

Cover page (recommended)

Organisation name (required)	Grampians Wimmera Mallee Water Corporation (GWMWater)
Total number of employees (and full time equivalent FTE), as at 30 June 2025	Total employees: 217 Total FTE: 204.24
Location (metropolitan, regional or rural. If other, please specify)	Rural

Attestation by head of organisation (required)

I confirm that:

- ☒ I am the head of organisation (CEO or equivalent)
- ☒ I have reviewed and approved the submission of this gender equality action plan (GEAP) on behalf of my organisation (as named above), and I attest that the implementation of the GEAP will be adequately resourced as required under the Gender Equality Act (2020).

Any comments?	
Name	Mark Williams
Role title	Managing Director
Signed	
Date	11/06/2026

A) Planning your GEAP

Section 1: Use insights from your previous gender equality work (recommended)

The development of this Gender Equality Action Plan (GEAP) has been strongly informed by learnings from the organisation's previous gender equality work, including the 2021 GEAP and subsequent progress reporting. The earlier plan provided a valuable foundation for understanding the organisation's workforce, systems, and culture through a gender equity lens, and has significantly strengthened organisational awareness and capability in this area.

Through the implementation and review of the previous GEAP, the organisation gained important insights into how gender equity strategies are best designed and delivered within its specific operating context. One key learning was the importance of focus and prioritisation. The earlier GEAP explored a broad range of activities, which was instrumental in building understanding and momentum, but also highlighted the need for clearer scoping, sharper prioritisation, and more precise action design to support effective implementation and measurement.

This reflective process underscored the value of using practical, specific language that clearly articulates intent, responsibility, and expected outcomes. It also reinforced the need to align actions with organisational capability and ensure they are assigned to roles best positioned to deliver them. Importantly, the journey of developing, implementing, reporting on and reviewing the previous GEAP deepened understanding of the organisation's identity, workforce composition, and operational environment, including how different staff groups, work types, gender representation, and intersectional factors shape employee experience.

These learnings have directly informed the design of the current GEAP. The new plan is anchored in practicality while remaining aspirational in its commitment to advancing gender equity and equality. Actions are more focused, clearly defined, and tailored to the organisation's context, with an emphasis on being achievable, measurable, and outcome-driven. Responsibility has been deliberately aligned to appropriate roles and functions to strengthen accountability and delivery.

Overall, the previous GEAP has been a critical step in the organisation's gender equity journey, providing the insight, self-awareness, and confidence to develop a more precise, focused, and deliverable plan that supports meaningful and sustained progress.

Section 2: Processes, record keeping and governance (recommended)

Clear and proportionate processes, record-keeping arrangements, and governance structures have been established to support the effective implementation, oversight, and monitoring of this Gender Equality Action Plan (GEAP).

Governance oversight for the GEAP is embedded within existing organisational structures. Approval of the GEAP, progress reporting, and any material updates will occur through the Executive Leadership Team, the People and Culture Board Committee, and the Board of Directors, depending on the level of oversight required. This ensures accountability at the appropriate organisational level and integrates gender equality considerations into routine governance and decision-making processes.

GEAP monitoring and reporting have been incorporated into established reporting cycles and forward planners for relevant governance forums. This enables regular review of progress against actions and milestones, identification of risks or barriers, and timely decision-making where adjustments are required.

Clear responsibility for process maintenance, record keeping, and reporting has been assigned to a defined leadership group. This includes the Executive Manager – Customer and Employee Experience, the Manager – People, Culture and Legal, and the Team Leader – People and Culture. This structure provides strategic oversight, operational coordination, and day-to-day management of GEAP activities, supporting continuity and accountability across the life of the plan.

Implementation is supported through a timeline-driven approach, with actions sequenced against defined milestones and timeframes. Responsibilities and reporting requirements are communicated to action owners and stakeholders, with progress monitored through regular reviews and formal reporting.

Records relating to consultation, decisions, progress, and evaluation are maintained in line with organisational record-keeping requirements, supporting transparency, auditability, and continuous improvement of gender equality outcomes.

Section 3: Leadership commitment (recommended)

Leadership commitment to gender equality is demonstrated through governance oversight, accountability, and support for evidence-based approaches to advancing the Gender Equality Action Plan (GEAP).

The organisation's Executive Leadership Team, Managing Director, and Board have endorsed the GEAP and provide ongoing oversight of its implementation through established governance and reporting mechanisms. While senior leaders are not directly responsible for the day-to-day activation of GEAP actions, they maintain visibility of progress, risks, and outcomes through regular reporting to the Executive Leadership Team, the People and Culture Board Committee, and the Board of Directors. This oversight ensures gender equality remains a recognised organisational priority and is considered within broader strategic and operational decision-making.

Leaders have supported reflective review of outcomes and learnings from the previous GEAP, enabling a more focused, practical, and outcomes-oriented approach in the current plan. This includes supporting clearer prioritisation, realistic action design, and appropriate allocation of responsibility to roles best positioned to deliver change. Executive and board oversight reinforces accountability for progress while enabling operational ownership to sit with dedicated roles and functions.

Leadership commitment is also demonstrated through continued participation in external research and learning initiatives. The organisation continues to participate in a gender research project focusing on gender equality targets, conducted by the Australian National University in collaboration with the Commission for Gender Equality in the Public Sector (CGEPS), contributing to broader understanding of gender-related workforce experiences. This engagement reflects a commitment to informed governance and evidence-based decision-making, and supports leadership awareness of emerging issues, trends, and good practice beyond the organisation.

Senior leaders and board members support the GEAP by setting expectations for transparency, monitoring, and continuous improvement, and by enabling appropriate governance, capability, and reporting structures. This leadership approach balances oversight with practical delivery, supporting an environment in which meaningful and sustained progress toward gender equality can be achieved.

B) Consult on your audit results and strategies

Section 4: Confirm consultation groups (required)

You must consult with your...	Confirm yes or no	If no, why not?
Governing body (if your organisation has one)	Yes	
Employees	Yes	
Employee representatives, including relevant trade unions	Yes	
You might consult with...	Confirm yes or no	Please describe additional people and/or groups
Other relevant people	Yes	Victorian Water Industry HR Practitioners Special Interest Group

Section 5: Document your consultation process (required)

A staged and inclusive consultation process was undertaken to inform the development of this Gender Equality Action Plan (GEAP), ensuring meaningful input from employees, employee representatives, governance bodies, and other relevant stakeholders.

Initial consultation occurred during November and December 2025 with established employee consultation groups, including the Staff Consultative Committee and the Diversity and Inclusion Action Group. These sessions provided education on the purpose of the GEAP, relevant obligations, and organisational context, and sought early input on priority issues and potential focus areas. Participants were provided with time between sessions to reflect, consult with colleagues, and submit considered feedback and suggestions.

In November 2025, introductory engagement was also undertaken with the organisation’s women in STEM cohort and women in Water Services Operations (WSO). These sessions introduced the upcoming GEAP, provided foundational information, and invited participants to begin identifying experiences, barriers, and ideas for improvement, with the understanding that further consultation would follow.

From March to December 2025, the Victorian Water Industry Human Resources Special Interest Group (SIG) was engaged on a monthly basis to support the development of GEAP actions. This SIG comprises human resource practitioners from Victorian water authorities and provided a valuable statewide forum for sharing experience, workload, and practical insight. Engagement with the SIG focused on identifying common-ground actions that are meaningful and transferable across organisations, while drawing on diverse perspectives to explore structural challenges and effective solutions. This collaborative approach enabled the co-development of actions informed by contemporary practice, operational realities, and lessons learned across the sector.

In early March 2026, follow-up consultation was held with the women in STEM and Water Service Operations to present proposed GEAP actions and gather more detailed feedback. These discussions focused on role-specific experiences and opportunities, informing the refinement of actions to ensure relevance to operational, technical, and non-traditional work environments.

In February 2026, consultation was undertaken with the four unions representing employees. A draft GEAP, structured around the seven gender equality indicators, was shared to support informed feedback on proposed actions and areas requiring further consideration.

Governance-level consultation also occurred in February 2026 with the Executive Leadership Team and the People and Culture Board Committee, presenting findings from the 2025 gender audit and the draft plan. The draft GEAP was presented at a briefing to which all staff were invited, and ultimately to the Executive for a final time for endorsement, incorporating feedback received throughout the consultation process.

Section 6: Findings from your consultation (recommended)

Consultation outcomes provided valuable insight into both the organisation's audit data and the practical drivers of gender inequality across different parts of the workforce. Feedback gathered from employees, cohort-specific consultations, unions, and governance bodies confirmed that while gender pay equity remains a key focus, contributors identified a broader set of interconnected issues spanning multiple gender equality indicators.

In parallel, the development of the GEAP was strongly informed by evidence from the 2023–2024 and 2024–2025 People Matter Surveys (PMS). While the PMS does not constitute a consultation group, it provided a critical evidence base that highlighted workforce-wide experiences, perceptions, and trends. Survey outcomes enabled the authors of the GEAP to identify areas requiring immediate attention, as well as more nuanced cultural and structural issues that warrant longer-term action.

PMS data provided concrete insights into areas such as workplace safety and respect, informing the prioritisation of targeted responses including in-person workplace sexual harassment training. The survey also highlighted differences in how women and men perceive fairness, opportunity, and access to career progression, reinforcing the need to address potential bias and improve transparency within recruitment, development, and performance systems.

Consultation findings complemented these data insights by explaining how such trends manifest in practice. Participants consistently raised structural and cultural factors influencing gendered outcomes over time, including access to flexible work, shared parenting arrangements, and equitable access to overtime, allowances, and development opportunities. This feedback helped contextualise gender pay gap data by identifying how cumulative access to such opportunities can contribute to inequitable outcomes even where base pay settings appear neutral.

Targeted consultation with women in non-traditional and operational roles, including STEM and Water Services Operator cohorts, surfaced role-specific challenges not immediately visible in aggregate data. These included access to facilities, experiences of isolation, uneven work allocation, and limited informal networks in historically male-dominated environments.

Overall, consultation outcomes and PMS data together strengthened understanding of both quantitative trends and lived experience. This combined evidence base directly informed the refinement of GEAP strategies, ensuring actions are targeted, realistic, and capable of addressing systemic and intersectional drivers of gender inequality.

C) Consider the gender equality and the gender pay equity principles, and intersectionality

Section 7: Consider the gender equality principles (required)

The development of this Gender Equality Action Plan (GEAP) was guided by core gender equality principles, including fairness and equality of opportunity, the elimination of discrimination, shared responsibility for gender equality, and addressing structural and systemic drivers of inequality.

In developing this GEAP, the organisation reflected on the outcomes, data, and learnings from the previous Gender Equality Action Plan. Outcome data and implementation experience were reviewed to understand where progress was achieved, where impact was limited, and where barriers remained. These insights directly informed the refinement of priorities and the design of more targeted actions, ensuring the current GEAP builds on prior progress.

The gender equality principles were applied through an evidence-based and consultative approach that focused on organisational systems, practices, and cultural norms, rather than individual behaviour alone. Workforce data analysis and consultation outcomes were used to identify where existing arrangements may unintentionally create or reinforce unequal outcomes, reinforcing the need for structural solutions.

In applying these principles, consideration was given to the specific nature of the organisation's workforce, including the diversity of roles, work locations, employment types, and career stages across the employee cohort. Actions have been framed to respond to these contextual challenges, recognising that gender inequality may present differently across operational, field-based, and corporate environments.

The GEAP emphasises shared responsibility by embedding gender equality considerations into leadership capability, governance processes, and ongoing monitoring and evaluation, supporting transparency, continuous improvement, and measurable progress.

Section 8: Consider the gender pay equity principles (required)

The development of this Gender Equality Action Plan (GEAP) was informed by core gender pay equity principles, including equal remuneration for work of equal or comparable value, transparency in remuneration practices, fairness in access to pay-related opportunities, and addressing structural drivers of gender-based pay gaps.

In developing the current GEAP, the organisation reflected on outcomes, report data, and implementation learnings from the previous Gender Equality Action Plan. This review strengthened understanding of both the drivers of progress and the structural factors that continue to contribute to pay inequity. These insights informed the refinement of focus areas and the design of actions intended to deliver practical and sustainable impact.

A critical review of remuneration-related structures and practices was undertaken, including areas that may appear established or neutral but can result in different outcomes across genders over time. This included closer consideration of how access to additional remuneration opportunities and progression-linked pay outcomes operate in practice. Analysis also identified that gender pay inequities persist within certain salary levels, informing a more targeted approach to scrutiny and review within these cohorts.

Gender pay equity principles were applied in the context of the organisation's workforce profile, including the diversity of roles, employment types, and career pathways. Actions focus on strengthening consistency, transparency, and governance in remuneration decision-making, while addressing structural influences that may disadvantage employees by gender.

These pay equity principles directly informed the prioritisation of GEAP strategies focused on remuneration governance and monitoring of access to allowances and higher-graded opportunities.

Ongoing monitoring, disaggregated analysis, and regular review of pay outcomes will support continual improvement and sustained progress in reducing gender-based pay disparities.

Section 9: Consider intersectionality (required)

In developing this Gender Equality Action Plan (GEAP), intersectional gender inequality was deliberately considered by examining how gender interacts with other characteristics that shape people's workplace experiences. Workforce data and consultation feedback were analysed across factors such as employment type, classification level, work location, age, caring responsibilities, disability, cultural background, and Aboriginal and Torres Strait Islander identity where data was available.

Data from workforce metrics, staff surveys, focus groups, and targeted consultations was synthesised through an intersectional lens rather than considered in isolation. This approach identified patterns where gendered barriers are compounded for particular cohorts. For example, consultation findings indicated that women in operational and field-based roles experience different constraints in accessing flexible work and development opportunities compared with women in corporate roles. Women with caring responsibilities and those in part-time or non-ongoing roles reported distinct challenges relating to workload allocation, visibility, and progression pathways.

These insights informed both the prioritisation and design of GEAP actions, with a focus on addressing structural drivers of inequality rather than applying uniform solutions. Close attention has been given to identifying where "one-size-fits-all" approaches may unintentionally reinforce inequities, and actions have been framed to enable flexible or targeted application across different workgroups and employment contexts.

To support this approach, Gender Impact Assessments (GIAs) will be enhanced and applied more consistently where appropriate, ensuring gender equality and intersectional principles are embedded in policy, program, and decision-making processes. Ongoing monitoring, disaggregated reporting, and continued consultation will enable refinement over time and support equitable outcomes across intersecting groups.

D) Making a case for change

Section 10: Make a case for change and create a vision (recommended)

Gender equality matters at GWMWater because it is fundamental to who we are as a public service organisation, how we deliver outcomes for our communities, and how we create a safe, inclusive and high-performing workplace. As a Victorian public sector entity, we have a responsibility not only to comply with the Gender Equality Act 2020, but to lead by example in advancing gender equality across our workforce, decision-making and service delivery.

GWMWater has made sustained progress in recent years through the development and implementation of our Gender Equality Action Plan, regular workplace gender audits, and transparent progress reporting to the Commission for Gender Equality in the Public Sector (CGEPS). These processes have strengthened our understanding of gender inequality within our organisation and informed targeted actions across leadership, workforce composition, flexibility, career development and workplace culture.

Our commitment extends beyond compliance. GWMWater is participating in a CGEPS pilot initiative aligned to Victoria's Our Equal State strategy, contributing to system-wide efforts to reduce the gender pay gap, improve gender representation in senior leadership and support more equitable uptake of parental leave across genders. Gender equality is also being embedded within our broader People and Culture Strategy, ensuring alignment across workforce planning, capability development and wellbeing initiatives.

Gender equality is critical to attracting and retaining skilled people, enabling inclusive leadership, and delivering trusted public value. By continuing to take a data-informed, intersectional and values-led approach, GWMWater will embed gender equality as a core organisational capability—supporting our people to thrive and ensuring we uphold our role as a fair, inclusive and accountable public sector organisation.

At GWMWater, gender equality means that all people—regardless of gender—have equitable access to opportunities, resources, safety, flexibility and career progression. It also means actively identifying and addressing structural and cultural barriers that can create disadvantage, particularly where gender inequality is compounded by other forms of discrimination such as Aboriginality, disability, cultural background, caring responsibilities or gender identity. Achieving gender equality allows people to contribute their full capability, free from stereotypes or systemic bias, strengthening organisational performance and workforce sustainability.

Our Vision for Gender Equality

Our vision is for GWMWater to be a genuinely inclusive organisation where gender equality is embedded in leadership, culture, systems and decision-making. We aspire to a workplace where our diversity reflects that of our broader community, and people of all genders are supported equally across roles and levels of the organisation; where flexible work and caring responsibilities are normalised and accessible; where pay and progression are fair and transparent; and where everyone feels safe, respected and valued.

We recognise that gender equality is not a static end point but an ongoing commitment to continuous improvement. Our ambition is to integrate a gender lens into how we design policies, deliver services and plan for the future—ensuring our organisation is resilient, representative and reflective of the diverse communities we serve.

E) Analysing your data to identify forms of gender inequality AND developing your strategies

Section 11: Identifying underlying causes of gender inequality (recommended)

Overall, gender inequality at GWMWater is primarily driven by occupational segregation, gendered care expectations, cultural norms around flexibility and leadership, and data limitations that constrain targeted action, rather than systemic unequal pay practices. Underlying causes of gender equality at GWMWater include:

1. Workforce Composition and Industry Legacy

Men continue to comprise approximately 65% of the workforce, reflecting the historically male-dominated nature of the water and infrastructure sector. Although women's representation has increased modestly, progress is gradual, suggesting that entrenched industry norms, limited pipelines into technical roles, and slow turnover continue to shape gender imbalance. The absence of employees identifying as self-described gender also points to potential inclusion or disclosure barriers.

2. Gendered Work Patterns and Care Responsibilities

Women remain far more likely to work part time (38.2% compared to 4.3% of men), indicating that caregiving responsibilities continue to fall disproportionately on women. This pattern restricts women's access to full-time roles, leadership pathways, and higher earnings and reinforces the "ideal worker" norm that disadvantages employees with caring responsibilities.

3. Occupational Gender Segregation

Occupational segregation remains a key driver of inequality. Women are over-represented in clerical and administrative roles and under-represented in technicians, trades, labourer and professional roles. Although representation has improved in professional and management categories, regression in technical roles and persistently low participation in labourer roles limits women's access to higher-paid occupations and leadership pipelines.

4. Pay Gaps Driven by Role Distribution

Gender pay gaps at GWMWater are not primarily the result of unequal pay for equal work. Median base salary gaps are zero, indicating consistent pay within bands. However, mean total remuneration gaps persist, driven by gender differences in occupational distribution, seniority, and access to discretionary remuneration (such as allowances or higher-graded roles). This reinforces the structural impact of occupational segregation.

5. Senior Leadership Fragility and Data Integrity

Gender balance in senior leadership is currently strong; however, this position remains fragile due to the relatively small number of senior roles. As a result, minor personnel changes or data variability can have a disproportionate impact on gender balance outcomes and the accuracy of reporting. This fragility also has broader cultural implications, as limited representation in senior leadership (even where roles are few) may reduce the visibility of role models, reinforcing the principle that representation matters.

6. Workplace Culture and Sexual Harassment Risk

There is a notable discrepancy between the number of sexual harassment incidents that are formally reported and the prevalence of sexual harassment experiences indicated through the People Matter Survey. In addition, the absence of gender-disaggregated data, reporting insights, and feedback on complaint handling limits organisational understanding of who is most affected and why. This restricts the ability to implement targeted prevention and response strategies.

7. Perceptions of Fairness and Trust

Although recruitment and promotion outcomes for women have improved, women consistently report lower perceptions of fairness than men. This suggests lingering effects of historical inequity, possible informal bias, or limited transparency in decision-making processes. Perception gaps may indicate trust and confidence issues that extend beyond measurable outcomes.

8. Gender Norms in Flexibility and Parental Leave

Despite increased parental leave uptake by men, women continue to take significantly longer leave and are more likely to use flexible work arrangements. This reflects enduring gender norms around caregiving and availability, reinforcing women's reduced workforce participation and men's limited use of flexibility.

Section 12: Analysing your data and documenting your strategies (required)

Indicator 1: Gender composition of all levels of the workforce

Describing the problem (see [step 2](#))

Analyse audit data (required)	Critical performance measures: Gender composition of the duty holder organisation in 2025: 35% women, 65% men, 0% self-described. Gender composition of part time workers in the duty holder organisation in 2025: 38.2% of women, 4.3% of men, 0% of self-described. Gender composition of senior leaders in the duty holder organisation in 2025: 40% women, 60% men. <i>Note: one senior leader (woman) was inadvertently not identified as such on the audit data, resulting in data showing 25% women (one of four rather than two of five) and 75% men (three of four rather than three of five).</i> The problem: GWMWater operates within a historically male-dominated industry, resulting in a persistent gender imbalance across the organisation. Men comprise approximately 65% of the overall workforce, with this imbalance becoming more pronounced at leadership levels, where 75% of Divisional Managers and 75% of Team Leaders reporting to Divisional Managers are men. This concentration of men in senior and influential roles limits women's representation, career progression, and visibility in decision-making positions. At the same time, despite women comprising only 35% of employees, they are significantly over-represented in part-time roles, reinforcing gendered workforce participation patterns and constraining women's access to full-time leadership pathways, earnings progression, and senior opportunities. Together, these factors reflect structural and cultural barriers that sustain gender inequality within GWMWater.
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Setting metrics (see [step 6](#))

Measures (required)	Critical performance measures: Gender composition of the duty holder organisation. Gender composition of part time workers in the duty holder organisation. Gender composition of senior leaders in the duty holder organisation. Additional measures (optional):
Target/s (recommended)	Increase representation of women or self-described genders across levels -2 and -3 to an average of 29% over the life of the GEAP.

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
Train all recruitment panellists on unconscious bias	People & Culture – Learning & Development Coordinator	Year 4	5 7
Develop a Succession Planning Framework to identify and retain emerging talent, applying a gender lens	People & Culture Team	Year 2	5 7
Utilise a gendered language analysis tool to ensure job ads do not favour any gender	People & Culture Team	Years 3-4	5 7
Review imagery on job ads to ensure we are attracting a diverse range of applicants	Communications & Engagement Team	Year 1	5 7
Ensure Women in Service Delivery are represented in Leadership Development (Emerging Leaders) program by using a targeted nomination process	People & Culture – Learning & Development Coordinator	Year 1 and ongoing	5 7
Participate in Diversity Council Australia's Inclusive Employer Index	People & Culture Team	Year 1 and ongoing	5 6 7

Indicator 2: Gender composition of the governing body

Describing the problem (see [step 2](#))

Analyse audit data (required)	Critical performance measures: Gender composition of the duty holder organisation’s governing body in 2025: 50% women, 50% men, 0% self-described. The problem: While GWMWater’s Board is currently gender-balanced in terms of equal representation of men and women, data is not available for Board members of self-described gender. In addition, the organisation lacks sufficient intersectional data to fully understand the Board’s diversity profile. Available insights indicate a limited diversity of cultural background and other intersectional characteristics, constraining the range of perspectives at the governance level. As GWMWater does not have direct control over director appointments, its ability to proactively influence Board diversity outcomes and address gaps beyond gender representation is limited.
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Setting metrics (see [step 6](#))

Measures (required)	Critical performance measures: Gender composition of the duty holder organisation’s governing body. Additional measures (optional):
Target/s (recommended)	

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
Promote GWMWater Board membership as an opportunity within professional women’s networks and at events	Communications & Engagement Team	Year 1-2 and ongoing	
Encourage Board to disclose intersectional data, ensuring and promoting confidentiality	People & Culture Team	Year 2 and ongoing	

Indicator 3: Equal remuneration for work of equal or comparable value across all levels of the workforce, irrespective of gender

Describing the problem (see [step 2](#))

Analyse audit data (required)	Critical performance measures: Mean total remuneration gender pay gap by occupation group in 2025: Managers: 2.4% women, self-described unavailable Professionals: 7.8% women, self-described unavailable Technicians and Trades: 15.7% women, self-described unavailable Clerical and Administrative: 10.3% women, self-described unavailable Labourers 8.6% women, self-described unavailable Mean total remuneration senior leader gender pay gap in 2025: 7.2%* <i>*Note: due to inadvertent failure to identify one woman as a senior leader in the audit data, the senior leader pay gap appeared as 15.2% in GWMWater's 2025. However, the true pay gap at senior leader level was 7.2%.</i> Supplementary measures: Mean base salary pay gap in 2025: 1.2% women, self-described unavailable Median total remuneration pay gap in 2025: 7% women, self-described unavailable Median base salary pay gap in 2025: 0% women, self-described unavailable The problem: Analysis of current remuneration practices indicates some risks to gender pay equity. Access to supplementary income opportunities is disproportionately weighted towards men, contributing to unequal total remuneration outcomes. Enhancing transparency in Senior Officer salary review processes would support greater assurance that decisions are made consistently and informed by appropriate evidence. In addition, the absence of organisation-wide oversight of performance review and pay outcomes constrains the ability to identify and address potentially discriminatory pay practices. These structural issues are compounded by a tendency for men to be more likely to negotiate higher salaries at commencement and during review periods, further entrenching gender-based pay differences over time.
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Setting metrics (see [step 6](#))

Measures (required)	Critical performance measures: Mean total remuneration gender pay gap by occupation group. Mean total remuneration senior leader gender pay gap. Supplementary measures: Mean base salary pay gap. Median total remuneration pay gap. Median base salary pay gap. Additional measures (optional):
Target/s (recommended)	Incremental reduction in total remuneration pay gap for women in each audit across the life of the GEAP (no fixed percentage) Maintain base salary pay gap of <2% for women over the life of the GEAP

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
Review access to supplementary income across bands (including backfill and on-call opportunities)	People & Culture Team	Years 2-3	
Implement new performance review system with reporting capability to identify potential discrimination	People & Culture Team	Years 1-2	
Review Remuneration Guidelines relating to eligibility for increase where performance review occurs during or after parental leave	People & Culture Team	Year 1	
Provide salary negotiation coaching for Senior Officer women	People & Culture Team	Year 3	
Increase transparency for remuneration review process for Senior Officers	People & Culture Team	Year 1	
Conduct targeted education on the Gender Pay Gap for People & Culture and hiring managers	People & Culture Team	Year 3	
Develop and publish accessible resources on the intranet to support understanding of gender pay gap drivers and actions to reduce the gap	People & Culture Team	Year 3	

Indicator 4: Sexual harassment in the workplace

Describing the problem (see [step 2](#))

Analyse audit data (required)	Critical performance measures: Anonymous experience rate of sexual harassment in 2025: Data unavailable for all groups, however the People Matter Survey report indicated 6.6% of employees experienced sexual harassment. Number of formal reports of sexual harassment in 2025: Unknown number/group of women, 1 man or group of men, unknown number/group of self-described gender. Supplementary measures: Participants who said they reported sexual harassment in 2025: Data unavailable for all groups. Reasons for not making a formal sexual harassment complaint in 2025: Data unavailable for all groups. Satisfaction with handling of workplace sexual harassment complaint in 2025: Data unavailable for all groups. Satisfaction with handling of formal workplace sexual harassment complaint in 2025: Data unavailable for all groups. The problem: People Matter Survey results indicate an increase in sexual harassment-related behaviours at GWMWater over recent years, while formal sexual harassment complaints remain low. This gap between survey-reported experiences and formal reporting suggests that harmful behaviours may be occurring without being escalated through established channels. Evidence indicates this is not due to a lack of awareness of reporting mechanisms, but reflects more complex barriers, including perceptions about the seriousness of behaviours and concerns about potential consequences of reporting. While the People Matter Survey provides valuable high-level insights, limitations relating to anonymity and the absence of gender-disaggregated data restrict deeper analysis. This discrepancy presents a critical opportunity for GWMWater to investigate underlying drivers of non-reporting, strengthen confidence in reporting pathways, and refine prevention and response strategies to more effectively manage sexual harassment risks.
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Setting metrics (see [step 6](#))

Measures (required)	Critical performance measures: Anonymous experience rate of sexual harassment. Number of formal reports of sexual harassment. Supplementary measures: Participants who said they reported sexual harassment. Reasons for not making a formal sexual harassment complaint. Satisfaction with handling of workplace sexual harassment complaint. Satisfaction with handling of formal workplace sexual harassment complaint. Additional measures (optional):
Target/s (recommended)	Over the life of the Gender Equality Action Plan, reduce the gap between anonymous experience rate of sexual harassment and the number of formal sexual harassment reports received.

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
In-person, organisation-wide sexual harassment training biannually	People & Culture Team – Learning & Development Coordinator	Year 2 and Ongoing	
Review Workplace Behaviours Procedure to ensure sexual harassment complaints are dealt with sensitively and respectfully, and to increase trust in investigation process and confidentiality	Psychological Safety Committee	Year 1	
Review personnel responsible for responding to Confidential Incidents (including complaints of sexual harassment) to ensure responders are appropriate, there are sufficient options, and to increase confidentiality and trust in the process	Psychological Safety Committee	Year 1	
Confidential Incident (including sexual harassment) responders to undertake trauma-informed response training	People & Culture Team – Learning & Development Coordinator	Year 2	
Review procedures for working alone safely	People & Culture Team	Year 2	7

Indicator 5: Recruitment and promotion practices in the workplace

Describing the problem (see [step 2](#))

Analyse audit data (required)	Critical performance measures: Gender composition of recruited employees in 2025: 34.6% women, 65.4% men, 0% self-described Gender composition of employees who were promoted in 2025: 72.7% women, 27.3% men, 0% self-described Perceptions of recruitment, by gender in 2025: 70.8% of women, 73.9% of men, self-described unknown Perceptions of promotion, by gender in 2025: 54.2% of women, 59.1% of men, self-described unknown The problem: Recruitment outcomes largely mirror the organisation's existing gender composition, with the proportion of women recruited similar to overall representation. While this maintains current balance, it does not support meaningful progress toward improved gender equity. Promotion activity is limited, meaning outcomes can be disproportionately influenced by small numbers of appointments, reducing opportunity for sustained change. Perceptions of fairness indicate further risk. Women report lower perceptions of fairness than men in both recruitment and promotion processes, and across the organisation, perceptions of fairness are significantly lower for promotion than for recruitment. These findings suggest that advancement processes present particular challenges for achieving gender-equitable outcomes.
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Setting metrics (see [step 6](#))

Measures (required)	Critical performance measures: Gender composition of recruited employees. Gender composition of employees who were promoted. Perceptions of recruitment, by gender. Perceptions of promotion, by gender. Additional measures (optional):
Target/s (recommended)	Maintain the proportion of women/self-described gender recruited at or above the current proportion of women/self-described gender in the workforce, to support a sustained increase in representation over time.

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
Apply a consistent and transparent recruitment process to roles advertised internally as well as those advertised externally	People & Culture Team	Year 3	1
Promote flexibility in leadership roles and showcase personal stories	People & Culture Team	Year 1 and ongoing	1 6
Utilise Succession Planning Framework to increase access to promotions for women and under-represented groups	People & Culture Team	Year 3-4	1 7

Indicator 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

Describing the problem (see [step 2](#))

Analyse audit data (required)	Critical performance measures: Average weeks of parental leave, by gender in 2025: Women 19.3, Men 2.9, self-described unknown Uptake of flexible work, by gender in 2025: Women 60.5%, Men 15.3%, self-described unknown Perceptions of flexible work culture, by gender in 2025: 83.3% of women, 75% of men, self-described unknown Supplementary measures: Gender composition of parental leave takers in 2025: 42.1% Women, 57.9% Men, self-described unknown Gender gap in carer's leave in 2025:** 18.5% of Women, 19% of Men, self-described unavailable. ** Note: Carer's leave data may not truly reflect carer's leave taken, as due to system constraints employees often select 'personal leave' rather than 'carer's leave' when making an application. We will seek to address this as part of our 2026-2030 GEAP strategies. The problem: Patterns of leave and flexible work arrangements indicate gender-differentiated impacts within the organisation. Women take a significantly higher proportion of parental leave than men, particularly unpaid parental leave, and are far more likely to work part-time or access flexible working arrangements. Perceptions of flexible work culture differ slightly by gender, with men reporting lower perceptions than women. This may partly reflect operational constraints in male-dominated areas, where flexible work can be more challenging to implement. These patterns contribute to compounding equity impacts for women, including long-term effects on pay, superannuation accumulation, potential loss of entitlements, limits to career progression, and barriers to return to work, reinforcing gender-based disparities and the persistence of the gender pay gap over time.
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Setting metrics (see [step 6](#))

Measures (required)	Critical performance measures: Average weeks of parental leave, by gender. Uptake of flexible work, by gender. Perceptions of flexible work culture, by gender. Supplementary measures: Gender composition of parental leave takers. Gender gap in carer's leave. Additional measures (optional):
Target/s (recommended)	

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
Review Parental Leave scheme and 'primary/secondary' carer leave allocations	People & Culture Team	Year 2-3	
Establish 'keep in touch' practices during parental leave (invite to training, briefings and morning teas, include in all-staff communications)	People & Culture Team, Supervisors	Year 3-4	
Investigate a superannuation top-up for whilst on extended unpaid parental leave	People & Culture Team, Payroll	Year 2-3	
Review policies such as Reward and Recognition (Years of Service) / Long Service Leave accrual to mitigate compounding Gender Pay Gap factors	People & Culture Team	Year 2	
Promote flexible arrangements to encourage shared parenting responsibilities / showcase personal stories	People & Culture Team	Year 1 and Ongoing	
Consider introduction of separate 'carer's leave' category, ensure Payroll system leave categories reflect carers and personal leave, and promote use of correct category of leave application for accurate reporting	People & Culture Team	Year 2-3	
Consider introduction of IVF/reproductive leave	People & Culture Team	Year 2-3	
Introduce menopause support program	People & Culture Team	Years 3-4	
Investigate and promote options for flexibility in Operations	Regional Operations Managers and Executive Manager Service Delivery	Years 1-2	7
Provide safe and accessible location for breastfeeding at work	People & Culture Team	Year 3	

Indicator 7: Gendered segregation within the workplace

Describing the problem (see [step 2](#))

Analyse audit data (required)	Critical performance measures: Occupational gender segregation in 2025: Managers: 42.9% Women, 57.1% Men, Self-described not available Professionals: 30.4% Women, 69.6% Men, Self-described not available Technicians and Trades: 16.7% Women, 83.3% Men, Self-described not available Clerical and Administrative: 63.5% Women, 36.5% Men, Self-described not available Machinery Operators: Women not available, 100% Men, Self-described not available Labourers: 8.6% Women, 91.4% Men, Self-described not available The problem: Occupational gender segregation persists across the sector, with Service Delivery and Infrastructure roles remaining heavily dominated by men, and Call Centre and Administrative roles continuing to be predominantly held by women. These patterns are not unique to GWMWater and reflect long-standing industry norms and societal expectations about gender and work. The entrenchment of these historic gender roles contributes to ongoing workforce segmentation, limits diversity across occupational groups, and constrains opportunities for change. Progress in addressing these norms is incremental, presenting a sustained challenge to achieving greater gender balance across all areas of the organisation.
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Setting metrics (see [step 6](#))

Measures (required)	Critical performance measures: Occupational gender segregation. Additional measures (optional):
Target/s (recommended)	Incremental increase in proportion of women or self-described gender in Labourers, Technicians and Trades at each audit across the life of the GEAP (no fixed percentage)

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
Bring together women in traditionally under-represented roles (particularly those who are geographically isolated) three times per year, providing an opportunity to network and share experiences, advice and effective work practices	People & Culture Team	Year 1 and Ongoing	
Conduct an audit of facilities (eg. toilets, showers) at all GWMWater worksites to ensure that all genders are accommodated and all requirements provided	People & Culture Team	Years 2-3	
Undertake a uniform review for women in Service Delivery roles and for men in the corporate office, with a focus on items being comfortable, well-fit and practical	People & Culture Team	Year 2	
Review allocation of equipment/tools to enable women in operations to work effectively	Regional Operations Managers and Executive Manager Service Delivery	Year 1	
Facilitate connections internally and with counterparts in other Water Corporations for those working in non-traditional roles	People & Culture Team	Year 2	

Additional areas of focus (optional): Gender Impact Assessments

Describing the problem (see [step 2](#))

Analyse audit data (required)	Not applicable
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Setting metrics (see [step 6](#))

Measures (required)	Performance measures: Number of Gender Impact Assessments completed Additional measures (optional): Actions taken as a result of Gender Impact Assessments undertaken
Target/s (recommended)	

Strategies (see [step 6](#))

Strategy (required)	Responsible (recommended)	Timeline (recommended)	Related to other indicators? (recommended)
Educate GWMWater personnel in relation to the requirement to undertake Gender Impact Assessments (GIAs), and the types of policies, programs and services GWMWater offers that may require a GIA.	People & Culture team	Year 2	
Embed completion of Gender Impact Assessments into project planning and other relevant procedures.	Project Delivery team	Year 2	

F) Resourcing your GEAP

Section 13: Identifying current and required resources (recommended)

GWMWater has assessed the resourcing required to deliver the Gender Equality Action Plan (GEAP) through consideration of existing organisational capability, governance arrangements and established compliance processes under the Gender Equality Act 2020. Responsibility for gender equality sits within the People and Culture function, supported by executive oversight and regular reporting to the People and Culture Committee and the Board. This structure has enabled GWMWater to meet legislative obligations, including undertaking workplace gender audits, developing and implementing a GEAP, and submitting progress reports to the Commission for Gender Equality in the Public Sector (CGEPS) within required timeframes.

Current resourcing has been sufficient to support core compliance activity, including data collection and analysis, governance reporting, and implementation of identified actions across workforce planning, flexibility, leadership development and workplace culture. Gender equality work is also increasingly embedded within broader organisational systems, particularly through the People and Culture Strategy, which integrates the GEAP with related action plans such as the People Matter Survey, Diversity & Inclusion and wellbeing initiatives.

As the maturity of gender equality work increases, GWMWater has identified that the primary resourcing opportunity lies not in additional FTE but in improved use of existing information and technology systems to streamline data collection, analysis and reporting. Increasing expectations around data quality, intersectional analysis, gender pay equity reporting and gender impact assessments place a growing administrative and analytical burden on current resources. These demands highlight the importance of maximising the capability of systems such as payroll, HR platforms, survey tools and reporting dashboards to reduce manual effort and improve the timeliness, consistency and accuracy of gender-related data.

Over the life of the GEAP, GWMWater will therefore focus on strengthening system integration, automating data extraction where possible, and improving internal reporting mechanisms to support evidence-based decision-making. Leveraging IT capability in this way will enable existing resources to shift from compliance-driven activity toward deeper analysis, proactive engagement with business areas, and sustained cultural change. Ongoing review of system effectiveness will ensure that GEAP delivery remains achievable, efficient and embedded in core business operations, supporting meaningful and sustainable gender equality outcomes.

Section 14: Developing a resourcing plan (required)

A key learning from GWMWater's previous Gender Equality Action Plan was that it included a commitment to dedicate resourcing specifically to the delivery of gender equality initiatives; however, this level of resourcing was not feasible within our operating and funding model as a Victorian water corporation and was ultimately not implemented in practice. This experience highlighted the importance of ensuring that commitments made in the GEAP are realistic, sustainable and achievable within existing organisational constraints.

In developing this GEAP, GWMWater has adopted a more pragmatic and integrated resourcing model that reflects both our capacity and long-term sustainability. Moving forward, GWMWater will balance priorities by focusing on actions where we believe we can have the greatest impact, and by leveraging initiatives that deliver mutual benefit across the People and Culture Strategy, Diversity and Inclusion activities, wellbeing initiatives, workforce planning and leadership development. This approach recognises that gender equality outcomes are most enduring when they are aligned with broader organisational systems, governance and cultural change rather than separate programs competing for limited resources.

The GEAP is also developed in the context of GWMWater's Enterprise Agreement being due for renewal. The bargaining process provides an important opportunity to consider initiatives that may better support gender equality outcomes, including those related to workplace flexibility, leave provisions, career progression and equitable access to opportunities. Where agreed through bargaining, such initiatives will strengthen GWMWater's ability to achieve the objectives of this Plan in a way that is embedded, enforceable and sustainable.

Resourcing effectiveness will be monitored throughout the life of the GEAP through regular progress reporting, executive oversight and review by the People and Culture Committee. This will enable GWMWater to assess whether actions remain achievable within available capacity, whether priorities require adjustment, and whether opportunities—such as those arising through enterprise

bargaining—can be leveraged to strengthen impact. This adaptive approach ensures the GEAP remains credible, responsive and embedded in long-term organisational practice.

Any other additions or comments (optional)