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| 2026 Progress report guidance |
| For duty holders under the Gender Equality Act 2020 |
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# Overview

## About

This guidance is for organisations that have obligations as duty holders under the [*Gender Equality Act 2020*](https://www.legislation.vic.gov.au/in-force/acts/gender-equality-act-2020/) (the Act). Visit the Commissioner’s website for a [list of duty holders under the Gender Equality Act](https://www.genderequalitycommission.vic.gov.au/list-defined-entities).

The Act requires duty holders to submit a progress report every 2 years. The next progress report is due on 1 May 2026.

Monitoring, measuring and reporting on progress allows both you and the Commissioner to evaluate the success of your gender equality action plan (GEAP) and gender impact assessments (GIA).

This will help you understand whether your actions are achieving positive change towards workplace gender equality.

## Why this work is important

Under the Act, you are required to report on progress to the Commissioner.

Reporting on progress helps your organisation:

* stay on track
* share knowledge and lessons learned
* celebrate progress made towards gender equality

## The pace of progress

GEAPs are 4-year action plans. Strategies and measures may have short, medium and long-term implementation plans.

Progress is not always linear and immediate.

This means your organisation may not yet have seen big numerical shifts in data on the workplace gender equality indicators.

The progress report is an opportunity to explain these challenges. The Commissioner will take this into account when assessing progress reports for compliance with the Act.

## What you need to do

Completing your progress report can take time.

Start collecting the information you need to report on progress as soon as possible.

Ideally, your organisation established a monitoring system during GEAP implementation to collect the information you need.

For example, this might include a GIA reporting system that collects the required information throughout the reporting cycle.

Before submitting your [progress report](https://www.genderequalitycommission.vic.gov.au/reporting-progress), ensure it complies with the [Gender Equality Act](https://www.genderequalitycommission.vic.gov.au/about-gender-equality-act-2020).

Use the checklist at the end of this guidance to check you have included all the required information.

This guidance corresponds with the [2026 progress report template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-Progress-report-template.docx). You will find guidance on:

[**Cover page**](https://www.genderequalitycommission.vic.gov.au/2026-progress-report-guidance/cover-page-and-attestation-head-organisation)

**[Step 1: Reporting on gender impact assessments (GIA)](https://www.genderequalitycommission.vic.gov.au/2026-progress-report-guidance/part-1-reporting-gender-impact-assessments)**

Confirming GIA exemptions

Describing policies, programs and services subjected to GIA

Describing actions taken as a result of a GIA

**[Step 2: Reporting on progress against the indicators](https://www.genderequalitycommission.vic.gov.au/2026-progress-report-guidance/part-2-reporting-progress-against-indicators)**

Completing your progress audit and analysing the data

Describing progress against the indicators

Describing factors contributing to or inhibiting progress

**[Step 3: Reporting on GEAP strategies](https://www.genderequalitycommission.vic.gov.au/2026-progress-report-guidance/part-3-reporting-geap-strategies)**

Explaining incomplete strategies

Describing achievements, challenges and learnings

Providing other updates on implementation

Describing resourcing allocation

**[Step 4: Submission and publication](https://www.genderequalitycommission.vic.gov.au/2026-progress-report-guidance/how-submit-and-publish-your-progress-report)**

For an accessible version of this guidance and/or template, please email [enquiries@genderequalitycommission.vic.gov.au](mailto:enquiries@genderequalitycommission.vic.gov.au)

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| **Helpful resources**   * Explore the [gender impact assessments](https://www.genderequalitycommission.vic.gov.au/gender-impact-assessments) page for more details * Click on [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) to access further information. * Find more information about [GEAPs](https://www.genderequalitycommission.vic.gov.au/gender-equality-action-plans-2021). * Learn more about maintaining [employee privacy](https://www.genderequalitycommission.vic.gov.au/how-do-i-maintain-my-employees-privacy). * Access [leading practice resources](https://www.genderequalitycommission.vic.gov.au/leading-practice-resources) including, research and tools. |

## Requirements under the Act

Progress reports must address:[[1]](#footnote-2)

1. **Gender impact assessments** (GIA): report on the policies, programs and services that were subject to a GIA and the outcomes of each GIA.
2. **Workplace gender equality indicators**: demonstrate your organisation’s progress in relation to the indicators.
3. **Gender equality action plan** (GEAP): report your organisation’s progress in relation to the strategies listed in your GEAP.
4. **Gender equality targets and quotas**: demonstrate your organisation’s progress towards meeting any prescribed gender equality targets or quotas. Currently, there are no prescribed gender equality targets or quotas in place. So, you are not required to report on this in the current round of progress report.[[2]](#footnote-3)

## Privacy and confidentiality

It is important to ensure the privacy and confidentiality of your workforce is maintained throughout the progress report process.

Information provided to the Public Sector Gender Equality Commissioner will be managed in line with relevant privacy laws.

Duty holders (defined entities) are responsible for complying with relevant privacy laws, including the *Privacy and Data Protection Act 2014* (Vic) (PDP Act).

## Key dates

**You must submit your progress report by 1 May 2026 via the Commissioner’s reporting platform.**

**You will submit your GEAP at the same time. Read more in the 2026** [**GEAP guidance**](https://www.genderequalitycommission.vic.gov.au/gender-equality-action-plan-guidance-2026)**.**

The relevant period for this progress reportis:

* 1 July 2023 to 30 June 2025 for all duty holders (except universities).
* 1 April 2023 to 31 March 2025 for universities

Different components of a progress report may have different **reporting****periods** that fall within the **relevant period**.

The relevant period is the time covered by a progress report, as specified in the Act. A reporting period is any specified period within the relevant period where the Commissioner requests particular information.

Reporting periods for each component will be explicit throughout this guidance.

The figures below sets out the relevant period for duty holders and the reporting periods for different obligations.

Figure 1a: Reporting periods within the relevant period – duty holders (except universities)

This image shows a timeline of audit relevant periods and submission dates for all duty holders except universities. 
For the 2025 audit, the relevant period is 1 July 2024 to 30 June 2025. The submission date is 1 December 2025.

Figure 1b: Reporting periods within the relevant period – universities

This image shows a timeline of audit relevant periods and submission dates universities. 
For the 2025 audit, the relevant period for universities is 1 April 2024 to 31 March 2025. The submission date is 1 December 2025.

## Using the 2026 progress report template and guidance

You must use the template provided by the Commissioner. This is a requirement of the Gender Equality Regulations 2020.

You can download the [2026 progress report template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-Progress-report-template.docx) from the right-hand side of this guidance (online).

This guidance will help your organisation complete and submit a progress report.

There are **required** and **recommended** items to include in each section of the progress report. You must include the required items. The recommended items are strongly encouraged.

**Supporting documents will not be accepted. All information must be included in the** template**.**

If you would like to include additional information, you may do this in the ‘Any other additions or comments’ section at the end of the template.

Use the checklist at the end of this guidance to ensure your progress report complies with the Act.

The appendices to this document include [advice for changed or new entities](#_Appendix:_guidance_for).

### Designed version of your progress report

You may create a designed version of your progress report to publish on your website. You do not need to submit this version to the Commissioner.

A designed version can include additional information not required by the Commissioner.

However, you must include all information required by the Commissioner and you must not alter the required content you submitted to the Commissioner (you may fix any spelling or grammatical errors).

### Changes since 2023 progress reports

#### Cover page

The cover page is new in 2026. Most of the cover page is recommended.

The attestation is **required**. Your **head of organisation (CEO or equivalent) must** **attest** that:

* they approve the progress report
* your organisation has completed all relevant gender impact assessments under the *Gender Equality Act 2020*.

If not, they must explain why.

#### Gender impact assessments

The **GIA exemptions section** is new**.** Any organisation with a permitted reason for not reporting on any GIAs must explain this.

**Actions taken** as a result of the GIA and **no actions taken** are **split into separate columns.** This is to improve clarity compared to 2023.

You are now **required to describe how intersectionality was considered,** or why it was not considered. In 2023, this was recommended only. This reflects that the Act requires that intersectionality is considered where practicable when undertaking GIAs. If you haven’t taken intersectionality into account in the GIAs you have completed to date (or haven’t recorded this) then you can explain this in the [progress report template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-Progress-report-template.docx). This will not impact your compliance on this aspect of the report in 2026. For GIAs completed from 1 July 2025 onwards, you should ensure information is captured about how intersectionality was considered (or why this was not practicable) and then report this in future progress reports.

It is recommended that you **explain the gendered impacts** the GIA uncovered and **describe any actions taken designed to address intersectional inequalities** (that is, where gender inequality is compounded by other forms of discrimination).

#### Progress against the indicators

The **numerical data** from your audit and the **description of your progress** (or not) **are split** out for clarity.

You are now **required to discuss the factors** affecting your progress (in 2023, this was recommended only).

#### GEAP strategies

Reporting on the implementation of your strategies has been significantly streamlined for 2026.

You must now **list any relevant strategies against each indicator,** and you can **provide information about delayed or cancelled strategies** in a single question.

This has replaced the line-item updates required in 2023.

In addition to telling the Commissioner about how your GEAP is resourced, **there are new recommended GEAP items** that let you describe how your GEAP implementation went so you are reflecting and improving on your first GEAP, as you start your second.

### Cover page and attestation by head of organisation

#### Cover page

The cover page provides important context. It will help us assess your progress report.

This section includes:

**Organisation name (required)**

Insert your organisation’s full legal name (that is, not an abbreviation or shorthand) and trading name (the name you are most well-known by in your industry or publicly).

**Total number of employees (recommended)**

Insert the total number of employees and their full-time equivalent workload (FTE) in your organisation on 30 June 2025.

**Response rate to employee experience survey (recommended)**

Insert the People matter survey (or equivalent) response rate for your organisation. The response rate is the percentage of your total workforce who completed the survey.

The Victorian Public Sector Commission (or alternative survey provider) should supply this with your survey results. This must be the survey that you used for your 2025 workplace gender audit.

**Contextual information (recommended)**

Describe anything that affected your progress towards gender equality and your ability to make reasonable and material progress on the workplace gender equality indicators in the Act.

You may wish to discuss the factors in section 16(2) of the Act. These are the factors that the Commissioner considers when determining whether a duty holder has made reasonable and material progress.

The ‘Factors affecting progress’ webpage has further information.

You will also have an opportunity to discuss these in the ‘workplace gender equality indicators’ section of your progress report. If applicable, you may copy and paste some or all of the same information in both sections of the progress report.

**Location (recommended)**

Insert either metropolitan, regional or rural. Please use your organisation’s primary location or your central office. If you insert ‘other’, please explain.

#### Attestation by head of organisation (required)

Your head of organisation (CEO or equivalent) mustcomplete this section to:

* show they have approved your progress report, and
* confirm that your organisation has completed all relevant gender impact assessments.

Your CEO can also use this space to provide further comments for the Commissioner to consider when assessing your progress report. Your CEO will be your Secretary (for Victorian government departments), Vice-Chancellor (for universities) or equivalent.

# Step 1: Reporting on gender impact assessments (GIA)

This step includes required and recommended action items.

You are required to report on gender impact assessments (GIAs) that you undertook during the reporting period.

The Act requires organisations to conduct a GIA when developing or reviewing any policy, program or service with a **direct and significant impact on the public**.

**Do not report on any GIAs conducted on internal workforce policies or programs that did not have a direct and significant impact on the public** (for example, a flexible work policy or staff training program).

Only report on GIAs in this progress report if:

* it is clear how the policy, program or service will be, or has been, changed because of the GIA, **or**
* no change will be made (and this is clear).

Clear changes, or lack of changes, due to a GIA can include:

* all GIA recommendations were approved for action by the person responsible for making these decisions (scenario 1, below)
* some GIA recommendations were approved for action by the person responsible for making these decisions (scenario 2, below)
* all GIA recommendations were rejected by the person responsible for making these decisions (scenario 3, below)

If decisions have not been made yet, do not report on the GIA in this reporting period. Instead, report on it in the next reporting period, once the decisions have been made (scenario 4, below).

The table below sets out some example scenarios.

| Scenario | Description | How to report |
| --- | --- | --- |
| 1 | A GIA was undertaken on a water corporation public policy during the reporting period.  Several recommendations were made.  All were approved for implementation by the CEO. | Report on this GIA.  Select ‘yes’ in column F.  Describe the actions in column G. |
| 2 | A GIA was undertaken on a Victorian Government department’s public program.  Several recommendations were made.  Some recommendations were approved, and some were rejected by the relevant Deputy Secretary. | Report on this GIA.  Select ‘yes’ in column F.  Describe the approved actions in column G. |
| 3 | A GIA was undertaken on a public health service’s public program.  Several recommendations were made.  No recommendations will be implemented due to resourcing decisions by senior leaders. | Report on this GIA.  Select ‘no’ in column F.  Describe why no actions were taken in column H. |
| 4 | A GIA was undertaken on a local government policy impacting the public.  Several recommendations were made.  No decision has been reached yet as to which recommendations will be approved. This is because Council has not yet considered the proposal. | Do not report on this GIA.  If the GIA is finalised in the next reporting period, report on this GIA in the next progress report. |

In this step, you will find:

* 1.1 Confirming your GIA exemptions (**required**)
* 1.2 Describing policies, programs or services subject to a GIA (**required and recommended items**)
* 1.3 Describing actions taken as a result of a GIA (**required and recommended items**)

## 1.1 Confirming GIA exemptions (required)

### Summary

* If applicable, select the permitted reason why you have not listed any policy, program or service that was subject to a GIA.
* You can select more than one reason.
* Explain how the reason(s) apply to you.
* Select ‘None of these apply’ and write ‘NA’ under explanation if the exemptions don’t apply.

Section 19(4) of the Act sets out the permitted reasons why you might not be able to identify or report on policies, programs and services subject to a GIA.

In some cases, you may not have been required to undertake any GIAs in the reporting period.

If you have a permitted reason for not reporting on any GIAs you must report this so the Commissioner knows you have complied with the Act.

Permitted reasons include at least one of the following:

* doing so would make the progress report an exempt document within the meaning of the *Freedom of Information Act 1982*
* doing so would result in a disclosure prohibited by a different Act
* doing so would reveal confidential information
* the entity had no policies, programs or services that met the Act’s [threshold for a GIA](https://www.genderequalitycommission.vic.gov.au/is-gender-impact-assessment-required/assess-impact).

#### Advice for demonstrating compliance

You will receive an outcome of [‘compliance not demonstrated’](https://www.genderequalitycommission.vic.gov.au/compliance-gender-equality-act-2020) if you:

* do not report on policies, programs and services that were subject to a GIA, **and**
* do not select the permitted reason and explain the reason further.

#### Privacy obligations

You have obligations under relevant privacy legislation that you must comply with. You must not report on a policy, program or service if it would disclose confidential or prohibited information.

In addition to the permitted reasons, this may also include information that is considered Cabinet in Confidence (for Victorian Public Service departments).

For further advice, contact the [Office of the Victorian Infor](https://ovic.vic.gov.au/)mation Commissioner (OVIC) and consider [exemptions under the Freedom of Information Act](https://ovic.vic.gov.au/freedom-of-information/resources-for-agencies/practice-notes/#foi-exemptions).

You may also wish to seek legal advice.

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

### Summary

* Identify each policy, program or service that was the subject of a GIA during the reporting period.
* Only include GIAs done on policies, programs or services that have a direct and significant impact on the public.
* Only include GIAs that have been completed, where final decisions have been made about whether to change the policy, program or service.
* Exclude any policies, programs or services that would disclose confidential information.
* Add more rows as needed.
* List one policy, program or service per row.
* You must fill in all required elements to be compliant with your obligations under the Act.

### Instructions for completing the template

| Column | Description |
| --- | --- |
| Reference number (‘ref #’) (pre-filled) | This is prefilled in the template.  You will need the reference number to provide further information against each policy, program or service in the next table under (G) (1.3 Describing actions taken as a result of GIA). |
| (A) Title **(required)** | Insert the name of the relevant policy, program or service that was the subject of the GIA. |
| (B) Subject **(required)** | Select from the drop-down if the GIA was done on a policy, program or service. |
| (C) Description of the policy, program or service **(required)** | Provide a brief and clear description of the policy, program or service.  You should provide enough detail here for the Commissioner to understand the context of the policy, program or service. |
| (D) Status **(required)** | Select from the drop-down menu to indicate if the GIA was done on a policy, program or service that was **new** or **up for review.** |
| (E) Description of gendered impacts **(recommended)** | Describe the gendered impacts you identified when completing a GIA on this policy, program or service.  Gendered impacts are the areas where a GIA revealed that people of different genders might be impacted in different ways. These insights may have shown you where and how the policy, program or service needed to be changed.  Completing this column will assist you to complete section 1.3 describe the actions taken as a result of the GIA (under (G)).  Any actions taken as a result of your GIA should link directly to the gendered impacts you describe here. |

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

### Summary

* Describe the actions taken as a result of undertaking a GIA.
* Use the reference number (‘ref #’) from table 1 to link your GIA description to the relevant policy, program or service.
* Add more rows as needed.

### Instructions for completing the template

| Column | Description |
| --- | --- |
| Reference number (ref #) | This is prefilled in the template. The reference number refers to the listed policy, program or service in the previous table under (A) of 1.2 Describing policies, programs and services subject to GIA. |
| (F) Were actions taken as a result of the GIA? **(required)** | Select ‘yes’ or ‘no’ from the drop-down to indicate whether you took action (or not) as a result of the GIA.  Do this for every policy, program or service you listed.  If actions were taken, select ‘yes’. There may be cases where several recommendations were made but not all actions were approved. In this case you should still select ‘yes’ if some actions were approved.  If actions weren’t taken:   * select ‘no’ * write N/A in the next column (under (G)) * explain why no actions were taken in the column after that (under (H)) |
| (G) Describe the actions taken as a result of the GIA in order to:  meet the needs of people of different genders  promote gender equality  address gender inequality.  (**required**) | Describe how the actions taken as a result of the GIA:   * Met the needs of persons of different genders; and/or * Addressed gender inequality; and/or * Promoted gender equality   Do this for every policy, program or service you listed.  Report only on completed GIAs.  Explain how the actions to develop or change your policy, program or service will achieve better outcomes for people of different genders.  If you are unsure how the actions relate to better outcomes for people of different genders, refer to the gender equality principles (section 6 of the Act), research or evidence to better understand how the actions drive progress towards gender equality.  Only report on completed GIAs in your progress report. This means that if no final decision has been made about whether to change the policy, program or service, the GIA should be included in the next progress report.  **Advice for demonstrating compliance**  Make sure you include information on how your actions met the needs of people of different genders, addressed gender inequality or promoted gender equality.  If it is not clear that the actions you describe help meet the above goals, you may receive an outcome of ‘compliance not demonstrated’. |
| (H) If you did not take action as a result of the GIA, explain why **(required)** | Describe the reason(s) why no action was taken on your policy, program or service as a result of the GIA.  If actions were taken:   * write N/A in this column * move to the next column (under (I)). |
| (I) Describe how and why intersectionality was considered (or not) **(required)** | Describe how you considered intersectionality.  If you did not consider intersectionality, explain why.  Do this for every policy, program or service you listed.  When undertaking a GIA, the Act requires duty holders to take into account, where practicable, how gender inequality can be compounded by disadvantage or discrimination that groups of people may experience. This is called [intersectional gender equality](https://www.genderequalitycommission.vic.gov.au/applying-intersectionality).  To do an intersectional analysis, you should consider the impact of your policies, programs or services on people who experience compounding forms of discrimination on the basis of gender **and** other factors (for example, being a woman with disability, being a First Nations woman, or being a gender diverse person from a culturally or racially marginalised background). Factors can include:   * being a First Nations person * age * disability * ethnicity * gender identity * race * religion, and/or * sexual orientation.   Compounded gender inequality can be considered across more than one stage of a GIA. You might consider:   * consulting with stakeholders or community members who experience compounded gender inequality * asking experts about compounded gender inequality * using data in your GIA that reveals forms of compounded gender inequality * doing research about compounded gender inequality to inform your GIA.   For many organisations, taking intersectional gender equality into account is a new practice. Documenting and reporting on any intersectional analysis here will support capability-building across all duty holders.  If you were unable to consider compounded gender inequality when doing the GIA, you must explain why this was not practicable in this section. |
| (J) Describe any actions taken specifically designed to address intersectional inequalities (compounded gender inequalities) (**recommended**) | Describe any actions taken to address issues you identified when considering compounded gender inequality.  You can cross-reference the actions you already described, if relevant (under (G)). |

# Step 2: Reporting on progress against the indicators

This step includes required and recommended action items.

This section supports you to report on your progress against the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) (indicators) in the Act.

This allows the Commissioner to assess your compliance with the requirement to make ‘reasonable and material progress’ on the indicators.

It will also help you to determine if the strategies in your GEAP have translated into measurable change. This information will assist you to further develop and tailor your GEAP strategies.

In this step, you will find:

* Completing your workplace gender audit and analysing the data (**required**)
* 2.1 Describing progress against the workplace gender equality indicators (**required and recommended items**)
* 2.2 Describing factors contributing to or inhibiting progress (**required**)

### Completing your workplace gender audit and analysing the data (required)

Before completing the indicators section of the template, you must undertake a workplace gender audit (audit).

You must collate and analyse your audit data to demonstrate your progress in relation to the indicators.

Do this by collecting and submitting updated audit data to the Commissioner and comparing this with your last audit.

See the [2025 Workplace gender audit guidance](https://www.genderequalitycommission.vic.gov.au/audit-guidance-2025) for further guidance on:

* collecting the required and recommended information
* submitting your audit.

You will then need to [analyse your progress audit data](https://www.genderequalitycommission.vic.gov.au/audit-guidance-2025/analysing-your-audit-results) and compare the results of your 2025 audit data with your 2023 audit data.

You can also discuss the results of your 2021 audit data (optional) in 2.1 and 2.2.

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

### Summary

* Refer to your progress data, ideally using the recommended performance measures for each indicator as a minimum (see details below).
* Include comparative quantitative data from your 2023 and 2025 audits for each indicator (option to include 2021 data).
* Include at least one data point per indicator.

The workplace gender equality indicators (indicators) are:

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

You can read more about the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators) on the Commissioner’s website.

### Instructions for completing the template

| Column | Description |
| --- | --- |
| (K) Indicator | This is prefilled in the template. It refers to the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators). Do not change this column. |
| (L) Progress data (**required**) | Refer to your progress data, ideally using the performance measures as a minimum.  Include comparative data from your 2023 and 2025 audits (**required**).  Include at least one data point per indicator (**required**).  You must include comparative data from your 2023 and 2025 audits to demonstrate your progress against the indicators. You can also compare your 2023 and 2025 audit data with your 2021 audit data if you wish.  **Using the performance measures (expected)**  Your workplace gender audit includes data for each indicator.  The Commissioner has identified measures that represent the minimum information she will use to assess your progress report for compliance. These measures include both workforce data and employee experience data from your audit. You are strongly encouraged to include data against the performance measures for each indicator.  If you do not provide data against the performance measures, the Commissioner will determine if the alternative data you provide is appropriate and adequate. Refer to the [data analysis guide](https://www.genderequalitycommission.vic.gov.au/analysing-your-workplace-gender-audit-results) for further guidance.  Your organisation may not have data against all the performance measures from 2023 and 2025. This will not impact your compliance.  If you do not currently collect data against one or more of the performance measures, consider a GEAP strategy to collect this data in future.  See [list of the performance measures](https://www.genderequalitycommission.vic.gov.au/performance-measures), below, for the minimum data that the Commissioner expects to see against each indicator.  **Using alternative measures (not recommended)**  If you choose to provide different progress data in column L instead of progress data using the performance measures, you must still include comparative quantitative data from your 2023 and 2025 audits to demonstrate compliance.  You must compare the same data points from your 2023 audit and your 2025 audit. This will help you determine if progress has (or has not) been made, which you will need to discuss in column O.  **Advice for demonstrating compliance**  You must include sufficient data from your 2023 and 2025 audits to demonstrate progress against each indicator. This means including both:   * comparative quantitative data from your 2023 and 2025 audits * where possible, at least two measures from your 2023 and 2025 audits.[[3]](#footnote-4)   If you do not include sufficient audit data, you may not be able to demonstrate progress (or lack of progress) during the relevant period. This could result in an outcome of ‘compliance not demonstrated’ for this requirement. |
| (M) Additional progress data (**recommended**) | Include progress data in addition to the performance measures. This may include:   * particular areas where progress has been made on the indicator * areas where more attention is needed * giving a more complete picture of your progress on the indicator * intersectional data in relation to progress on the indicator. |
| (N) Has progress been made? (**required**) | Select yes or no from the drop-down to indicate whether you believe your organisation has made numerical progress against each indicator.  If you have not made numerical progress, you may still be able to achieve compliance if you provide further information in **2.2.** This includes information about the factors that limited your progress, or the strategies implemented to drive progress in future. The Commissioner will take this information into account and consider whether it is reasonable when assessing compliance.  **Stable progress**  If your quantitative data on an indicator has remained stable between your 2023 and 2025 audit:   * select no * see further guidance on how to interpret stable data under ‘How to interpret stable data’. |
| (O) Explain how the data does (or does not) demonstrate progress (**required**) | Explain why changes in your data provided in the progress data column(O) do or do not represent progress against each indicator.  Refer to the quantitative changes in the data you provided from your 2023 and 2025 audit. You can also refer to data from your 2021 audit if you wish.  **Stable progress**  Your quantitative data on an indicator may have remained stable between your 2023 and 2025 audit. If this is the case, consider:   * If you had already achieved gender equality on the indicator in 2023 and therefore did not need to make any further progress, then note this. * If you have not achieved gender equality on the indicator, acknowledge that there is still work to do.   Further guidance on how to interpret stable data can be found under ‘How to interpret stable data’.  **No quantitative progress**  If you have not made numerical progress for reasonable reasons, this will be taken into account when your progress report is being assessed for compliance. You may still achieve compliance if you have not made numerical progress.  You can identify and discuss these reasons in 2.2 Describing factors contributing to or inhibiting progress. You can also identify and discuss your GEAP strategies that contributed to the progress (or lack of progress) against each indicator. |

### How to interpret stable data (further guidance)

This section relates to **2.1** and **2.2** of the [progress reporting template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-Progress-report-template.docx).

If your data has remained stable between your 2023 and 2025 audits, this could mean that:

* You had achieved gender equality on this indicator in 2023
* There is still work to do, and you are not making numerical progress. This does not mean that you cannot achieve compliance on this indicator.

The example scenarios below explain these two situations for indicator 1: gender composition of all levels of the workforce.

### Example scenarios

| Scenario | Action |
| --- | --- |
| **Gender equality not achieved.**  Your data on this indicator has remained stable between your 2023 and 2025 audit.  However, the gender composition throughout your organisation is **heavily skewed** towards one gender or another. | In **2.1**:   * select ‘no’ in column N. You have not made progress, and you have not achieved gender equality. * In column O, explain why your data shows that you have not made progress and that you have not achieved gender equality. Acknowledge that there is work to be done.   In **2.2**, you can provide further context about:   * any factors that limited your progress on this indicator, and * any GEAP strategies designed to make progress on this indicator.   If the Commissioner is satisfied with the information you provide in 2.2, you will be marked compliant on this indicator. |
| **Gender equality achieved.**  Your data on this indicator has remained stable between your 2023 and 2025 audit.  The gender composition throughout your organisation is **mostly balanced**. | In **2.1:**   * Select ‘no’ in column N. You have not made progress. * In column O, explain why your data shows that you have not made progress (for example, because there was no progress to be made) and therefore why your stable data is not a problem.   In **2.2**, you can provide further context about:   * any GEAP strategies designed to maintain gender equality on this indicator. |

## List of performance measures

You are strongly encouraged to provide progress data against the following [performance measures](https://www.genderequalitycommission.vic.gov.au/performance-measures) for each indicator.

The performance measures set the minimum expectations for the data you should consider against each indicator to assess your progress. They have been chosen because:

* They are the minimum data points to understand gender inequality in your organisation. They help you understand where to start.
* They help you navigate all the different data that you collect by focusing on the most important data.
* They are simple and straightforward data points that are easy to talk about with your stakeholders.
* You already collect data against the measures as part of your audit. Therefore, there is no extra work to provide this data.

Using the performance measures in your GEAP and your progress report will support you and your stakeholders to see connections between these obligations. It will also help you to drive and assess progress.

You do not **have to** use the performance measures to select data to include in your GEAP. You can choose to include different data from your audit. However, the measures are practical and represent benchmark data. You can select your own data in addition to providing data against the performance measures if you are more progressed in your gender equality journey.

There are two types of measures:

* **Critical measures** are minimum measures. These are considered the minimum data to understand gender inequality in your organisation. While you may achieve compliance without providing data against them, the Commissioner wants you to use these measures.
* **Supplementary measures** are recommended for duty holders with capacity for further analysis. Providing data against the supplementary measures will help you (and the Commissioner) to better understand gender inequality issues in your organisation.

To view the performance measures in full, visit [Performance Measures](https://www.genderequalitycommission.vic.gov.au/performance-measures)

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

### Summary

* Select any factors listed in section 16(2) of the Act that may have affected your progress in relation to the indicators (required).
* Discuss those factors (required).
* Select and discuss for each indicator.
* Select more than one, if applicable.
* Select ‘none’ if none apply.
* List relevant strategies against each indicator.

### Instructions for completing the template

| Column | Description |
| --- | --- |
| (P) Indicator (**pre-filled**) | This is prefilled in the template. It refers to the [workplace gender equality indicators](https://www.genderequalitycommission.vic.gov.au/workplace-gender-equality-indicators). Do not change this column(P). |
| (Q) Did any of the factors listed below limit or contribute to your progress? (**required**) | Select any of the factors (a to g) that may have affected your organisation’s ability to make progress against each indicator. Select g if your organisation has made genuine attempts at progress.  Select more than one factor, if applicable.  Select ‘none’ if none apply.  The factors are:   1. the size of the organisation, including the number of employees 2. the nature and circumstances of the organisation, including any barriers to making progress 3. requirements that apply to the organisation under any other Act, including an Act of the Commonwealth 4. the organisation’s resources 5. the organisation’s operational priorities and competing operational obligations 6. the practicability and cost to the organisation of making progress; and 7. genuine attempts made by the organisation to make progress.   The Commissioner will take these factors into account when determining whether you have made reasonable and material progress against the indicators. |
| (R) Explain how any factor(s) limited or contributed to your progress (**required**) | Explain howthe factor(s) that you identified show that you have made reasonable or material progress against each indicator. Even if you did not make quantitative progress, the factors might show that this is reasonable.  If you selected multiple factors, make sure you refer to all of them in your explanation.  If you selected ‘none’ to factors impacting your progress (or lack of progress), write N/A in this column (R). |
| (S) List the strategies implemented that contributed to or aligned with the indicator (**required**) | List the GEAP strategies that supported, or were designed to support, progress against each indicator.  Completing this section forms part of your organisation’s required reporting on the implementation of your [GEAP strategies and measures](https://www.genderequalitycommission.vic.gov.au/gender-equality-action-plan-guidance-2026/step-6-developing-your-strategies-and-measures).  You must list the relevant strategies against each indicator, whether or not you have made progress on that indicator. |

# Step 3: Reporting on GEAP strategies

This step includes required and recommended action items.

This step shows you how to report on your progress in implementing the strategies in your gender equality action plan (GEAP).

In this step, you will find:

* 3.1 Explaining incomplete strategies (if any) (**required**)
* 3.2 Describing achievements, challenges and learnings (**recommended**)
* 3.3 Providing other updates on implementation (**recommended**)
* 3.4 Describing resourcing allocation (**required)**

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

### Summary

* Explain if you had strategies in your gender equality action plan (GEAP) that were not completed (**required**).
* Explain why they were not completed (**required**).

### Detail

Sometimes activities do not go as planned. Strategies may have been delayed or cancelled for many reasons.

For **3.1**, briefly summarise strategies in your GEAP that were not completed and explain why.

You can discuss these in general terms.

You do not need to list every strategy that was not completed. However, if you have not completed multiple strategies, please provide a total number.

## 3.2 Describing achievements, challenges and learnings (recommended)

### Summary

* Summarise any **noteworthy strategies** that positively contributed to gender equality (**recommended**).
* Discuss any **success factors** (in addition to the data you provided in step 2) that demonstrated significant progress. This might include commentary about goals you set yourself at the start of the GEAP, indicators you selected to monitor, or evaluation findings (**recommended**).
* Discuss any **challenges** in implementing your strategies. This could include things that did not work well or that did not go as planned (**recommended**).
* Summarise your **lessons** learnt from implementing your strategies. You could explain how this has changed your approach to gender equality work going forward (**recommended**).

### Detail

In the [2026 GEAP template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-GEAP-template.docx), a similar question on your achievements, challenges and learnings from your previous GEAP is included.

You can copy your answer from the [2026 progress report template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-Progress-report-template.docx) into your 2026 GEAP. Or, you can reference your answer in your GEAP, such as ‘Refer to 2026 progress report section 3.2’.

## 3.3 Providing other updates on implementation (recommended)

### Summary

* Provide any other updates on your GEAP implementation (**recommended**).

### Detail

Implementing a GEAP is a complex and long-term project. There may be specific things that you want to tell the Commissioner and others reading your progress report about your GEAP implementation. Please include these updates here.

## 3.4 Describing resourcing allocation (required)

### Summary

* Describe the resourcing allocated to implementing the strategies in your first GEAP (**required**).

### Detail

Reflect on the resourcing required and allocated to implementing your first GEAP.

Consider:

* How many staff members/FTE were allocated to implementing the strategies?
* Who implemented the strategies in your GEAP? What roles they performed and at what level?
* Was financial, technological, physical and/or time resourcing adequate?
* If not, how will your organisation address this in your next GEAP?

Note that you are required under the Act to allocate adequate resourcing to implementing your GEAP.

* Any other assessment.

# Step 4: How to submit and publish your progress report

## Submission

Your 2026 progress report is due to the Commissioner on **1 May 2026,** unless you have an approved extension.

You may submit your progress report earlier.

Submit your progress report using the [2026 progress report template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-Progress-report-template.docx) via the [reporting platform](https://www.genderequalitycommission.vic.gov.au/reporting-platform-help).

You must use the template.[[4]](#footnote-5)

Supporting documents will not be accepted.

Any requests for extensions must be sent to the Commissioner before the submission date. For further information on extension requests, visit the [Commissioner’s extension request page.](https://www.genderequalitycommission.vic.gov.au/request-extension-submit-obligation)

If you receive an extension for your organisation this will not change your future deadlines under the [*Gender Equality Act 2020*](https://www.legislation.vic.gov.au/as-made/acts/gender-equality-act-2020).

## Reporting platform

Your reporting process owner and platform users have access to the reporting platform.

To request new or additional reporting platform users, fill this [Nomination of *Gender Equality Act* reporting platform users](https://forms.office.com/pages/responsepage.aspx?id=H2DgwKwPnESciKEExOufKMnWNqWgMRhCvKZpsLWfS81UQ1JRNjBGSlQxNjQ2QlBaWDJYTVIzTVU1TCQlQCN0PWcu&route=shorturl) form. Note that only reporting process owners can fill in this form.

If you have questions about how to use this form contact the Commissioner’s team [enquiries@genderequalitycommission.vic.gov.au](mailto:enquiries@genderequalitycommission.vic.gov.au)

## Publishing your progress report on your website

You must publish your progress report on your website.

You may:

* publish as soon as reasonably practicable after submission (i.e. before the Commissioner’s compliance assessment)
* wait to publish after the Commissioner has notified you of the compliance outcome of your progress report.

All progress reports must be published within **3 months** of notification of compliance outcomes.

The Commissioner will publish progress reports on the [Insights Portal](https://insights.genderequalitycommission.vic.gov.au/application-dashboard).

Additional information can be included in the last section of the template and can include:

* a more detailed analysis of your data, or infographics
* additional details about GIAs undertaken
* further summary information.

Appendix: guidance for changed or new entities

**My organisation has become a new entity recently and has not submitted a GEAP. Are we required to submit a progress report?**

If your new organisation has not previously submitted a GEAP, you are not required to submit a progress report. Your next obligation will be to submit a GEAP in 2026. If you are unsure, please email [enquiries@genderequalitycommission.vic.gov.au](mailto:enquiries@genderequalitycommission.vic.gov.au).

**My organisation has experienced a significant structural change. How do we report on progress?**

Your organisation may have experienced a significant change, such as:

* merging with another organisation
* splitting into multiple new organisations
* changing its name.

In some cases, your organisation, or part of your organisation, may have completed a GEAP prior to this change.

After notifying the Commissioner of your significant organisational change, your organisation would have received a letter from the Commissioner informing you about whether you are required to submit a progress report.

If you are unsure whether your new organisation is required to submit a progress report, please contact the Commissioner’s team at [enquiries@genderequalitycommisison.vic.gov.au](mailto:enquiries@genderequalitycommisison.vic.gov.au).

The Commissioner acknowledges that structural changes in your organisation may impact the way in which you report on progress. If you are unsure how to complete your progress report considering these changes, please contact the Commissioner’s team at [enquiries@genderequalitycommisison.vic.gov.au](mailto:enquiries@genderequalitycommisison.vic.gov.au).

# Progress report checklist

This checklist is for your use only. Use it to ensure you have completed what you are required to do. Do not submit this to the Commissioner.

## General

|  |  |
| --- | --- |
| ****Did you include the following components required under the Gender Equality Act 2020 and Gender Equality Regulations 2020?**** | ****Mark ‘yes’**** |
| The report uses the 2026 progress report template. |  |
| Your head of organisation (CEO or equivalent) has completed the attestation. |  |
| The report does not contain any personal or potentially identifying information. |  |

## For gender impact assessments (GIAs)

|  |  |
| --- | --- |
| ****Did you include the following components required under the Gender Equality Act 2020 and Gender Equality Regulations 2020?**** | ****Mark ‘yes’**** |
| You have confirmed whether GIA exemptions apply (or not) and why. |  |
| The report includes details of the policies, programs and services subject to a GIA. |  |
| The report includes only GIAs that were completed:  during the reporting period **and**  on policies, programs or services that have a direct and significant impact on the public. |  |
| You have described actions taken as a result of each GIA in relation to how they:  met the needs of people of different genders  promoted gender equality   * addressed gender inequality.   Or if no actions were taken, you explained why. |  |
| The report explains how intersectionality was considered, or why it was not. |  |

## For workplace gender equality indicators (indicators)

|  |  |
| --- | --- |
| ****Did you include the following components required under the Gender Equality Act 2020 and Gender Equality Regulations 2020?**** | ****Mark ‘yes’**** |
| The report includes progress data for all indicators, including:   * at least one data point in relation to each indicator (ideally using the performance measures as a minimum) **and** * comparative workplace audit data from 2023 and 2025.   And the report explains whether progress has been made for all indicators. |  |
| The report identifies and explains any factors limiting progress. |  |

## For GEAP strategies

|  |  |
| --- | --- |
| ****Did you include the following components required under the Gender Equality Act 2020 and Gender Equality Regulations 2020?**** | ****Mark ‘yes’**** |
| GEAP strategies are listed against relevant indicators. |  |
| The report explains any incomplete GEAP strategies and why. |  |

1. As outlined in section 19 of the Act. [↑](#footnote-ref-2)
2. When developing your progress report, duty holders must think about legal obligations they may have under Commonwealth and State legislation and industrial instruments, including but not limited to: the [*Fair Work Act 2009*](https://www.legislation.gov.au/Series/C2022C00341) (Cth) and other Commonwealth workplace relations legislation; the [*Equal Opportunity Act 2010*](https://www.legislation.vic.gov.au/in-force/acts/equal-opportunity-act-2010/) (Vic) and the [*Charter of Human Rights and Responsibilities Act 2006*](https://www.legislation.vic.gov.au/in-force/acts/charter-human-rights-and-responsibilities-act-2006/) (Vic); the [S*ex Discrimination Act 1984* (Cth)](https://www.legislation.gov.au/Series/C2004A02868) and the [*Workplace Gender Equality Act 2012*](https://www.legislation.gov.au/Series/C2004A03332) (Cth); enterprise agreements, workplace determinations and modern awards. [↑](#footnote-ref-3)
3. Except for Indicator 2: Gender composition of the governing body. You may use a single data point for this indicator (tell us what proportion of your governing body that were women, men or people of self-described gender in your 2023 and 2025 audits). [↑](#footnote-ref-4)
4. You must use the [2026 progress report template](https://www.genderequalitycommission.vic.gov.au/sites/default/files/2025-04/2026-Progress-report-template.docx) as prescribed in the Gender Equality Regulations 2020. Please refer to guidance on the [regulations](#_*_The_proposed) for further information. [↑](#footnote-ref-5)