

BOARD BRIEF

GENDER EQUALITY TARGETS 2026–2029

What Designated Employers Must Do Now

March 2026

1. EXECUTIVE SUMMARY

Amendments to the Workplace Gender Equality Act introduce a new performance obligation for employers with 500 or more employees.

Designated relevant employers must:

- Select **three gender equality targets**
- Meet or demonstrate measurable improvement against those targets
- Do so over a **three-year target cycle**
- Publicly report performance

This represents a shift from compliance reporting to performance accountability.

For Boards, gender equality is now:

- A governance responsibility
- A measurable performance issue
- A reputational and procurement risk consideration
- A workforce productivity lever

2. WHAT HAS CHANGED?

From Reporting to Results

Previously:

Annual reporting against gender equality indicators.

Now:

In addition to reporting, designated employers must:

1. Select three gender equality targets
2. Establish a baseline
3. Meet or show demonstrable improvement over 3 years

Failure to comply may result in:

- Public naming
- Ineligibility for Commonwealth procurement
- Ineligibility for grants or financial assistance
- Ministerial reporting consequences

This is a governance issue, not solely a HR process.

3. WHO IS A DESIGNATED RELEVANT EMPLOYER?

An employer becomes designated when:

- It employs **500 or more employees** at any time.

The status remains unless employee numbers fall below 400 for six continuous months.

Approximately 2,000 Australian employers fall into this category.

4. WHAT ARE GENDER EQUALITY TARGETS?

Targets must be selected from legislated gender equality indicators, including:

1. Workforce gender composition
2. Governing body composition
3. Equal remuneration and gender pay gap
4. Flexible working arrangements and support for carers
5. Employee consultation
6. **Sexual harassment prevention and action**

5. GOVERNANCE RISK SNAPSHOT

Recent national data highlights a governance gap:

- 60% of Boards review policies to prevent sexual harassment
- 59% of governing bodies communicate expectations on safety and respectful conduct
- Fewer than 15% report performance against positive duty standards to CEO and Board

6. THE THREE-YEAR TARGET CYCLE

Each cycle:

1. Baseline report establishes starting position
2. Organisation selects three targets
3. Progress is measured annually
4. At end of cycle, employer must:
 - a. Meet each target, OR
 - b. Demonstrate improvement against baseline

Without reasonable excuse, failure to meet or improve constitutes non-compliance.

This introduces measurable Board accountability.

7. BOARD RESPONSIBILITIES

Boards should:

1. Seek Clear Advice from the CEO

- Which three targets are recommended?
- Why?
- What is the baseline position?

2. Assess Risk Exposure

- Is there a significant gender pay gap?
- Is Board composition materially imbalanced?
- Are harassment metrics actively monitored?

3. Require Performance Reporting

- Quarterly updates on target progress
- Clear metrics, not narrative summaries
- Comparison to baseline and trajectory modelling

4. Embed Accountability

- Link executive KPIs to target performance
- Align remuneration structures where appropriate
- Ensure workforce consultation occurs

8. STRATEGIC OPPORTUNITY

The Act's objects explicitly link gender equality to:

- Improved productivity
- Workforce participation
- Equal remuneration
- Removal of structural barriers
- Business competitiveness

Organisations that treat targets as compliance risk missing:

- Retention benefits
- Employer brand advantages
- Talent pipeline improvements
- Stronger governance credentials

Boards can reposition this as a strategic performance initiative.

9. KEY QUESTIONS FOR YOUR NEXT BOARD MEETING

1. Are we currently a designated relevant employer?
2. What is our baseline position across each gender equality indicator?
3. Which three targets will deliver the greatest strategic and cultural impact?
4. What improvement trajectory is realistic within three years?
5. How will progress be measured and reported?
6. Who owns delivery?
7. How are we evidencing compliance with positive duty obligations?
8. Are we prepared for public comparison?

10. TIMELINE OVERVIEW

Private Sector:

Reporting window 1 April – 31 May 2026

Target selection occurs within this reporting cycle.

Commonwealth Public Sector:

Submission window 1 September – 31 October 2026

Boards should request preparatory briefings well in advance of reporting windows

11. IMMEDIATE ACTIONS FOR BOARDS

Within 30 Days:

- Schedule a governance briefing
- Request baseline gender equality dashboard
- Confirm designated employer status

Within 60 Days:

- Review target options
- Model impact scenarios
- Determine reporting cadence

Within 90 Days:

- Approve selected targets
- Confirm accountability structures
- Communicate expectations to executive leadership

10. CONCLUSION

Gender equality targets represent a structural shift in workplace governance.

For designated employers, this is no longer a question of policy presence.

It is a question of measurable performance, improvement and accountability.

Boards that lead proactively will strengthen governance, mitigate compliance risk and position their organisations competitively for the future.