

Cover page

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
Response rate to employee experience survey	71%
Contextual information	
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 progress report on behalf of my organisation (as named above). I attest to providing truthful and accurate information.
- ☒ I attest that my organisation has completed all relevant gender impact assessments under the Gender Equality Act 2020, or I have explained why not in the comment box below.

Any comments?	
Name	Mark Williams
Role title	Managing Director
Signed	
Date	30/04/2026

Step 1: Reporting on gender impact assessments (GIAs)

Section 1.1 Confirming GIA exemptions (required)

If you have not listed any GIAs, please choose one or more permitted reason:

- ☐ Reporting on the GIA(s) would make the progress report an exempt document. This is within the meaning of the *Freedom of Information Act 1982*.
- ☐ Reporting on the GIA(s) would result in a disclosure prohibited by a different Act.
- ☐ Reporting on the GIA(s) would reveal confidential information.
- ☐ Your organisation had no policies, programs or services requiring a GIA. This is under the parameters of the *Gender Equality Act 2020*.
- ☒ None of these apply (**go to 1.2**).

Section 1.2 Describing policies, programs and services subject to a GIA (required and recommended)

Ref #	A: Title (required)	B: Subject (required)	C: Description of the policy, program or service (required)	D: Status (required)	E: Description of gendered impacts (recommended)
1.	Recruitment and Selection Procedure	Policy	Procedure to be followed whenever vacated or new positions are to be filled within the Corporation	Up for review	The Procedure is relevant for all community members seeking employment. It is gender-neutral in intent and supports gender equity through merit-based decision-making, transparent documentation, gender-balanced selection panels, and People and Culture oversight. However, some gendered impacts may arise in practice where short-term higher duties or non-advertised appointments rely on managerial discretion, which can unintentionally advantage employees with greater visibility or flexibility—factors that may disproportionately favour men or employees without caring responsibilities. Further, there remains potential for conscious or unconscious bias and discrimination in recruitment decisions, and the possibility of unintended gendered language or lack of representation in imagery in advertisements. Intersectional considerations such as providing inclusive bathrooms, accessibility of interview rooms, and accommodating neurodiversity in interviews were also considered.
2.	GWMWater Customer and Stakeholder Workshop	Program	A structured engagement forum designed to gather insights, feedback, and perspectives from customers, community representatives, industry stakeholders, and partners on key service, planning, or operational matters. Feedback is used to inform decision-making and planning.	Up for review	Women and people with caring responsibilities may face barriers to participation if workshops are held outside standard hours, require travel, or rely on in-person attendance without flexible options. Group-based discussion formats may also unintentionally privilege more dominant voices, which can reduce the visibility of women's perspectives if facilitation is not actively inclusive.
3.	Southern Wimmera & North East Pyrenees Project Business Case	Service	Proposed extension of the Wimmera Mallee Pipeline to deliver non-potable (raw) water supply to rural properties and small towns across parts of the Pyrenees, Northern Grampians, and Central Goldfields Shires.	New	The Gender Impact Assessment found that water insecurity places significant pressure on rural households by increasing the time, cost, and effort required to manage both domestic and agricultural water needs, particularly during dry periods. Stakeholder consultation highlighted impacts on farm productivity and household wellbeing, including stress and reduced domestic amenity, with disproportionate challenges for older farmers, smaller landholders, and households reliant on domestic water for health and wellbeing. The findings also underscore that domestic and gendered impacts of water insecurity are often under-represented in traditional productivity-focused assessments, highlighting the importance of considering household and gender dynamics.

Section 1.3 Describing actions taken as a result of a GIA (required and recommended)

Ref #	F: Were actions taken as a result of the GIA? (required)	G: Describe the actions taken as a result of the GIA in order to: - Meet the needs of people of different genders; and/or - Promote gender equality; and/or - Address gender inequality. If you did not take action, write N/A here and explain why in (H). (required)	H: If you did not take action, explain why. If you did take action, describe it in (G) and write N/A here. (required)	I: Describe: How and why intersectionality was considered (or not) (required)	J: Describe any actions taken specifically designed to address intersectional inequalities (compounded gender inequalities)? (recommended)
1.	Yes (go to column G)	Inclusion of gender-neutral language in the Procedure. Utilise imagery on advertisements which depicts a diverse workforce. Implementation of a feedback survey for new employees on their experience during the recruitment process to identify potential discriminatory or non-inclusive practices. Encouragement for hiring managers (within and outside the Procedure) to consider all employees that may be interested in short-term Higher Duties opportunities. Review of position descriptions prior to advertising roles, to ensure they use plain language and are gender neutral.	N/A	Disability – access issues such as requirement to use stairs to attend interview. First Nations – Consideration of any cultural safety issues which may impact First Nations candidates. Gender – availability of inclusive / gender neutral bathroom facilities.	Providing an alternative and accessible downstairs space for interviews. Candidates are asked if any reasonable adjustments may be required to accommodate their needs ahead of interview. Inclusive bathroom facilities are available for candidates.
2.	Yes (go to column G)	Workshop presenters represent gender diversity. Checklist for venue now includes consideration of appropriate toilets and facilities for all genders. Workshop scheduling avoids school start and end times to cater for attendance by carers of school children.	N/A	Age - workshops are offered online or in-person in Horsham, barrier to access could be limited computer skills or inability to travel long distances. Gender - timing of events could limit accessibility due to caring responsibilities, venue facilities (toilets) may not be appropriate for all genders or baby changing, size of venue facilitating a pram, representation of speakers/facilitators. Accessibility - wheelchair facilities, hearing/seeing presenters and screens, translations for other languages, time out of work to attend, literacy and plain language of presentations, what to expect on the day/arrival, catering. First Nations - representation of speakers/facilitators. Hardship - cost of living as a barrier to access internet, fuel to attend, time out of work.	Venue checklist now includes 'ensure there are appropriate toilets and facilities for all genders and abilities', and is promoted in workshop invitations. Reimbursement available for customers traveling to attend. Agenda and presentations reviewed for plain language, ensuring attendees can see and hear presentations clearly.
3.	Yes (go to column G)	As a result of the Gender Impact Assessment, GWMWater progressed the preferred option to develop a regional domestic and stock water supply network to improve the reliability and quality of water for rural households and farm businesses. The project is designed to reduce reliance on water carting and emergency supply arrangements, lowering time, labour, financial costs, and stress associated with water insecurity, while supporting domestic and agricultural activities and overall wellbeing. To promote equitable outcomes, the project incorporates ongoing consultation with landholders and communities, transparent and affordable connection pricing, and monitoring of participation and feedback to ensure benefits are broadly and fairly distributed, consistent with the objectives of the Gender Equality Act.	N/A	Recognising that gendered impacts of water insecurity can be compounded by factors such as age, physical capacity, financial resources, and household circumstances.	Several actions incorporated an indirect or practical intersectional lens, particularly through measures aimed at mitigating compounded disadvantage. These included affordability considerations for smaller landholders, ongoing consultation with diverse landholders and community groups, and monitoring participation and feedback during implementation. While not framed specifically as intersectional interventions, these actions were designed to support groups who may experience heightened impacts due to the interaction of gender with age, financial capacity, or household circumstances.

Step 2: Reporting on progress against the indicators

Section 2.1 Describing progress against the workplace gender equality indicators (required and recommended)

K: Indicator *	L: Progress data (required)	M: Additional progress data (recommended)	N: Has progress been made? (required)	O: Explain how the data does (or does not) demonstrate progress. (required)
1	Critical performance measures Gender composition of the duty holder organisation: 2023: 32.2% women, 67.8% men, 0% self-described 2025: 35% women, 65% men, 0% self-described Gender composition of part time workers in the duty holder organisation: 2023: 39.4% of women, 3.6% of men, 0% of self-described gender 2025: 38.2% of women, 4.3% of men, 0% of self-described gender Gender composition of senior leaders in the duty holder organisation: 2023: 50% women, 50% men, 0% self-described 2025: 40%* women, 60%* men, 0% self-described	In relation to senior leaders, this represents a small group of five roles at GWMWater. In 2023, one of these roles had two occupants due to parental leave. As such, 50% in 2023 represented three men and three women, two of whom were effectively sharing a role. In 2025, all roles were filled by one incumbent. The 40% represents two women and the 60% three men. Therefore the gender balance across substantive role occupancy has not changed. <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>	Yes	The proportion of women across the organisation has increased by 2.8%. There has been no increase in employees of self-described gender. There has been a small increase in men working part time, up to 4.3% from 3.6%, and a similar slight decrease in women working part time.
2	Critical performance measures Gender composition of the duty holder organisation's governing body: 2023: 57.1% women, 42.9% men, 0% self-described 2025: 50% women, 50% men, 0% self-described	In 2023 the governing body Chair was a man, in 2025 the governing body Chair was a woman.	Yes	Whilst the proportion of women appears to have decreased, the governing body consisted of eight members in 2025 (four men and four women) as compared with seven in 2023 (four women and three men). In addition, the Chair of GWMWater's Board was a woman in 2025 (for the first time).
3	Critical performance measures Mean total remuneration gender pay gap by occupation group: 2023: (all occupations) women 9.6%, self-described not available 2025: (all occupations) women 7.0%, self-described not available Mean total remuneration senior leader gender pay gap: 2023: Women 19.7%, self-described not available 2025: Women 7.2%** , self-described not available	Mean total remuneration pay gaps decreased for women in all occupation groups other than Professionals (-1.9% in 2023 to 7.8% in 2025).	Yes	Pay gaps have reduced for women across critical performance measures. Pay gaps across supplementary measures decreased in all respects for women, other than median base salary which remained at zero (indicating that the median woman and man are positioned on the same remuneration band). <i>**Note: due to inadvertent failure to identify one woman as a senior leader as noted under Indicator 1 above, the senior leader pay gap appeared as 15.2% in GWMWater's 2025 audit data. However, the true pay gap at senior leader level was 7.2%.</i>

	Supplementary measures Mean base salary pay gap: 2023: Women 4.7%, self-described not available 2025: Women 1.2%, self-described not available Median total remuneration pay gap: 2023: Women 9.2%, self-described not available 2025: Women 8.8%, self-described not available Median base salary pay gap: 2023: Women 0%, self-described not available 2025: Women 0%, self-described not available			
4	Critical performance measures Anonymous experience rate of sexual harassment: 2023: Women 10%, Men 0%, self-described not available 2025: data not available Number of formal reports of sexual harassment: 2023: Women not available, Men 1, self-described not available 2025: Women not available, Men 1, self-described not available Supplementary measures Participants who said they reported sexual harassment: 2023: data not available 2025: data not available Reasons for not making a formal sexual harassment complaint: 2023: data not available 2025: data not available Satisfaction with handling of workplace sexual harassment complaint: 2023: data not available 2025: data not available Satisfaction with handling of formal workplace sexual harassment complaint: 2023: data not available 2025: data not available	People Matter Survey experiences of sexual harassment: 2023 (4.4%) 2024 (5.5%) 2025 (6.6%)	No	Due to the unavailability of data, we are unable to confirm whether progress has or has not occurred according to the critical and supplementary measures. However, the People Matter Survey results from 2023 (4.4%), 2024 (5.5%) and 2025 (6.6%) indicate that experiences of sexual harassment have increased at GWMWater. Unfortunately, there is no data relating to men and women's respective experiences, reports, reasons for not reporting, or satisfaction with outcomes.
5	Critical performance measures Gender composition of recruited employees: 2023: Women 26.5%, Men 73.5%, self-described 0% 2025: Women 34.6%, Men 65.4%, self-described 0%.		Yes	Measures have improved in favour of women in all critical performance areas. In addition, while women's perception of fairness in both recruitment and promotion is lower than men's, the gap is closing with women's perceptions of fairness increasing by 6.8% for recruitment (compared with men's increasing by 3.5%), and by 12.2% for promotion (compared with men's increasing by 10.7%).

	Gender composition of employees who were promoted: 2023: Women 40%, Men 60%, self-described 0%. 2025: Women 72.7%, Men 27.3%, self-described 0%. Perceptions of recruitment, by gender: 2023: Women 64%, Men 70.3%, self-described not available. 2025: Women 70.8%, Men 73.9%, self-described not available. Perceptions of promotion, by gender: 2023: Women 42%, Men 54.2%, self-described not available. 2025: Women 54.2%, Men 59.1%, self-described not available.			
6	Critical performance measures Average weeks of parental leave, by gender: 2023: Women 51.3, Men 3.0, self-described not available. 2025: 19.3, Men 2.9, self-described not available. Uptake of flexible work, by gender: 2023: Women 68%, Men 19.3%, self-described not available. 2025: Women 60.5%, Men 15.3%, self-described not available. Perceptions of flexible work culture, by gender: 2023: Women 78%, Men 69.2%, self-described not available. 2025: Women 83.3%, Men 75%, self-described not available. Supplementary measures Gender composition of parental leave takers: 2023: Women 66.7%, men 33.3%, self-described not available. 2025: Women 42.1%, men 57.9%, self-described not available. Gender gap in carer's leave: 2023: Women 26.7%, Men 16.1%, self-described not available. 2025: Women 18.5%, Men 19%, self-described not available.		Yes	Whilst women continued to take significantly longer parental leave periods than men in 2025, there has been progress in that men were more likely to take parental leave in 2025 than women (57.9% in 2025 compared with 33.3% in 2023). This taking of leave by number in 2025 more closely and proportionately reflects the gender balance in employees across the organisation than in 2023. The uptake of flexible work arrangements has decreased for both men and women, but other factors such as the post-COVID return to the office have contributed to this decline. Importantly, perceptions of a flexible workplace culture have improved since 2023 for both men and women. <i>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.</i>
7	Critical performance measures Occupational gender segregation: 2023: Managers 42.1% women, 57.9% men. Professionals 22% women, 78% men. Technicians and trades 25% women, 75% men. Clerical and		Yes	There has been incremental improvement in women's representation in several traditionally male-dominated roles, particularly in management and professional occupations. The proportion of women in management rose slightly from 42.1% in 2023 to 42.9% in 2025, indicating slow but positive movement toward gender balance in leadership roles. A more notable shift occurred among professionals, where women's representation increased from 22% to 30.4%

	administrative 62% women, 38% men. Labourers 7.1% women 92.9% men. • 2025: Managers 42.9% women, 57.1% men. Professionals 30.4% women, 69.6% men. Technicians and trades 16.7% women, 83.3% men. Clerical and administrative 63.5% women, 36.5% men. Labourers 8.6% women 91.4% men.			Similarly, although women remain underrepresented among labourers, there was a modest improvement, with women increasing from 7.1% to 8.6%. Given women's historically low participation in this group, incremental progress is to be celebrated.
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*Indicators (column K)

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

Section 2.2 Describing factors limiting and contributing to progress (required)

P: Indicator	Q: Did any of the factors listed below limit or contribute to your progress?* (required)	R: Explain how any factor(s) limited or contributed to your progress. If 'none' is selected, write N/A and move to (S) (required)	S: List the strategies implemented that contributed to or aligned with the indicator. (required)
1	☐ None ☐ a ☒ b ☐ c ☒ d ☒ e ☐ f ☐ g	The nature and operating circumstances of GWMWater limit its ability to achieve a balanced gender composition across all levels of the workforce for several reasons: • Operationally male-dominated roles: A large proportion of GWMWater's workforce is concentrated in field-based, technical, trade and labouring roles (e.g. maintenance, infrastructure and operations). These occupations are traditionally male-dominated across the water and utilities sector, reducing the availability of women in the external labour market and making gender balance difficult. • Physical and on-call job requirements: Many operational roles may involve physical work, emergency response, after-hours callouts and remote site work. These conditions can be less attractive or harder to accommodate for some employees with caring responsibilities, which disproportionately affects women. • Regional and rural context: As a regional water authority, GWMWater operates in rural and regional areas where the local labour pool is smaller and less diverse. Limited access to training pathways, alternative employment opportunities for partners, childcare services and transport can further constrain gender-diverse recruitment and retention. • Career pipeline challenges: Progression to management and senior roles often relies on experience gained in operational or technical positions. If women are underrepresented at entry and mid-career operational levels, this naturally limits the pool of women eligible for advancement into leadership over time. • Workforce stability and low turnover: GWMWater staff typically have long tenure and with relatively low staff turnover numbers (averaging 8.01% over the reporting period), GWMWater experiences slow changes in gender composition, as fewer recruitment opportunities arise to rebalance roles. In addition, operational priorities and resourcing constraints limited GWMWater's ability to commit fully to in-depth mentoring for senior women. It is proposed that this will form part of developing and implementing a succession planning framework as part of the 2026-2030 GEAP.	Take a long-term approach and focus awareness, education and recruitment efforts early on school students, early year university students, internship, trainee and apprenticeship programs and people returning to the region, to build talent acquisition and succession pipelines of women and diverse talent. Build an approach to collect and monitor employee demographics.
2	☐ None ☐ a ☒ b ☒ c ☐ d ☐ e ☐ f ☐ g	GWMWater's governing body is appointed by the Water Minister under section 95 of the <i>Water Act 1989</i>. GWMWater does not have any direct control or influence over the selection of its members.	
3	☐ None ☐ a ☒ b ☐ c ☐ d ☐ e ☐ f ☐ g	The nature and circumstances of GWMWater may have limited progress in closing the gender pay gap due to structural factors rather than unequal pay practices. A workforce concentrated in male-dominated operational and trade roles—which often attract overtime and allowances—can widen the overall pay gap when women are more represented in lower-paid clerical or professional roles. Limited female representation in senior and leadership positions, often fed by technical career pathways, further reinforces this gap. In addition, regional labour market constraints, caring-responsibility impacts on access to overtime or on-call work, personal preferences and low workforce turnover mean changes to pay outcomes occur slowly, even where pay for equivalent roles is equitable.	Regularly conduct pay equity analysis to understand the reasons for pay gaps. Provide an annual pay equity analysis to the Executive for action/s. Remediate the pay equity gaps where identified.
4	☐ None ☒ a ☒ b	As an organisation with over 200 employees, unfortunately sexual harassment continues to be present in the workplace despite GWMWater taking reasonable measures to prevent it. This is because prevention systems can only reduce risk, not eliminate individual misconduct.	Establish a dedicated function for employees to raise issues and obtain help with elevating their concerns through constructive language to achieve positive outcomes.

	☐ c ☐ d ☐ e ☐ f ☐ g	Human behaviour is not under the complete control of an employer, incidents often occur privately in contexts that can deter reporting, and organisational size and complexity as well as external influences on individuals can lead to inconsistencies in workplace culture which can impact the number of instances of sexual harassment. In addition, our employees are also exposed to the behaviour of external parties such as contractors, customers and other stakeholders whose behaviour we cannot control or influence. Training and policies are in place which set expectations but unfortunately cannot in and of itself change all attitudes or stop deliberate breaches. At GWMWater we have proactive measures and appropriate systems in place such as sexual harassment training and flexible and confidential reporting procedures, and we respond promptly and reasonably when issues arise. During the reporting period we have been actively educating our people and encouraging them to report instances of sexual harassment, and therefore an increase in awareness and reporting is to be expected.	
5	☐ None ☐ a ☒ b ☐ c ☐ d ☐ e ☐ f ☐ g	Similarly to Indicator 1, GWMWater's ability to achieve gender equality in recruitment and promotion is limited by the nature of its workforce, regional context and career structures. Many roles are operational, technical or trade-based and are traditionally male-dominated, reducing the pool of female applicants and creating a narrow pipeline for advancement. As a regional organisation, GWMWater operates within a smaller and less diverse labour market, with limited training pathways and support services that can affect women's attraction and retention. Promotion into senior roles often depends on operational experience, where women are underrepresented, and low workforce turnover further slows change by limiting recruitment and promotion opportunities.	Take a long-term approach and focus awareness, education and recruitment efforts early on school students, early year university students, internship, trainee and apprenticeship programs and people returning to the region, to build talent acquisition and succession pipelines of women and diverse talent. Identify scholarship opportunities to build long-term relationships with potential recruits, particularly women and people with diverse backgrounds. Review and refresh recruitment and selection practices, onboarding and buddying programs to ensure the documents, policies, processes and practices incorporate and embed best practice D&I principles. Monitor and measure talent acquisition by gender and diverse background. Introduce a Diversity and Inclusion Working group, with diverse representation and a supporting Terms of Reference, to provide governance, enable prioritisation and alignment with business strategy, and identify specific areas needing focus. Design and develop a program centred on inclusive leadership principles and practices for all organisational leaders. Ensure all aspects of the employee lifecycle are embedded into this development program. Implement Inclusive Leadership program across all leaders: (a) Executive team; (b) Divisional Managers; (c) Managers and Supervisors.
6	☐ None ☐ a ☒ b ☐ c ☐ d ☐ e ☐ f ☐ g	With men heavily dominating operational and trade roles at GWMWater, and these being the roles where flexibility is more limited, this limits GWMWater's ability to progress towards an equal uptake of flexible work. Long-held societal beliefs and norms relating to caring for children limit GWMWater's ability to move towards equality in relation to the length of parental leave taken across genders.	Examine all roles and identify: (a) roles that require physical presence based on emergency service and/or customer service needs; (b) a team-design approach to consider flexible working options for identified teams whilst maintaining quality customer and emergency service. Considerations include flexible working times, flexible leave options, and employee input into team-rostering/scheduling; and (c) targeted opportunities to educate leaders about the importance of flexible work arrangements, of reducing the barriers to working flexibly and of promoting the value of flexible work. Review leave provisions and flexible working arrangements to incorporate D&I principles to strengthen our employee value proposition. Raise awareness of flexible work arrangements through stories and celebrations.
7	☐ None ☐ a ☒ b ☐ c ☐ d ☐ e ☐ f ☐ g	Similarly to Indicators 1 and 5, GWMWater's ability to achieve gender equality in recruitment and promotion is limited by the nature of its workforce, regional context and career structures. Many roles are operational, technical or trade-based and are traditionally male-dominated, reducing the pool of female applicants and creating a narrow pipeline for advancement	Take a long-term approach and focus awareness, education and recruitment efforts early on school students, early year university students, internship, trainee and apprenticeship programs and people returning to the region, to build talent acquisition and succession pipelines of women and diverse talent. Identify scholarship opportunities to build long-term relationships with potential recruits, particularly women and people with diverse backgrounds. Introduce a Diversity and Inclusion Working group, with diverse representation and a supporting Terms of Reference, to provide governance, enable prioritisation and alignment with business strategy, and identify specific areas needing focus. Celebrate inclusion and diversity activity in

			communications and ensure a diverse representation in communication materials. Promote the GEAP and all D&I commitments on the website. Design, promote and celebrate a calendar of Diversity and Inclusion events. Build an approach to collect and monitor employee demographics.
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*Factors (column Q):

- a. the size of the organisation, including the number of employees
- b. the nature and circumstances of the organisation, including any barriers to making progress
- c. requirements that apply to the organisation under any other Act, including an Act of the Commonwealth
- d. the organisation's resources
- e. the organisation's operational priorities and competing operational obligations
- f. the practicability and cost to the organisation of making progress; and
- g. genuine attempts made by the organisation to make progress.

Step 3: Reporting on GEAP strategies

Section 3.1 Explaining incomplete strategies (if any) (required)

Examine all roles and identify: (a) roles that require physical presence based on emergency service and/or customer service needs; (b) a team-design approach to consider flexible working options for identified teams whilst maintaining quality customer and emergency service. Considerations include flexible working times, flexible leave options, and employee input into team-rostering/scheduling; and (c) targeted opportunities to educate leaders about the importance of flexible work arrangements, of reducing the barriers to working flexibly and of promoting the value of flexible work.

While the strategy was not completed in its entirety, meaningful progress was made in key areas. Consideration was given to impact of actions, and therefore effort was focused on exploring flexible working arrangements in roles that have traditionally been considered unsuitable for flexibility, challenging existing assumptions and testing alternative approaches. This included examining workforce needs to distinguish roles requiring physical presence due to emergency response or customer service requirements, and considering team-based design approaches that could support flexibility while maintaining service quality. In parallel, targeted leadership development was delivered through a leadership program module focused on flexible work, building leaders' capability to understand its value, reduce barriers to uptake, and support flexible working times, leave options, and employee input into rostering and scheduling where feasible.

Review and refresh recruitment and selection practices, onboarding and buddying programs to ensure the documents, policies, processes and practices incorporate and embed best practice D&I principles. Monitor and measure talent acquisition by gender and diverse background.

A 'new starter' feedback survey was implemented following a Gender Impact Assessment completed on GWMWater's Recruitment and Selection Procedure, as a measure to identify potential changes to recruitment and selection practices. Onboarding documentation was reviewed to ensure GWMWater took the opportunity to collect intersectional data where new employees were comfortable providing it. Prior to the introduction of a new system which allows GWMWater to collect intersectional data, we have been unable to monitor and measure talent acquisition by gender and diverse background.

Regularly conduct pay equity analysis to understand the reasons for pay gaps. Provide an annual pay equity analysis to the Executive for action/s.

Full pay equity analyses were not conducted or delivered to Executive due to system constraints, a lack of resources, and competing organisational priorities. In addition, on reflection it was felt that this strategy as presented was unlikely to be effective due to the rigid pay structure prescribed by GWMWater's Enterprise Agreement.

However, potential causes impacting the gender pay gap were identified, including outcomes of Performance Reviews, and a manual analysis of Performance Review outcomes was undertaken to identify potential bias. No apparent bias was identified.

In addition, our audit data identified that the pay gap in total remuneration is significantly larger than that of base salary alone. This is largely attributable to operations and trades employees (predominantly men) on lower remuneration bands having access to forms of supplementary income such as allowances and overtime pay. By contrast, lower-level administrative roles with fixed income, which have traditionally been held by a higher proportion of women, do not have equivalent access to additional income. As such, this is an issue we seek to address through strategies in our 2026-2030 Gender Equality Action Plan.

Remediate the pay equity gaps where identified.

As no apparent bias was identified in Performance Reviews, no remediation was undertaken. Remuneration was consistent with our Enterprise Agreement and our review of Performance Review outcomes indicated fair processes were implemented across the organisation. With the implementation of a new system in 2026, coupled with our commitment to collect intersectional data from more employees, we will be able to systemise that review and access meaningful data relating to the gender pay gap, placing us in a better position to take remedial action where required.

Review current people policies to check that best practice D&I principles are embedded.

Some, but not all, people policies were reviewed for this purpose. Due to resource constraints, we were unable to review all policies but again focused on areas of high impact. GWMWater's Workplace Behaviours Policy was revised to clearly set expectations for respectful, inclusive, and professional conduct and explicitly prohibit discrimination, bullying, harassment, and victimisation. It reinforces dignity, fairness, and accountability in everyday interactions, requires leaders to model inclusive behaviours and address issues early, and provides clear, consistent reporting and response processes.

GWMWater's Uniform Policy was revised to embed best-practice Diversity and Inclusion principles by providing flexibility and choice in uniform options so employees can dress in a way that respects their gender identity, cultural background, religious beliefs, physical needs, and personal comfort, while still meeting safety and professional standards.

Additional initiatives have been introduced outside of formal policies to ensure compliance with best practice Diversity and Inclusion principles. These include introduction of a prayer and breastfeeding space in the corporate office and offering flexible work arrangements for those observing religious holidays and practices.

Ensure that the Executive Team actively promotes and encourages deliberate change through their leadership impact in at least one area of the GEAP ensuring all areas are covered by the collective team.

Ensure that Executives lead one area of the GEAP and commit to sponsor the actions in that area.

Appoint GEAP Champions from the Executive and senior leaders to elevate the importance of the GEAP.

Each Executive Team member ensured there was progress towards Gender Equality through implementation of the strategies relevant to their respective portfolios, rather than appointing 'GEAP champions'. This included supporting data collection and analysis to inform gender equality outcomes, engaging in discussions to identify risks and improvement opportunities, integrating gender equality considerations into workforce planning, recruitment and selection practices, remuneration discussions, and performance management processes, investigating and supporting options for flexible work in operations and trades roles, and reinforcing expectations around gender equality through organisational messaging, decision-making, and strategic priorities.

Review leaders' progress towards targets including efforts and outcomes.

This strategy was discontinued because its purpose and intended application were not clearly understood.

Develop mentoring programs targeted at women for professional development.

A formal mentoring program has not been developed due to a lack of resources, and difficulty identifying suitable mentors in a rural setting. However, senior executives and managers continue to provide informal mentoring to females in middle management and in non-traditional gender roles (i.e. in STEM). This has involved building strong and trusted relationships, fostering learning and development, and identifying, discussing, and implementing opportunities for internal career progression.

Develop a targeted approach to succession planning that increases access to promotions for women and under-represented groups through higher duties opportunities and directed skill and experience development.

Capacity and capability considerations have led GWMWater to seek external assistance with succession planning. Due to competing organisational priorities and budget constraints, whilst work has commenced, a succession planning framework has not yet been developed.

Promote the GEAP and all D&I commitments on the website. Design, promote and celebrate a calendar of Diversity and Inclusion events.

As GWMWater's Diversity and Inclusion Working Group was established towards the end of the reporting period, we have not been in a position to fully complete this strategy. However, the activities of the Diversity & Inclusion Working Group will include developing a calendar of events and promoting these on GWMWater's website as well as internally.

Develop a program for all employees that focuses on inclusive leadership through self-leadership and focuses on constructive and effective communication with leaders and colleagues.

No such program has been developed or delivered for all employees, as a decision was made to focus on the Leadership Development Program (discussed below) and other strategies likely to have greater impact on GWMWater's progress towards Gender Equality.

Create and communicate meaningful targets and metrics with timeframes for people leaders to interpret and act upon in their areas (for example, gender targets and targets to increase under-represented groups).

As GWMWater was not subject to targets under the Gender Equality Act during the reporting period, no targets were set. However, ongoing engagement with the water sector and targets set by VicWater in its Water Industry Equity, Diversity & Inclusion Strategy will inform future work in this area.

Create dashboard for reporting gender and diversity data and insights

This strategy is not complete, as the transition to GWMWater's new system only occurred in 2026 and we were not yet able to retrieve data reports and insights relating to gender and diversity.

Section 3.2 Describing achievements, challenges and learnings (recommended)

Identify scholarship opportunities to build long-term relationships with potential recruits, particularly women and people with diverse backgrounds.

GWMWater created a University Book Scholarship program to identify potential recruits (particularly women and people with diverse backgrounds) and start to build long-term relationships. The first scholarships were awarded for commencement of the 2025 academic year.

Take a long-term approach and focus awareness, education and recruitment efforts early on school students, early year university students, internship, trainee and apprenticeship programs and people returning to the region, to build talent acquisition and succession pipelines of women and diverse talent.

GWMWater's 2024-2026 Recruitment Strategy was developed and implemented during the reporting period. Actions under that Strategy were implemented specifically to meet the objectives of this GEAP strategy. These included provision of University Book Scholarships, attendance at local Careers Expo and Aboriginal and Torres Strait Island Careers Expo, and entering discussions with a local University with a view to implementing a summer work placement program. Work continues in this space.

Raise leaders' awareness and education of psychological safety, unconscious bias, inclusive team characteristics and demonstrate support for inclusion through story sharing and internal/external publication of these where appropriate. This will be done through an Inclusive Leadership Program.

Design and develop a program centred on inclusive leadership principles and practices for all organisational leaders. Ensure all aspects of the employee lifecycle are embedded into this development program.

GWMWater is committed to developing its leaders and has continued with an annual Leadership Development Program. The program includes three modules annually, with topics including Psychological Safety, Flexible Work Arrangements, and Diversity and Inclusion covered in 2024 and 2025. The Leadership Development Program is attended by Team Leaders, Managers, Executives, and employees identified as Emerging Leaders.

Work individually with senior women to build and champion their personal development plan. Grow the representation of women in leadership roles by monitoring the progress of their targeted development plan.

Senior women and emerging leaders continue to be encouraged to undertake specific development activities. Examples include the Peter Cullen Trust leadership program and Leadership Wimmera program. We have also promoted and encouraged women to participate in industry led mentoring programs such as AWA mentoring program and Young Water Professionals. In addition, all employees (including senior women) have an Individual Performance Plan which identifies professional aspirations and development opportunities.

Introduce a Diversity and Inclusion Working group, with diverse representation and a supporting Terms of Reference, to provide governance, enable prioritisation and alignment with business strategy, and identify specific areas needing focus. Celebrate inclusion and diversity activity in communications and ensure a diverse representation in communication materials.

A Diversity and Inclusion Working Group has been established at GWMWater. The group comprises a diverse selection of GWMWater employees and meets every 2-3 months to advocate for and implement inclusive work practices, celebrate diversity and host events, the first of which was International Day of People with Disability.

An audit of imagery on job advertisements and other outward-facing communication material has been undertaken to ensure that all materials celebrate and represent the diversity of GWMWater's community and workforce.

Build an approach to collect and monitor employee demographics.

GWMWater has implemented a two-pronged approach to collecting employees' intersectional data. An optional intersectionality form is now included in onboarding paperwork, with details entered into GWMWater's system. For existing staff members, new data fields were added within the system for employees to self-enter cultural identity, disability status, religion and sexual orientation.

We are continuing to find additional methods to promote the disclosure of this data and to ensure confidentiality and anonymity where possible, including investigating the possibility of collecting data through online forms which feed directly into the system, and only accessing and reporting data on an anonymous basis.

Establish a dedicated function for employees to raise issues and obtain help with elevating their concerns through constructive language to achieve positive outcomes.

GWMWater developed and implemented a new Grievance Procedure in 2023, which encourages employees to raise issues by normalising concerns as a legitimate part of organisational accountability, promoting respectful and constructive communication, and providing clear support and escalation pathways. Employees are guided to clearly explain the issue, describe its impact, and suggest a preferred outcome, which shifts conversations from blame to problem-solving and positive resolution. Concerns are reviewed objectively and fairly, with defined response pathways and escalation options where informal resolution is unsuccessful. Together, these elements build confidence, psychological safety, and trust, enabling employees to elevate concerns constructively and achieve positive outcomes.

GWMWater has also introduced a Confidential Incident register and new Workplace Behaviours Procedure for reporting incidents such as bullying and sexual harassment. The procedure ensures that employees can raise issues by offering a safe, confidential way to report concerns without fear of reprisal, helping build trust and psychological safety. Employees are supported to describe incidents clearly, respectfully, and factually. Clear escalation pathways and access to appropriate support ensure concerns are elevated early and addressed fairly, leading to positive outcomes for both individuals and the organisation. Corrective actions identified are tracked and reported to our Board.

Review leave provisions and flexible working arrangements to incorporate D&I principles to strengthen our employee value proposition. Raise awareness of flexible work arrangements through stories and celebrations.

Leave provisions in GWMWater's Enterprise Agreement were reviewed through a D&I lens. All entitlements are gender-neutral, however there is a heavy gender imbalance in relation to the uptake of those leave entitlements. Leave provisions were not changed as a result, but we focussed on raising awareness and promotion of flexible arrangements especially in traditionally less flexible areas such as in operations. Stories celebrating flexible work arrangements for all genders are featured in regular People and Culture Newsletters.

Ensure that leaders can make decisions that are informed by D&I data and insights and provide regular progress reporting to the SLT and Board to maintain a relentless focus on outcomes and progress.

Leaders can make D&I-informed decisions through the systematic collection, analysis, and reporting of workforce metrics at GWMWater. Relevant data including Victorian Public Sector Workforce Profiles, People Matter Survey results and Gender Audit Data is regularly reviewed to identify trends, risks, and improvement opportunities, enabling evidence-based decision-making across workforce planning, recruitment, remuneration, and capability development. Progress against gender equality and broader D&I objectives is reported annually to the Executive Leadership Team and the People and Culture Board Committee, providing transparency, accountability, and oversight. This regular reporting framework supports informed governance, enables timely intervention where required, and maintains a strong and ongoing focus on measurable outcomes and continuous progress.

Section 3.3 Providing other updates on implementation (recommended)

The implementation of this Gender Equality Action Plan has generated important organisational learnings, noting that it was the first GEAP developed following the introduction of statutory requirements under the Act. At that time, because the requirements were new, there was limited internal capability and experience to support effective planning and delivery. This contributed to an overly optimistic assessment of the resources and capacity available to implement the actions within the required timeframes alongside other organisational priorities and business-as-usual activities. Implementation was further impacted by changes in personnel, including at executive and managerial levels within the responsible function, which reduced continuity and institutional knowledge and presented additional challenges to sustained delivery. These factors have been carefully considered and have informed a more mature, realistic, and informed approach to the development and implementation of future Gender Equality Action Plans.

Section 3.4 Describing resourcing allocation (required)

GWMWater's People & Culture Team (total 4.9FTE) were responsible for implementation of the GEAP. Key personnel involved in implementation included the relevant Divisional Manager, Team Leader and People & Culture Officers, supported by Executive Manager Customer & Employee Experience.

GEAP implementation became part of the portfolio of each of these employees, with a focus on their respective responsibility area (whether that be training, recruitment, reporting or otherwise), and monthly meetings were held to track progress against strategies.

Technical and financial resources were also utilised (less significantly) to support data collection and reporting.

The projected resource allocation under GWMWater's first GEAP was unable to be realised and in hindsight was overly ambitious. The organisation experienced resource constraints that affected its capacity to implement the proposed resourcing model. Budget limitations prevented the engagement of the proposed additional full-time fixed-term role, while executives were unable to realistically allocate 0.1 FTE each to support GEAP delivery. In addition, competing business-as-usual priorities meant that People and Culture staff could not reasonably dedicate the proposed 25 per cent of their time to GEAP-related activities.

Strategies in GWMWater's 2026-2030 GEAP have been developed with a more realistic approach to resourcing allocation.

Any other additions or comments (optional)

During the life of the GEAP, we also implemented several initiatives that were not formal strategies under the plan but were considered impactful and worthy of note. These included the introduction of a quarterly lunch for women in traditionally under-represented roles, including operations, to provide opportunities for connection and networking. Given the geographical spread of our workforce and the isolation that can arise from the nature of this work, these gatherings have been particularly meaningful. They have enabled women to support one another by sharing practical solutions for working in the field, as well as advice and experiences.

Over the same period, GWMWater has streamlined its approach to collecting, extracting and reporting data. With each audit, we have improved our processes so that our data is increasingly accurate and meaningful. This has included reviewing and correcting our 2023 data to ensure that comparative results provide an accurate representation of progress.

Responsible personnel have also developed stronger capability in interpreting and analysing data, enabling a clearer understanding of where progress is, or is not, being demonstrated against the indicators. This improved capability has informed the development of the 2026 GEAP, ensuring strategies are aligned with the focus areas identified through audit data analysis.