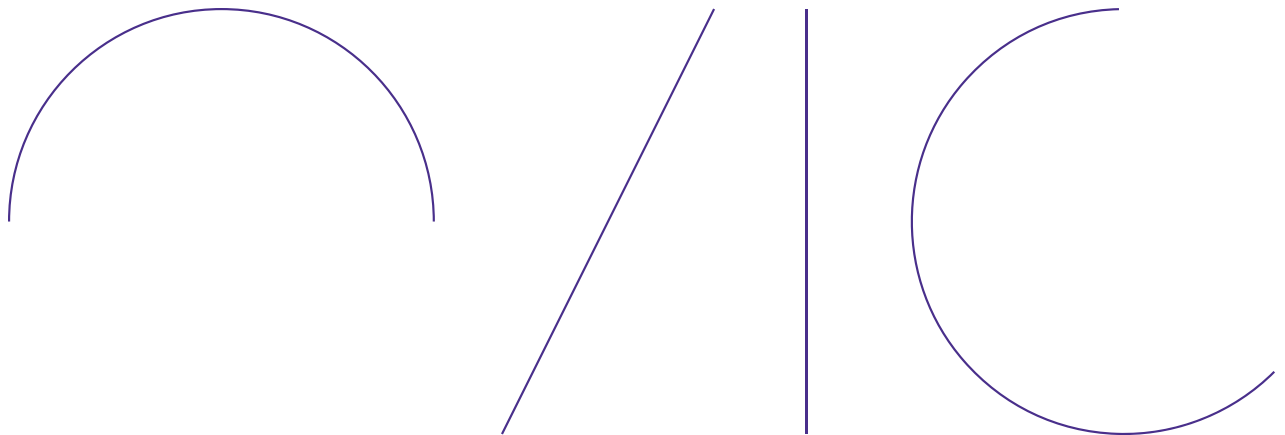




Office of the Victorian
Information Commissioner

Gender Equality Action Plan

2022-2025



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Acknowledgement of Country

The Office of the Victorian Information Commissioner acknowledges the Aboriginal Traditional Owners of Country throughout Victoria and pays respect to their cultures and Elders past, present and emerging.

Message from the Information Commissioner

The *Gender Equality Act 2020* provides us with a unique opportunity to contribute to true societal change.

All OVIC employees have a responsibility to reflect on and challenge gendered bias in the workplace. Such bias can be obvious or hidden. It need not be the result of any intention to discriminate but can result from lack of awareness or the fact that all of us have lived much of our lives in an environment where some privileges and biases were simply taken for granted.

I want the next four years to be the time where we address these issues head on and make a meaningful and lasting change. I encourage everyone in our workforce to call out issues of gender inequality and discrimination. I also encourage everyone to contribute to solutions.

I look forward to implementing the program outlined in OVIC's Gender Equality Action Plan 2022-2025.

Sven Bluemmel

Victorian Information Commissioner

Vision for Gender Equality

The Office of the Victorian Information Commissioner (**OVIC**) will be gender equitable and genuinely inclusive. It will be a workplace that is deeply fair and rewarding for all employees.

Over the next four years we will challenge gender inequality and gender stereotypes and ensure better outcomes and experiences for women, men, and gender diverse employees from all backgrounds.

We also commit to making progress towards a workforce that better reflects the diverse community that we serve.

Our priority areas of focus under this Gender Equality Action Plan (**GEAP**) 2022-2025 include:

- communicating a clear and consistent organisational commitment to gender equality and inclusion;
- establishing whole of organisational accountability for gender equality;
- building a gender equitable and inclusive workplace culture;
- applying an intersectional gender lens to policies and procedures that contribute to workplace gender equality;
- building a culture of gender equitable and inclusive leadership; and
- making progress in addressing any internal factors contributing to the gender pay gap.

We are excited to contribute to a more gender equitable and inclusive Victoria.

Case for Change

OVIC is the primary regulator and source of independent advice to the community and Victorian government about how the public sector collects, uses and discloses information.

We acknowledge that gender inequality persists in all workplaces

We recognise that there is still a long way to go until gender equality is achieved in Australia. Across Australia women make up over 50% of the workforce but less than 20% of CEOs, while the majority of boards have more men than women (22% of boards only have men).

Only 12% of primary carers leave was used by men in 2019-2020 and progress towards pay equality is slow with only 4 in 10 employers narrowing their pay gap last financial year¹. In Victoria the gender pay gap remains persistent and specifically in the Victorian public sector stands at 10%².

We recognise that gender equality brings benefit at both a national and organisational level

The evidence shows that workplace gender equality leads to increased productivity and economic growth as more women remain in the workforce³.

It also contributes to increased organisational performance, enhanced ability to attract and retain employees and enhanced organisational reputation. For our small organisation, employee retention is a business imperative, and we understand the role that gender equitable culture, policies and processes will play in attracting and retaining a skilled, invested and committed team.

We believe gender equality is a human right

We seek to make progress towards gender equality because it is a human right. All people regardless of gender should be able to live full lives free from constraining stereotypes and can build meaningful careers free from bias and discrimination.

We must address gender inequality through an intersectional lens

To authentically address gender inequality, we must be intersectional in our understanding and approach. This means being deliberate in investigating how discrimination and disadvantage may be experienced by someone based on their gender and also compounded by other aspects of their identity including Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes. We commit to keeping intersectionality front of mind as we seek to progress towards workplace gender equality.

¹ [Australia's gender equality scorecard | WGEA](#)

² [Workplace gender equality indicators | Commission for Gender Equality in the Public Sector \(\[genderequalitycommission.vic.gov.au\]\(http://genderequalitycommission.vic.gov.au\)\)](#)

³ [Workplace gender equality | WGEA](#)

Gender Equality Principles

Our GEAP is underpinned by a commitment to the Gender Equality Principles as defined under the *Gender Equality Act 2020*.

1. 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;
2. Gender equality benefits all Victorians regardless of gender;
3. Gender equality is a human right and precondition to social justice;
4. Gender equality brings significant economic, social and health benefits for Victoria;
5. Gender equality is a precondition for the prevention of family violence and other forms of violence against women and girls;
6. Advancing gender equality is a shared responsibility across the Victorian community;
7. All human beings, regardless of gender, should be free to develop their personal abilities, pursue their professional careers and make choices about their lives without being limited by gender stereotypes, gender roles or prejudices;
8. Gender inequality may be compounded by other forms of disadvantage or discrimination that a person may experience based on Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes;
9. Women have historically experienced discrimination and disadvantage based on sex and gender; and
10. Special measures may be necessary to achieve gender equality.

Legislative Context

Our work to comply with the *Gender Equality Act 2020* will also intersect with commitments under a range of other legislation and agreements, including:

- The *Victorian Charter of Human Rights*, which details 20 rights that fall within the key themes of freedom, respect, equality, and dignity. As a public authority, OVIC is required to act consistently with the rights that are set out in the Charter;
- The *Equal Opportunity Act 2010 (Vic)*, which requires us to take a positive duty to eliminate discrimination, sexual harassment, and victimization in our workplace.
- The *Fair Work Act 2009 (Cth)*, which sets out minimum entitlements, enabling flexible working arrangements and fairness at work and prevention of discrimination against employees;
- *Sex Discrimination Act 1984 (Cth)*, which makes it unlawful to discriminate against a person because of their sex, gender identity, intersex status, sexual orientation, marital or relationship status, family responsibilities, because they are pregnant or might become pregnant or because they are breastfeeding; and
- *Occupational Health and Safety Act 2004 (Vic)*, which is the main workplace health and safety law in Victoria. It sets out key principles, duties and rights about Occupational Health and Safety and secures the health, safety and welfare of employees and other persons at work.

Developing our GEAP

Under the *Gender Equality Act 2020*, OVIC is required to develop a GEAP every four years. This plan will ensure the organisation makes demonstrable progress towards achieving workplace gender equality.

In line with legislative requirements, OVIC has completed a workplace gender audit and conducted meaningful consultation to inform GEAP development. We have also completed a rapid gender analysis of existing workplace policies and procedures.

Workplace Gender Audit

Our audit included collection of the following data:

1. **Workforce Data**

- We extracted available data from our workforce systems as per requirements under the Commission for Gender Equality in the Public Sector's (**CGEPS**) *Workforce Reporting Template*; and
- We identified key data gaps related to intersectional attributes including Aboriginality, disability, cultural identity, and sexual orientation. These gaps will be addressed as a priority within the GEAP to ensure employees are able to voluntarily contribute this information in future.

2. **People Matter Survey response data** (survey administered by the Victorian public sector Commission, in line with requirements set out by CGEPS)

- 43% of OVIC employees completed the survey during the reporting period however due to the size of the organisation and subsequently the small number of respondents it was not possible to disaggregate the results by gender.

Audit analysis highlighted many positive aspects of working at OVIC and we seek to build on these in the GEAP.

We are proud of many of our People Matter Survey (**PMS**) results, including:

- 88% of employees agree there is a positive culture in the organisation in relation to employees of different sexes / genders;
- 96% of employees agree that OVIC encourages respectful workplace behaviours;
- 83% of employees agree that senior leaders actively support diversity and inclusion in the workplace;
- 96% of employees agree OVIC would support them if they needed to take family violence leave;
- 96% of employees agree there is a positive culture around family responsibilities;
- 88% of employees agree that using flexible work is not a barrier to success in the organisation;
- 88% of employees agree there is a positive culture around caring responsibilities;
- 92% of employees agree that the organisation uses respectful images and language; and
- 88% of employees agree that in their workgroup work is allocated fairly, regardless of gender.

Meaningful Consultation

OVIC's consultation process was designed to meet the requirements of Victoria's *Gender Equality Act 2020*, taking into account our headcount of 64 employees.

Consultation activities included:

- 90 minute facilitated discussion with the Executive Leadership Team (6 participants);
- 90 minute focus group session open to all employees (36 participants);
- Online survey open to all employees (10 responses); and
- Dissemination of workplace gender audit results and follow-up discussion with employee CPSU representative.

OVIC does not have a Board or Governing Body and therefore no consultation was required.

Through consultation our employees told us that they value our commitment to:

- flexible work;
- equity and fairness;
- women in leadership;
- supporting employees to have a work life balance; and
- our existing processes in relation to recruitment and career development.

There is still significant work to do

There is still much that needs to be done to achieve gender equality at OVIC.

Analysis of our workforce data highlighted that:

- There are more men in Executive with a split of 60% men (3) and 40% women (2);
- That more women (22%) than men (17%) hold part-time roles;
- That OVIC has a gender pay gap favouring men by 14.5% on median base salary;
- That recruitment favours women with 72% of new hires being women and 28% men;
- That more women (24%) than men (17%) access formal flexible working arrangements; and
- Women are more likely to hold professional roles (72%) and clerical roles (100%) than men.

Areas of note for improvement emerging out of the People Matter Survey include:

- 50% of employees agree there is a positive culture within the organisation in relation to employees with disability.
- 46% of employees agree there is a positive culture within the organisation in regards to employees who are Aboriginal and/or Torres Strait Islander.
- 63% of employees agree that OVIC takes steps to eliminate bullying, harassment, and discrimination;
- 50% of employees agree that disability is not a barrier to success in the organisation;

- 58% of employees agree that being Aboriginal or Torres Strait Islander are not a barrier to success in the organisation; and
- 67% of employees agree that age is not a barrier to success in the organisation.

During consultation we heard that employees may feel constrained by gendered stereotypes and roles. Employees suggested there is more we can do to address gendered language and behaviour in the workplace and that challenging poor behaviour or raising complaints can be extremely difficult in our small organisation.

Employees also spoke of a desire for strong and consistent leadership on gender equality and the importance of appropriate resources being allocated to this important work.

Rapid gender analysis of OVIC policies and procedures

To inform GEAP development we completed a rapid gender analysis of the following policies and procedures:

- OVIC Respect in the Workplace Policy;
- Recruitment and Selection Policy;
- OVIC Flexible Work Arrangements Policy and Procedures;
- OVIC Occupational Health and Safety Policy;
- OVIC Internal Complaints Procedures;
- OVIC Study Assistance Policy and Procedures and Business Case; and
- Privacy Policies and Procedures.

Analysis suggested these documents provide a strong foundation for progressing workplace gender equality. Over the next four years, we intend to make targeted improvements to ensure we are better able to collect data required for future workplace gender audit processes and ensure workplace practice contributes to intersectional gender equality.

Implementing our GEAP

The Executive will have full oversight of the implementation of the GEAP and will ensure that progress is achieved by including it as a standing agenda item at Executive meetings once every 6 months.

An Executive Sponsor will also establish a cross organisational working group representative of employees from across the organisation.

Day to day implementation will be the responsibility of the Office Manager. Updates to the position description for this role will be made in the first quarter of implementation. Additional support will be provided from members of the Corporate team. Budget will be made available annually for training and development. It is anticipated all employees will attend training annually.

GEAP Strategies

Overarching Strategies

Overarching strategies will underpin the success of strategies and measures contained throughout the GEAP 2022-2025.

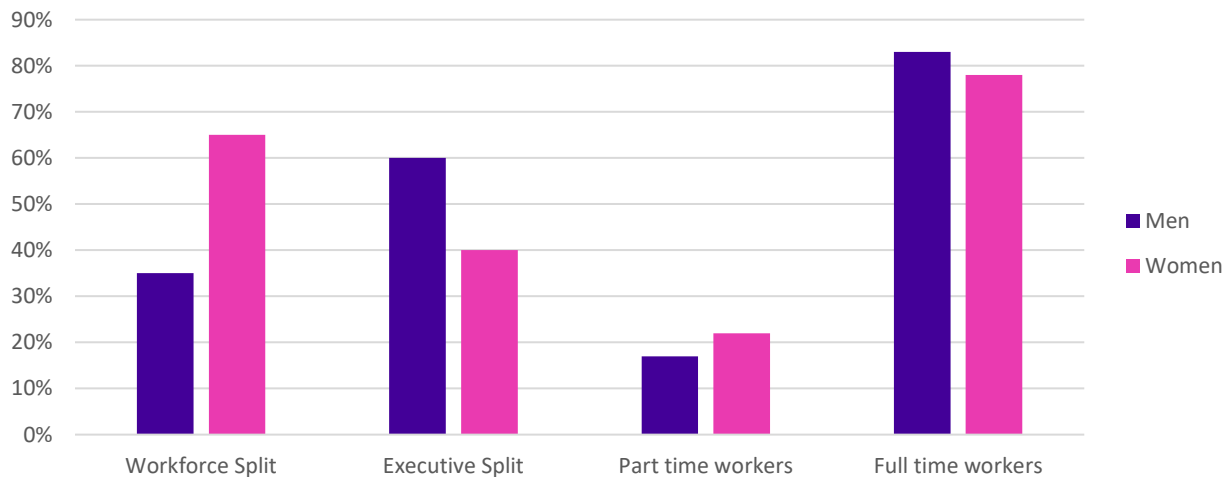
Number	Strategy	Actions/Measures	Year
OS1	Communicate clear and consistent organisational commitment to gender equality	Intersectional Gender Equality a regular agenda item at Executive and All Staff meetings	2022-2025
		Create cross organisational Gender Equity Working Group with Executive sponsorship	
OS2	Establish whole of organisation accountability for gender equality	Develop reporting framework inclusive of key measures across each indicator and implement quarterly reporting to Executive	2022
		Undertake assessment of OVIC capacity to meet CGEPS reporting requirements for the Workplace Gender Audit. Develop plan to address barriers that are identified	
		Undertake Privacy Impact Assessment on data required for the <i>Gender Equality Act 2020</i> and communicate access, use and storage protocols to employees	
OS3	Apply an intersectional gender lens to policies and procedures that contribute to workplace intersectional gender equality	Develop OVIC approach to applying an intersectional gender lens to policy and procedures (standard language and inclusions, accountability etc.)	2022
		Build employee capacity to apply an intersectional gender lens to policies and procedures through training or coaching	2022-2023
		Prioritise policies with strong links to the GEAP (Respect in the Workplace, Recruitment & Selection, Flexible Work, OH&S, Internal Complaints) – action plan	2023-2025
OS4	Communications Plan	Develop internal Communications Plan to promote implementation of the GEAP. Document key messaging and build commitment to Gender Equality Vision	2022-2025

Indicator 1: Gender Composition of the Workforce

Women are often underrepresented in leadership roles, and overrepresented in lower-level roles. This contributes to the gender pay gap and means that organisations may be missing out on the expertise and skills of women at senior levels. By collecting and reporting data on gender composition at all levels, organisations can see where they could benefit from greater gender diversity and take action to support women into senior roles⁴.

Workforce Data

- Overall workforce split is 65% women and 35% men
- Executive split is 60% (3) men and 40% women (2)
- 17% of men and 22% of women work part-time
- 83% of men and 78% of women work full-time
- 0 employees work casually
- No executives work in a part-time capacity



Employee Experience Data

88% of employees agree there is a positive culture in the organisation in relation to employees of different sexes/genders

⁴ [Workplace gender equality indicators | Commission for Gender Equality in the Public Sector \(genderequalitycommission.vic.gov.au\)](https://www.genderequalitycommission.vic.gov.au)

Indicator 1: Strategies

Number	Strategy	Actions/Measures	Year
1.1	Build culture of gender equitable and inclusive leadership	Leaders complete Gender Equitable and Inclusive leadership training	2022
		Integrate expectations around intersectional gender equality into Leader Position Descriptions	
		Introduce gendered performance and development goals for leaders	
1.2	Leadership composition is gender equitable and inclusive	Establish position on equitable representation of people of different genders and identities	2022
		Establish commitment to ensuring leaders have access to flexible work arrangements	2023-2024
1.3	Promote flexible modes of employment to people of all genders	Annual conversation with all employees regarding flexible modes of employment (during performance management)	2022
1.4	Build a gender equitable and inclusive workplace culture	Develop internal Communications Plan to promote implementation of the GEAP. Document key messaging and build commitment to Gender Equality Vision	2022-2025

Indicator 2: Governing Body

OVIC has no formal governing body therefore no data or strategies included.

Indicator 3: Pay Equity

The gender pay gap is persistent in Victoria and as of November 2019 stands at 9.6%. In the Victorian public sector it is 10%.

The gender pay gap is driven by several factors, including the unequal distribution of unpaid care work, higher rates of pay in male-dominated industries, and gender discrimination. By collecting and reporting pay data, organisations can see where pay gaps are largest and identify the underlying causes.

Workforce Data

On average men at OVIC earn 14.5% more than women on median *base salary*

On average men at OVIC earn 17.9% more than women on median total remuneration

Note that remuneration data is converted to annualised full-time equivalent prior to calculation of gender pay gap

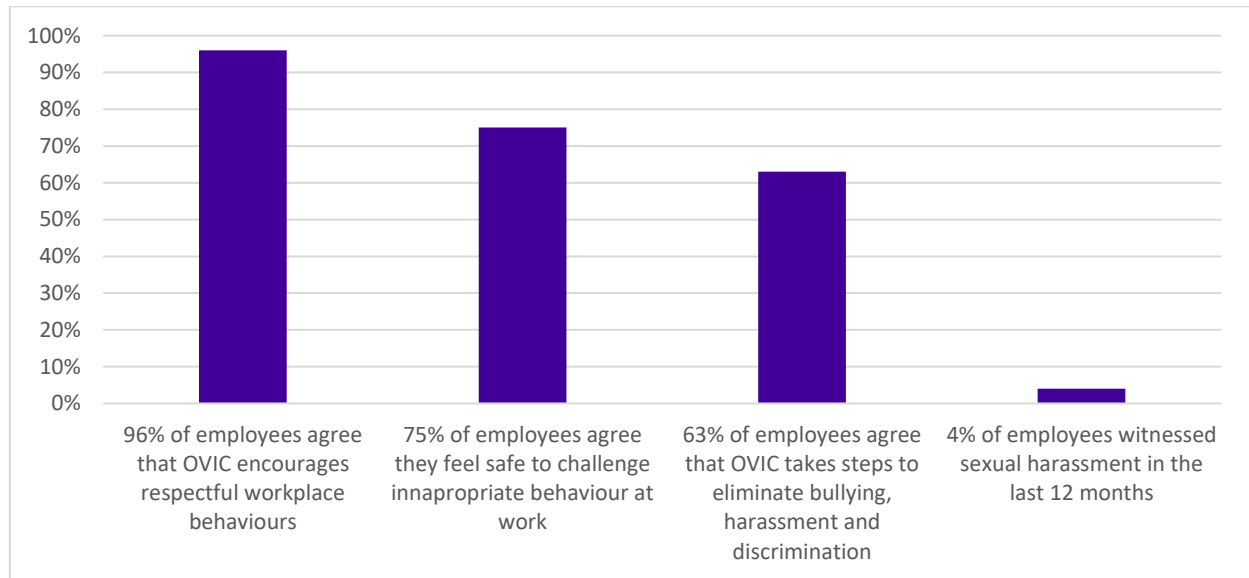
Indicator 3: Strategies

Number	Strategy	Actions/Measures	Year
3.1	Make progress on closing the gender pay gap	Investigate and report on pay gap in detail to develop an endorsed action plan	2022-2023
		Make progress towards addressing any internal factors contributing to the pay gap	2023-2025
		Report on gender pay gap bi-annually to Executive and annually to organisation	2022-2025
		Training for leaders on gender pay gap	2023

Indicator 4: Sexual Harassment

Sexual harassment in the workplace is common in Australia, including Victoria. It causes financial, psychological, and physical harm to victim survivors. It also has a significant economic cost to organisations and the community⁵.

Employee Experience Data



Workforce Data

0 formal complaints of sexual harassment received

⁵Workplace gender equality indicators | Commission for Gender Equality in the Public Sector (genderequalitycommission.vic.gov.au)

Indicator 4: Strategies

Number	Strategy	Actions/Measures	Year
4.1	Build a culture of prevention that addresses the root causes of sexual harassment	Gender training for all employees (also noted under Indicators 1 & 7)	2022
		Annual whole of organisation communication from Executive	2022-2025
4.2	Ensure organisation systems, process and responses to sexual harassment are victim-survivor centric and trauma informed	Develop a stand-alone sexual harassment policy that is gendered, intersectional, victim-survivor centric and trauma informed	2023
		Investigate increasing use of alternative methods of resolving incidents of sexual harassment such as restorative justice	
		Investigate appropriate ways to increase transparency when responding to complaints of sexual harassment (regarding outcomes of investigation)	
		Develop Leaders protocols in responding and preventing workplace sexual harassment	
		Training for Leaders on responding appropriately to workplace sexual harassment	

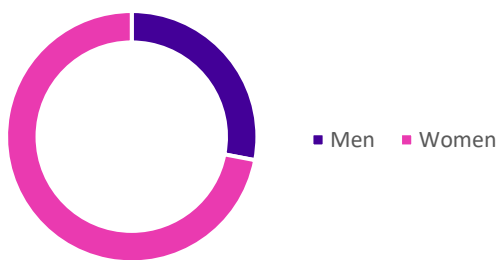
Indicator 5: Recruitment and Promotion

Gender bias and gender stereotypes can influence recruitment, promotion, and career progression practices. This means that women may not have access to the same career opportunities as men. Other forms of disadvantage and discrimination can also have an impact, limiting career opportunities for women from different backgrounds, such as women with disability or older women.

Data on recruitment and promotion outcomes can show where women's careers are stalling and help identify strategies to create more equal opportunities.

Workforce Data

Composition of new recruits for the 2021 Financial Year



Employee Experience Data

- 71% of employees agreed that the organisation make fair recruitment and promotion decisions, based on merit
- 58% of employees agreed they have an equal chance at promotion in the organisation
- 50% of employees agreed that disability is not a barrier to success
- 58% of employees agreed that being Aboriginal or Torres Strait Islander are not a barrier to success
- 75% of employees agreed that cultural background is not a barrier to success
- 67% of employees agreed that age is not a barrier to success
- 79% of employees agreed that sexual orientation is not a barrier to success
- 71% of employees agreed that people in their workgroup actively support diversity and inclusion in the workplace
- 83% of employees agreed that senior leaders actively support diversity and inclusion in the workplace

Indicator 5: Strategies

Number	Strategy	Actions/Measures	Year
5.1	Apply an intersectional gender lens to recruitment policy and procedures	Apply an intersectional gender lens to recruitment policy and modify practice according to recommendations from this process	2022
		Train selection panels and leaders on Gender Equitable and Inclusive recruitment practice	2022
		Apply an intersectional gender lens to policies guiding promotion practices such as study support, secondments, acting arrangements	2023
		Track promotion outcomes by gender, level, and mode of employment	2022-2025

Indicator 6: Leave and Flexibility

Flexible working arrangements and leave entitlements including parental leave help Victorians of all genders balance paid work with other responsibilities. But structural and cultural factors mean women are far more likely than men to work flexibly, especially by working part time, and taking longer parental leave.

On average women do nearly twice as much unpaid work as men. It's important that defined entities collect clear data on who is accessing flexible work so they can see what extra support might be needed.

By encouraging more men to work flexibly and take leave to care for children or others, organisations can contribute to a more equal gender balance in unpaid work.

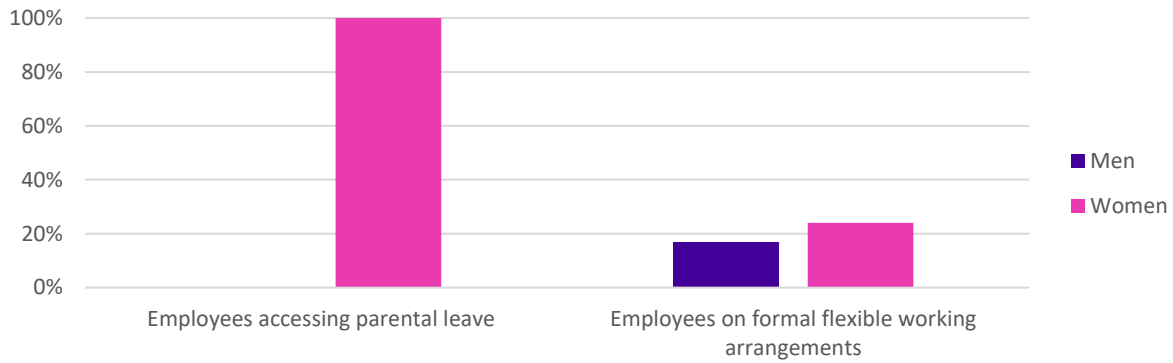
Family violence causes significant trauma to a victim survivor, which can affect their ability to work. Victim survivors may worry about consequences if they try to remove themselves from the violent situation. This may include the perpetrator attending the workplace, or missing work to attend to housing and legal matters.

Family violence leave supports victim survivors to manage the impacts of their experience. It also promotes an organisational culture that does not accept family violence⁶.

⁶ [Workplace gender equality indicators | Commission for Gender Equality in the Public Sector \(genderequalitycommission.vic.gov.au\)](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators)

Workforce Data

- 100% of employees accessing parental leave are women
- 0 people exited the organisation during parental leave
- 24% of women and 17% of men are on formal flexible working arrangements



Employee Experience Data

- 96% of employees agree OVIC would support them if they needed to take family violence leave.
- 96% of employees are confident that their request for flexible work would be considered.
- 83% of employees agree that OVIC support employees with family or other caring responsibilities regardless of gender.
- 96% of employees agree they have the flexibility to manage work and non-work activities and responsibilities.
- 88% of employees agree that flexible work arrangements are not a barrier to success in the organisation.

Indicator 6: Strategies

Number	Strategy	Actions/Measures	Year
6.1	Ensure a positive working environment for employees who access flexible working arrangements	Investigate and report on experiences of flexible work arrangements through interviews and/or focus groups. Explore workload, access to conditions etc	2022-2023
		Leaders act as a role model on flexible work arrangements	2022-2025
		Incorporate more detail in relation to flexible working arrangements to people of all genders through employee guide (including case studies)	2023
		Annual conversations with team members through performance management processes	2023-2025
6.2	Promote parental leave to people of all genders	Benchmark best practice approaches to parental leave conditions for people of all genders	2023
		Investigate return to work processes	
		Apply an intersectional gender lens to support available to employees regarding parental leave	
6.3	Ensure approach to family violence is best practice	Deliver Responding to Disclosures of Family Violence in the Workplace training for all leaders	2022-2023
		Develop leaders guide for responding to workplace disclosures of family violence	2023
		Communicate family violence approach to all employees annually during the 16 days of activism campaign	2023

Indicator 7: Gendered Segregation

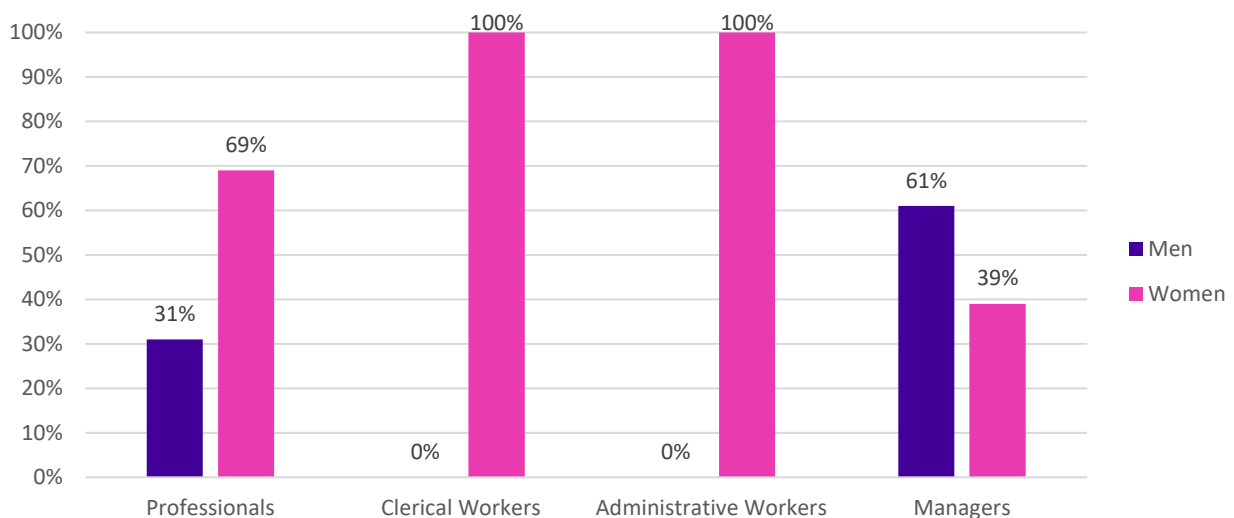
Women make up a higher proportion of certain occupations and industries, while men are more represented in others.

This gendered segregation is driven by gendered norms and stereotypes about what work is appropriate for men and women, as well as structural factors including access to flexible working arrangements.

Gendered workforce segregation reinforces gender inequality and widens the pay gap, as the average pay is lower in industries and occupations dominated by women⁷.

Workforce Data

To comply with the *Gender Equality Act 2020* entities are required to classify roles using the Australian New Zealand Standard of Classification of Occupations (**ANZSCO**) codes (professionals, clerical workers, administrative workers and managers).



Employee Experience Data

- 92% of employees agree that the organisation uses respectful images and language
- 89% of employees agree regardless of gender, work in their group is allocated fairly

⁷ <https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators>

Indicator 7: Strategies

Number	Strategy	Actions/Measures	Year
7.1	Address gendered patterns of employment across the workforce	Analyse workplace segregation to build a meaningful picture	2023
		Develop a plan for addressing workplace gendered segregation (including considering pilot program, review PD's etc.)	2023
		Track positions for trends in gender over time	2022-2025
		Promote alternative pathways – e.g. Acting arrangements/Secondments	2022-2024
7.2	Build a gender equitable and inclusive workplace	Gender training for all employees (also in Indicators 1&4)	2022
		Apply an intersectional gender lens to communications policies	2022-2023
		Apply an intersectional gender lens to bullying policies	2022-2023

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