



# Workplace Gender Equality Amendment (Setting Gender Equality Targets) Bill 2024

Submission to the Finance and Public Administration Legislation  
Committee Inquiry

16 December 2024

## About Science in Australia Gender Equity (SAGE)

SAGE is Australasia's leading advocate for equity, diversity and inclusion in the education and research sector. Founded by the Australian Academy of Science and the Australian Academy of Technological Sciences and Engineering, we provide institutions with accreditation under the world-respected Athena Swan accreditation program.

SAGE drives participants' EDI evolution. Through an evidence-based and impact-focussed framework, each institution develops a uniquely customised approach to achieve systemic, structural and cultural change, measured against international benchmarks.

Institutions begin with a Bronze Award and must demonstrate their movement through cycles of self-evaluation, action planning, implementation and measurement before they can achieve the Silver Award. The SAGE Athena Swan Silver Award represents a significant milestone in development and progress through the SAGE accreditation pathway towards embedded gender equity, diversity and inclusion.

By supporting our participating organisations with advice, tools and dynamic communities of practice, we're transforming this country's most respected academic and research institutions into vibrant workplaces where everyone can thrive.

## Contact

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# Recommendation 1

**WGEA should partner with organisations that have expertise in setting and delivering on equity targets, such as SAGE (Science in Australia Gender Equity) to achieve the effective implementation of targets.**

## In brief

SAGE applauds the intention to establish measurable gender equity targets against which large Australian organisations are held accountable. However, we wish to highlight the importance of ensuring these systems of accountability are responsive to the circumstances of each organisation.

Our extensive experience in the higher education and research sector demonstrates that gender inequity is driven by different structural, cultural and systemic problems in different organisations. Accordingly, we have found that targets must be understood within a framework of organisational change, and tailored to the organisation in order to be successfully implemented.

By working with accrediting partner organisations that have expertise in supporting systemic change, WGEA can more successfully help businesses overcome their specific barriers to gender equity, and secure more success in achieving targets.

## What organisations need to succeed

In a review of the academic literature on Target Setting for Gender Equality, Dr Leonora Risse states that “the successful implementation of gender equality targets needs can be understood more broadly within the context of change management”,<sup>1</sup> and summarises that a successful implementation of change management policies and practices includes:

- the need for accountability
- a commitment to resourcing
- addressing resistance, and
- openness to innovate and learn.

These principles have underpinned SAGE's support for the higher education and research sector over the last 10 years, as the only organisation licensed to provide accreditation under the world-respected Athena Swan equity, diversity and inclusion framework. We require organisations to commit to resourcing their diversity and inclusion work, and to create an action plan for change and in turn we provide the support they need to succeed.

SAGE provides accountability through its structured framework, evidence-based actions and rigorous accreditation process, and holds organisations accountable by utilising data transparency, structured planning, external review and a commitment to ongoing progress.

Together, these approaches ensure that diversity and equity efforts are not just aspirational but actionable and measurable.

## Higher education and research shows gender equity progress is complex

Thanks to continuous efforts to improve gender equity in collaboration with SAGE, many organisations in the higher education and research sector have attained – and maintained – reasonably high standards of gender equity in leadership positions and in workforce composition.

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<sup>1</sup> Risse, L. (2024) Target Setting for Gender Equality: A review of the literature. Report prepared for the Workplace Gender Equality Agency (WGEA)

## Higher education sector WGEA data shows high levels of gender equity: <sup>2</sup>

- The proportion of women in senior leadership<sup>3</sup> across the tertiary education sector is 48%
- 95% of organisations have a formal policy/strategy on flexible working arrangements.
- 97% provide employer-funded parental leave for primary carers regardless of gender, 100% provide employer-funded parental leave for secondary carers regardless of gender.
- 78% of organisations consulted with employees on issues concerning gender equality in the workplace during the reporting period.
- 91% of SAGE subscribers consulted with employees on issues concerning gender equality in the workplace during the reporting period.

## WGEA data shows that SAGE Subscribers set targets (from WGEA 2023-24 Data) <sup>4</sup>

- 87% of SAGE subscribers set some kind of target to address gender equality in the workplace.
- 71% of SAGE subscribers set targets to reduce the organisation-wide gender pay gap vs 59% all employers.
- 61% of SAGE subscribers set targets to increase the number of women in management positions vs 68% all employers.
- 61% of SAGE subscribers set targets to increase the number of women in male-dominated roles vs 51% all employers.
- 91.4% of SAGE subscribers consulted with employees on issues concerning gender equality in the workplace during the reporting period (2022-23 data).

## However, segregation persists

Despite these ostensibly positive metrics, there are areas of significant concern for gender equity.

The sector's workforce is highly segregated. For example, the underrepresentation of women in STEM fields persists, with the proportion of women in STEM-qualified occupations currently at only 15%<sup>5</sup>.

Furthermore, the lack of detailed data capturing the experiences of disadvantaged groups across organisations limits the sector's ability to address these inequities effectively.

## Targets will not be enough to shift the dial

The current data collected by WGEA, based on high-level ANZSCO and management categories, does not adequately reflect the complexities of the higher education and research sector. This means WGEA data is not nuanced enough to show the underrepresentation of women in STEM.

For example, the Partnership Centre for Gender Equity and Leadership Advancement (The Centre) reports that healthcare is delivered by women, led by men. In order to change the system, they have a very nuanced approach, supporting women on their journey while also collectively advocate for policies and practices that drive better, safer and inclusive workplaces and enable, empower and elevate women from across the diversity spectrum into leadership and decision-making roles to improve organisational and system performance.

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<sup>2</sup> Data from the Workplace Gender Equality [Data Explorer](#), accessed 12 December 2024

<sup>3</sup> Includes the following roles as reported to WGEA: CEO, Head of Business, KMP, Other Executives, Senior Managers

<sup>4</sup> Data from the Workplace Gender Equality [Data Explorer](#), accessed 12 December 2024

<sup>5</sup> Department of Industry, Science and Resources: STEM Equity Monitor Data report 2024

In addition, the sector's workforce frequently reports that high workloads are demanded in order to compete on a global scale to achieve excellence and career advancement. This mindset will not shift simply with the introduction of targets.

Therefore, proposed amendment to the Bill may not effectively address some of the entrenched systemic, structural and cultural issues that continue to be prevalent in the competitive higher education and research sector.

### Sector diversity practitioners: targets may mask nuanced equity issues

Diversity and inclusion practitioners in the sector have provided SAGE with evidence supporting this assessment. These are provided in the following responses to our survey:

*"While targets will help elevate the profile and importance of gender equality, diversity and inclusion teams, **the proposed targets will (very likely) measure progress against the long-standing WGEA categories of managers and non-managers, which are far removed from the way organisations are aligning their commitments with Athena Swan principles.** 1. Gender Composition (should be 'yes') but might be 'no' If the gender composition targets are measured against "Managers" and/or the individual Manager categories (as defined by WGEA), **they will not help us drive meaningful change.** This categorisation was created by WGEA to standardise data on senior, decision-making roles nationally. At an institution level, these categories are not used to drive progress internally and they are not connected to Athena Swan. Under the banner of Athena Swan, **we are applying a more nuanced understanding**, for example improving the representation of women Professors in STEMM. This is where the challenge, gaps and opportunities are. In contrast, **by measuring the proportion of women among Managers, we'll be masking systemic issues.** The Bill should require organisations to identify where the gender composition is in need of targets but I am afraid this tailored approach, while most meaningful to employers, would not allow them to track and report progress nationally."*

*Participant 6, SAGE survey*

*"There are also challenges to target setting/achievement in some areas. For example, 'Increase the representation of under-represented gender in non-manager and manager'. **We have made good headway with increasing women in senior positions, however there are some long-term challenges e.g. pool of suitable women to promote in certain areas** and vacant positions at senior levels. Conversely, increasing the representation of men in certain areas and roles in the organisation is a difficult issue to address and require long-term multifaceted inventions at both the institutional and societal level."*

*Participant 7, SAGE survey*

### A solution: partnerships

To foster an enabling environment within organisations and help them tackle the nuances in equity, diversity, and inclusion, we propose that WGEA should consider adding the option of membership of an accrediting body to its list of action targets.

This approach will not only support the setting and delivery of effective, tailored targets, but will also make best use of organisations' available resources. By partnering with existing organisations in the Equity, Diversity and Inclusion space, WGEA would ensure that existing efforts to improve equity are supported, rather than divided or undermined.

This approach will also support delivery against other legislative compliance mechanisms. For example, organisations reporting to the Victorian Commission for Gender Equality in the public sector already report on progress towards their actions plans.

Feedback from the SAGE practitioner network supports this proposal. When asked, "If implemented, would targets setting support your SAGE/Athena Swan work?", we received the following responses:

**No, because resources will be dedicated to WGEA first before working on Athena Swan progress. Yes, because Athena Swan gives us the framework to know what to do to make progress on GEI [gender equity and inclusion] indicators.**

*Participant 2, SAGE survey*

*Yes, **much of the work units are already doing as part of their Cygnet Awards, and to address the introduction of the National Higher Education Code to Prevent and Respond to Gender-based Violence (National Code) will work complementarily with the proposed Bill amendment.** It may also strengthen support for SAGE focused work in universities. I recommend a more nuanced approach, though, where targets consider intersections of identity.*

*Participant 4, SAGE survey*

*Gender composition of boards – maybe - As for targets on improving the gender composition of boards, the Victorian Government's Women on Boards commitment stipulates that for boards and portfolios that have less than 50% women, no less than 50% of all future appointments must be women. This applies to appointments for our governing body. That being said, these targets are important as many organisations are still working to dismantle patriarchy, and they will help further legitimise the work of Athena SWAN.*

*Participant 6, SAGE survey*

To fully support the great work practitioners and organisations are doing, WGEA could collaborate with an accrediting partner organisation such as SAGE, the Partnership Centre for Gender Equity and Leadership Advancement (The Centre), including Advancing Women in Healthcare Leadership (AWHL)<sup>6</sup>, ACON<sup>7</sup>, and/or the Victorian Equal Opportunity Commission.

WGEA should develop a system to evaluate and accredit organisations that also work to support systemic change in organisations and therefore align with target setting goals. This would mean reporting organisations do not have to duplicate their efforts and the broader support system for reporting organisations is recognised. This also addresses the challenges with a lack of nuances in WGEA reporting and it fosters a more tailored and impactful approach for organisations that are taking this work seriously.

WGEA-accredited EDI organisations would be required to provide a nuanced progress report, which they can issue to a member organisation. These supplemental reports could serve as a valuable benchmark for measuring progress and driving further improvements in achieving equity goals across the sector.

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<sup>6</sup> [Partnership Centre Gender Equality and Leadership Advancement - MCHRI](#)

<sup>7</sup> [ACON](#): Building a workplace that attracts and develops the best people

## Recommendation 2

### **Expand the WGEA Procurement Principles to also apply within the Commonwealth Grants Rules and Guidelines to strengthen consequences of non-compliance.**

Financial levers are a strong incentive for institutions to meet targets. These include the WGEA procurement principles, but could be widened to improve the impacts in the higher education and research sector.

In accordance with the Workplace Gender Equality Procurement Principles, relevant employers seeking to supply goods or services to government at or above \$80,000 must provide a Certificate of Compliance as part of the procurement process. The consequence of non-compliance is that the employer will not be issued with a certificate of compliance. The existence of a certificate of compliance is considered as part of the employer's eligibility to contract with the Australian Government through procurement processes.

The 2022 [Workplace Gender Equality Review](#) stressed that there should be a review as to how the Principles can apply within the Commonwealth Grants Rules and Guidelines to improve transparency on whether grantees are compliant with the Act where appropriate.

The higher education and research sector primarily interacts with grants or other forms of financial assistance, rather than procurement. These grants are typically administered by individual government departments or agencies, such as the Australian Research Council (ARC) or the National Health and Medical Research Council (NHMRC). This funding framework supports research initiatives, academic programs, and projects that align with national priorities and objectives, ensuring targeted financial assistance to advance the sector's contributions to society.

However, since grants are not included in the WGEA Procurement Principles, the consequences of non-compliance are unclear.

*It is not clear what the consequences are of not achieving the targets. **Leverage is required to get executive buy in.** It would be important for senior leadership to appreciate benefits not just for employees, but also employers with improved retention, productivity, safety, and enhanced reputation.*

*Participant 7, SAGE survey*

### **Link grant funding to targets and commitments**

SAGE has previously recommended that the ARC utilise the power of funding at its disposal to build greater equity in the Australian research landscape. We call for two actions: to use funding requirements as a lever to shape and change institutions' commitment to equity, while also directly improving EDI among funding recipients.

We recommend that the ARC require a commitment to gender EDI as part of the assessment criteria for research funding. This also opens the opportunity to take an intersectional approach, addressing not just gender but other intersections of marginalization such as cultural and linguistic diversity, disability, sexuality, and First Nations identity.

Several initiatives in Australia and internationally have begun linking research funding to gender equity and inclusion policies, though the full impacts are yet to be seen. These include the European Union's

Horizon Europe program<sup>8</sup>, research funders in Ireland<sup>9</sup>, and domestically at the Snow Medical Research Foundation<sup>10</sup> and the National Health and Medical Research Council (NHMRC)<sup>11</sup>. These initiatives are relatively new and thus the impact and outcomes are not yet clear. Independent research recommends<sup>12</sup> that Australia trial a similar approach, linking funding to an institutional and project-level commitment to EDI policies, practices, and outcomes.

The expansion of the WGEA Procurement Principles to also apply within the Commonwealth Grants Rules and Guidelines would strengthen consequences of non-compliance and would be an incentive for government departments to use funding as a lever to shape and change institutions' commitment to equity, while the second directly improves EDI among funding recipients.

## Recommendation 3

**The government should operationalise the need for organisations to allocate adequate resources, including funding, staff, and support, to effectively implement actions required to meet the established targets.**

The government needs to operationalise that organisations must allocate adequate resources to implement actions required to meet equity and diversity targets. Without sufficient investment in time, funding, and staff, it will be challenging for organisations to achieve meaningful progress, beyond box-ticking. This commitment ensures that initiatives are not only well-intentioned but also actionable, fostering accountability and driving sustainable change toward meeting these important goals.

Feedback from the SAGE practitioner network stressed that resourcing for the change process could be a major challenge. When asked, "What do you think will be the challenges for your organisation of setting and achieving (or improving on) the targets as set out in the proposal?", we received the following responses:

***We have not been able to secure more resources to support our GEDI work. Our efforts to ensure legislative compliance with state and federal gender equality laws are rapidly growing in scope and complexity. The increasing requirements could easily justify the creation of new dedicated full-time positions but for some reason, we are not able to achieve that. Leaders might accept the targets but will place further responsibility on their already stretched GEDI / EDI / DEI teams.....My dream would be for WGEA to place a requirement on organisations to have well-resourced GEDI / EDI / DEI teams dedicated to workplace equity, diversity and inclusion (the word 'workplace' is a critical distinction because in our sector, there are student-facing teams for EDI that are more generously resourced due to the government's long-standing focus on access and participation of low SES and regional students).***

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<sup>8</sup> Horizon Europe is the EU's 2021–2027 framework programme for research and innovation. To be eligible for Horizon Europe funding, applicants must show that their institution has a Gender Equality Plan that is publicly available, adequately resourced, evidence-based and supported by capacity building; and they have integrated a gender dimension in their research proposal, for example by examining any sex or gender differences in the outcomes of a drug trial.

<sup>9</sup> Science Foundation Ireland (n.d.) [Irish funding bodies to require Athena SWAN gender equality accreditation for higher education institutions to be eligible for research funding](#), SFI website, accessed 31 March 2023.

<sup>10</sup> Hare J (6 March 2023) '[No gender equality? Then no money from this major philanthropist](#)', Australian Financial Review, accessed 31 March 2023.

<sup>11</sup> National Health and Medical Research Council (12 October 2022) [Working towards gender equity in Investigator Grants](#), NHMRC website, accessed 11 April 2023.

<sup>12</sup> Kingsley, I., Slavich, E., Harvey-Smith, L., Johnston, E. L., & Williams, L. A. (2024, February 14). Research brief: Gender differences in Australian research grant awards, applications, amounts, and workforce participation. <https://doi.org/10.31219/osf.io/e4jna>

**Resources required to develop and implement strategy that could support an organization meeting its targets;** Backlash from men and even some women who are privileged in the current gendered culture; Workload implications for strategy and reporting that are often under-resourced falling on women; Organisations may choose the easiest 'three' targets to achieve instead of those that might make the most positive difference to women and gender diverse people.

Participant 4, SAGE survey

Institutional inertia, risk aversion, lack of data systems, lack of priority, **insufficient resources.**

Participant 3, SAGE survey

There is the risk that **resourcing the expectations and requirements of SAGE would be the key barrier/challenge in setting up and achieving targets.**

Participant 2, SAGE Survey

It's a challenging time for the HER sector, **so resources and financial capacity to dedicate to DEI work are not readily available.**

Participant 1, SAGE survey

SAGE therefore supports the suggestion put forward by Dr. Leonora Risse that, "One way to operationalise the need for resource commitment is to include an action step on the allocation of specific resources to the implementation and ongoing monitoring of targets on the target menu, as a way to boost organisations' likelihood of achieving their targets."<sup>13</sup>

The government should emphasize the importance of focusing on substantive outcomes and providing the necessary support to achieve targets.

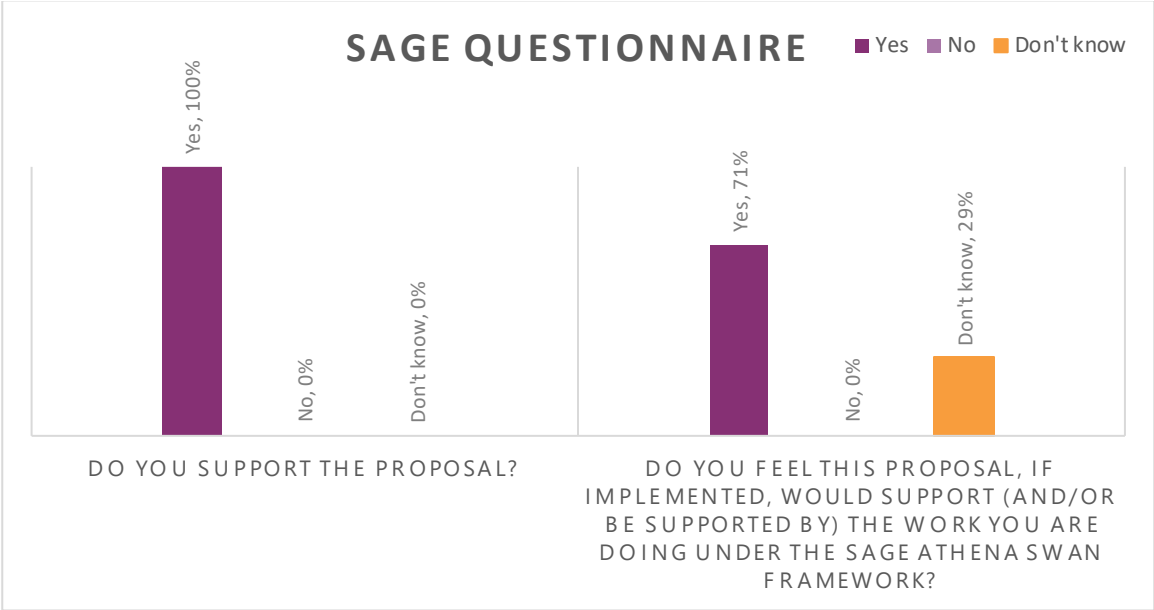
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<sup>13</sup> Risse, L. (2024) Target Setting for Gender Equality: A review of the literature. Report prepared for the Workplace Gender Equality Agency (WGEA)



# Appendix

Table 1: SAGE Questionnaire asking about the proposed changes to the Workplace Gender Equality Legislation.



Note: 19% of eligible organisations responded.