



**Submission to Senate Education, Employment and  
Workplace Relations Committee**

**On**

**Equal Opportunity for Women in the  
Workplace Amendment Bill 2012**

**Chamber of Commerce and Industry – April 2012**

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## About CCI

CCI is the leading business association in Western Australia (WA) and has members across most industries in WA.

CCI is one of the largest organisations of its kind in Australia, with a membership of over 7,000 organisations in all sectors, including: manufacturing; resources; agriculture; transport; communications; retailing; hospitality; building and construction; community services; and finance.

Originally established in 1910 as the WA Employers Federation, CCI as it is today was formed in 1992 by an amalgamation of the Western Australian Chamber of Commerce and Industry and the State's then largest employer organisation - the Confederation of Western Australian Industry.

Through its Group Training Scheme, wholly owned subsidiary Apprenticeships Australia, CCI is the direct employer of more than 700 Australian apprentices and trainees across WA and the Northern Territory. Apprentices are hosted to large, medium and small businesses with a significant cohort in the resources, oil and gas, building and construction industries. More than 25 per cent of apprentices and trainees are Indigenous Australians.

A key objective of CCI is to promote, develop and protect the industrial relations interests of persons engaged in industry, trade and commerce.

CCI has extensive involvement on behalf of its members in workplace relations matters across all of these industries:

- a) Representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally;
- b) Business representation on a range of statutory and business boards, committees and other forums;
- c) Representing business in state and national bodies including Fair Work Australia;
- d) Research and policy development on issues concerning Western Australian business; and
- e) The publication of leading business surveys and other information products.



CCI regularly makes submissions to Annual Wage Reviews and to Parliamentary and Government Inquiries and has historically been active in Industrial Tribunal proceedings both as party principal and as a representative of individual employers.

Most of CCI's members are private businesses, although CCI also has members in the not-for-profit sector and the government sector.

CCI members employ a significant number of employees:

- around 70 per cent employ up to 19 employees;
- over 20 per cent employ between 20 and 99 employees; and
- over 5 per cent employ more than 100 employees.

CCI members are located in all geographical regions of WA.

CCI provides extensive industrial relations services to members through its Employee Relations Advice Centre (ERAC), Employee Relations Consulting (ERC) team consultants and the Construction Services team.

CCI's ERC Consultants have expertise across all major industry sectors enabling them to tailor strategic industrial relations advice to the specific needs of the industry sector.

The Construction Services team provides strategic industrial relations advice directly to mining and construction clients and members; negotiates with unions, including on behalf of members/clients; and provides day to day advice to contractors.

CCI is a State council or federation representative of a significant number of organisations (within the ordinary meaning of the term) representing employers in a range of industries – consistent with the definition in section 12 of the *Fair Work Act 2009*.

CCI is afforded a legislative employer representative status under the *Industrial Relations Act 1979* (WA).

Given the diversity of CCI's membership, it has broad representation across most industries in WA.



## Background

On Thursday 1 March 2012 the Hon. Julie Collins MP, Minister for Community Services, Minister for the Status of Women and Minister for Indigenous Employment and Economic Development, introduced the *Equal Opportunity for Women in the Workplace Amendment Bill 2012* (the Bill) to the House of Representatives.

The Bill seeks to amend the current *Equal Opportunity for Women in the Workplace Act 1999* (EOWW Act) through the establishment of a new Workplace Gender Equality Agency (WGEA) and an amended reporting and compliance framework on employers.

In introducing the Bill, the Hon. Julie Collins said “*improving women’s workforce participation is central to improving productivity and addressing current and future skills shortages.*” The Government proposes the Bill will seek to achieve this aim by improving gender equality outcomes and simplifying reporting for businesses.<sup>1</sup>

The Bill seeks to amend the name of the legislation to the *Workplace Gender Equality Act 2012*. It also proposes new principal objects to reflect the new focus of promoting gender equality and improving outcomes for women and men in the workplace. The amended objects are:

- (a) to promote and improve gender equality (including equal remuneration between women and men) in employment and in the workplace; and
- (b) to support employers to remove barriers to the full and equal participation of women in the workplace, in recognition of the disadvantaged position of women in relation to employment matters; and
- (c) to promote, amongst employers, the elimination of discrimination on the basis of gender in relation to employment matters (including in relation to family and caring responsibilities); and
- (d) to foster workplace consultation between employers and employees on issues concerning gender equality in employment and in the workplace; and

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<sup>1</sup> The Hon. Julie Collins, House of Representatives *Equal Opportunity to Women in the Workplace Amendment Bill 2012* Second Reading, 1 March 2012



- (e) to improve the productivity and competitiveness of Australian businesses through the advancement of gender equality in employment and in the workplace.<sup>2</sup>

CCI supports workplace gender equality and acknowledges the need to implement measures to encourage the participation of women in the workforce.

Boosting labour force participation is one of the key measures identified by CCI to bolster the country's workforce and ensure that Australia meets its ongoing labour requirements.

In a survey conducted by CCI of female employee's perceptions of workforce issues, it was revealed that balancing work and family commitments placed significant constraints on the ability of women to engage in the labour force. Outdated skills and a lack of confidence in their own abilities were also identified as key barriers.<sup>3</sup>

CCI has concerns as to whether the amendments proposed by the Bill will sufficiently address these issues. It is predicted that the new reporting obligations will divert the attention of employers away from efforts to implement measures to promote workplace equality, to ensuring they are compliant with the procedural requirements of the legislation.

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<sup>2</sup> *Equal Opportunity for Women in the Workplace Amendment Bill 2012*, section 2A

<sup>3</sup> Chamber of Commerce and Industry, *Women in the Workforce: A discussion paper*, October 2008



## Labour Force Trends

### Labour Force Participation

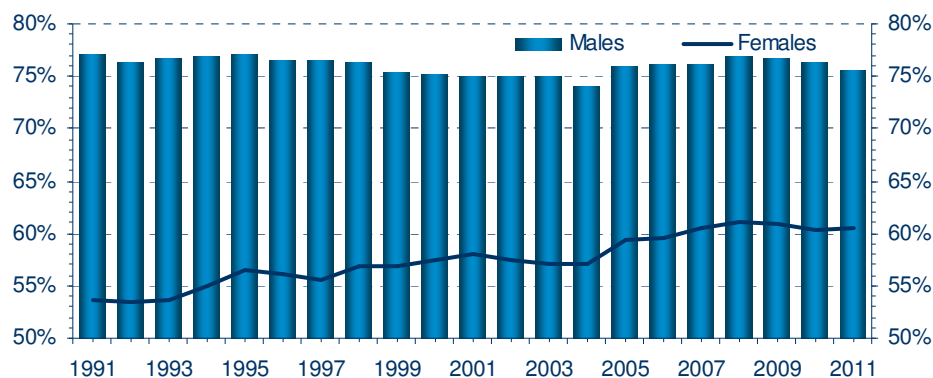
The labour force generally tends to follow trends in the broader economy. As the national economy enters its 21<sup>st</sup> consecutive year of uninterrupted economic growth, trends in the female labour market across Australia have been similarly positive.

A key characteristic of the labour market in Australia has been the increased female labour force, underpinned by both strong population growth and rising participation. The past two decades have seen Australia's female labour force (those employed or looking for work) grow by almost 55 per cent (or 1.9 million women), to 5.5 million in 2011. On average, the female labour force has grown by 2.2 per cent per annum over this period.

Growth in the female labour force has been considerably stronger than for males. Over the same period, the male labour force has increased by 32.6 per cent (or 1.6 million persons), to 6.6 million by 2011. Overall, women have represented a major source of labour for the economy, accounting for around 54 per cent of the increase in the national labour force over the past two decades.

The female labour force in WA has experienced even stronger growth. Over the past two decades, the state's female labour force has risen by almost 67 per cent (or 228,900 persons). This compares to the state's male labour force, which grew by 50 per cent (or 241,500) over this period.

**Chart 1**  
**Participation Rates, WA**  
Male vs Female



Source: ABS Cat. No. 69210

On average, the female labour force in WA has risen by 2.5 per cent per annum over this period. Growth in the state's labour force has been underpinned by rising



participation. In 2011, WA's average female participation rate stood at 60.5 per cent, up from 53.6 per cent 20 years previously (Chart 1). WA now has the second highest female participation rate of all states and territories, behind Queensland (where female labour force participation stands at 61.5 per cent).

Female participation rates across Australia have recorded a similar upward trend; although still remain behind that of WA. In 2011, Australia's female participation rate stood at 59 per cent, up from 52 per cent in 1991.

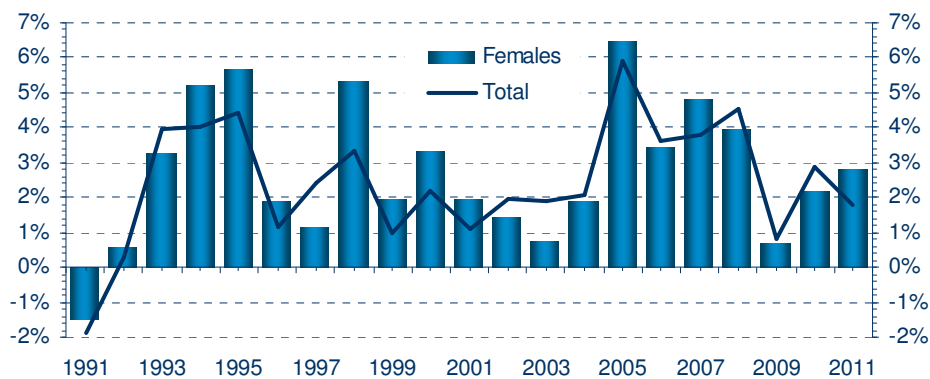
Despite this upward trend over the past two decades, female participation rates still remain below that of men. The male participation rate stood at 75.7 per cent in WA in 2011, and 72.3 per cent nationally.

## Employment and Unemployment

### Employment

The female labour market in WA has also been characterised by strong employment growth, with the state's female workforce growing on average by 2.7 per cent per annum over the past 20 years. A net 232,700 additional women have been employed over this period, accounting for 48 per cent of the growth in the state's total workforce over this period (Chart 2). Female employment in WA has recorded stronger growth than for males, with the male workforce growing on average by 2.2 per cent per annum over this period.

**Chart 2**  
**Employment Growth, WA**  
Female vs Total

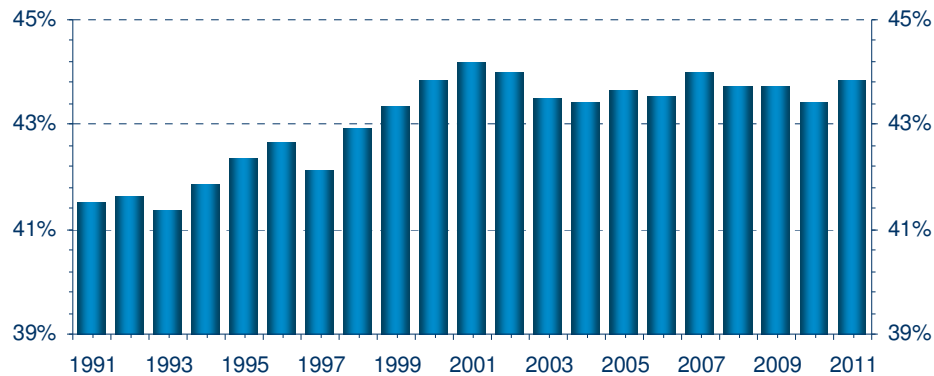


Source: ABS Cat. No. 6302.0

In total, around 541,500 women were employed in WA in 2011, accounting for around 44 per cent of the state's total workforce, compared to the 41.5 per cent share held 20 years previously (Chart 3).



**Chart 3**  
**Female Employment, WA**  
As a % of Total Workforce

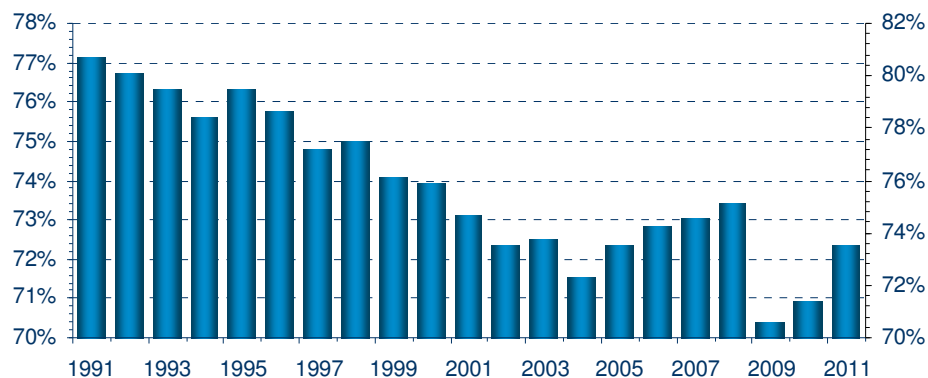


Source: ABS Cat. No. 6320.0

A similar trend has also been recorded for female employment nationally, which has increased by 2.3 per cent per annum over the past 20 years (with a net 1.9 million additional women employed). This rate of growth has also outstripped the increase in the male workforce nationally, which rose by only 1.5 per cent per annum over this period. In total, around 5.2 million women were employed across Australia in 2011.

Much of the increase in female employment both in WA and nationally has been due to the increased take up of part time positions - which has accounted for more than half of the increase in female employment over the past two decades. Part time employment amongst women has grown on average by 3.1 per cent per annum in WA, and three per cent per annum on average nationally over the past two decades. In total, an additional 118,700 women have been employed in part time positions in WA, and 1.1 million nationally over this period.

**Chart 4**  
**Part Time Employment, WA**  
Females, as a % of Total Part Time Workers



Source: ABS Cat. No. 6202.0





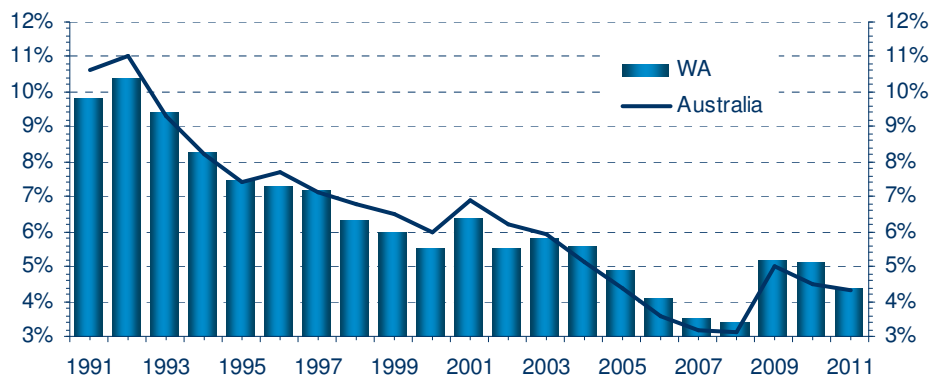
Historically, females have represented the largest proportion of the part time labour force. This remains so today, with women accounting for more than 70 per cent of the part time workforce in both WA and across Australia in 2011. However, this share has declined from over 75 per cent two decades previously (Chart 4).

## Unemployment

The sustained growth in the WA economy has resulted in lower unemployment among women. In 2011, there were 8,300 fewer unemployed females in WA, than two decades previously. This compares to male unemployment, which has declined by 23,500 over this period. Overall, females have accounted for over 26 per cent of the fall in unemployment in WA over the past two decades.

In line with the fall in the number of unemployed women, the female unemployment rate in WA has more than halved, falling progressively from 9.8 per cent in 1991, to 4.4 per cent in 2011. By comparison, the male unemployment rate in WA fell from 11.1 per cent in 1991 to 4.1 per cent in 2011 (Chart 5).

**Chart 5**  
**Female Unemployment Rate**  
WA and Australia



Source: ABS Cat. No. 6302.0

A similar declining trend has also been experienced across Australia during the past two decades, with the number of unemployed women nationally falling by 32,700. However, females have accounted for only 16 per cent of the fall in the number of unemployed persons nationally over this period.

The female unemployment rate across Australia has also declined from 9.2 per cent in 1991, to 5.3 per cent in 2011, while the male unemployment rate has fallen from 9.9 per cent in 1991, to 4.9 per cent in 2011.



## Underemployment

A considerable proportion of the workforce is also underemployed. This refers to part time workers who wish to work full time, or more hours on a part time basis. Underemployed workers are an important component of underutilised labour resources in an economy, capturing a dimension of such resources not available from the unemployment rate alone.

Underemployment among females has declined in recent years. Of the total number of female part time workers across Australia in December 2011, 21 per cent (or 519,700) would prefer to work more hours – a proportion which is largely unchanged from a year previously

Given the increasing trend of female workforce participation, it is unclear as to why the Government sees a need to amend the existing legislation and add further administrative burden on employers.



## Encouraging Female Workforce Participation

### Commonwealth Bank- CCI Survey of Business Expectations

Employer perceptions of female workforce issues were gauged in the December quarter 2007 *Commonwealth Bank- CCI Survey of Business Expectations*. The survey canvassed views of around 350 businesses, of all sizes, operating in the production, distribution, manufacturing and services sectors.

By occupation, the results of the survey found that women accounted for a relatively small proportion of senior management and professional positions. Some 68 per cent of respondents said that less than half of their senior management and professional workforce are females, with almost 35 per cent indicating that women are represented in less than 10 per cent of these roles.

Despite women accounting for a lesser proportion of the workforce, the results also show that female employment has been on the rise in recent years. Almost 94 per cent of respondents deemed that the proportion of the workforce that is female has remained at a similar level, or increased, over the past five years.

When asked what measures would encourage greater female participation in the workforce, respondents indicated a preference towards flexible working arrangements. While flexible working hours were favoured by businesses of all sizes and operating across all sectors, larger businesses in particular preferred this option, with over 95 per cent indicating that this measure would encourage greater female participation.

Affordable childcare was the next most popular option, and was identified by 40 per cent of businesses surveyed. Some 44 per cent of medium sized businesses, and 57 per cent of large businesses, also indicated affordable childcare would encourage greater female participation in the workforce.

Other strategies to encourage female participation in the workforce included salary sacrifice of childcare expenses (identified by 26 per cent of respondents), comparable pay (identified by 22 per cent of respondents), and accessible parking (identified by 22 per cent of respondents). A range of other measures were also identified by respondents, including greater training, and extended maternity leave.

CCI submits that since this survey was conducted several legislative measures have been introduced to address these factors inhibiting female workforce participation.

### *Fair Work Act 2009- National Employment Standards (NES)*

#### Parental Leave



The NES allows employees the right to request up to 24 months leave in relation to the birth or the adoption of a child. This leave can either be taken by one parent who assumes primary care of the child, or can be shared between both parents. The 'return to work guarantee' ensures that an employee cannot be disadvantaged for taking parental leave as the legislation requires they are able to return to their pre-leave position on return to work.

### Flexible Working Arrangements

Employees who have caring responsibilities for children under school age or a child with a disability who is under the age of 16 are entitled to request flexible working arrangements. Employers can only refuse these requests on reasonable business grounds.

### Maximum Weekly Hours

Full time employees cannot be made to work more than 38 hours per week, unless those additional hours are deemed 'reasonable'. Factors to determine reasonableness include the employee's personal circumstances, such as family responsibilities and risks to the employee's health and safety.

### Personal/Carer's Leave

Employees are entitled to take up to ten days paid leave per year to provide care or support to a member of the employee's immediate family who requires care or support because of a personal illness or injury or an unexpected emergency.

### *Other entitlements under the Fair Work Act 2009*

#### Individual Flexibility Arrangements (IFA)

IFA's allow employers and individual employees to form agreements which vary the effect of modern awards and enterprise agreements in order to meet the genuine needs of an individual employee. IFA's may include arrangements for when work is performed.

#### General Protections

General protections provisions prevent employers from taking adverse action against employees for exercising workplace rights, or for discriminatory reasons which include sex and family responsibilities.

#### Equal Remuneration

Equal Remuneration provisions allow Fair Work Australia to make orders to ensure that there will be equal remuneration for men and women workers for work



of equal or comparable value. The first successful test case initiated by multiple unions in the social and community services sector resulted in significant above award safety-net increases in excess of 40 per cent. This increase applies to males and females but will benefit females given they are over-represented in the industry sector.<sup>4</sup>

### Low Paid Bargaining

Fair Work Australia may issue a low-paid bargaining authorisation to assist low-paid employees in industries where they have difficulty engaging in bargaining. Low paid bargaining authorisations allow a bargaining representative or a relevant employee organisation to negotiate with two or more employees for an enterprise agreement. Many industries likely to benefit from low-paid bargaining authorisations are those that are female dominated. The first authorisation has already been issued to apply to the aged care industry.

### *Paid Parental Leave*

The Federal Government funded paid parental leave scheme commenced as of 1 January 2011. This provides eligible employees up to 18 weeks payment based at the rate of the national minimum wage.

### *Child Care Rebate*

The Federal Government currently offers a child care rebate to eligible guardians a 50% rebate, up to \$7,500, for costs associated with child care.

### *Other Anti-Discrimination Legislation*

A comprehensive range of laws focusing on anti-discriminatory conduct already exists at both Federal and State level. These statutes already provide a range of protections for women, which would merely be duplicated by the *Equal Opportunity for Women in the Workplace Amendment Bill 2012*.

Significant overlap already exists between anti-discrimination legislation and other laws. CCI submits that there must be a consolidation of these anti-discrimination and equal opportunity statutes, rather than further regulation adding compliance with no great benefit.

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<sup>4</sup> [2012] FWAFB 1000



## Increasing Reporting Requirements

CCI submits that the compliance approach to increasing female workforce participation is likely to divert resources away from genuine reform. There is little evidence to suggest that amending the reporting obligations of employers will actually encourage women into the workforce and promote gender equality.

In 2009, the Office for Women, Department of Families, Housing, Community Services and Indigenous Affairs ordered a review of the *Equal Opportunity for Women in the Workplace Act 1999*. KPMG was commissioned to compile a report of the findings of the review which highlighted several issues with the legislation.

The report highlighted that many submissions made to the review suggested that placing reporting obligations on employers provides “*little value to organisations... and little benefit is observed for women workers.*” It further suggested the reporting process was “*largely ineffective in improving employment outcomes for women.*” The report also highlighted that an overwhelming number of submissions to the review suggested they didn’t support an increase in reporting requirements on the grounds that “*compiling an annual report drained resources that could be better utilised implementing equal employment opportunity programs.*”<sup>5</sup>

Given these findings, it is unclear why the Government would propose an amendment to the current legislation that would increase employer reporting obligations given that the review found that they were largely ineffective.

Furthermore, in viewing several submissions made to the Senate Committee in support of passing of current Bill, none have provided explicit evidence as to how the reporting obligations will meet the objectives of the Bill.

There are several other issues that will result from the new reporting obligations.

### Increased compliance costs

The Government has suggested the new legislation will “*simplify reporting obligations for businesses,*”<sup>6</sup> however; CCI has been informed by its members that this is unlikely to be the case. Information that will be required to form the ‘gender

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<sup>5</sup> Office for Women, Department of Families, Housing, Community Services and Indigenous Affairs, *Review of the Equal Opportunity for Women in the Workplace Act 1999 Consultation Report*, January 2010

<sup>6</sup> The Hon. Julie Collins, Media Release: *New Bill to improve gender equality in the workplace*, 1 March 2012.



equality indicators' for reporting purposes is not information employers generally have readily available. Significant administrative and financial resources will therefore be needed to establish systems capable of capturing the indicators and any anomalies, and developing plans to deal with such anomalies, leaving aside the difficulties associated with having the confidence to identify anomalies in the first place.

Not all employers that have 100 employees or more should be assumed to be equal in their financial and operational capacities. Not all have sophisticated HR departments or Equal Employment Opportunity (EEO) specialists. Policy makers should understand one-size policies do not fit all employers.

### **Minimum Standards**

At this stage, the Bill does not yet set out any “*minimum standards*” but suggests they will be set by the relevant Minister in the future.

It is therefore impossible for a cost-benefit analysis to be conducted, and for employers to prepare for the new reporting obligations given they are likely to change.

The collection of data is a new and enhanced regulatory burden, but the real impact of the legislation is unable to be quantified because it is not clear what exactly will be required to be collected and provided to the WGEA.

Furthermore, CCI is concerned about how such minimum standards would be derived. Despite indications that the standards would be set by industry, concerns remain as to the fairness and validity of such standards given that employers often operate quite uniquely, even if they are in a similar industry. CCI sees little merit in obligating such employers to meet minimum standards.

If minimum standards are to apply, they should be established prior to the Bill progressing through Parliament. Only when the minimum standards are known can any objective assessment as to their impact be made.

### **Obligation to Inform Employee Organisations**

The Bill stipulates that employers must notify relevant employee organisations when their annual reports have been submitted. Whilst this may be a simple exercise for employers who regularly deal with one or two unions, for other employers, the process of identifying all possible unions with coverage of its employees can be onerous, further increasing the burden on employers.



Trade union membership has considerably declined over recent years. In 2010, private sector union membership in Western Australia stood at 11.7 per cent<sup>7</sup>. CCI believes that the majority of workplaces do not actually have any union members.

An employer does not ordinarily know, nor do they ask employees, whether they are a union member and to which union they belong to. Where a union or multiple unions are not active in the workplace, it makes no sense to require an employer to provide a report to those unions when their presence is not known.

Further, the requirement to notify unions of the lodgment of the report will increase the likelihood of the reports being used for industrial purposes. Given that the reports will be made publicly available by the WGEA and that employees are to be notified when they have been lodged, unions will have adequate opportunity to address any concerns without having to be notified directly.

There is a risk that this requirement will cause unnecessary disputation within workplaces.

### **Sensitivity of Information**

CCI is also concerned that information that employers will be required to collate may be sensitive in nature and have potential to damage the interests of employers if misconstrued.

As such, CCI predicts that some employers may decide not to disclose sensitive and detailed information to the WGEA if they believe there is little benefit to do so.

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<sup>7</sup> Australian Bureau of Statistics, *Employee Earnings, Benefits and Trade Union Membership*, Aug 2010, Cat. No. 6310.0





## Issues with Non-Compliance

CCI submits that the penalties for non-compliance are too stringent and could potentially result in employers choosing not to participate in reporting.

The Bill outlines several instances whereby employers will be considered to be non-compliant with the Act. These include:

- Failure to lodge a public report on time or to give the WGEA information;
- The employer lodges a public report that contains false or misleading information;
- Failure to meet a minimum standard set by the Minister;
- Failure to inform employees, shareholders or employee organisations that the report has been lodged;
- Failure to have the report signed by the CEO; and
- Failure to, as soon as reasonably practicable after lodging the report, to provide employees and shareholders access to the report.

Subsection 19(D) outlines the consequences of non-compliance. These include: naming the employer in WGEA reports; and naming the employer in other ways such as via the WGEA's website or through the print media.

The simplified outline of Part IVA of the Bill provides that a further consequence of failing to comply with the Act is that an employer may be made ineligible to compete for contracts under the Commonwealth procurement framework and may not be eligible for Commonwealth grants or other financial assistance.

CCI submits that the consequence of non-compliance should be directly proportionate to the severity of the non-compliance. It defies logic that any breach of the Act, whether minor or not, would result in an employer being publicly named.

Such uniform consequences for non-compliance will likely result in employers who know they are not meeting minimum standards choosing not to report, given they will likely face the same consequences. The commercial impact of being named for failing to report is likely to be lesser than that of being named for failing to meet minimum standards.

The penalty of being "*named and shamed*" is potentially damaging in itself. It is inappropriate to make a generalisation that suggests an employer who fails to meet a requirement of the Act is not a well regarded employer in the market.



Irreversible damage could potentially be done to the reputation of such an employer.

Subsection 19(2) mandates the WGEA in the case of non-compliance to name the employer in a report and “*set out the details of the non-compliance*”. The employer’s reason for non-compliance is not able to be published in the WGEA’s report. There should be a reconsideration requiring details of non-compliance.

CCI also regards the penalty of being locked out of government tendering and procurement work as extreme. Such a penalty has the potential to have devastating effects on an employer and could result in the need to reduce staff numbers as a consequence. This may put employees in a worse position and injure their employment situation.

The Bill does not provide any statutory rights for aggrieved employers who wish to challenge a determination of the WGEA. Despite no pecuniary penalties applying for non-compliance, the penalty of having an employer’s brand and reputation damaged by being publicly named or locked out of procurement based on an onerous finding of non-compliance is significant. A mechanism for appeal is essential.

Furthermore, sections of the Act that prescribe the consequences for non-compliance do not allow for cases of genuine mistakes. It is usually the case that employment data involving large numbers of employees will invariably not be correct 100 per cent of the time, yet the employer may be publicly named and locked out of procurement on account of unintentional errors.

It defies logic that a Government Agency could cause such damage to the reputation and profitability of an employer, when the Act does not even require the Government itself to comply with such obligations. It is unclear why the Bill does not extend to the public sector as an employer.

There is a lack of evidence that exists to demonstrate a causal link between employer reporting obligations and improved outcomes for women in the workplace. This will mean that technical non-compliance with the Act by an employer may have little correlation in terms of how the firm is engaged in maintaining or improving gender equity and diversity outcomes.

CCI suggests the Government would need to implement a targeted education and assistance program to help employers understand the new reporting obligations before any consequences for non-compliance can be enforced.

CCI submits that there should be consideration of better incentives for firms to be encouraged to improve on their own gender equality targets voluntarily, rather



than being penalised with possible reputational damage in a 'name and shame' approach or financially impacted by being locked out of procurement.



## Alternative Means of Improving Gender Equality Outcomes

CCI supports workable and sensible policy measures which have the capacity to make a real improvement to enhancing gender equality. Such measures do not necessarily involve additional or new legal obligations.

CCI submits the following recommendations for improving gender equality outcomes:

- Australia spends less on childcare than most other Organisation for Economic Co-Operation & Development (OECD) countries.<sup>8</sup> Affordable and accessible childcare is critical to ensure that working parents can balance their work and family commitments. The Government should review the Child Care Benefit and the Child Care Tax Rebate accordingly.
- Changes should be made to allow child care to be salary sacrificed in the same way that it is allowed for motor vehicles, superannuation and computers.
- The provision of targeted family assistance is important not only for social equity reasons, but also to assist in encouraging workforce participation.
- Targeted education campaigns to assist employers in encouraging the utilisation of pre-existing measures that promote female workforce participation such as flexible working arrangements and paid parental leave.
- Industry specific policies and training programs targeted at attracting employees into industry sectors traditionally dominated by a single gender.
- Removing the burden on employers to administer paid parental leave payments and educate them on promoting the scheme to their employees.
- The development of voluntary codes and guidelines with industry.
- The implementation of training and assistance programs to assist employers to bridge gender pay gaps that exist in their organisations and ensure men and women receive equal pay for equal work.

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<sup>8</sup> OECD, *Better Life Index*. Available online at <http://oecdbetterlifeindex.org/countries/australia/>



CCI supports workplace gender equality and acknowledges the need to implement measures to encourage further participation of women in the workforce.

The Committee is urged to recognise that whilst female participation has continually risen in recent time, there are some industry sectors that continue to have difficulty attracting female workers. Employers in these sectors in particular have concerns about the impact that the new legislation will have on them.

A 'one size fits all' approach is unlikely to address persistent issues but will instead divert resources away from efforts to implement genuine cultural changes in workplaces.

Gender equality should be addressed on a longer term basis using an educational/preventative approach.

