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| **Disclaimer:** this document gives general guidance on privacy, confidentiality, and employee safety. It does not give legal advice. Duty holders are responsible for meeting all privacy laws, including the Privacy and Data Protection Act 2014 (Vic) (PDP Act). The Information Privacy Principles (IPPs) in Schedule 1 of the PDP Act set out minimum standards for handling personal information in Victoria’s public sector. |

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# Introduction

This practice note explains how to collect and handle employee experience data for the 2025 audit under the *Gender Equality Act 2020* (the Act). Duty holders must create a Gender Equality Action Plan (GEAP) every four years and submit a Progress Report two years later.

Employee experience data complements the workforce data to show the full picture of gender inequality in a workplace. But this data can be very sensitive. If you make a mistake in how you gather or report it, you may cause harm. We strongly suggest that you use a third-party survey provider to run your survey.

This practice note outlines key standards for privacy, survey methods, technical details, and contracts when hiring a third-party provider or conducting internally.

## Using the People Matter Survey 2025 for data collection

Victorian public sector organisations can use the 2025 People Matter Survey (including the employee experience section) to shape their GEAP and track progress on the seven gender equality indicators. Local councils, universities, and libraries may opt in to use a gender equality version for a fee.

The Victorian Public Sector Commission (VPSC) runs the People Matter Survey with strict privacy and anonymity rules. We recommend using the 2025 People Matter Survey. It provides the most complete data set at a low cost. It also saves you time since we upload the survey data for you. You don’t need to fill out and upload the employee experience reporting template yourself.

If you do not or cannot use the 2025 People Matter Survey, you can choose a different third-party provider.

## Engaging a third-party provider for data collection

You may select another third-party provider to collect your employee experience data. The survey questions can either be run as a specific gender equality survey or be integrated into an existing employee experience survey.

# Privacy and confidentiality

We strongly recommend hiring an external third-party provider. Some survey questions are about sensitive or personal information. For example, cultural identity or sexual orientation is sensitive information under the PDP Act and Privacy Act 1988 (Cth). Disability data is health information under the Health Records Act 2001 (Vic). Also, bullying or sexual harassment questions are very sensitive.

Participation should be voluntary and anonymous.

## What privacy protocols should be in place?

Your survey provider must follow data protection laws and use robust security:

* Comply with IPPs (in the PDP Act) and Australian Privacy Principles (in the Privacy Act 1988). See [OVIC](https://ovic.vic.gov.au/privacy/for-agencies/information-privacy-principles/) and OAIC.
* Ensure data remains in Australia or make proper disclosures if stored overseas (see APP 8 and IPP 9).
* Respect your organisation’s privacy requirements and any enterprise agreements or awards.
* Limit access to identifiable data to a few authorised people.
* Handle paper-based surveys with care (e.g., keep them in a locked box that only the provider can open).
* De-identify data and remove personal details as soon as possible, including in backups. This may involve masking combinations of details that could reveal someone’s identity.

Include contract terms that require the provider to comply with the PDP Act and use secure systems.

## Privacy collection statement

You must include a privacy collection statement in the survey. Under IPP 1.3, you must explain:

* Who is collecting the data and how to contact them
* How each person can see their data
* Why the data is collected
* Who usually gets this kind of data
* Any law that makes you collect it
* What happens if the data is not provided

## Protecting confidentiality by de-identifying survey results

Because people can be identified from tables of data, your provider must use strict privacy controls during survey collection and reporting.

## Aggregated results for demographic groups

Your provider must only report aggregated data for groups (for example, “women with a disability”) if:

* The survey has 30 or more total respondents.
* Each demographic group has 10 or more respondents.
* No more than 2 demographic variables are combined (e.g., gender + age is fine, but not gender + age + disability).
* Suppressed group results (fewer than 10) cannot be revealed by working backward from other data.
* Groups at sub-organisation levels get demographic results only if there are 30 or more responses in that sub-group. For example, demographic results should not be provided for work groups within an organisation (i.e. for divisions, teams, units) and not be provided for other workplace identifiers such as questions on occupation, where there are fewer than 30 responses in that work group.

### Particularly sensitive questions

For bullying, discrimination, or sexual harassment results:

* Only break results down by gender (no other demographics).
* Give results only if 10 or more participants said they experienced the behaviour.

Free-text comments should go in a separate report with no personally identifiable details. We recommend that your provider remove clues (like names or dates) before giving them to you. Store these comments in a safe place (like a password-protected folder).

### Raw/individual participant response data

If raw data is shared, it should **not** include:

* Demographic details
* Answers to bullying, discrimination, or sexual harassment questions
* Free-text comments

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| **Privacy obligations under the Gender Equality Act**  Under the Act (section 51), Duty holders have important privacy obligations:   1. to remove any personal information from their GEAPs or progress reports 2. when submitting any material that is likely to be published, advise the Commissioner whether the material contains any personal information   Personal information is defined in the PDP Act. It means information or an opinion (including information or an opinion forming part of a database) that is recorded in any form and, whether true or not, is about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. |

# Distress protocol to protect the wellbeing of respondents

Some survey questions (like sexual harassment or bullying) may cause distress. Let staff know in the introduction that:

* It is good but **not required** to answer every question.
* They can **stop** the survey at any time.

At the end of the survey or after any sensitive question, **offer details on support services.**[[1]](#footnote-2) You can show these to all respondents or only to those who want them.

# Survey methodology – question wording, order and response options

Use the exact wording from the employee experience survey questionnaire Excel (available on our website). Keep the same order for questions and responses.

Even small changes in wording or question order can affect results. Following the exact text also helps the Commission compare results across Duty holders.

# Specification

## Materials to be used in developing the survey

The following artefacts are available on our website and should be used by your survey provider to develop the survey

* Employee experience survey questions and responses
* This guidance note.

Employee experience survey questions and responses

The survey questions and responses are contained within an Excel spreadsheet containing the following sheets

1. Instructions – for guidance on how to use the spreadsheet
2. Survey Questions – providing the questions and responses for the survey
3. Indicator Key – outlining the workplace gender equality indicator corresponding to each number in the indicator column in sheet 2 (Survey Questions)

Definitions for each column in the **Survey Questions** sheet are as follows

|  |  |
| --- | --- |
| **Column** | **Definition** |
| Suggested order | Indicates the order in which the question should be presented to the respondent |
| Suggested section | Indicates which section this question should be contained within |
| Question ID | The unique identifier for this question |
| Question | The text of the question to be presented to the respondent |
| Routing | Indicates any preconditions - i.e. whether or not this question should be shown based on answers to a previous question |
| Response required | Indicates whether respondents who are shown this question need to answer it to complete their survey |
| Response type | Indicates whether respondents:   * Must select a single response * May select multiple responses * Can enter a free text response, or * A combination of the above |
| Explanatory text and definition | Provides supporting explanatory text that should be shown to the respondent alongside the question |
| Response options | A list of responses to be presented to the respondent, in the specified order |
| Indicator | Indicates which workplace gender equality indicator this question relates to (this information does not need to be presented to the respondent) |
| What to report to the Commission | Information about how to calculate results to report to the Commission (this information does not need to be presented to the respondent) |

## Response data

Once the survey has been closed and the results generated, they must be provided in a specific format.

Note: The Commission strongly recommends that your survey provider deliver the response data information to you in the format described below.

The employee experience reporting template is an Excel workbook. It contains the following sheets

1. Instructions – providing instructions for the population of the spreadsheet.
2. Results – the container into which the responses must be populated.
3. Indicator Key – outlining the workplace gender equality indicator corresponding to each number in the indicator column in sheet 2 (Results)

Definitions for each column of the **Results** sheet are as follows

|  |  |
| --- | --- |
| **Column** | **Definition** |
| Suggested section | Text to make the context of the question clear |
| Question ID | The unique identifier for this question |
| Question | The text of the question |
| Indicator | Indicates which workplace gender equality indicator this question relates to |
| Measure | Indicates which response or responses to report in this row |
| Measure calculation notes | Describes how to calculate the result in this row |
| Gender | One of the following  Woman  Man  Self-described |
| Intersectional group | One of the following   * N/A * Age * Aboriginal and/or Torres Strait Islander * Caring responsibility * Country of birth * Disability * Language other than English spoken with family or community * Sexual orientation |
| Intersectionality | A demographic attribute describing the group captured in this row |
| Result W | Holds the value associated with this combination of attributes. Must be populated either with  A decimal value between 0 and 1 (inclusive) as described in the Measure calculation notes column; or  The letter N, to indicate that a result has been redacted to protect participants’ confidentiality, per the method described in this practice note |
| Result M |
| Result S |

Notes:

1. The collection template is presented in a fully-populated format – that is a row is populated for every valid combination of question + response + gender + intersection
2. Each value must be populated as described in the table above. Blank values are not acceptable.

# Maximising response rates

Try for at least **30** completed surveys so results are valid and can be reported without identifying people. This will ensure that any demographic group data can be aggregated in a way that maintains confidentiality and is representative of your workforce.

To boost responses:

* Stress that the survey has **privacy safeguards**.
* Explain **how** data will be handled and reported by the third-party provider.
* **Promote** the survey and **commit** to act on its findings.
* Use **generic links** instead of individualised ones where possible.
* Make it **mobile-friendly** for non-desk workers.
* Provide a **computer or tablet** at work for staff who need one.
* Allow **work time** to complete the survey.
* Make sure your third-party provider follows all steps for **confidentiality**.

# Quality assurance and compliance

We recommend that the survey is conducted by a third-party provider who is a member of the Association of Market and Social Research Organisation (AMSRO) or The Research Society (formerly the Australian Market & Social Research Society AMSRS).

Alternatively, the provider could supply evidence of equivalent accreditation and supply documented evidence of compliance via independent assessment.

The provider should also be able to provide you with evidence of accreditation or pending accreditation (before the commencement of the survey) under the International Standard for Market Research (AS ISO 20252).

# Timing for data collection

Audits are due on or before 1 December 2025. To meet this deadline, the employee experience survey should be conducted in the 2025 calendar year (ideally mid 2025).

The employee experience survey should be administered for a limited period, for example, four weeks between 29 May and 24 June 2025.

# Contract considerations

When you write a contract with your survey provider, ensure you establish the following to meet your obligation

1. How the data will be provided to you
2. Who will be responsible for completing the employee experience reporting template (we strongly recommend that you require this to be populated by your survey provider as it can reach more than 50,000 rows of data)
3. That they will provide you with information you need to complete the [Additional Information about the survey data collection](#_Additional_Information_about) – including the number of employees that participating in the survey.

# Further information

## Additional Information about the survey data collection

Please submit the template on the next page (page 11) to as an attachment when submitting your audit. This will help us better understand your organisation’s responses. The questions include.

* Which third-party provider did you engage to administer the survey?
* When did data collection take place?
* How many employees were invited,
* How many responded?

For further information contact the Commission at [enquiries@genderequalitycommission.vic.gov.au](mailto:enquiries@genderequalitycommission.vic.gov.au)

Template to be submitted with audit: Information about the survey data collection

| **Question** | **Response** |
| --- | --- |
| Which company did you hire to run the survey? |  |
| What was the timing and duration of your survey? |  |
| How many employees were invited to participate in, and how many actually completed the survey? |  |
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1. Support services referred to may include 1800RESPECT (sexual assault, domestic or family violence and abuse), Beyond Blue (anxiety, depression and suicide prevention), Centres Against Sexual Assault (referral to non-profit, government-funded organisations that provide support, counselling and crisis care), your Employee Assistance Program, Lifeline (crisis support and suicide prevention), Relationships Australia (family and relationships services), QLife (LGBTIQ+ peer support and referral), SafeSteps (family violence), Sexual Assault Crisis Line Victoria (sexual assault), the Victorian Civil and Administrative Tribunal (sexual harassment complaints) and the Victorian Equal Opportunity and Human Rights Commission (sexual harassment complaints). [↑](#footnote-ref-2)