

# Gender equality action plan (GEAP) guidance 2026

## Commission for Gender Equality in the Public Sector

## Draft version for consultation

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## Overview

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

The Act requires duty holders to develop a gender equality action plan (GEAP) every four years. GEAPs are designed to promote workplace gender equality in your workplace, benefiting everyone who works there. Your GEAP will help you plan, implement, and measure change.

The purpose of a GEAP is to:

* focus attention on gender equality and improve understanding of why this is important.
* identify areas where there is gender inequality in the organisation using the [seven key workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) in the Act.
* plan for, and take steps towards, improving gender equality on the workplace gender equality indicators.
* set out the ways you will measure your progress and learn from it to ensure you’re on track.

|  |
| --- |
| The [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) are:1. Gender composition of all levels of the workforce
2. Gender composition of the governing body
3. Equal remuneration for work of equal or comparable value across all levels of the workforce, irrespective of gender
4. Sexual harassment in the workplace
5. Recruitment and promotion practices in the workplace
6. Availability and utilisation of terms, conditions and practices relating to: family violence leave, flexible working arrangements, and working arrangements supporting employees with family or caring responsibilities
7. Gendered segregation within the workplace
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#### This page has been intentionally left blank.

For consultation purposes, some pages have been removed for ease of review. You do not need to provide feedback on this omitted section.

The pages removed from this section include guidance on:

* Why this work is important
* What you need to do
* Requirements under the *Gender Equality Act 2020* and the *Gender Equality Regulations 2020*
* Key dates for developing and submitting your gender equality action plan (GEAP)
* How to use the gender equality action plan (GEAP) template and guidance
* Instructions on the cover page

# Part 1: Preparing to develop your gender equality action plan (GEAP)

## Step 1: Planning your gender equality action plan (GEAP)

#### This step includes recommended actions only.

Start with understanding what you are required to do under the [*Gender Equality Act 2020*](https://www.legislation.vic.gov.au/as-made/acts/gender-equality-act-2020)(the Act). In this step, you will find:

* 1.1 Using insights from your previous gender equality work (recommended)
* 1.2 Understanding the basics of gender equality (recommended)
* 1.3 Setting up for success: processes, record keeping, governance and leadership (recommended)
* 1.4 Learning from other duty holders (recommended)
* How-to guides and further reading

For help with the GEAP template related to this section, see the end of this step.

### 1.1 Using insights from your previous gender equality work (recommended)

If you previously completed a GEAP and a [progress report](https://www.genderequalitycommission.vic.gov.au/progress-reporting-2023), use the outcomes and reflections to inform your next GEAP.

Reflect on:

* What progress did you make against the seven [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators)?

**Tip:** Use data to assess your progress against the seven [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) by comparing your previous audit(s) with your most recent workplace gender audit data.

* Which strategies were not completed, and why? Do they need to be included in the next GEAP?
* Did you achieve the outcomes you intended? If not, why? Were there any strategies that were not successful? If so, why?

**Tip:** Reflect on whether your strategies had the intended impact. If not, was it because of the strategy itself or how it was implemented? Were there any unintended consequences?

* Did you have adequate leadership support and commitment from across the organisation? If not, why, and how can you ensure this in your new GEAP?

**Tip:** For help on leadership, visit the Champions of Change [The Leadership Shadow](https://championsofchangecoalition.org/resource/the-leadership-shadow/).

* What other insights did you gain from implementing your previous GEAP and reporting on your progress?
* Are there other metrics that show success and/or learnings?

**Tip:** Other metrics may include:

* Employee engagement
* Retention and turnover
* Leadership engagement

Visit WGEA’s [Employer of Choice for Gender Equality: leading practices in strategy, policy and implementation](https://www.wgea.gov.au/sites/default/files/documents/UQ%20full%20report.pdf) for further guidance on these.

* Did you consider [intersectional gender equality](https://www.genderequalitycommission.vic.gov.au/applying-intersectionality)? Are you prepared to do this in your next GEAP?

Your audit data and the required consultation with your employees, employee representatives (unions) and members of your governing body should inform your GEAP. Your GEAP must address aspects of gender inequality identified in your 2025 audit in relation to the 7 [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators).

### 1.2 Understanding the basics of gender equality (recommended)

Before developing your GEAP, familiarise yourself with the basics.

* What is gender equality, and why does it matter?
* What is my [duty to promote gender equality](https://www.genderequalitycommission.vic.gov.au/promoting-gender-equality) under the *Gender Equality Act 2020*?
* What are the gender equality principles, and why do they matter?
* What are the gender pay equity principles, and why do they matter?
* What are the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators)?
* What is [intersectionality, and how do you apply it](https://www.genderequalitycommission.vic.gov.au/applying-intersectionality)?

### 1.3 Setting up for success: processes, record keeping, governance and leadership (recommended)

Before developing your GEAP, do the groundwork to set your organisation up for success. Reading this guidance and the additional links provided for further information is a good start.

#### Processes

* **Create a plan for your GEAP development.** It should outline the activities, timelines, and responsible individuals or teams. A gantt chart can work well for this. This helps keep you on track to complete everything on time.
* **Form a working group** to lead the GEAP development. Ensure diverse representation from various employee equity groups, teams, and expertise levels. This group can drive the process, track challenges, and ensure progress.
* **Involve senior leaders**. Their support is crucial for the success of your GEAP. See below for further guidance on leadership.
* **Develop a consultation plan.** It should outline the steps, resources, and time needed for consultation. Include how you will engage staff with diverse experiences and communicate with employees in existing networks, and through other channels such as newsletters and chat groups. Allow time for feedback and potential delays. Ensure the process is safe, accessible, and respectful for all employees.See managing effective consultation and engagement for further guidance.
* **Define key terms** likegender equality, intersectionality and the pay gap. This will help ensure that everyone understands and uses them consistently. Discuss these terms during the consultation process. You can also include them in your GEAP in a glossary or definitions section.

#### Record keeping

While you plan your GEAP, it is important to set up strong record-keeping practices. Good records will help ensure:

* You track the implementation of your GEAP well.
* It is easier for you to report on your progress in future reports to the Commissioner.
* You can better evaluate the effectiveness of your GEAP and its strategies.

#### Governance

A clear governance structure with lines of authority, accountability and responsibility for the development and implementation of your GEAP is critical. Good governance contributes to better:

* **Accountability:** it clarifies who is responsible for what. This prevents confusion and inefficiency.
* **Decision-making:** it enables faster and more informed decisions.
* **Resource use:** it ensures that time, budget, and staff meet your goals.
* **Risk management:** it helps identify and address risks early. This means potential issues can be dealt with before they arise.

#### Leadership

To make a real impact in gender equality, the [Champions for Change](https://championsofchangecoalition.org/resource/the-leadership-shadow/) coalition recommends that leaders:

* **Communicate the vision**. Leaders need to make gender equality a priority linked to the organisation’s goals. Regular updates and celebrating GEAP achievements keep everyone engaged. When leaders speak openly about gender equality, it shows that this work matters.
* **Lead by example.** Actions speak louder than words. Leaders must model inclusive behaviour and provide strong support for GEAP initiatives. When employees see leaders act on their commitments, it builds trust. It encourages others to follow.
* **Set clear priorities.** What leaders focus on shows what matters. By dedicating time and resources to GEAP efforts, leaders signal its importance. They should make gender equality a visible priority in their schedules and decision-making.
* **Measure progress**. Sharing progress shows that gender equality is not a goal but a key measure of success. Leaders should set clear targets, monitor results, and hold themselves and others accountable. Recognising and rewarding progress motivates teams to stay committed.
* **Engage middle management**. Middle managers play a crucial role in ensuring the success of your GEAP. Leaders need to ensure that middle managers understand their role in achieving the strategies in the GEAP and are held to account for doing so.

Leaders can empower middle managers to drive change by:

* Setting clear expectations
* Providing support and resources
* Recognising their efforts

By taking these steps, leaders will drive change and create accountability. They will help ensure a commitment to gender equality at every level of the organisation. In the GEAP template you can reflect on the above and/or include a statement from the head of your organisation about their commitment to gender equality.

### 1.4 Learning from other duty holders

Learning from other duty holders is a great way to source ideas and know what others in your sector are doing. You can do this by:

* Joining [communities of practice](https://www.genderequalitycommission.vic.gov.au/communities-practice). These communities connect you with others working on gender equality.
* Exploring the insights portal to review 2021 GEAPs submitted by other organisations. Focus on those within your sector or with similar operational contexts. It may help you find relevant, practical ideas and strategies for your organisation.
* Identify successful strategies by looking at other organisation’s progress reports in the insights portal. Consider how similar approaches might work within your organisation.
* Connect with other duty holders to learn about their experiences firsthand.

#### Completing the GEAP template

* For **question 1**, summarise your key reflections on your previous GEAP, using 1.1 Using insights from your previous gender equality work. This step encourages you to reflect on your achievements, learnings and opportunities for improvement in your next GEAP (if relevant).
* For **question 2,** summarise how you have established processes, record-keeping and governance to manage the implementation of your GEAP. This step aims to help set your organisation up for success now and throughout GEAP implementation. In particular, it aims to ensure continuity of your GEAP through organisational, staff and resourcing changes. See 1.3 Setting up for success: processes, record keeping, governance and leadership.
* For **question 3,** summarise the engagement and commitment to the implementation of your GEAP from leadership. This might include a statement by your head of organisation (CEO or equivalent), or by other senior leaders. This step encourages your organisation to drive change and accountability for gender equality by senior leaders. While gender equality is everybody’s business, leadership buy-in is crucial. See 1.3 Setting up for success: processes, record keeping, governance and leadership.
	+ See gaining leadership commitment for further guidance on how to garner support for gender equality from leadership.
	+ See the further reading list below for more guidance on leadership power, influence, resistance and more.

#### How-to guides

* Creating a working group to help develop and implement your GEAP
* Gaining leadership commitment

#### Further reading

* [Power to create inclusive gender equality in the workplace](https://championsofchangecoalition.org/resource/power-to-create-inclusive-gender-equality-in-the-workplace/) (source: Champions of Change coalition)
* [Discussion guide on power to create inclusive gender equality in the workplace](https://championsofchangecoalition.org/resource/power-to-create-inclusive-gender-equality-in-the-workplace/) (source: Champions of Change coalition)
* [Understanding and using your leadership influence](https://championsofchangecoalition.org/resource/the-leadership-shadow/) (source: Champions of Change coalition)
* [Encountering resistance: Strategies to respond to resistance to gender equality initiatives](https://www.vichealth.vic.gov.au/sites/default/files/Encountering-Resistance-Gender-Equality.pdf) (source: VicHealth)
* [Avoiding the merit trap](https://championsofchangecoalition.org/resource/in-the-eye-of-the-beholder-avoiding-the-merit-trap/) (source: Champions of Change)
* [Workplace Equality and Respect Standards](https://www.ourwatch.org.au/workplace/resources/workplace-equality-and-respect-standards) (source: Our Watch)
* [Workplace Equality and Respect: How-to guide](https://www.ourwatch.org.au/workplace/resources/workplace-equality-and-respect-how-to-guide) (source: Our Watch)
* [Workplace Positive Duty Standards](https://www.ourwatch.org.au/workplace/resources/positive-duty-standards) (source: Our Watch)
* [Inclusive workplace toolkit – understanding different kinds of discrimination](https://huecolourtheconversation.com/shop/p/inclusive-workplace-tookit?gclid=CjwKCAjw4_K0BhBsEiwAfVVZ_9KKzZJFUmXgPkHhz0XyE6V85rDJvvCvf2IfQ6vG6sHDjSp8q6ZiEBoCMPIQAvD_BwE) (source: Hue Colour the Conversation)
* [Gender Affirmation in Victorian Public Sector Workplaces](%E2%80%A2%09https%3A/vpsc.vic.gov.au/workforce-capability-leadership-and-management/gender-affirmation/) (source: Victorian Public Sector Commission)
* [Transgender People at Work](https://www.humanrights.vic.gov.au/resources/transgender-people-at-work-guideline/) (source: Victorian Equal Opportunity and Human Rights Commission)
* [The Man Box: the attitudes and behaviours of Australian manhood](https://jss.org.au/programs/research/the-man-box/) ([source: Jesuit Social Services](https://jss.org.au/programs/research/the-man-box/))

## Step 2: Analysing your audit data to identify forms of gender inequality

#### This step includes required and recommended action.

Before developing your GEAP, you are required to analyse your 2025 workplace gender audit data. This analysis helps you understand where gender inequalities exist in your organisation.

In this step you will find:

* 2.1 Including the results of your audit in your GEAP (required)
* 2.2 Identifying causes of inequality in your organisation (recommended)
* How-to guides and further reading

Visit [the Analysing your workplace gender audit results](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2021-09/Workplace%20Gender%20Audit%20Results%20Analysis%20Guidance%20Note%20v1.pdf) guidance for further advice on how to analyse your workplace gender audit results to inform the development of your GEAP.

For help with the GEAP template related to this section, see the end of this step.

### 2.1 Including the results of your audit in your GEAP (required)

You are required to include the results and analysis of your workplace gender audit in your GEAP. Some ways of including this audit data are:

* Providing data in your GEAP against each workplace gender equality indicator (see ‘completing the GEAP template’ at the end of this step).
* Explaining the outcomes of your analyses in the GEAP template (see ‘completing the GEAP template’ at the end of this step).
* Including a more detailed analysis of your data in the space for additional materials at the end of the GEAP template (or an appendix, if you do not choose to use the template).
* Using infographics, summaries, and graphs in your GEAP, or including these in the space for additional materials at the end of the GEAP template (or an appendix, if you do not choose to use the template).

### 2.2 Identifying underlying causes of inequality in your organisation (recommended)

|  |
| --- |
| The workplace gender equality indicators are:1. Gender composition of all levels of the workforce
2. Gender composition of the governing body
3. Equal remuneration for work of equal or comparable value across all levels of the workforce, irrespective of gender
4. Sexual harassment in the workplace
5. Recruitment and promotion practices in the workplace
6. Availability and utilisation of terms, conditions and practices relating to: family violence leave, flexible working arrangements, and working arrangements supporting employees with family or caring responsibilities
7. Gendered segregation within the workplace

You can read more about the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) on the Commissioner’s website. |

Your audit data will reveal any inequalities based on gender (and possibly other identities). But it won’t explain why or how those inequalities came about. Understanding the root causes of inequalities that you find in your data takes time and effort, but it is vital to help develop practical solutions to address these. The following steps are intended as a guide for understanding what is behind any inequalities revealed in your data.

#### Clarifying the problems

Start by identifying inequalities in relation to the workplace gender equality indicators in the Act. Some questions to think about include:

* What is the workforce and employee experience data telling me?
* What further data or evidence do we have on these issues?
* What gaps or discrepancies are there in the data?
* What do I know about the problems? What don’t I know about the problems?
* How does the problem impact those who may experience intersecting disadvantages?

#### Analysing the problem

Investigate the root causes of the problems to understand why they exist. This will ensure your strategies address the underlying causes, not just the symptoms. Consider how organisational culture, policies, and practices may be contributing to any inequalities that you find in relation to the workplace gender equality indicators in the Act.

Questions to consider:

* Why does the problem exist? What are the causes of gender and other inequalities?
	+ For example: To understand the gender pay gap, check if your organisation has jobs done mainly by one gender. Most machine operators are men. They earn more than the administrative staff, who are mostly women and gender-diverse people. This could explain part of your pay gap. Gender segregation might be a reason for the gender pay gap.

Use the **‘but why?’ technique** **to identify root causes**. Start by examining a problem and ask, ‘But why?’ Repeat asking ‘but why?’ until you uncover the root cause. This is best done through consultation with key stakeholders and using evidence-based research on gender inequality to understand root causes.

* Visit [The Community Toolbox for further guidance on the ‘but why?’](https://ctb.ku.edu/en/table-of-contents/analyze/analyze-community-problems-and-solutions/root-causes/main) technique.
* Visit our [Baseline Report](https://www.genderequalitycommission.vic.gov.au/baseline-audit-report-2021) to learn more about the root causes of inequality on each workplace gender equality indicator.
* If possible, consider which groups experience the problem more or differently? (e.g. Aboriginal women, women with disabilities, CALD women, trans men etc).
* How are people affected by the problem?
* How do existing organisational policies, practices, and culture contribute to these problems?
* How do external factors influence these problems?
* Why have previous efforts to address these inequalities not been successful?
* What needs to change?
* What additional information or data do we need to better understand these problems?
* How do employee perceptions and experiences align with our data collected?

Some of these questions are best asked during your consultation (see step 3). But it is helpful to research them first and then test your findings with staff during consultation. The Commissioner’s [Baseline report – 2021 workplace gender audit data analysis](https://www.genderequalitycommission.vic.gov.au/baseline-audit-report-2021) has further information on each of the indicators.

#### Problem statement

Create a problem statement(s) related to each workplace gender equality indicator. Problem statements create a shared understanding of the problems with key stakeholders in a brief way.

Include a problem statement in the GEAP template after analysing your audit data to summarise your analysis. This is usually one or two sentences long, using plain language.

Examples of a problem statement:

* Gender pay equity: The gender pay gap hinders gender equality in our workplace. Women earn, on average, $12,000 per annum less than men. This gap is because women are concentrated in lower levels of our organisation and in lower paid areas. Unconscious bias may also play a role, as women in our organisation are not being trained and promoted equally.
* Gendered segregation: Gendered segregation in our workplace remains a critical issue. Women hold 85% of administrative roles. Men hold 90% of engineering and maintenance roles. This imbalance reinforces gendered stereotypes. This contributes to our gender pay gap and limits diversity in decision-making.

#### Prioritising problems to address

Your analysis may have revealed lots of problems. Prioritise the biggest issues for each of the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) once you have clarified and understood the root causes of the problems.

Under the Act you must be able to demonstrate reasonable and material progress in addressing at least some aspects of inequality on each of the indicators in each two-year period (if your data shows that inequality exists).

Some questions to think about in prioritising problems to address include:

* Which problems have the most significant impact on our employees and organisation?
* What problems are most urgent and require immediate attention?
* Which problems, if resolved, would lead to the most impactful and sustainable change?
* How do these problems intersect with our vision, goals, and stakeholders' expectations?
* How do these problems intersect with the gender equality principles and the gender pay equity principles?

#### Completing the GEAP template

For **question 11,** include the findings from analysing your 2025 workplace gender audit data. Question 11 is organised by the indicators, with an additional table for issues outside of the indicators.

For each indicator:

* Describe the key gender inequality issues under “analysing audit data”. In your response:
	+ use your audit data against the Commissioner’s measures to discuss the problem(s) you have identified and explain why it’s a problem (**required**). [Please note that the Commissioner will be recommending minimum data points for duty holders to include from their workplace gender audit. These are currently being finalised and will be published along with the guidance in May.]
	+ consider discussing where you have not made progress in your last GEAP (if applicable) to address in this GEAP.
	+ consider including a problem statement to summarise your analysis (see step 2.2).
	+ consider describing additional data sources used to understand the problem.
	+ consider highlighting any gaps in your data and your plan for building data collection.
	+ consider outlining key insights from using intersectional analysis.
* Describe the underlying causes of inequalities under “identifying underlying causes of inequality”. In your response:
	+ use the ‘but why?’ technique to help you uncover the underlying causes related to each workplace gender equality indicator (see step 2.2).
	+ draw from findings from your consultation (see step 3).
	+ include findings from further research.
* Your answer to these questions aims to demonstrate your understanding of the gender inequality issues in your organisation. Using your audit data is essential as, over time, it will help you to understand whether your efforts are working (or not).

#### How-to guides

* Using a range of data sources to inform your GEAP development
* Highlighting where data gaps currently exist and your plan for building data collection
* Using intersectional analysis to understand data
* Outlining key insights from applying an analysis of intersectional gender inequality
* Outlining any other information sources or data that were considered as part of your GEAP development
* [How to maintain employees’ privacy](https://www.genderequalitycommission.vic.gov.au/how-do-i-maintain-my-employees-privacy)

#### Further reading

* [Unpacking intersectional approaches to data](https://www.data4sdgs.org/resources/unpacking-intersectional-approaches-data)
* The ‘but why?’ technique (<https://ctb.ku.edu/en/table-of-contents/analyze/analyze-community-problems-and-solutions/root-causes/main>)

## [Step 3: Consulting on your audit results](#_Step_4:_Consulting)

#### This step includes only recommended actions.

**At least one round of consultation with your employees, employee representatives and governing body is *required* under the Act.**

How you consult with these stakeholders in preparing your GEAP is your choice. We recommend two rounds of consultation in the development of your GEAP, including consulting on your audit results and consulting on your strategies (see step 7).

In this step, you will find guidance on:

* 3.1 Consulting on your audit results (recommended)
* How-to guides

For help with the GEAP template related to this section, see the end of this step.

### 3.1 Consulting on your audit results

Consultation helps make employees and stakeholders aware of your workplace gender audit findings. It also provides the opportunity to discuss the impact and possible actions for change. This helps you determine, and prioritise, actions to address issues. Employees from diverse backgrounds may be able to provide valuable insights into barriers to gender equality they experience.

If there are existing ways to consult under enterprise agreements and other laws (like the Occupational Health and Safety Act 2004), use them in your GEAP consultation process. Partner with those involved to enhance them if needed (see below).

Consultation and engagement require careful planning. This includes:

* Deciding the purpose of your consultation
* Identifying who to consult
* Advice on specific stakeholders:
	+ Consulting with union representatives
	+ Consulting with your governing body
	+ Involving senior leaders
* Managing effective consultation and engagement, including:
	+ Consultation methods
	+ Budget and timeframe
	+ Communication methods
	+ Choosing who to lead the consultation
	+ Supporting participants to feel safe
	+ Consultation materials
	+ Documenting and sharing consultation feedback
	+ Intersectional approach to engagement
* Gathering feedback and reflections on your consultation process

#### Completing the GEAP template

* For **question 4,** insert yes or no next to each stakeholder group to confirm whether you consulted them. If you did not consult the required stakeholders, please explain why in the third column (note that you must consult with your governing body, if your organisation has one), employees, and employee representatives, including relevant trade unions, under the Act). If you consulted other people and groups, describe this with a summary of who and their relevance to your GEAP in the last row.
	+ See 7.2 Documenting your consultation for further guidance.
* For **question 5,** describe how you consulted with stakeholders. At the very least, this must include how many sessions and in what format those sessions were. You might also include a summary of the purpose of your consultation/s, consultation methods, communication methods, who led the consultations, how you supported participants to feel safe, and/or reflections on what went well and what could be improved.
	+ See advice on consulting with union representatives, governing body and engaging with senior leaders in the how-to guides.
* For **question 6**, summarise the outcomes and findings from consulting with your stakeholders on your audit results. This question aims to demonstrate what your stakeholders said about your audit results and how you have used their feedback to better understand your audit findings. See 3.1: Consulting on your audit results for further guidance.
	+ See 2.2: Identify and understand the underlying causes of inequality,which is best done through consulting with key stakeholders. This could include clarifying and analysing the problems, creating problem statements and prioritising problems to address.
	+ See Deciding the purpose of your consultation for suggestions on what topics you might want to focus on in consultation.
* For **question 7**, summarise the outcomes and findings from consulting with your stakeholders on your proposed strategies. This question aims to demonstrate how you have used your stakeholders’ feedback to shape your strategies. See 7.1 Consulting on your strategies for further guidance.
	+ Use the gender equality principles and gender pay equity principles to guide discussions (see 4.1 Considering the gender equality principles and 4.2 Considering the gender pay equity principles).
	+ Develop a case for change (see 5.1: Developing a case for change) and a vision for gender equality (see 5.2: Creating a vision) using stakeholder input.

#### How-to guides

* Consulting with union representatives
* Consulting with your governing body
* [Ongoing engagement with staff during GEAP implementation (recommended)](#_Ongoing_engagement_with) (step 10)
* [Participatory approaches](https://innovationnetwork.vic.gov.au/toolkits/understanding-participatory-approaches) include guidance on how to plan, design, implement, and evaluate with people affected by your products, policies, services, and systems (this is a toolkit on the Innovation Network, and this requires login). Accessible for all Victorian public sector employees.

# [Part 2: Developing your gender equality action plan (GEAP)](#_Part_2:_developing)

## [Step 4: Considering the gender equality and the gender pay equity principles](#_Step_5:_Developing), and intersectionality

#### This step includes required and recommended actions.

You are required to take into account the gender equality principles (as required under the *Gender Equality Act 2020*) and the gender pay equity principles (as required under the *Gender Equality Regulations 2020*) in developing your GEAP. You are also required to take intersectionality into account, where practicable, in developing your GEAP.

In this step, you will find guidance on:

* 4.1 Considering the gender equality principles (required)
* 4.2 Considering the gender pay equity principles (required)
* 4.3 Considering intersectional gender equality (required)

For help with the GEAP template related to this section, see the end of this step.

### 4.1 Considering the gender equality principles (required)

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| The gender equality principles* All Victorians should live in a safe and equal society, have access to equal power, resources and opportunities and be treated with dignity, respect, and fairness.
* Gender equality benefits all Victorians regardless of gender.
* Gender equality is a human right and precondition to social justice.
* Gender equality brings significant economic, social and health benefits to Victoria.
* Gender equality is a precondition for the prevention of family violence and other forms of violence against women and girls.
* Advancing gender equality is a shared responsibility across the Victorian community.
* All human beings, regardless of gender, should be free to develop their abilities, pursue their professional careers and make choices about their lives without being limited by gender stereotypes, gender roles or prejudices.
* Gender inequality may be compounded by other forms of disadvantage or discrimination based on Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation, and other attributes.
* Women have historically experienced discrimination and disadvantage based on sex and gender.
* Special measures may be necessary to achieve gender equality.
 |

You must explain how you have taken the gender equality principles into account in preparing your GEAP (please note that simply listing them in your GEAP and stating that you have taken them into account will not be acceptable for demonstrating compliance). Some ways you can use the gender equality principles are:

* **Building your case for change:** Use the principles to explain why gender equality matters for your organisation, the sector, and the community. Show how they relate to your workplace and provide evidence.
* **Defining your GEAP vision and objectives**: Use the principles to help staff discuss your GEAP’s vision and goals. Draw on the principles for language or inspiration.
* **Guiding consultation discussions**: Use the principles to start discussions during consultations. Ask staff what they mean to them, and use them to guide talks about audit data, issues, or strategies.
* **Informing decision-making during strategy development**: Use the principles to choose and prioritise strategies.
* **Engaging your leadership team:** Use the principles to educate leaders on gender equality and the importance of the GEAP.
* **Developing a monitoring and evaluation framework**: Measure progress against your strategies and measures, using the principles as goals.
* **Collaborating with like-minded organisations**: Work with other organisations that share these principles to deliver initiatives.

### 4.2 Considering the gender pay equity principles (required)

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| The pay equity principles1. equal pay for work of equal or comparable value, which refers to work valued as equal or similar in terms of skill, effort, responsibility and working conditions, including different types of work
2. employment and pay practices are free from bias and discrimination, including the effects of unconscious bias and assumptions based on gender
3. employment and pay practices, pay rates and systems are transparent, and information about these matters is readily accessible and understandable
4. employment and pay practices recognise and account for different patterns of labour force participation by employees who undertake unpaid or caring work
5. interventions and solutions are collectively developed and agreed to, sustainable and enduring;
6. employees, unions, and employers work collaboratively to achieve mutually agreed outcomes.

For the Act, pay means remuneration. It includes but is not limited to, salary, bonuses, overtime, allowances, and superannuation. |

Organisations must consider the gender pay equity principles when preparing a GEAP. This is a [new requirement under the *Gender Equality Regulations 2020*](https://www.genderequalitycommission.vic.gov.au/gender-equality-amendment-regulations-2021). You must explain how you have taken the gender pay equity principles into account in preparing your GEAP (please note that simply listing them in your GEAP and stating that you have taken them into account will not be acceptable for demonstrating compliance).

To learn more about the gender pay gap, visit [KPMG’s *She’s Price(d)less 2022* report](https://kpmg.com/au/en/home/insights/2022/07/shes-priced-less-gender-pay-gap-economics.html), which analyses the contributing drivers of the gender pay gap to explain why it exists, and where it needs to be addressed the most.

You must describe how the pay equity principles have been taken into account in the development of your GEAP. Some ways you can use the gender pay principles in the development of your GEAP are:

#### Analysing your audit data

* Look at pay differences among employees, broken down by gender. Where available, consider intersectionality.
* Compare the pay of people of different genders at the same level, such as managers or professionals.
* Analyse gendered and other demographic trends in which employees use alternative working arrangements, such as unpaid and caring work.
* Examine how your organisation considers or responds to requests for different part-time and flexible work arrangements at senior levels.

#### Planning your consultation process

* Share your gender pay gap data with your employees. Include intersectional data if available.
* During consultation, discuss:
	+ Recruitment, promotion, and training processes
	+ Pay practices like base salaries, salary packages, bonuses, and loadings
	+ How do these practices affect different groups
	+ Ways to make these processes fairer.
* Describe how your consultation collectively designed pay equity solutions (principle E).
* Describe how including the gender pay equity principles in consultation supported collaboration among employees, unions, and your organisation (principle F).

#### Considering your organisational values

* Discuss how the pay equity principles align with your organisational values. These might include transparency, collaboration, and freedom from bias and discrimination.
* Refer to any pay equity principles in your enterprise agreement, if applicable.

#### Developing strategies on gender pay equity

* Use the principles, audit findings and consultations to inform your strategies across multiple relevant indicators. These include flexible work, leave, recruitment, promotion, and development.
	+ For example, more women than men work part-time. This can limit their access to senior roles, which are usually full-time. This can widen the gender pay gap. Policies that support part-time/job-share at senior levels can help pay equity
* Address as many principles in your strategies as possible.
* Review your pay and promotion policies to see whether they reflect the gender pay equity principles.

Visit the strategies on the pay equity principles for further guides on how to develop strategies using the pay equity principles.

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| **TIP:** The [Workplace Gender Equality Agency](https://www.wgea.gov.au/) has a practical [Guide to gender pay equity](https://www.wgea.gov.au/sites/default/files/documents/guide-to-gender-pay-equity.pdf) to improve pay equity between women and men at your organisation. |

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| **Applying** [**intersectionality**](#_4.3_Working_towards) **to the gender pay equity principles**Some employee groups may face extra barriers to promotion and pay equity. Consider how to apply an intersectional lens to each of the pay equity principles. For instance, the Commissioner’s [Intersectionality at Work](https://www.genderequalitycommission.vic.gov.au/intersectionality-work) report found that:* pay gaps were largest between First Nations women when compared with non-Indigenous men, at 21% across all industries. This is compared to the pay gap between:
	+ First Nations women and First Nations men at 11%
	+ First Nations women and non-indigenous women at 7%.
* women with disabilities experienced large pay gaps when compared with men without disabilities, at 19% across all industries. This is compared to the pay gap between:
	+ women with disabilities and men with disabilities at 10%
	+ women with disabilities and women without disabilities at 7%
* pay gaps between culturally and racially marginalised (CARM) women and non-CARM men was 19%. This is compared to the pay gap between:
	+ CARM women and CARM men at 10%
	+ CARM women and non-CARM women at 7%
* pay gaps between trans, non-binary and other gender diverse employees and cisgender men were 18%. This is compared to the pay gap between
	+ Trans, non-binary or gender diverse people and cisgender women at 3%
	+ Cisgender women and cisgender men at 15%

To bring an intersectional lens to the pay gap, you could:* Analyse pay gap data by demographic attributes as part of your annual review.
* Consider how different employment types affect pay and promotion in your review. Like part-time and job share arrangements.
* Examine data on barriers to promotion for different employee groups. Consider how this will affect their pay.
* Consult employees with diverse experiences.
 |

### 4.3 Considering intersectional gender equality (required)

The Act requires duty holders to consider intersectional gender equality. Intersectional gender equality is the disadvantage or discrimination that a person may experience on the basis of any of the following *in addition to gender inequality*:

* Aboriginality
* age
* disability
* ethnicity
* gender identity
* race
* religion
* sexual orientation

See Applying intersectionality to the gender pay equity principles in step 4.2 for examples of using intersectional analysis.

You are required to take intersectionality into account when preparing your GEAP.[[1]](#footnote-2) You must explain how you have considered it in **question #** of the template. If possible, you should also plan to collect demographic attribute data about your workforce and then use that data to examine the intersections between gender inequality and other forms of discrimination or disadvantage, particularly against the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators).[[2]](#footnote-3)

Taking an intersectional approach to gender equality will help you develop more inclusive, responsive, and fair policies and processes for all your employees. It can also lead to more effective programs and services for your community as they are more likely to meet community needs from the start. This avoids the need to 'retrofit' parts of a program or service to ensure access for people facing barriers.[[3]](#footnote-4)

Read our [Applying intersectionality guide](https://www.genderequalitycommission.vic.gov.au/applying-intersectionality) to learn how to apply an intersectional approach in your GEAP.

#### Completing the GEAP template

* For **question 8,** summarise how you have considered the gender quality principles to develop your GEAP. The gender equality principles frame why gender equality is important across human rights, social, economic, and health and safety domains. They guide why all duty holders have a responsibility to promote, encourage and facilitate the achievement of gender equality and the improvement in the status of women. The principles can be considered in many ways. For instance, you can consider them to:
	+ **Build the case for change and/or vision**
	+ **Guide consultation discussions**
	+ **Inform decision-making during strategy development**
	+ **Engage the leadership team**
	+ Any other aspect.
* For **question 9,** summarise how you have considered the gender pay equity principles to develop your GEAP. The gender pay equity principles guide good practice to achieve gender pay equity. They aim to redress disadvantage, address stigma, stereotyping and prejudice, and accommodate persons of different genders by way of structural change. They also aim to enhance economic and social participation of persons of different genders. The principles can be considered in many ways. For instance, they can be used to:
	+ guide policy making/changes related to pay equity.
	+ analyse your audit data.
	+ inform your consultation process.
	+ consider alongside your organisational values.
	+ develop strategies.
* However you choose to take both sets of principles into account in developing your GEAP, you must explain how you have done this in your GEAP.
* Simply listing both sets of principles in your GEAP with a note that you have taken them into account is not sufficient to meet this requirement under the Act. You must describe *how* you have taken the principles into account in your GEAP.
	+ See 4.1 Considering the gender equality principles for further guidance and 4.2 Considering the gender pay equity principles for further guidance.
* For **question #,** summarise how you have considered intersectionality in developing your GEAP or why you haven’t considered it. For instance, you may have considered intersectionality during:
	+ Consultation, such as consulting with employees who may experience intersecting disadvantage.
	+ Workplace gender audit analysis, such as describing issues related to intersecting inequality in your audit data.
	+ Strategies development, such as including strategies that are designed to address intersectional gender inequality.
	+ See 4.3 Considering intersectional gender equality for further guidance.

## Step 5: [Making a case for change](#_Step_5:_Developing)

#### This step includes recommended actions only.

Including a case for change and a vision for gender equality in your GEAP involves explaining why gender equality matters at your workplace.

In this step, you will find guidance on:

* 5.1 Developing a case for change (recommended)
* 5.2 Creating a vision for the future (recommended)
* How to guides and further reading

For help with the GEAP template related to this section, see the end of this step.

### **5.1 Developing a case for change (recommended)**

Include a case for change to explain why gender equality is relevant and important for your workplace. The audience is primarily your workforce. But it also explains to the wider community why [gender equality matters](https://www.genderequalitycommission.vic.gov.au/promoting-gender-equality) for your organisation and community. It is also a useful communication tool which can support employees to understand why your GEAP matters.

Fundamentally, your GEAP is about:

* promoting, encouraging and facilitating the achievement of gender equality and improvement in the status of women.
* supporting the identification and elimination of systemic causes of gender inequality in policy, programs and delivery of services in workplaces and communities.
* recognising that gender inequality may be compounded by other forms of disadvantage or discrimination that a person may experience on the basis of Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes.
* redressing disadvantage, addressing stigma, stereotyping, prejudice and violence, and accommodating persons of different genders by way of structural change.
* enhancing economic and social participation by persons of different genders.
* further 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.[[4]](#footnote-5)

Additionally, taking action for gender equality can also:

* improve the wellbeing of staff.
* enhance your organisation’s external image.
* improve your organisation’s competitiveness.
* help your organisation attract and retain talented staff.
* reduce costs associated with staff turnover.
* enhance productivity.
* help future-proof your organisation.

In your case for change, you could address the underlying causes of gender inequalities at your organisation (see step 2) and explain how you will commit to changing these. You can also include your organisation’s commitment to the gender equality principles and the pay equity principles, and how these have informed developing your [strategies](#_6.1_How_to) to [promote gender equality](https://www.genderequalitycommission.vic.gov.au/promoting-gender-equality) in your organisation.

### **5.2 Creating a vision (recommended)**

As part of your case for change, you could also include a vision. A vision statement expresses what your organisation is striving to achieve in terms of gender equality in the long term. A strong vision can help to align efforts, energise stakeholders, and create unity. It helps everyone understand what they are working towards. This can help drive the success of your GEAP.

Ideally, your vision will be:

* **Employee-led:** work with staff from diverse lived experiences to create a vision. This promotes employee ownership. Consider describing how employees helped shape the vision in your GEAP.
* **Easy to understand**: Use simple language so stakeholders can easily grasp it.
* **Impactful:** Describe the intended impact in your workplace and its significance to the community.

#### Completing the GEAP template

* Under **question 10,** describe why gender equality matters at your organisation. This helps to frame how and why you are doing this work and serves as a communication tool with your stakeholders. Ideally, your case for change will be guided by the Gender Equality Act, research and evidence (see step 1 and step 2), and consultation with key stakeholders (see step 3). In your answer, consider including:
	+ Your vision for gender equality (see step 5.2)
	+ How gender equality aligns with your organisational values and other equality commitments relating to Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other.
	+ An acknowledgment of your existing efforts on gender equality, including your previous GEAP (if applicable).

#### How-to guides

* Acknowledging your existing efforts on gender equality
* Aligning with other equality commitments relating to Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other

#### Further reading

* What is gender equality, and why does it matter?
* What is intersectionality, and how do you apply it?
* [WGEA’s workplace gender equality: the business case](https://www.wgea.gov.au/publications/gender-equality-business-case) (source: WGEA)
* [A guide for inclusive gender equality by design](https://championsofchangecoalition.org/resource/7-switches-a-guide-for-inclusive-gender-equality-by-design/) (source: Champions of Change coalition)[Inclusive workplace toolkit – understanding different kinds of discrimination](https://huecolourtheconversation.com/shop/p/inclusive-workplace-tookit?gclid=CjwKCAjw4_K0BhBsEiwAfVVZ_9KKzZJFUmXgPkHhz0XyE6V85rDJvvCvf2IfQ6vG6sHDjSp8q6ZiEBoCMPIQAvD_BwE) (source: Hue Colour the Conversation)
* [Workplace equality and respect standards and how to guide](https://www.ourwatch.org.au/workplace) (source: Our Watch)
* [Workplace positive duty standards](https://www.ourwatch.org.au/workplace/resources/positive-duty-standards) (source: Our Watch)
* [Change the story: a shared framework for the primary prevention of violence against women](https://www.ourwatch.org.au/resource/change-the-story-a-shared-framework-for-the-primary-prevention-of-violence-against-women-in-australia) (source: Our Watch)
* [Gender Affirmation in Victorian Public Sector Workplaces](https://dhhsvicgovau.sharepoint.com/sites/DFFH-FV-CGEPS-GRP/Shared%20Documents/GEAP25%20and%20PR25%20obligations/06%20GEAP%20development/%E2%80%A2%09https%3A/vpsc.vic.gov.au/workforce-capability-leadership-and-management/gender-affirmation/) (source: Victorian Public Sector Commission)
* [Transgender People at Work](https://www.humanrights.vic.gov.au/resources/transgender-people-at-work-guideline/) (source: Victorian Equal Opportunity and Human Rights Commission)

## [Step 6: Developing your strategies and measures](#_Step_6:_Developing)

#### This step includes required and recommended actions.

You are required to develop strategies and measures and document them in your GEAP.

Your **strategies** are the actions your organisation will take to address gender inequalities on the seven [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) (and any other areas of gender inequality you may have identified). Your **measures** assess the performance of your strategies. They provide you with insight into how well your strategies are performing and whether changes are needed to ensure your GEAP is on track.

In this step, you will find guidance on:

* 6.1 How to develop your strategies (recommended)
* 6.2 Setting measures (required)
* 6.3 Setting targets (recommended)
* 6.4 Documenting your strategies and measures in your GEAP (required)
* How-to guides and further reading

For help with the GEAP template related to this section, see the end of this step.

### 6.1 How to develop your strategies (recommended)

Your strategies for addressing gender inequality on each of the 7 workplace gender equality indicators over the life cycle of your GEAP will ideally be specific, measurable, achievable, relevant, and time-bound (SMART).[[5]](#footnote-6)

To be effective, your strategies will ideally target the underlying causes of gender inequality in your organisation (see step 2.2). An [intersectional approach](https://www.genderequalitycommission.vic.gov.au/applying-intersectionality) is important where possible, because it will help you address any compounding forms of discrimination impacting your employees. This will help make your gender equality strategies inclusive and targeted.

We suggest you use the following steps to develop your strategies:

#### A) Understand the underlying problems (see [step 2](#_Step_2:_Using))

* Analyse your workforce and employee experience data. Look at patterns and issues on the 7 workplace gender equality indicators.
* Conduct additional research if needed. Use surveys, interviews, or review existing studies to understand the problems better.
* Identify the underlying issues. Find the root causes of the gender inequality in your organisation (see step 2.2)

#### B) Consult with staff on your audit results (and any other research) (see [step 3](#_Step_3:_Round))

* Engage with employees and employee representatives. Talk to your staff to understand deeper issues related to gender inequality. Their insights may help identify the root causes (see [Step 3](#_Step_3:_Consulting) for further guidance)

#### C) Refer to your vision and principles

* Use your vision and the gender equality principles and gender pay equity principles to frame where you want to go. Use these to guide decision-making and to keep focused on your end goals (see step 4).

#### D) Plan where you want to go by assessing current state and desired future state

* Clearly define where your organisation is now and where you want it to be in 4 years’ time (i.e., at the end of the life of your GEAP). Visit WGEA’s [policy and strategy guides](https://www.wgea.gov.au/take-action/policy-and-strategy-guidance) (see below) for further guidance. See also step 6.2 on setting targets.
* Outline the steps needed to move from the current state to the desired future state.
* Decide what success will look like for your organisation and ensure that you can measure this.

#### E) Learn from others

* Review other GEAPs and progress reports on the reporting platform. Look at what other organisations have done and seek further advice from them (see step 1.4).
* Review research andevidence. Use strategies that have worked in similar contexts. For instance: [Employer of Choice for Gender Equality: leading practices in strategy, policy and implementation](https://www.wgea.gov.au/publications/EOCGE-leading-practices-report) (source: Workplace Gender Equality Agency).
* Determine feasibility. Consider what strategies have been effective in other contexts. Ask yourself:
	+ Appropriate: does it fit my purpose?
	+ Replicable: is there enough detail about the strategy and its outcomes to replicate it?
	+ Practical: is it feasible to implement this in my organisation?
	+ Compatible: is the intervention appropriate for my organisation’s situation?

#### F) Develop strategies

* Choose comprehensive strategies. Consider all parts of your organisation, like structure, culture, policies, and practices. Consider how these parts are connected. Strategies could focus on:
	+ addressing any data gaps you have in your workplace gender equality audit
	+ policies and processes
	+ communication and engagement
	+ education and training
	+ culture change
	+ leadership and accountability
* Ensure strategy options address intersectional gender inequality if possible.

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| Need more help? Visit the Workplace Gender Equality Agency’s [policy and strategy guides](https://www.wgea.gov.au/take-action/policy-and-strategy-guidance) for further guidance on:* [Equal remuneration between women and men](https://www.wgea.gov.au/sites/default/files/documents/Policy-and-Strategy-Guidance-Equal-Remuneration_0.pdf)
* [Gender composition of the workforce](https://www.wgea.gov.au/sites/default/files/documents/Policy-and-strategy-guidance-gender-composition-of-the-workforce.pdf)
* [Gender composition of governing bodies](https://www.wgea.gov.au/sites/default/files/documents/Policy-and-strategy-guidance-gender-composition-of-governing-bodies.pdf)
* [Flexible working arrangements](https://www.wgea.gov.au/sites/default/files/documents/Policy-and-strategy-guidance-flexible-working-arrangements.pdf)
* [Sexual harassment, harassment on the ground of sex and discrimination](https://www.wgea.gov.au/sites/default/files/documents/6-Policy-and-strategy-guidance-Sexual-harassment-harassment-on-the-ground-of-sex-and-discrimination.pdf)
* [Strategies and setting targets for gender diversity](https://www.wgea.gov.au/sites/default/files/documents/SETTING-GENDER-TARGETS-Online-accessible_0.pdf)
 |

### 6.2 Setting measures (required)

You must consider how your organisation will make measurable progress on each of the seven [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) through your GEAP strategies.

Measures are the metrics that you will use to assess how well (or not) your strategies are performing. They can be used to monitor the implementation and/or the outcomes of your strategies. When tracked over time, measures are useful in highlighting progress (or not) towards your target (see 6.3). Measures will be used by the Commissioner to assess your future progress against the indicators.

The measures in the Commissioner’s *Data Analysis Guide* set out the minimum expectations for measures against each indicator. You are strongly encouraged to use the Commissioner’s measures. These measures are **outcome measures**. Outcome measures are used to measure how successful your strategies have been at achieving your targets.

You might also want to consider including **process measures.** Process measures are used to determine whether your strategies have been implemented as planned or whether there are unintended consequences.

Having both types of measures will help you to distinguish whether your strategies were effective (or not) because of the desired effect of your strategies (i.e. outcomes) and/or their implementation (i.e. process). This will help you to understand what went right (or wrong) with your strategies and to explain your findings to the Commissioner and key stakeholders.[[6]](#footnote-7)

The Commissioner’s measures are pre-filled in the GEAP template. These measures are the minimum expectations for your GEAP. The Commissioner will also use them to assess your progress in 2 years’ time. You can use additional measures if you are more progressed in your gender equality journey. If you do not use the Commissioner’s measures at all, the Commissioner will determine if the alternative measures you provide are appropriate and/or adequate. Refer to the Commissioner’s *Data Analysis Guide* for further guidance.

### 6.3 Setting targets (recommended)

One way to help ensure you make progress on the indicators is to set targets in relation to your measures. **Targets** are the quantitative (measurable) change or outcome you aim to achieve by the end of your GEAP. Setting targets can help you to focus your efforts and understand if your strategies are effective and/or are on track to achieving gender equality. They are also used to indicate if your strategies are off track, suggesting the need to modify or change them and/or your implementation processes.

Ideally, targetswill be aspirational, as well as achievable and realistic in your organisational context. They also need to be measurable, time bound, and related to outcomes. Use your current audit data as the point against which future progress can be monitored, compared and assessed. Using your previous audit data (if applicable) can also help to determine whether your targets are realistic.

To set targets, describe the direction you want to achieve, such as to reduce or improve. Targets should reflect the final state, not the change needed to get there. Use the format “By when, who/what will experience what type of change, by how much”.[[7]](#footnote-8)

For example, if your audit data identified the problem: “In 2026, the pay gap between men, and women and gender diverse people, was 10.0% in favour of men (median total remuneration)”. The **target** could be “By 2030, our pay gap will have reduced by 50% between men, and women and gender diverse people”.

#### Key principles to target setting

The [Workplace Gender Equality Agency](https://www.wgea.gov.au/) (WGEA) has useful resources to help organisations to set targets. In its publication ‘How to set gender diversity targets’, WGEA advises that the key principles of target setting are:

* **Clarity**: Set clear targets with timelines to ensure progress can be measured
* **Small steps**: Consider setting interim goals and measures as steps towards a longer-term goal. This will focus immediate efforts and encourage momentum, while enabling the organisation to monitor progress.
* **Control**: Ensure managers can influence the metrics and have appropriate control over your strategies and initiatives to achieve the targets.
* **Realistic**: Set targets that can be achieved. This requires a thorough analysis of all of the possible barriers to achieving targets and the support needed for maximising the opportunities to achieve them.
* **Accountability**: Create managerial accountabilities and rewards, e.g. linking remuneration or career progression to achieving targets.

WGEA also advises when setting targets that organisations make sure to:

* Gain leadership commitment to gender equality and targets.
* Be strategic with gender equality work by aligning it to broader organisational goals, plans and priorities.
* Engage and regularly communicate with key stakeholders, including working with groups such as employees, employee representatives and governing bodies to set targets (you could do this during consultations).
* Set clear accountabilities to deliver gender equality outcomes.
* Set up internal systems to collect data (which will help you report on progress to the Commissioner) and embed targets into organisational processes.
* Review and prepare your organisational culture and systems for change.

For further guidance on setting gender equality targets, visit:

* [Guide to setting gender targets](https://www.wgea.gov.au/tools/gender-targets-toolkit) (source: Workplace Gender Equality Agency)
* [Target setting for gender equality: a review of the literature](https://www.wgea.gov.au/publications/target-setting-for-gender-equality-literature-review) (source: Workplace Gender Equality Agency)
* [What works, what’s fair](https://www.genderequalitycommission.vic.gov.au/2021-research-projects#what-works-what%E2%80%99s-fair-%E2%80%93-the-university-of-melbourne-the-australian-national-university-and-swinburne-university-of-technology) (promoting workplace gender equality), the University of Melbourne, Australian National University and Swinburne University of Technology (source: Commission for Gender Equality in the Public Sector)
* [Employer of Choice for Gender Equality: leading practices in strategy, policy and implementation](https://www.wgea.gov.au/publications/EOCGE-leading-practices-report) (source: Workplace Gender Equality Agency)

### 6.4 Documenting your strategies and measures (required)

Use the GEAP template to document your strategies and measures. The relevant section of the GEAP template is organised by the [seven workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators). An additional table is provided for strategies that might fall outside of the indicators.

If you choose not to use the GEAP template, you must include strategies and measures for promoting gender equality in the workplace, based on the results of the workplace gender [audit](https://www.genderequalitycommission.vic.gov.au/progress-audit-2023) and ideally grouped by the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators). This will help us to assess compliance of your GEAP.

You must include at least one strategy per indicator. Unless your organisation does not have a governing body, in which case you do not need a strategy for this indicator. If you have not identified a gender equality problem in relation to one or more of the indicators, you should still include a maintenance strategy. For example, if your governing body is gender balanced and diverse, you could include a strategy to monitor the composition and culture at regular intervals or points of turnover (maintenance strategy). In addition, you could include a strategy to build the capacity of the governing body to lead on gender equality (extension strategy).

#### Completing the GEAP template

For each [workplace gender equality indicator](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) under **question 11,** fill in:

* **Measures**: these are what you will measure to assess the performance of your strategies. They help you to understand what data you should be keeping track of and whether to change, adapt and/or pivot your strategies in the future. This is set at the indicator-level, rather than at the individual strategy level. Refer to step 6.2 for further guidance. To set measures:
	+ You are strongly encouraged to use the Commissioner’s measures, which are pre-filled in the GEAP template. You can use additional measures if you are more progressed in your gender equality journey. Refer to Commissioner’s *Data Analysis Guide* for further guidance. [Please note that the Commissioner will be recommending minimum measures for duty holders to include in their GEAPs. These are currently being finalised and will be published along with the guidance in May.]
* **Target(s):** are numerical goals that you set based on your measures. Targets identify where you want to be, based on where you are now, using your audit data. These are set at the indicator level, rather than at strategy level. Refer to step 6.3 for further guidance.
	+ Use descriptive words like ‘reduce’ and ‘increase’.
	+ Use current audit data as a point to progress from. Use previous audit data (if applicable) and evidence-based research to assess whether your targets are realistic.
	+ Your targets should be ambitious, to drive change, but achievable.
	+ Example target: By 2030, reduce the organisation-level gender pay gap (using mean base salary) between men and women by 50%.
* **Strategy**: is the specific action you will take to make reasonable and material progress against each of the [seven workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators), and any other gender equality priorities for your organisation. Include 1 strategy per row. You can add rows if you need to. Refer to step 6.1 for further guidance.
* **Other relevant indicators**: some strategies may impact across multiple indicators. Consider using this column to indicate whether your strategies relate to other indicators. For example, a strategy in relation to promotion (indicator 5) might also reduce the gender pay gap (indicator 3).
* **Responsible**: refers to the role or team responsible for implementing each strategy. This ensures accountability and continuity of work during times of organisational change. It is good practice to assign responsibility for each strategy in your GEAP.
* **Timeline**: refers to when the activities will be completed within the life cycle of your GEAP. Include start and completion timeframes or just completion timeframes. High quality GEAPs include clear timelines from the start.

If you want to include strategies in your GEAP that do not align to the workplace gender equality indicators, complete the optional ‘additional areas of focus’ section. Examples are strategies about cultural change, communication, or broader gender equality issues.

#### How-to guides

* Developing strategies using a comprehensive approach, including strategies on:
	+ Policies and processes
	+ Communication and engagement
	+ Education
	+ Data gaps and measuring change
	+ Pay equity principles
* Applying an intersectional lens to your strategies and measures
* Prioritising your strategies with low resourcing

#### Further reading

* [Accelerating workplace gender equality toolkit](https://www.genderworks.com.au/resources/workplace-gender-equality-toolkit) (source: Gender Works)
* [Breaking dad psychological safety and men’s parental leav](https://the100percentproject.com.au/research/)e (source: the 100% project)
* [Employment and disability in Australia: Improving employment outcomes for people with disability](https://bcec.edu.au/publications/employment-and-disability-in-australia-improving-employment-outcomes-for-people-with-disability/?utm_medium=email&utm_campaign=Bankwest%20Curtin%20Economics%20Centre%20E-News%20-%20February%202024%20Edition&utm_content=Bankwest%20Curtin%20Economics%20Centre%20E-News%20-%20February%202024%20Edition+CID_100a23a64be1de0eb4207eb601a77168&utm_source=Campaign%20Monitor&utm_term=Employment%20and%20disability%20in%20Australia%20Improving%20employment%20outcomes%20for%20people%20with%20disability) (source: Bankwest Curtin Economics Centre)
* [Recruit smarter: Inclusive recruitment practices and addressing unconscious bias in recruitment](https://www.vic.gov.au/recruit-smarter) (source: Victorian Government)
* [National review into work conditions and discrimination among pregnant and parent workers in Australia](https://www.unisa.edu.au/research/cwex/projects/national-study-on-parents-work-conditions-pregnancy-leave-and-return-to-work/) (source: University of South Australia)
* [Strategies and policies on six gender equality indicators](https://www.wgea.gov.au/take-action/policy-and-strategy-guidance) (source: Workplace Gender Equality Agency)
* [Building respectful and inclusive workplaces: Men’s positive roles in violence prevention](https://xyonline.net/content/building-respectful-and-inclusive-workplaces-mens-positive-roles-violence-prevention) (source: XY online)
* [Intersections at work: understanding the experiences of culturally diverse LGBTQ talent](https://www.dca.org.au/wp-content/uploads/2023/06/intersections_at_work_online_final.pdf) (source: Diversity Council Australia)
* [Encountering resistance: Strategies to respond to resistance to gender equality initiatives](https://www.vichealth.vic.gov.au/sites/default/files/Encountering-Resistance-Gender-Equality.pdf) (source: VicHealth)
* [Avoiding the merit trap](https://championsofchangecoalition.org/resource/in-the-eye-of-the-beholder-avoiding-the-merit-trap/) (source: Champions of Change)

## [Step 7: Consulting on your strategies](#_Step_7:_Consulting)

#### This step includes required and recommended actions.

At least one round of consultation with your employees, employee representatives and governing body is *required* under the Act. How you wish to consult with these stakeholder groups in preparing your GEAP is your choice. We recommend two rounds of consultation in the development of your GEAP, including consulting on your audit results (see step 3) and consulting on your strategies and measures.

In this step, you will find guidance on the following:

* 7.1 Consulting on your strategies (recommended)
* 7.2 Documenting your consultation (required)

For help with the GEAP template related to this section, see the end of this step.

### 7.1 Consulting on your strategies (recommended)

After drafting your strategies, gather feedback on them from your employees, union representatives, any other employee representatives, and members of your governing body (if you have one). This should be done before finalising your strategies, as the consultation process can reveal gaps, challenges, and areas for improvement. This will help ensure that the strategies are practical, relevant, and supported by stakeholders in the GEAP.

Some questions to ask during consultation(s):

* **Reflection on previous GEAP and progress reports (if relevant):** What worked or did not work?
* **Clarity:** Are strategies clear and easy to understand?
* **Relevance:** Do the strategies cover the key gender inequality issues in our organisation?
* **Feasibility:** Are the strategies realistic within the timeframe?
* **Impact:** Do you think the strategies will have the desired impact on the workplace gender equality indicators?
* **Missing groups:** Are there groups in our organisation whose experiences of gender equality are not accounted for in these strategies?
* **Lived experience:** Are strategies meaningful to diverse employees, especially those potentially experiencing discrimination?
* **Involvement:** What would help stakeholders feel more engaged in the GEAP?

This step complements step 3: consulting on your audit results. For further guidance on how to plan and run consultations, see:

* Deciding the purpose of your consultation
* Identifying who to consult
* Advice on specific stakeholders:
	+ Consulting with union representatives
	+ Consulting with your governing body
	+ Involving senior leaders
* Involving senior leaders
* Managing effective consultation and engagement, including:
	+ Consultation methods
	+ Budget and timeframe
	+ Communication methods
	+ Choosing who to lead the consultation
	+ Supporting participants to feel safe
	+ Consultation materials
	+ Documenting and sharing consultation feedback
	+ Intersectional approach to engagement
* Gathering feedback and reflections on your consultation process

### 7.2 Documenting your consultation (required)

You must document your consultation process in the GEAP. That is, how you consulted (at least once) with your employees, union representatives, any other employee representatives, and members of your governing body (if you have one). This might include:

* Consultation methods used, such as online or in-person, and through surveys or focus groups.
* How feedback during consultation(s) shaped the interpretation of your audit results, the development of your strategies and measures, and/or any other parts of your GEAP.
* Participant numbers for each stakeholder group.
* How you created an inclusive and safe consultation.
* Communication methods used before, during and after consultation, such as using infographics to make information easy to read and understand.

You can include extra consultation details in the section at the end of the GEAP template for any additions or comments, to keep the main body of the GEAP concise. If you choose not to use the template, you can include this information in an appendix at the end of your GEAP.

#### Completing the GEAP template

This step aligns with the advice in step 3. See step 3 for guidance on completing the GEAP template.

## Step 8: Resourcing your GEAP

#### This step includes required and recommended actions.

The Act requires you to ensure adequate resources are allocated to developing and implementing your GEAP. You must provide evidence of adequate resource allocation for implementing all your GEAP strategies in order to make reasonable and material progress on each of the workplace gender equality indicators in every 2-year period (required). The head of your organisation will be required to attest that the resourcing is adequate to make this progress on the GEAP cover page.

In this step, you will find guidance on:

* 8.1 Developing a resourcing plan that outlines how your GEAP will be adequately resourced (recommended)
* How-to guide

For help with the GEAP template related to this section, see the end of this step.

### 8.1 Developing a resourcing plan that outlines how your GEAP will be adequately resourced

You must demonstrate that adequate resources were allocated to developing the GEAP. You must also demonstrate that your organisation has allocated adequate resources to implementing the GEAP strategies. This is so that you make reasonable and material progress on each of the workplace gender equality indicators over its four-year life.

Use the GEAP template to document your resourcing needs assessment, resourcing gaps and resource allocation to develop and implement your GEAP. You may want a more detailed resourcing plan than what is provided in the template for internal use.

Recommended steps to building your resourcing plan:

#### Identify current and required resources

Identify what is needed to implement each strategy. This might include human, financial, technological, physical, and time resources. Then assess what resources you currently have and what resources you have access to. Compare this to your resourcing needs against each strategy to identify your resource gap.

Consider:

* **Allocating resources across different parts of the organisation:** If you are part of a larger organisation, GEAP work may involve multiple teams. Ensure all involved teams have the resources needed to do the work successfully.
* **Looking for shared resources:** Determine if GEAP actions are new or if they overlap with other ongoing work. Consider sharing resources from other projects if they overlap.
* **Planning for ongoing engagement:** allocate time and budget for staff engagement and consultation throughout the GEAP lifecycle.
* **Budgeting for evaluation and communications:** Set aside resources for monitoring and reporting. Ensure adequate resources are allocated for these tasks, including staff time, systems or training.
* **Joining or forming communities of practice and collaborating:** including sharing tools/toolkits, knowledge or resources with other organisations.
* **Investing in systems and processes**: Invest in embedding systems and processes to streamline your gender equality work in the future. This could include upgrading or investing in human resource information management systems, project management software, or developing monitoring and evaluation tools such as data dashboards. It could also involve designing processes for developing this GEAP that can be repeated for future GEAPs to reduce workload.
* **Outsourcing**: Consider whether outsourcing or using temporary contracts is right for your organisation, or whether the loss of knowledge over time might create further work in future.

#### Develop a resourcing plan

Your resourcing plan could include:

* Matching resources to specific strategies and measures.
* A timeline showing when each resource is needed.
* Identifying any dependencies (e.g. a task that cannot start until a specific resource is available).
* Dates for regular review and adjustment of the plan to ensure resources are adequate to achieve the outcomes.

#### Completing the GEAP template

* Under **question 12**, consider summarising your assessment of what resourcing you need to implement your GEAP. This question aims to have you reflect on the resourcing needs to implement your GEAP over its life cycle.
* Under **question 13,** summarise what resourcing is allocated to developing and implementing your GEAP.
* Together, these questions ensure that your GEAP is prioritised, that you have the right resourcing in place, and that your GEAP can withstand organisational change.

#### How-to guides

* Prioritising your strategies

## Step 9: Instructions on submission

#### Submission

Your gender equality action plan is due to the Commissioner by **1 May 2026,** unless you have an approved extension.

Submit using the GEAP template 2026 (highly recommended) via the [reporting platform](https://www.genderequalitycommission.vic.gov.au/reporting-platform-help)\*. Note that supporting documents will not be accepted.

If you choose not to use the GEAP template 2026 (not recommended), ensure you have included all the required components in your GEAP and have a table of contents that shows the Commissioner and her team where to find them.

If you experience unforeseen circumstances that will impact whether you can complete your GEAP on time, you can request an extension to submit your GEAP. Should you this, send a request to the Commissioner in a reasonable timeframe well before the submission date. For further information on extension requests, visit the Commissioner’s extension request page.

Note that the extension does 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 access for new 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 complete this form.

If you have questions about how to use this form, please contact the Commissioner’s team via enquiries@genderequalitycommission.vic.gov.au

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## GEAP checklist

### Did you include the following components required under the *Gender Equality Act 2020* and *Gender Equality Regulations 2020*?

#### [ ]  The results of your workplace gender audit to identify forms of gender inequality for each of the seven indicators

#### [ ]  Details of at least one c**onsultation with your** governing body, employees, employee representatives and any other relevant people to develop your GEAP

#### [ ]  A description of how you considered the gender equality principles and the gender pay equity principles in the Act

#### [ ]  Consideration of intersectionality, where practicable

#### [ ]  Strategies for each of the seven indicators

#### [ ]  Measures for each of the seven indicators

#### [ ]  A description of how your GEAP development and implementation is adequately resourced

#### This page has been intentionally left blank.

For consultation purposes, some pages have been removed for ease of review. You do not need to provide feedback on this omitted section.

The pages removed from this section is *Part 3: After submitting your GEAP.* Guidance in this sectionincludes:

* Communicating your GEAP to your organisation
* Monitoring and evaluation
* Reporting on your gender equality progress and gender impact assessments (GIA)
* Appendix
1. Where practicable, you should also consider intersectionality when undertaking your gender impact assessments. [↑](#footnote-ref-2)
2. Note that methods for applying an intersectional lens to quantitative data are still being developed (Ben 2018). As such, there is no single, correct way to undertake an intersectional analysis of your workforce and employee experience data (source: intersectional guide). [↑](#footnote-ref-3)
3. Adapted from Victorian Government. (2024). *Intersectional Policy Guide.*Melbourne, Victorian Government. [↑](#footnote-ref-4)
4. Objects of the Act (7) [↑](#footnote-ref-5)
5. Source: USAID, Engendering Industries: Setting Strategic Gender Equality Targets, p.2 (<https://www.usaid.gov/sites/default/files/2022-05/USAID-Engendering-Industries-Guide-Target-Setting.pdf>). [↑](#footnote-ref-6)
6. Reference: Issel (2013), Health Program Planning and Evaluation: A Practical, Systematic Approach for Community Health. Jones & Bartlett Learning: USA [↑](#footnote-ref-7)
7. Reference: Issel (2013), Health Program Planning and Evaluation: A Practical, Systematic Approach for Community Health. Jones & Bartlett Learning: USA [↑](#footnote-ref-8)