

30 January 2013

The Hon Julie Collins MP  
The Minister for the Status of Women  
c/o Department of Families, Housing, Community Services and Indigenous Affairs  
PO Box 7576  
Canberra Business Centre ACT 2610

Via email: [women@fahcsia.gov.au](mailto:women@fahcsia.gov.au)

Dear Minister

RMIT University is a global university of technology and design that delivers education and training across the full breadth of tertiary delivery, both in Australia and internationally. The University is committed to providing a supporting and flexible workplace for all our staff, and we are proud to have been consistently recognised as an Employer of Choice for Women.<sup>1</sup> We welcome the opportunity to comment on the reporting arrangements for the *Workplace Gender Equality Act 2012*.

RMIT understands that the aim of the new Gender Equality Indicators (GEIs) and its reporting framework is to better support gender equality in the workplace assessments and to simplify reporting arrangements.<sup>2</sup> We understand that information sought will be focused on measurable outcomes (to highlight the current “state of play”) and on process indicators, that indicate conditions, practices or policies. We also note that the Act requires that minimum standards be set. RMIT would value opportunities to drive further improvements to our gender equality approaches, and strongly supports a more streamlined, outcomes-focused approach to reporting. A high reporting burden can adversely affect competitiveness and mean that organisations deploy resources to measure and report on gender equality, rather than create change. Streamlined reporting is also consistent with governments’ and business policies to work together to free the business environment from unnecessary, changing and costly regulation.<sup>3</sup> In this context, we broadly support the intent of the new arrangements.

However, RMIT sees a risk that the new arrangements—particularly the process indicators—could increase reporting burden, not align with other reporting requirements, or go beyond what is required to inform gender equality decisions. The framework should recognise that universities already have high reporting costs and strong gender equality policies and support organisations to have flexibility in the development and implementation of their approaches to gender equality. Specifically, a minimum critical set of indicators that are outcome-focused should be developed and implemented through arrangements that are efficient and effective, underpinned by further consultation.

We provide further comments and context below. Where possible we have linked our comments to select questions from the consultation paper.

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<sup>1</sup>RMIT has been recognised by the Equal Opportunity for Women in the Workplace Agency (EOWA) over nine years - in 2001 to 2003, and from 2007 to 2012.

<sup>2</sup>Commonwealth, *Workplace Gender Equality Act 2012*, Consultation on reporting matters, January 2013, p 1.

<sup>3</sup> As expressed through the **National Regulatory and Competition Reform Compact**, which was signed by First Ministers, ALGA and representatives from key business groups at the Prime Minister’s Business Advisory Forum on 6 December 2012, see eg <http://www.coag.gov.au/node/486>, accessed 22 January 2013.

## Impact on Universities

12. *Are there any outcomes or indicators that should or should not be included for particular industries?*

Higher education providers are required by the *Higher Education Support Act 2003 (HESA)* to provide a variety of information to Government agencies. This is in addition to the many other types of statutory and corporate reporting that attach to being a large Australian organisation. Information requested includes a comprehensive “Higher Education Staff Data Collection”, encompassing workforce profile, and a variety of other reports linked to our strategies to achieve public policies. Similarly, universities are also asked to provide a variety of reports to other agencies, including annual reports to State Parliaments on our activities, such as information on our workforce.<sup>4</sup> Both the high level of university reporting burden and the university staff data collection requirements themselves have been under review through the Commonwealth Department of Innovation, Industry, Science, Resources and Tertiary Education (DIISRTE),<sup>5</sup> but the outcomes have not yet been published.

While we understand that the Gender Workplace Equality Agency has a particular and important purview, RMIT believes that there is a risk that new arrangements could duplicate other reporting requirements, or be formed without reference to other collections. This could result in missed opportunities to align reporting frameworks between agencies. The review of university reporting burden could also determine new principles for university reporting requirements. For these reasons we strongly urge the agency to discuss reporting requirements with DIISRTE.

## Flexibility and effectiveness - outcomes-focused reporting

3. & 4. *What are the priority measurable outcomes or indicators for each objective?*

5. & 6. *What information will be most useful?*

RMIT supports the proposed outcomes-focused approach to the reporting framework. However, given gender equality policies and practices themselves are designed to create more flexible workplace practices, there is a risk that an overly-prescriptive approach could constrain organisations. This could be a particular issue in relation to the requirements linked to the GEI “Consultation with employees on issues concerning gender equality in the workplace.” For example, as a university established under legislation with a governing Council, RMIT has very specific processes and procedures for major policy changes and staff consultation. Any process indicator for this outcome should not set specific consultation processes to ensure that organisations are able to engage with their staff in the ways that best suit the organisation.

Similarly, where institutions are asked to outline their “underpinning processes and strategies”<sup>6</sup> in detail, reporting can become burdensome, particularly where reports are based on narrative information or quantitative evidence which is costly to report and analyse. This type of information will also not always provide meaningful information that can be easily translated into something that could have application across other types of organisations. Nor will information always remain relevant when changes occur in the business environment.

For this reason, RMIT believes that a minimum critical set of indicators should be developed and agreed with by the sector. These indicators should focus on the priority measurable outcomes in areas such as leadership positions, pay scales by gender and the profile of the workforce and the composition of governing bodies. Priority process indicators would focus on the implementation of gender equality strategies, pay

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<sup>4</sup> DEECD, Guidelines for the annual reporting process for Victoria’s public universities, See, for example, Victoria University Annual Report 2010, <http://www.vu.edu.au/sites/default/files/mcd/pdfs/2010%20Annual%20Report.pdf>, p 23.

<sup>5</sup> Commonwealth, Higher Education Staff Data Review, <http://www.innovation.gov.au/HigherEducation/Policy/Pages/HigherEducationStaffDataReview.aspx>, accessed 22 January 2013. For information and background on the Review of University Reporting Burden commissioned by DIISRTE, see e.g. the background paper at: <http://www.phillipskpa.com.au/images/news/REVIEW%20OF%20UNIVERSITY%20REPORTING%20REQUIREMENTS.pdf>, accessed 22 January 2013.

<sup>6</sup> As floated in the consultation paper, p 4.

equity, and other policies that support flexible workplace practices and that can promote talent identification, career progression, and training and development, provided that they can be assembled at minimum cost. We recognise that information of this type can support organisations to develop strategies to support a more diverse and stronger workforce as well as help to address skills shortages.

### **An efficient framework that is stable over time**

*7 & 8. Which outcomes or process indicators will be most difficult or costly for employers to report on? Why? Are there alternative ways that this information could be obtained?*

*9&11 Would it be useful to phase in or out certain measure or indicators? What assistance is required to report?*

The reporting framework should minimise the costs of compliance and be efficient to implement. RMIT also supports the creation of a “long term dataset”<sup>7</sup> as frequent changes undermine the value of benchmarking and trend data and as organisations need stability and certainty to be able to establish processes and systems to gather information. However, as the detail of the proposed framework is being developed, it is more challenging for providers to assess the efficiency or cost of the framework, or identify implementation implications. RMIT also notes that an additional GEI and associated indicators could be introduced, and that the proposed minimum standards could also have compliance and implementation implications.

For these reasons, RMIT believes that the reporting framework should be supported by:

- Consultation with organisations on the full set of data requirements, including their value as a long-term data-set and the time required for implementation and submission processes.
- An agreed annual submission process that allows appropriate time for organisations to report, verify and endorse the data.
- A requirement that future changes to the final agreed model should have a clear rationale, and be supported by further consultation.
- Online reporting that is underpinned by other mechanisms such as: a template or sample reports; guidance on appropriate ways to measure the “measurable outcomes”; reporting templates with in-built calculators; drop down menus to assist with providing data provision.

### **Conclusion**

RMIT notes that the Government is committed to ongoing consultation and welcomes the opportunity to comment further on the proposed framework when further detail is available. As a long-standing Employer of Choice for Women we are well-placed to contribute to the process and support the development of a gender equality framework that is efficient, effective and stable, and that continues to support flexible approaches. If you have any queries about this submission or the proposed approach, please contact Dr Anand Kulkarni, Senior Manager, Planning and Research Consultancy, [Anand.Kulkarni@rmit.edu.au](mailto:Anand.Kulkarni@rmit.edu.au) or through (03) 9925 9037.

Yours sincerely

Professor Margaret Gardner AO

**Vice-Chancellor and President**

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<sup>7</sup> Commonwealth, *Workplace Gender Equality Act 2012*, Consultation on reporting matters, January 2013, p 1.