIA is finalised in the next reporting period, report on this GIA in the next progress report. |

In this part, you will find:

* 1.1 Confirming your GIA exemptions (**required**)
* 1.2 Describing policies, programs or services subject to a GIA (**required and recommended items**)
* 1.3 Describing actions taken as a result of a GIA (**required and recommended items**)

## 1.1 Confirming GIA exemptions (required)

### Summary

* If applicable, select the permitted reason why you have not listed any policy, program or service that was subject to a GIA.
* You can select more than one reason.
* Explain how the reason(s) apply to you.
* Select ‘None of these apply’ and write ‘NA’ under explanation if the exemptions don’t apply.

Section 19(4) of the Act sets out the permitted reasons why you might not be able to identify or report on policies, programs and services subject to a GIA.

In some cases, you may not have been required to undertake any GIAs in the reporting period.

If you have a permitted reason for not reporting on any GIAs in your progress report, it is important to identify this. If you do not do so, the Commissioner will not know if you have complied with the Act.

Permitted reasons include at least one of the following:

* doing so would make the progress report an exempt document within the meaning of the *Freedom of Information Act 1982*
* doing so would result in a disclosure prohibited by a different Act
* doing so would reveal confidential information
* the entity had no policies, programs or services that met the Act’s [threshold for a GIA](https://www.genderequalitycommission.vic.gov.au/is-gender-impact-assessment-required/assess-impact).

#### Advice for demonstrating compliance

You will receive an outcome of [‘compliance not demonstrated’](https://www.genderequalitycommission.vic.gov.au/compliance-gender-equality-act-2020) if you:

* do not report on policies, programs and services that were subject to a GIA, **and**
* do not select the permitted reason and explain the reason further.

#### Privacy obligations

You will have existing obligations under relevant privacy legislation that you must meet when conducting work under the Gender Equality Act. You must not report on a policy, program or service if it would disclose confidential or prohibited information.

When identifying a policy, program or service that was subject to a GIA or reporting on actions taken, you should determine if this would disclose any information that is confidential.

In addition to the ‘permitted reason’ list above, this may also include information that is considered Cabinet in Confidence (for Victorian Public Service departments), such as a business case that was not funded.

For further advice, contact the [Office of the Victorian Information Commissioner (OVIC)](https://ovic.vic.gov.au/) which also has further information about [exemptions under the Freedom of Information Act](https://ovic.vic.gov.au/freedom-of-information/resources-for-agencies/practice-notes/#foi-exemptions).

You may also wish to seek legal advice.

## 1.2 Describing policies, programs or services subject to a GIA

### Summary

* Identify each policy, program or service that was the subject of a GIA during the reporting period.
* Only include GIAs done on policies, programs or services that have a direct and significant impact on the public.
* Only include GIAs that have been completed, where final decisions have been made about whether to change the policy, program or service.
* Exclude any policies, programs or services that would disclose confidential information.
* Add more rows as needed.
* List one policy, program or service per row.
* You must fill in all required elements to be compliant with your obligations under the Act.

### Instructions for completing the template

| **Component** | **Description** |
| --- | --- |
| Reference number (‘ref #’) (pre-filled) | This is prefilled in the template.  You will need the reference number to provide further information against each policy, program or service in the next table under (G) (1.3 Describing actions taken as a result of GIA). |
| (A) Title **(required)** | Insert the name of the relevant policy, program or service that was the subject of the GIA. |
| (B) Subject **(required)** | Select from the drop-down if the GIA was done on a policy, program or service.  Find definitions of [policies, programs and services](#_Policies,_programs_and) in our glossary of terms. |
| (C) Description of the policy, program or service **(required)** | Provide a brief and clear description of the policy, program or service.  You should provide enough detail here for the Commissioner to understand the context of the policy, program or service. |
| (D) Status **(required)** | Select from the drop-down menu to indicate if the GIA was done on a policy, program or service that was **new** or **up for review.** |
| (E) Description of gendered impacts **(recommended)** | Describe the gendered impacts you identified when completing a GIA on this policy, program or service.  Gendered impacts are the areas where a GIA revealed that people of different genders might be impacted in different ways. These insights may have shown you where and how the policy, program or service needed to be changed.  Completing this column will assist you to complete section 1.3 describe the actions taken as a result of the GIA (under (G)).  Any actions taken as a result of your GIA should link directly to the gendered impacts you describe here. |

## 1.3 Describing actions taken as a result of a GIA

### Summary

* Describe the actions taken as a result of undertaking a GIA.
* Use the reference number (‘ref #’) from table 1 to link your GIA description to the relevant policy, program or service.
* Add more rows as needed.

### Instructions for completing the template

| **Component** | **Description** |
| --- | --- |
| Reference number (ref #) | This is prefilled in the template. The reference number refers to the listed policy, program or service in the previous table under (A) of 1.2 Describing policies, programs and services subject to GIA. |
| (F) Were actions taken as a result of the GIA? **(required)** | * Select ‘yes’ or ‘no’ from the drop-down to indicate whether you took action (or not) as a result of the GIA. * Do this for every policy, program or service you listed.   If actions were taken, select ‘yes’. There may be cases where several recommendations were made but not all actions were approved. In this case you should still select ‘yes’ if some actions were approved.  If actions weren’t taken:   * select ‘no’ * write N/A in the next column (under (G)) * explain why no actions were taken in the column after that (under (H)) |
| (G) Describe the actions taken as a result of the GIA in order to:   * meet the needs of people of different genders * promote gender equality * address gender inequality.   **(required)** | * Describe how the actions taken as a result of the GIA:   + Met the needs of persons of different genders; and/or   + Addressed gender inequality; and/or   + Promoted gender equality * Do this for every policy, program or service you listed. * Report only on completed GIAs.   Explain how the actions to develop or change your policy, program or service will achieve better outcomes for people of different genders.  If you are unsure how the actions relate to better outcomes for people of different genders, refer to the gender equality principles (section 6 of the [Act](https://www.legislation.vic.gov.au/as-made/acts/gender-equality-act-2020)), research or evidence to better understand how the actions drive progress towards gender equality.  Only report on completed GIAs in your progress report. This means that if no final decision has been made about whether to change the policy, program or service, the GIA should be included in the next progress report. Advice for demonstrating compliance Make sure you include information on how your actions met the needs of people of different genders, addressed gender inequality or promoted gender equality.  If it is not clear that the actions you describe help meet the above goals, you may receive an outcome of ‘compliance not demonstrated’. |
| (H) If you did not take action as a result of the GIA, explain why **(required)** | * Describe the reason(s) why no action was taken on your policy, program or service as a result of the GIA.   If actions were taken:   * write N/A in this column * move to the next column (under (I)). |
| (I) Describe how and why intersectionality was considered (or not) **(required)** | * Describe how you considered intersectionality. * If you did not consider intersectionality, explain why. * Do this for every policy, program or service you listed.   When undertaking a GIA, the Act requires duty holders to take into account, where practicable, how gender inequality can be compounded by disadvantage or discrimination that groups of people may experience. This is called [intersectional gender equality](#_Intersectional_gender_inequality).  To do an intersectional analysis, you should consider the impact of your policies, programs or services on people who experience compounding forms of discrimination on the basis of gender **and** other factors (for example, being a woman with disability, being a First Nations woman). Factors can include:   * being a First Nations person * age * disability * ethnicity * gender identity * race * religion, and/or * sexual orientation.   Compounded gender inequality can be considered across more than one stage of a GIA. You might consider:   * consulting with stakeholders or community members who experience compounded gender inequality * asking experts about compounded gender inequality * using data in your GIA that reveals forms of compounded gender inequality * doing research about compounded gender inequality to inform your GIA.   For many organisations, taking intersectional gender equality into account is a new practice. Documenting and reporting on any intersectional analysis here will support capability-building across all duty holders.  If you were unable to consider compounded gender inequality when doing the GIA, you must explain why this was not practicable in this section. |
| (J) Describe any actions taken specifically designed to address intersectional inequalities (compounded gender inequalities)? (**recommended**) | Describe any actions taken to address issues you identified when considering compounded gender inequality.  You can cross-reference the actions you already described, if relevant (under (G)). |

# Part 2: Reporting on progress against the indicators

**This part includes required and recommended action items.**

This section supports you to report on your progress against the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) (indicators) in the Act.

Reporting on your organisation’s progress on the indicators allows the Commissioner to assess your organisation’s compliance with the requirement to make ‘reasonable and material progress’ on the indicators.

It will also help you to determine if the strategies in your GEAP have translated into measurable change. This information will assist you to further develop and tailor your GEAP strategies.

In this part, you will find:

* 2A Completing your workplace gender audit and analysing the data (**required**)
* 2.1 Describing progress against the workplace gender equality indicators (**required and recommended items**)
* 2.2 Describing factors contributing to or inhibiting progress (**required**)

## 2A Completing your workplace gender audit and analysing the data (required)

Before completing the indicators section of the template, must undertake a workplace gender audit (audit).

You must collate and analyse your audit data to demonstrate your progress in relation to the indicators.

Do this by collecting and submitting updated audit data to the Commissioner and comparing this with your last audit.

See the 2026 Workplace gender audit guidance for further guidance on:

* collecting the required and recommended information
* submitting your audit.

You will then need to analyse your progress audit data and compare the results of your 2025 audit data with your 2023 audit data.

You can also discuss the results of your 2021 audit data (optional) in steps 2.1 and 2.2.

## 2.1 Describing progress against the workplace gender equality indicators

### Summary

* Refer to your progress data, ideally using the Commissioner’s measures for each indicator as a minimum (see details below).
* Include comparative quantitative data from your 2025 and 2023 audits for each indicator (option to include 2021 data).
* Include at least one data point per indicator.

### Instructions for completing the template

| **Column** | **Description** |
| --- | --- |
| Indicator | This is prefilled in the template. It refers to the workplace gender equality indicators. Do not change this column. |
| Progress data (**required**) | * Refer to your progress data, ideally using the Commissioner’s measures as a minimum. * Include comparative data from your 2023 and 2025 audits (**required**). * Include at least one data point per indicator (**required**).   You must include comparative data from your 2023 and 2025 audits to demonstrate your progress against the indicators. You can also compare your 2023 and 2025 audit data with your 2021 audit data if you wish. Using the Commissioner’s measures (expected) Your workplace gender audit includes data for each indicator.  The Commissioner has identified key measures that represent the minimum information she will use to assess your progress report for compliance.  Referring to progress data from your 2023 and 2025 audits using the Commissioner’s measures will ensure she is able to assess your progress report effectively. These measures are a minimum standard against each indicator.  [Please note that the Commissioner will be recommending minimum data points for duty holders to include from their 2023 and 2025 audits, so that they can effectively demonstrate progress. These are currently being finalised and will be published along with the guidance in May.] Using alternative measures (not recommended) You may use different quantitative data measures that you think better demonstrate your progress against the indicators. However, the Commissioner recommends that you use these in addition to the expected measures.  If you choose to provide different progress data, you must still include comparative quantitative data from your 2023 and 2025 audits to demonstrate compliance.  You must compare the same data points from your 2023 audit and your 2025 audit. This will help you determine if reasonable and material progress has (or has not) been made, which you will need to discuss in the next column. Advice for demonstrating compliance You must include sufficient data from your 2023 and 2025 audits to demonstrate progress against each indicator. This means including both:   * comparative quantitative data from your 2023 and 2025 audits. * Where possible, at least two measures from your 2023 and 2025 audits.[[4]](#footnote-5)   If you do not include sufficient audit data, you may not be able to demonstrate progress (or lack of progress) during the relevant period. This could result in an outcome of ‘compliance not demonstrated’ for this requirement. |
| Additional progress data (**recommended**) | * Include progress data in addition to the Commissioner’s measures. This may include:   + particular areas where progress has been made on the indicator   + areas where more attention is needed   + giving a more complete picture of your progress on the indicator   + intersectional data in relation to progress on the indicator. |
| Has progress been made? (**required**) | * Select yes or no from the drop-down to indicate whether you believe your organisation has made numerical progress against each indicator. * If you have not made numerical progress, you can still achieve compliance by providing further information in step 4. This includes information about the factors that limited your progress, or the strategies implemented to drive progress.  Stable progress If your quantitative data on an indicator has remained stable between your 2023 and 2025 audit:   * select no * see further guidance on how to interpret stable data under ‘How to interpret stable data’. |
| Explain how the data does (or does not) demonstrate progress (**required**) | * Explain why changes in your data provided in the progress data column(s) do or do not represent progress against each indicator. * Refer to the quantitative changes in the data you provided from your 2023 and 2025 audit. You can also refer to data from your 2021 audit if relevant.  Stable progress Your quantitative data on an indicator may have remained stable between your 2023 and 2025 audit. If this is the case, consider:   * If you had already achieved gender equality on the indicator in 2023 and therefore did not need to make any further progress, then note this. * If you have not achieved gender equality on the indicator, acknowledge that there is still work to do.   Further guidance on how to interpret stable data can be found under ‘How to interpret stable data’. No quantitative progress If you have not made numerical progress for reasonable reasons, this will be taken into account when your progress report is being assessed for compliance. You can still achieve compliance if you have not made numerical progress.  You can identify and discuss these reasons in 2.2 Describing factors contributing to or inhibiting progress. You can also identify and discuss your GEAP strategies that contributed to the progress (or lack of progress) against each indicator. |

### How to interpret stable data (further guidance)

If your data has remained stable between your 2023 and 2025 audits, this could mean that:

* You had achieved gender equality on this indicator in 2023
* There is still work to do, and you are not making numerical progress. This does not mean that you cannot achieve compliance on this indicator.

The example scenarios below explain these two situations for indicator 1: gender composition of all levels of the workforce.

### Example scenarios

| **Scenario** | **Action** |
| --- | --- |
| **Gender equality not achieved.**  Your data on this indicator has remained stable between your 2023 and 2025 audit.  However, the gender composition throughout your organisation is heavily skewed towards one gender or another. | Select ‘no’ in column D. You have not made progress, and you have not achieved gender equality.  In column E, explain why your data shows that you have not made progress and that you have not achieved gender equality. Acknowledge that there is work to be done.  In step 4, you can provide further context about:  any factors that limited your progress on this indicator, and  any GEAP strategies designed to make progress on this indicator.  If the Commissioner is satisfied with the information you provide in step 4, you will be marked compliant on this indicator. |
| Gender equality achieved.  Your data on this indicator has remained stable between your 2023 and 2025 audit.  The gender composition throughout your organisation is mostly balanced. | Select ‘no’ in column D. You have not made progress.  In column E, explain why your data shows that you have not made progress (for example, because there was no progress to be made) and therefore why your stable data is not a problem.  In step 4, you can provide further context about:  any GEAP strategies designed to maintain gender equality on this indicator. |

## 2.2 Describing factors limiting and contributing to progress

### Summary

* Select any factors listed in section 16(2) of the Act that may have affected your progress in relation to the indicators (required).
* Discuss those factors (required).
* Select and discuss for each indicator.
* Select more than one, if applicable.
* Select ‘none’ if none apply.
* List relevant strategies against each indicator.

### Instructions for completing the template

| **Column** | **Description** |
| --- | --- |
| Indicator (**pre-filled**) | This is prefilled in the template. It refers to the workplace gender equality indicators. Do not change this column. |
| (F) Did any of the factors listed below limit your progress? (**required**) | * Select any of the factors that may have affected your organisation’s ability to make progress against each indicator. * Select more than one factor, if applicable. * Select ‘none’ if none apply.   The factors are:   1. the size of the organisation, including the number of employees 2. the nature and circumstances of the organisation, including any barriers to making progress 3. requirements that apply to the organisation under any other Act, including an Act of the Commonwealth 4. the organisation’s resources 5. the organisation’s operational priorities and competing operational obligations 6. the practicability and cost to the organisation of making progress; and 7. genuine attempts made by the organisation to make progress.   The Commissioner will take these factors into account when determining whether you have made reasonable and material progress (or not) against the indicators. |
| (G) Explain how any factor(s) limited your progress (**required**) | Explain howthe factor(s) that you identified impacted your ability to make reasonable or material progress against each indicator.  If you selected multiple factors, make sure you refer to all of them in your explanation.  If you selected ‘none’ to factors impacting your progress (or lack of progress), write N/A in this column. |
| (H) List the strategies implemented that contributed to or aligned with the indicator (**required**) | List the GEAP strategies that supported, or were designed to support, progress against each indicator.  Completing this section forms part of your organisation’s required reporting on the implementation of your GEAP strategies and measures.  You must list the relevant strategies against each indicator, whether or not you have made reasonable and material progress on that indicator. |

# Part 3: Reporting on GEAP strategies

**This part includes required and recommended action items.**

This section shows you how to report on your progress in implementing the strategies in your gender equality action plan (GEAP).

To meet your obligations to report on your GEAP’s progress, you must use the 2026 progress report template.

While you should have listed your GEAP strategies in 2.2 (column H), this section aims to encourage you to think about the overall implementation of your strategies.

This section includes:

* 3.1 Explaining incomplete strategies (**required**)
* 3.2 Describing achievements, challenges and learnings (**recommended**)
* 3.3 Providing other updates on implementation (**recommended**)
* 3.4 Describing resourcing allocation (**recommended**)

## 3.1 Explaining incomplete strategies (if any)

### Summary

* Explain whether you had strategies in your gender equality action plan (GEAP) that were not completed (required).
* Explain why they were not completed (required).

### Detail

As with any program of work, sometimes activities do not go as planned. Strategies may have been delayed or cancelled for many reasons.

For **section 3.1**, briefly summarise strategies in your GEAP that were not completed and explain why.

You can discuss these in general terms.

You do not need to list every strategy that was not completed. However, if you have not completed multiple strategies, please provide a total number.

## 3.2 Describing achievements, challenges and learnings

### Summary

* Summarise any **noteworthy strategies** that positively contributed to gender equality (**recommended**).
* Discuss any **success factors** (in addition to the data you provided in part 2) that demonstrated significant progress. This might include commentary about goals you set yourself at the start of the GEAP, indicators you selected to monitor, or evaluation findings (**recommended**).
* Discuss any **challenges** in implementing your strategies. This could include things that did not work well or that did not go as planned (**recommended**).
* Summarise your **learnings** from implementing your strategies. You could explain how this has changed your approach to gender equality work going forward (**recommended**).

Reflecting on and describing what you have achieved and learned from implementing your GEAP will help you improve in your next GEAP. It will also help your organisation, the Commissioner, and other organisations to understand:

* what works and doesn’t work in GEAP implementation.
* what are key enablers, blockers and challenges in implementation, such as:
  + leadership commitment
  + governance
  + organisational or workforce context
  + ineffective strategies
  + low understanding of gender equality and/or intersectionality
  + resistance to gender equality.
* patterns across industries or the broader public sector in relation to achievements and challenges.

### Detail

The 2026 GEAP template asks a similar question. **Question 1** of the GEAP template prompts you to reflect on the implementation of your previous GEAP.

To reduce workload, you can copy your answer from the 2026 progress report template into your GEAP. Or, you can reference your answer in your GEAP, such as ‘Refer to 2026 progress report section 3.2’.

## 3.3 Providing other updates on implementation

### Summary

* Provide any other updates on your GEAP implementation (**recommended**).

### Detail

Implementing a GEAP is a complex and long-term project. There may be specific things that you want to tell the Commissioner and others reading your progress report about your GEAP implementation. Please include these updates here.

## 3.4 Describing resourcing allocation

#### Summary

* Describe the resourcing allocated to implementing the strategies in your GEAP (**recommended**).

### Detail

Assessing the resources required and allocated to effectively progress your GEAP may provide a valuable insight for your organisation, the Commissioner, and other organisations that want to improve gender equality within their workplaces.

We encourage you to reflect on the resourcing required and allocated to implementing your GEAP in your progress report.

Consider:

* How many staff members/FTE were allocated to implementing the strategies?
* Who implemented the strategies in your GEAP? What roles they performed and at what level?
* Was there enough resourcing to implement your strategies?
* If not, how will your organisation address this in your next GEAP?
  + Note that you are required under the Act to allocate adequate resourcing to implementing your GEAP.
* Was financial, technological, physical and/or time resourcing adequate?
* Any other assessment.

# How to submit and publish your progress report

## Submission

Your 2026 progress report is due to the Commissioner on **1 May 2026,** unless you have an approved extension.

You may submit your progress report earlier.

Submit your progress report using the 2026 progress report template via the [reporting platform](https://www.genderequalitycommission.vic.gov.au/reporting-platform-help).

You must use the template.[[5]](#footnote-6)

Note that supporting documents will not be accepted.

If you experience unforeseen circumstances that will impact whether you can complete your progress report on time, you can request an extension. Should you require this, send a request to the Commissioner as soon as possible before the submission date. For further information on extension requests, visit the Commissioner’s extension request page.

Note that an individual duty holder extension will not change future deadlines under the [*Gender Equality Act 2020*](https://www.legislation.vic.gov.au/as-made/acts/gender-equality-act-2020).

## Reporting platform

Your reporting process owner and platform users have access to the reporting platform.

To request new or additional reporting platform users, fill this [Nomination of *Gender Equality Act* reporting platform users](https://forms.office.com/pages/responsepage.aspx?id=H2DgwKwPnESciKEExOufKMnWNqWgMRhCvKZpsLWfS81UQ1JRNjBGSlQxNjQ2QlBaWDJYTVIzTVU1TCQlQCN0PWcu&route=shorturl) form. Note that only reporting process owners can fill in this form.

If you have questions about how to use this form please contact the Commissioner’s team via [enquiries@genderequalitycommission.vic.gov.au](mailto:enquiries@genderequalitycommission.vic.gov.au)

## Publishing your progress report on your website

You must publish your progress report on your website.

Publishing guidelines:

You may:

* publish as soon as reasonably practicable after submission (i.e. before the Commissioner’s compliance assessment)
* wait to publish after the Commissioner has notified you of the compliance outcome of your progress report.

If you choose the first option and the Commissioner determines you need to make updates to your progress report:

* you will need to update your published version (required)
* include a disclaimer noting your progress report has not been assessed by the Commissioner and may be subject to change (recommended).

If you choose the second option, you should publish your progress report within **3 months** of notification of compliance outcomes.

The Commissioner will publish progress reports on the [Insights Portal](https://insights.genderequalitycommission.vic.gov.au/application-dashboard).

Please note that the Commissioner will not accept supporting documents. Please provide all information using the template.

If you would like to include additional information, you may use the ‘Any other additions or comments’ section at the end of the template.

Additional information you may wish to provide in this section includes:

* a more detailed analysis of your data, or infographics
* additional details about GIAs undertaken
* further summary information.

# Appendix: guidance for changed or new entities

**My organisation has become a new entity recently and has not submitted a GEAP. Are we required to submit a progress report?**

If your new organisation has not previously submitted a GEAP, you are not required to submit a progress report. Your next obligation will be to submit a GEAP in 2026. If you are unsure, please email [enquiries@genderequalitycommission.vic.gov.au](mailto:enquiries@genderequalitycommission.vic.gov.au).

**My organisation has experienced a significant structural change. How do we report on progress?**

Your organisation may have experienced a significant change, such as:

* merging with another organisation
* splitting into multiple new organisations
* changing its name.

In some cases, your organisation, or part of your organisation, may have completed a GEAP prior to this change.

After notifying the Commissioner of your significant organisational change, your organisation would have received a letter from the Commissioner informing you about whether you are required to submit a progress report.

If you are unsure whether your new organisation is required to submit a progress report, please contact the Commissioner’s team at [enquiries@genderequalitycommisison.vic.gov.au](mailto:enquiries@genderequalitycommisison.vic.gov.au).

The Commissioner acknowledges that structural changes in your organisation may impact the way in which you report on progress. If you are unsure how to complete your progress report considering these changes, please contact the Commissioner’s team at [enquiries@genderequalitycommisison.vic.gov.au](mailto:enquiries@genderequalitycommisison.vic.gov.au).

# Progress report checklist

Include the following components required under the *Gender Equality Act 2020* and *Gender Equality Regulations 2020.*

## General

* The report uses the 2026 progress report template.
* Your head of organisation (CEO or equivalent) has completed the attestation.
* The report does not contain any personal or potentially identifying information.

## For gender impact assessments (GIAs)

* You have confirmed whether GIA exemptions apply (or not) and why.
* The report includes details of the policies, programs and services subject to a GIA.
* The report includes only GIAs that were completed:
  + during the reporting period **and**
  + on policies, programs or services that have a direct and significant impact on the public.
* You have described actions taken as a result of each GIA in relation to how they:
  + met the needs of people of different genders
  + promoted gender equality
  + addressed gender inequality.
* If no actions were taken, explained why?
* The report explains how intersectionality was considered, or why it was not.

## For workplace gender equality indicators (indicators)

* The report includes progress data for all indicators, including:
  + at least one data point in relation to each indicator (ideally using the Commissioner’s measures as a minimum) **and**
  + comparative workplace audit data from 2023 and 2025.
* The report explains whether progress has been made for all indicators.
* The report identifies and explains any factors limiting progress.

## For GEAP strategies

* GEAP strategies are listed against relevant indicators.
* The report explains any incomplete GEAP strategies and why.

1. <https://www.genderequalitycommission.vic.gov.au/progress-reporting-2023> [↑](#footnote-ref-2)
2. As outlined in section 19 of the Act. [↑](#footnote-ref-3)
3. When developing your progress report, duty holders must have regard to legal obligations they may have under Commonwealth and State legislation and industrial instruments, including but not limited to: the [*Fair Work Act 2009*](https://www.legislation.gov.au/Series/C2022C00341) (Cth) and other Commonwealth workplace relations legislation; the [*Equal Opportunity Act 2010*](https://www.legislation.vic.gov.au/in-force/acts/equal-opportunity-act-2010/) (Vic) and the [*Charter of Human Rights and Responsibilities Act 2006*](https://www.legislation.vic.gov.au/in-force/acts/charter-human-rights-and-responsibilities-act-2006/) (Vic); the [S*ex Discrimination Act 1984* (Cth)](https://www.legislation.gov.au/Series/C2004A02868) and the [*Workplace Gender Equality Act 2012*](https://www.legislation.gov.au/Series/C2004A03332) (Cth); enterprise agreements, workplace determinations and modern awards. [↑](#footnote-ref-4)
4. Except for Indicator 2: Gender composition of the governing body. You may use a single data point for this indicator (tell us what proportion of your governing body were women, men or people of self-described gender in your 2023 and 2025 audits). [↑](#footnote-ref-5)
5. You must use the 2026 progress report template as prescribed in the Gender Equality Regulations 2020. Please refer to guidance on the [regulations](#_*_The_proposed) for further information. [↑](#footnote-ref-6)