

## **Submission on the Review of Corporate Governance Principles and Recommendations**

### **Introduction**

Women on Boards welcomes the development of a third edition of the Corporate Governance Principles and Recommendations as a proactive response to global issues around corporate governance and risk management and to addressing the increasing attention being given by the investment community to environmental and social issues, including disability.

This submission reflects the view of the Women on Boards directors who have substantive experience in the application of the Principles and Recommendations as they relate to gender diversity within ASX listed companies. Particular reference is made to the recently released second edition of the WOB Traffic Light Index in which public disclosures in relation to gender diversity on the websites and in the annual reports of all ASX200 companies were reviewed and reported.<sup>1</sup>

This submission is framed within the context of the knowledge gained from this substantive research report and also the Guidelines for Gender Balance Performance and Reporting<sup>2</sup>, released in May and led by Women on Boards and the Governance Institute of Australia (formerly the Chartered Secretaries).

Working on both of the above mentioned reports highlighted to Women on Boards the need for improved transparency around gendered data sets. Few of the ASX200 companies have yet made their data sets or scorecard for diversity publicly available. This should be addressed by the reporting regime mandated by the Workplace Gender Equality Act (WGEA), however it is our view that the Corporate Governance Principles and Recommendations should equally reflect the governance and business benefits of making gendered data sets publicly available via company websites.

We also note the wide variance in the quality of diversity reporting and lack of tangible measurable objectives to improve gender balance in the workforce, in particular at senior levels. A measurable objective of 'increase the number of women in leadership roles over time' gives little comfort that the company is on the path to achieving the 'diversity dividend' and begs the question if such companies would countenance a profit target of 'increased EBIT' as their financial objective for a given year.

We therefore conclude that many companies would benefit from exposure to a best practices document, such as the Guidelines for Gender Balance Performance and Reporting, to ensure they strive as much for upward trend lines for workplace diversity as they do for increased EBIT and business growth. The Framework for data collection, analysis, reporting and performance improvement has been appended to this document.

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<sup>1</sup> Women on Board 2013 Traffic Light Index, [www.womenonboards.org.au/pubs/traffic-light/2013-traffic-lights/index.htm](http://www.womenonboards.org.au/pubs/traffic-light/2013-traffic-lights/index.htm)

<sup>2</sup> Guidelines for Gender Balance Performance and Reporting, May 2013, [www.womenonboards.org.au/pubs/guidelines](http://www.womenonboards.org.au/pubs/guidelines)

## Comments on the key recommendations

Women on Boards supports the following key recommendations that both directly and indirectly impact on company disclosures in relation to diversity and more specifically gender balance:

Proposed Recommendations	Women on Boards Comment
Relocation of the diversity related recommendations from Principle 3: Ethical and responsible decision-making to Principle 1: Lay solid foundations for management and oversight.	WOB strongly supports the relocation of the ‘diversity materials’ to Principle 1. By doing this diversity is being recognised as a strategic business enabler; along with the related areas (remuneration, audit, separation of duties) that are to be included in Principle 1. This is important for organisations and reflects that diversity is becoming a mainstream business issue.
Amalgamation of Principles 3.2, 3.3 and 3.4 in the new Principle 1.5	Women on Boards supports the amalgamation of these Principles.
Including a statement in Principle 1.5(c)(2)(A) that an entity should disclose how it has defined “senior executive” for the purpose of reporting its gender diversity statistics.	<p>Women on Boards review of diversity related materials for the 2013 Traffic Light Index found that there is lack of clarity in the way ‘senior executive’ and other management levels are defined. This makes overall measurement of improvements difficult to achieve. The WGEA definitions of managers is:</p> <ul style="list-style-type: none"> <li>• Chief Executive Officer (or equivalent)</li> <li>• Key management personnel (KMP)</li> <li>• Other executives/general managers</li> <li>• Senior managers</li> <li>• Other managers</li> </ul> <p>We further recommend that this Principle invites companies to consider parallel definitions of CEO-1, CEO-2 etc. These were adopted in the Guidelines for Gender Balance Performance and Reporting to overcome the significant differences in workforce classifications in industries and sectors. It also takes into account the workforce structure of smaller listed companies.</p>

<p>To allow those entities that are covered by the WGE Act, to choose under proposed recommendation 1.5(c)(2)(B) to treat their filings with the WGE Agency as meeting the requirement to publish their gender diversity statistics under the Principles and Recommendations.</p>	<p>The change is supported as the WGEA gendered data for each company (with some exceptions) will be made publicly available via its website. It is important to avoid the perception that gender based reporting is overly onerous for listed companies. In reality companies that are reporting progress against their measurable objectives in accord with ASX Governance may well include this material on their websites and in the governance statement as a matter of best practice.</p>
<p>Greater disclosure of annual reports on website.</p>	<p>The proposal to afford greater flexibility to listed entities to make their corporate governance disclosures on their website rather than in their annual report is strongly supported. Our work on the WOB 2013 Traffic Light Index highlighted that many companies include their corporate governance statements in their Annual Reports and on their websites. Some companies (for example Woolworths) include comprehensive supporting material relating to the diversity aspects on their websites. As the WGEA reporting requirements is likely to encourage reporting on websites rather than in the body of an Annual Report, greater transparency of gendered data should be encouraged as best practice. The Council may therefore like to consider further strengthening this recommendation.</p>

## Contact Information

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W: [www.womenonboards.org.au](http://www.womenonboards.org.au)

**Guidelines for Gender Balance Performance and Reporting  
May 2013**

Key Indicators	Gender Balance Indicators	Sample Answers	Reporting trigger	Guideline Level	Accountability	Explanation / Support	References																												
1	Policies and practices	A sex discrimination and harassment policy.	Yes/No	Good practice	Getting started	The board	Resources provided by WGEA and the Australian Human Rights Commission (AHRC) on their websites <a href="http://www.wgea.gov.au">www.wgea.gov.au</a> <a href="http://www.humanrights.gov.au">www.humanrights.gov.au</a>	3,4,9																											
2	Policies and practices	Diversity Council or similar chaired by CEO or CEO-1	Yes/No	Good practice	Getting started	CEO	See Gender balance dashboard/scorecard <a href="http://www.csaust.com/genderbalance">www.csaust.com/genderbalance</a> <a href="http://www.womenonboards.org.au">www.womenonboards.org.au</a>	2,4,9																											
3	Policies and practices	Develop and disclose a comprehensive diversity policy and action plan	Yes/No	Principle 3 Mandatory to disclose if adopted for ASX listed companies	Getting started	The board	Annual Report and /or website to include a summary of policy and annual assessment.	1,3,4,6,9,11																											
4	Policies and practices	Circulate the diversity policy to shareholders and employees, receive feedback and monitor.	Yes/No	Good practice	Getting started	Head of human resources/ head of investor relations	See Gender balance dashboard/scorecard <a href="http://www.csaust.com/genderbalance">www.csaust.com/genderbalance</a> <a href="http://www.womenonboards.org.au">www.womenonboards.org.au</a>	4,9																											
5	Policies and practices	flexible work practices available to staff	Yes/No	Good practice	Getting started	CEO	See Gender balance resources provided by WGEA and AHRC <a href="http://www.wgea.gov.au">www.wgea.gov.au</a> <a href="http://www.humanrights.gov.au">www.humanrights.gov.au</a>	1,2,3,4																											
6	Policies and practices	Annual reporting of the proportion of women employees in the whole organisation, women in senior executive positions and women on the board	Yes/No	Principle 3 Mandatory to disclose if adopted for ASX listed companies	Getting started	The board	Annual Report and /or website to include metrics as indicated below or applicable percentages	1,3,4,6,9,11																											
7	Policies and practices	Disclosure of board selection process - a statement as to the mix of skills and diversity for which the board is looking to achieve membership of the board	Yes/No	Principle 2 Mandatory to disclose if adopted for ASX listed companies	Getting started	The board	Annual Report and /or website to include a summary of process	1,3																											
8	Policies and practices	Annual Reporting of measurable objectives as set out in the policy for achieving gender diversity	Yes/No	Principle 3 Mandatory for ASX listed companies	Getting there	The board	Annual Report and /or website to include objectives	1,3,4,6,9,11																											
9	Policies and practices	Annual Reporting of performance against measurable objectives	Yes/No	Principle 3 Mandatory to disclose if adopted for ASX listed companies	Getting there	The board	Annual Report and /or website to include performance against objectives	1,3,4,6,9,11																											
10	Policies and practices	Publicly stated gender targets for women in management and senior executive positions	Yes/No	Good practice	Getting there	The board	Annual Report and /or website to include targets	1,2,3,4,6,9,11																											
11	Policies and practices	Internal procedures to review effectiveness of diversity policy	Yes/No	Good practice	Getting there	The board	See Gender balance dashboard/scorecard <a href="http://www.csaust.com/genderbalance">www.csaust.com/genderbalance</a> <a href="http://www.womenonboards.org.au">www.womenonboards.org.au</a>	3,4,6,9																											
12	Policies and practices	Paid Parental Leave above legislated minimum	Yes/No	Good practice	Getting serious	The board	WGEA resources: How To Guide for Parental Leave <a href="http://www.wgea.gov.au/Information_Centres/Media_Centre/Key_Issues_for_Women_in_the_Workplace/Child_Care.asp">www.wgea.gov.au/Information_Centres/Media_Centre/Key_Issues_for_Women_in_the_Workplace/Child_Care.asp</a>	4																											
13	Policies and practices	Procurement policy includes guidelines for supplier reporting on workforce gender composition as a minimum threshold for doing business	Yes/No	Good practice	Getting serious	The board																													
14	Workplace profile	<b>Number of all employees by gender</b> a) Fulltime, Operational Roles b) Fulltime, Functional Roles c) Fulltime, Support Roles d) Part-time, Operational Roles e) Part-time, Functional Roles f) Part-time, Support Roles <b>TOTAL Number</b>	<table border="1"> <thead> <tr> <th></th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>450</td> <td>85</td> </tr> <tr> <td>b)</td> <td>685</td> <td>495</td> </tr> <tr> <td>c)</td> <td>22</td> <td>165</td> </tr> <tr> <td>d)</td> <td>5</td> <td>21</td> </tr> <tr> <td>e)</td> <td>3</td> <td>69</td> </tr> <tr> <td>f)</td> <td>0</td> <td>64</td> </tr> <tr> <td><b>TOTAL Number</b></td> <td><b>1165</b></td> <td><b>899</b></td> </tr> </tbody> </table>		M	F	a)	450	85	b)	685	495	c)	22	165	d)	5	21	e)	3	69	f)	0	64	<b>TOTAL Number</b>	<b>1165</b>	<b>899</b>	Good practice and will inform reporting against Principle 3	Getting started	Head of human resources	See Gender balance dashboard/scorecard	1,3,4,5,6,8,10,11,12			
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**Guidelines for Gender Balance Performance and Reporting  
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20 Workplace profile	<b>Employees identified as high potential / 'top talent' or on similar development programs by gender.</b> a) Fulltime, Operational Roles b) Fulltime, Functional Roles c) Fulltime, Support Roles d) Part-time, Operational Roles e) Part-time, Functional Roles f) Part-time, Support Roles <b>TOTAL Number</b> <b>Total Employee base</b>	<table border="1"> <thead> <tr> <th></th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>6</td> <td>0</td> </tr> <tr> <td>b)</td> <td>8</td> <td>0</td> </tr> <tr> <td>c)</td> <td>0</td> <td>5</td> </tr> <tr> <td>d)</td> <td>0</td> <td>0</td> </tr> <tr> <td>e)</td> <td>0</td> <td>0</td> </tr> <tr> <td>f)</td> <td>0</td> <td>0</td> </tr> <tr> <td><b>TOTAL Number</b></td> <td><b>14</b></td> <td><b>5</b></td> </tr> <tr> <td><b>Total Employee base</b></td> <td><b>1165</b></td> <td><b>835</b></td> </tr> </tbody> </table>		M	F	a)	6	0	b)	8	0	c)	0	5	d)	0	0	e)	0	0	f)	0	0	<b>TOTAL Number</b>	<b>14</b>	<b>5</b>	<b>Total Employee base</b>	<b>1165</b>	<b>835</b>	Good practice	Getting there	Head of human resources	See Gender balance dashboard/scorecard	1,3,4,5,6,8,10,11,12
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21 Pay Equity	Identification of, and strategies to reduce the gender pay gap	Yes/No	Good practice	Getting started	CEO	WGEA tools on pay equity and the gender pay gap available at <a href="http://www.wgea.gov.au/Pay_Equity/Pay_Equity_Tools.asp">www.wgea.gov.au/Pay_Equity/Pay_Equity_Tools.asp</a>	1,3,4,5,6																											
22 Pay Equity	<b>Analysis of pay by gender including Base Remuneration and Performance -based Remuneration:</b> a) Fulltime, Operational Roles b) Fulltime, Functional Roles c) Fulltime, Support Roles d) Part-time, Operational Roles e) Part-time, Functional Roles f) Part-time, Support Roles <b>Total Average \$k</b>	<table border="1"> <thead> <tr> <th></th> <th>M Avg \$k</th> <th>F Avg \$k</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>97</td> <td>85</td> </tr> <tr> <td>b)</td> <td>80</td> <td>70</td> </tr> <tr> <td>c)</td> <td>60</td> <td>57</td> </tr> <tr> <td>d)</td> <td>70</td> <td>55</td> </tr> <tr> <td>e)</td> <td>55</td> <td>45</td> </tr> <tr> <td>f)</td> <td>NA</td> <td>25</td> </tr> <tr> <td><b>Total Average \$k</b></td> <td><b>67</b></td> <td><b>53</b></td> </tr> </tbody> </table>		M Avg \$k	F Avg \$k	a)	97	85	b)	80	70	c)	60	57	d)	70	55	e)	55	45	f)	NA	25	<b>Total Average \$k</b>	<b>67</b>	<b>53</b>	Good practice	Getting started	Head of human resources	See Gender balance dashboard/scorecard	1,3,4,5,6,8,10,11,12			
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23 Pay Equity	Starting salary by gender for graduates	<table border="1"> <thead> <tr> <th></th> <th>M Avg \$50k</th> <th>F Avg \$45k</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>		M Avg \$50k	F Avg \$45k				Good practice	Getting there	Head of human resources	WGEA tools on pay equity and the gender pay gap available at <a href="http://www.wgea.gov.au/Pay_Equity/Pay_Equity_Tools.asp">www.wgea.gov.au/Pay_Equity/Pay_Equity_Tools.asp</a>																						
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24 flexible work practices	Number of all employees by gender who utilise flexible work practices (for example: telecommuting, compressed hours, flexi-time etc): a) Fulltime, Operational Roles b) Fulltime, Functional Roles c) Fulltime, Support Roles d) Part-time, Operational Roles e) Part-time, Functional Roles f) Part-time, Support Roles <b>TOTAL Number</b> <b>Total Employee base</b>	<table border="1"> <thead> <tr> <th></th> <th>Male</th> <th>Female</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>0</td> <td>5</td> </tr> <tr> <td>b)</td> <td>0</td> <td>5</td> </tr> <tr> <td>c)</td> <td>1</td> <td>7</td> </tr> <tr> <td>d)</td> <td>1</td> <td>3</td> </tr> <tr> <td>e)</td> <td>2</td> <td>12</td> </tr> <tr> <td>f)</td> <td>0</td> <td>15</td> </tr> <tr> <td><b>TOTAL Number</b></td> <td><b>4</b></td> <td><b>32</b></td> </tr> <tr> <td><b>Total Employee base</b></td> <td><b>1165</b></td> <td><b>835</b></td> </tr> </tbody> </table>		Male	Female	a)	0	5	b)	0	5	c)	1	7	d)	1	3	e)	2	12	f)	0	15	<b>TOTAL Number</b>	<b>4</b>	<b>32</b>	<b>Total Employee base</b>	<b>1165</b>	<b>835</b>	Good practice	Getting started	Head of human resources	Percentage of promotions for the year to employees on parental leave  See Gender balance dashboard/scorecard	1,2,3,4,7
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27 flexible work practices	<b>Number of all employees by gender who exit the organisation (including via redundancy) 12-24 months after returning from parental leave.</b> a) Fulltime, Operational Roles b) Fulltime, Functional Roles c) Fulltime, Support Roles d) Part-time, Operational Roles e) Part-time, Functional Roles f) Part-time, Support Roles <b>TOTAL Number</b> <b>Total Employee base</b>	<table border="1"> <thead> <tr> <th></th> <th>M</th> <th>F</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>0</td> <td>5</td> </tr> <tr> <td>b)</td> <td>0</td> <td>5</td> </tr> <tr> <td>c)</td> <td>1</td> <td>7</td> </tr> <tr> <td>d)</td> <td>1</td> <td>3</td> </tr> <tr> <td>e)</td> <td>2</td> <td>12</td> </tr> <tr> <td>f)</td> <td>0</td> <td>15</td> </tr> <tr> <td><b>TOTAL Number</b></td> <td><b>4</b></td> <td><b>32</b></td> </tr> <tr> <td><b>Total Employee base</b></td> <td><b>1165</b></td> <td><b>835</b></td> </tr> </tbody> </table>		M	F	a)	0	5	b)	0	5	c)	1	7	d)	1	3	e)	2	12	f)	0	15	<b>TOTAL Number</b>	<b>4</b>	<b>32</b>	<b>Total Employee base</b>	<b>1165</b>	<b>835</b>	Good practice	Getting started	Head of human resources	See Gender balance dashboard/scorecard	1,2,3,4,6,7
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**Guidelines for Gender Balance Performance and Reporting  
May 2013**

Key Indicators	Gender Balance Indicators	Sample Answers	Reporting trigger	Guideline Level	Accountability	Explanation / Support	References																											
28	Recruitment & Promotion	At least one suitable representative of each gender required on interview panels.	Yes/No	Good practice	Getting started	CEO	3,4																											
29	Recruitment & Promotion	Internal recruitment processes required to include suitably qualified male and female candidates on the shortlist.	Yes/No	Good practice	Getting there	CEO	1,4,11																											
30	Recruitment & Promotion	Entity's external recruitment policy requires external recruiters to meet targets for inclusion of suitably qualified male and female candidates on the shortlist.	Yes/No	Good practice	Getting there	CEO	3,4,11																											
31	Recruitment & Promotion	Number of applicants considered for senior executive positions (CEO-1 & CEO-2) by a) Internal b) External <b>TOTAL Number</b>	<table border="1"><thead><tr><th></th><th>M</th><th>F</th></tr></thead><tbody><tr><td>a)</td><td>5</td><td>2</td></tr><tr><td>b)</td><td>3</td><td>1</td></tr><tr><td><b>TOTAL Number</b></td><td><b>8</b></td><td><b>3</b></td></tr></tbody></table>		M	F	a)	5	2	b)	3	1	<b>TOTAL Number</b>	<b>8</b>	<b>3</b>	Good practice	Getting there	Head of human resources	See Gender balance dashboard/scorecard 1,3,4,6,11															
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32	Recruitment & Promotion	<b>For all promotions/placements to senior executive positions (CEO-1 &amp; CEO-2) numeric breakdown by gender:</b> a) number of applications b) number of promotions/placements awarded <b>TOTAL Number</b>	<table border="1"><thead><tr><th></th><th>M</th><th>F</th></tr></thead><tbody><tr><td>a)</td><td>5</td><td>2</td></tr><tr><td>b)</td><td>3</td><td>1</td></tr><tr><td><b>TOTAL Number</b></td><td><b>8</b></td><td><b>3</b></td></tr></tbody></table>		M	F	a)	5	2	b)	3	1	<b>TOTAL Number</b>	<b>8</b>	<b>3</b>	Good practice	Getting serious	Head of human resources	See Gender balance dashboard/scorecard 1,3,4,6,11															
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33	Recruitment & Promotion	Percentage of employees promoted while on parental leave by gender	10%	Good practice	Getting serious	Head of human resources	1,3,4,6,11																											
34	Recruitment & Promotion	Percentage of employees eligible to participate in annual remuneration reviews by gender	<table border="1"><thead><tr><th></th><th>M</th><th>F</th></tr></thead><tbody><tr><td></td><td>90%</td><td>45%</td></tr></tbody></table>		M	F		90%	45%	Good practice	Getting serious	Head of human resources/CEO																						
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35	Evaluation & Development	Formal job evaluation/classification and performance review processes.	Yes/No	Good practice	Getting started	Head of human resources	3,4																											
36	Evaluation & Development	<b>Employee participation in leadership or similar development programs by gender:</b> a) Fulltime, Operational Roles b) Fulltime, Functional Roles c) Fulltime, Support Roles d) Part-time, Operational Roles e) Part-time, Functional Roles f) Part-time, Support Roles <b>TOTAL Number</b> <b>Total Employee base</b>	<table border="1"><thead><tr><th></th><th>M</th><th>F</th></tr></thead><tbody><tr><td>a)</td><td>0</td><td>5</td></tr><tr><td>b)</td><td>0</td><td>5</td></tr><tr><td>c)</td><td>1</td><td>7</td></tr><tr><td>d)</td><td>1</td><td>3</td></tr><tr><td>e)</td><td>2</td><td>12</td></tr><tr><td>f)</td><td>0</td><td>15</td></tr><tr><td><b>TOTAL Number</b></td><td><b>4</b></td><td><b>32</b></td></tr><tr><td><b>Total Employee base</b></td><td><b>1165</b></td><td><b>835</b></td></tr></tbody></table>		M	F	a)	0	5	b)	0	5	c)	1	7	d)	1	3	e)	2	12	f)	0	15	<b>TOTAL Number</b>	<b>4</b>	<b>32</b>	<b>Total Employee base</b>	<b>1165</b>	<b>835</b>	Good practice	Getting there	Head of human resources	See Gender balance dashboard/scorecard <a href="http://www.csaust.com/genderbalance">www.csaust.com/genderbalance</a> <a href="http://www.womenonboards.org.au">www.womenonboards.org.au</a> 1,3,4,5,6,7
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37	Evaluation & Development	<b>Employee participation in mentoring and sponsorship programs by gender:</b> a) Fulltime, Operational Roles b) Fulltime, Functional Roles c) Fulltime, Support Roles d) Part-time, Operational Roles e) Part-time, Functional Roles f) Part-time, Support Roles <b>TOTAL Number</b> <b>Total Employee base</b>	<table border="1"><thead><tr><th></th><th>M</th><th>F</th></tr></thead><tbody><tr><td>a)</td><td>20</td><td>5</td></tr><tr><td>b)</td><td>18</td><td>5</td></tr><tr><td>c)</td><td>0</td><td>7</td></tr><tr><td>d)</td><td>3</td><td>3</td></tr><tr><td>e)</td><td>0</td><td>0</td></tr><tr><td>f)</td><td>0</td><td>0</td></tr><tr><td><b>TOTAL Number</b></td><td><b>41</b></td><td><b>20</b></td></tr><tr><td><b>Total Employee base</b></td><td><b>1165</b></td><td><b>835</b></td></tr></tbody></table>		M	F	a)	20	5	b)	18	5	c)	0	7	d)	3	3	e)	0	0	f)	0	0	<b>TOTAL Number</b>	<b>41</b>	<b>20</b>	<b>Total Employee base</b>	<b>1165</b>	<b>835</b>	Good practice	Getting there	Head of human resources	See Gender balance dashboard/scorecard <a href="http://www.csaust.com/genderbalance">www.csaust.com/genderbalance</a> <a href="http://www.womenonboards.org.au">www.womenonboards.org.au</a> 1,3,4,5,6,7
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38	Evaluation & Development	<b>Key Performance Indicators (KPIs) on gender balance targets included in annual performance scorecards for:</b> a) CEO(s) b) CEO-1, CEO-2	a) Yes/No b) Yes/No	Good practice	Getting serious	The board/CEO	See Gender balance dashboard/scorecard <a href="http://www.csaust.com/genderbalance">www.csaust.com/genderbalance</a> <a href="http://www.womenonboards.org.au">www.womenonboards.org.au</a>																											
39	Evaluation & Development	Key Performance Indicators (KPIs) on gender balance targets included in annual performance scorecards for all middle management	Yes/No	Good practice	Getting serious	The board/CEO	See Gender balance dashboard/scorecard <a href="http://www.csaust.com/genderbalance">www.csaust.com/genderbalance</a> <a href="http://www.womenonboards.org.au">www.womenonboards.org.au</a>																											
40	Communication & Information	Visible commitment at CEO and senior executive level including articulation of a compelling business case for gender balance in the organisation as part of business strategy	Yes/No	Good practice	Getting started	CEO	2,3																											
41	Communication & Information	Anonymous employee surveys are conducted to benchmark staff attitudes to gender diversity; track changes and test perceptions of achievements.	Yes/No	Good practice	Getting there	Head of human resources	See Appendix D: Sample annual employee survey questions 2																											
42	Communication & Information	Mechanism for staff to provide input to and feedback on gender diversity initiatives. Management provide responses to feedback to demonstrate genuine consideration of staff input.	Yes/No	Good practice	Getting there	Head of human resources	2																											
43	Communication & Information	All gender diversity initiatives are evaluated for effectiveness and impact.	Yes/No 50%	Good practice	Getting there	Head of human resources	2,																											
44	Communication & Information	Conduct workshops, training and information sessions to all staff regarding gender diversity issues in the workplace, unconscious bias and the initiatives being taken to achieve improved gender balance outcomes	Yes/No 50%	Good practice	Getting there	Head of human resources/CEO	Track the percentage of employees who have taken training 2,3																											