



BEP – Contractor GEAP Training

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Basic BEP Overview

The Building Equality Policy came into effect back in late 2021 with the intention of creating training and employment opportunities for women in the construction sector. The policy is applied to all state publicly funded construction projects valued at over \$20 million with an RFT on or after the 1st of January 2022. BEP does not apply to projects contracted before the 1st of January 2022 or contracts for design or operation and management.

The intention of the policy is to generate meaningful work and training opportunities for women in the construction industry, by encouraging businesses to implement policies and effect culture that increases the amount of women working and staying in the industry. As a supplier or contractor, meeting BEP targets isn't just about compliance; it's about futureproofing your business, building stronger teams, and growing your reputation as an industry leader.

BEP applicable projects

- Applies to state government funded construction projects
- Over \$20 million in value
- RTF on or after 1st January 2022

There are 3 key actions for suppliers when it comes to BEP:

- 1. Meet project-specific gender equality targets:** 3% trade labour, 7% non-trade labour, and 35% management roles performed by women. It's about real numbers and real impact, giving women genuine visibility across every aspect of construction.
 - **3% trade labour** – the 3% target applies to each occupation type, so 3% of all carpenters or electricians through to 3% general labourers. It is not 3% of all trade covered positions, it is 3% of each type.
 - **7% non-trade construction award covered labour** – again, this is 7% of each occupation type. This category applies to any worker covered by the construction general on site award.
 - **35% management supervisory and specialist labour** – This category is the least defined out of all of them, so you can think of this as your catch all categories. If it does not fit into trade, or non-trade – construction award covered labour, then you can track the hours here as specialist labour. Hours worked offsite that are directly related to the project will also count towards targets for this action.
- 2. Engage and support women as apprentices, trainees, and cadets:** At least 4% of total labour hours must be allocated to women in these pathways, building tomorrow's diverse and skilled workforce.
 - This target is different to the targets in action 1 in that it is a catch all category, so it is 4% of all apprentice, trainee, cadet hours worked, not by occupation type. Again, with this one, hours worked offsite directly relating to the project

can be counted, along with any hours spent undertaking the training. So that does include hours spent at uni or TAFE.

- 3. Deliver Gender Equality Action Plans (GEAPs):** These are your business's blueprint for change. Every tender requires a workplace gender audit, an organisation-wide GEAP, and a project-specific GEAP.

Project specific gender equality targets

Action 1	Action 2	Action 3
Project gender equality targets	Engage women as apprentices, trainees and cadets	Gender Equality Action Plans (GEAPs)
• 3% trade covered labour positions • 7% non-trade construction award covered labour • 35% management/supervisory and specialist labour	• 4% apprentice, trainee and cadet hours	• Organisational GEAP • Project specific GEAP

GEAP – Gender Equality Action Plan

What are GEAPs? Gender equality Action Plans. They were developed with the introduction of the Gender Equality Act of 2020, which was designed to assess 7 key indicators of gender equality within a business. The idea is that through these key indicators, businesses can get an understanding of where they currently stand in regard to gender equality. Organisational rules, decisions, policies and practices can be subject to gender bias. Through a review of the 7 key indicators, the business can then develop strategies to improve where they sit against the indicators hopefully, addressing root causes of gender inequality and leading to long term improvements.

The 7 key indicators are:

1. Gender pay equity
2. Gender composition of the workforce
3. Gender composition of governing bodies
4. Workplace sexual harassment
5. Recruitment and promotion
6. Gender work segregation
7. Leave and flexibility

Largely, you can separate the completion of GEAPs into 3 main steps.

- **Data** – Collect the data required under each of the indicators
- **Analysis** – Analyse the data
- **Strategy** – where you are required to address the gaps presented in the data. And provide a minimum of 1 strategy to address the gaps presented.

What are GEAPs?

7 key indicators	GEAP actions
• Gender pay equity • Gender composition of the workforce • Gender composition of governing bodies • Workplace sexual harassment • Recruitment and promotion • Gender work segregation • Leave and flexibility	• Data – Collect the data required under each of the indicators • Analysis – Analyse the data • Strategy – To address the gaps presented

Indicator 1 – Gender pay equity

The gender pay gap is driven by several factors, including the unequal distribution of unpaid care work, higher rates of pay in male-dominated industries, and gender discrimination. By collecting pay data, Contractors can see where pay gaps are largest and create a strategy to address the underlying causes.

Now, a lot of the indicators have similar or overlapping minimum standards or strategies to address. Things like setting annual targets to eliminate the gap and implementing updates to leadership on progress against the indicator.

Minimum standards	Guidance
• Set an annual target to eliminate the gender pay gap. • Provide regular progress reports to keep the leadership team informed about progress to eliminate the gender pay gap. • Set occupational salary bands and employ into them regardless of existing salaries.	• Allocate a specific budget to eliminate the gender pay gap. • Increase representation of women in leadership positions. • Regularly review the workforce gender composition to improve gender equality

Indicator 2 – Gender Composition of the workforce

Women are often underrepresented in leadership roles, and overrepresented in lower-level roles. This contributes to the gender pay gap and means that organisations may be missing out on the expertise and skills of women at senior levels.

By collecting and reporting data on gender composition at all levels, organisations can see where they could benefit from greater gender diversity and take action to support women into senior roles.

Many of the indicators you are required to collect data on are also required to be captured through WGEA reporting. Gender composition of the workforce is captured in detail as part of now mandatory reporting of companies with over 100 people on WGEA. This data is very useful to individual women when looking for employment, they can see in real time where other women in the sector are working.

Minimum standards	Guidance
• Set annual gender targets to drive equitable representation across all occupational salary bands. • Conduct workshops with employees and leadership to identify occupation-specific barriers to gender equality. Establish strategies, timelines and allocate tasks to eliminate these barriers.	• The occupational salary bands must be determined by the organisation or project, based on its structure.

Indicator 3 – Gender composition of governing bodies

Very similar to indicator 2, but this time we are talking about leadership in the business. Boards, committees of management and other governing bodies make important decisions about finances and strategy. It is important that governing bodies have diverse voices at the table.

By collecting data on the gender composition of governing bodies, Contractors can create a strategy to ensure gender-balanced boardrooms.

Minimum standards	Guidance
• Set annual gender targets to drive equitable representation for all occupations across the governing body and executive team. • Conduct workshops with management and executive/ board members to identify barriers to gender equality within leadership roles. Establish strategies, timelines and allocate tasks to eliminate these barriers.	• Ensure that nomination and selection processes for the governing body are fair, transparent, and considerate of the gender diversity targets. • Prior to the workshops, share data on the current compositions of leadership in the organisation. Have an external person that can facilitate the conversation, allowing for open discussion. • Prioritise the barriers and annually review progress to eliminate the barriers.

Indicator 4 – Workplace sexual harassment

Sexual harassment in the workplace is common. It causes financial, psychological, and physical harm to victim survivors. It also has a significant economic cost to organisations and the community.

The systemic barriers to reporting sexual harassment include fear of reprisals or other negative consequences, lack of confidence in the reporting system, and a limited understanding of what constitutes sexual harassment.

By collecting data on workplace sexual harassment, Contractors can create a strategy that is transparent and builds workers confidence to report experiences of sexual harassment.

For this indicator you are required to report the number of sexual harassment incidents over a 12 month period. It is also important to be able to display appropriate resolution and reporting procedures for individuals and site teams to follow if and when an incident occurs. With the introduction of the psychosocial safety legislation, workplaces must now take proactive steps to ensure this kind of harm is not happening in the workplace and must be valued as highly as physical safety.

Minimum standards	Guidance
• Conduct quality industry specific training for sexual harassment, discrimination, bullying and other forms of work-related violence for all workers with a focus on awareness, prevention, and reporting. • Embed the Respect Code – Building and Construction Industry across the organisation and projects to ensure everyone knows their workplace legal rights and obligations. • Implement an anonymous, impartial and victim centric reporting system to encourage workers to report incidents. All complaints must be reported to the governing body. • Provide a contact officer for workers to seek advice and support, including internal and external reporting options	• Include sexual harassment reporting related questions in worker satisfaction surveys to gauge how well the reporting systems are working and to assess progress and improvement. • Contact officers must be available for any worker that needs advice or assistance. They must be trained appropriately in relevant legislation, including matters of privacy, disclosure, responsible referral practices and work-related violence. • Include the Respect Code – Building and Construction Industry as a regular agenda item at onsite and offsite meetings, toolbox talks etc.

Indicator 5 – Recruitment and promotion

Gendered bias and gendered stereotypes influence recruitment, promotion and career progression. This often results in women not having equal access to the same career opportunities as men. By collecting data on recruitment and promotion outcomes,

Contractors can identify the barriers and create a strategy to ensure equitable outcomes for women.

Some strategies to address bias that impacts this indicator includes diverse interview panels, bias training for hiring managers, and targets for diverse applicants offered interviews.

Minimum standards	Guidance
• Review recruitment and appointment procedures to remove gender bias. • Provide training to raise awareness about gender bias to strive for a gender balanced workforce that promotes equality and inclusivity.	• Establish diverse interview panels to participate in the employment process. • Once promotions are finalised divide them by gender to ensure equitable outcomes are achieved. • Set recruitment targets that reflect the strategies set out in Indicator 2 – Composition of Workforce.

Indicator 6 – Gender work segregation

Gendered segregation is driven by gendered norms and stereotypes about what work is appropriate for men and women.

By collecting data on workforce composition, Contractors can see which roles and areas have more women or more men and create a strategy to achieve a more gender diverse workplace.

Often in the construction sector you can see this gendered work segregation concept highlighted in gender composition of the workforce data, with majority of women in an organisation being represented in administrative or head office based roles. This can eventuate from bias in hiring and promotion, inflexibility of certain job roles not being as accommodating for parttime or remote work, timing of shifts etc. Like all indicators in the GEAP, a layered approach containing actions or strategies that overlap multiple indicators will assist in addressing gendered work segregation. Workplace culture, inclusive job design and hiring and promotion checks could assist organisations with progress against this indicator.

Minimum standards	Guidance
• Set an annual gender target to create equality across all roles. • Provide regular education and training opportunities for workers and leadership to identify occupation-specific barriers. Establish strategies, timelines and allocate tasks to eliminate these barriers.	• Set occupational salary bands and employ into them regardless of existing salaries.

Indicator 7 – Leave and flexibility

Flexible working arrangements and leave entitlements including parental leave, help all genders balance paid work with other responsibilities. Structural and cultural factors mean women are far more likely than men to work flexibly, be employed in part time or casual work, and take longer parental leave.

On average women do nearly twice as much unpaid work as men. Unpaid work must be recognised, redistributed, valued, and shared.

By collecting data on who is accessing flexible work arrangements, parental leave, family violence leave and other forms of gendered violence leave, Contractors can create a strategy to support more men to work flexibly and share the caring responsibilities.

Minimum standards	Guidance
• Implement policies for parental leave, family violence leave, and flexible working arrangements. Ensure policies are gender neutral and provide equal access for all workers to share equally in caring responsibilities. • Provide training and education to workers about their legal rights to flexible work, parental leave and family violence leave. • Ensure that workers on leave or utilising flexible work arrangements have equal access to secure employment, overtime hours and career development opportunities, such as training programs and promotions.	• Develop and offer programs to support individuals returning from parental leave or extended periods of absence such as coaching. • Promote the uptake of parental leave and flexible work arrangements by men, as they should equally share the caring responsibilities.

Tender phase

Organisation Wide GEAP	Under each indicator the organisation must provide: • Data • Analysis • Strategy	Submit during tender
Project Specific GEAP	Under each indicator the organisation must provide: • Strategy	Submit during tender

Project Specific GEAP - Updated RFT Template as at 1 July 2024			
Request for Tender - Template			
Project Specific GEAP		Project Specific GEAP - Tender Submission	
		Date:	
Indicator 1 - Gender Pay Equity		Indicator 1 - Gender Pay Equity	
		Tender Submission	
Data Measure - Collect data on the gender pay gap across the project		Man and woman	Man and Self-Described
Average base salary gap for all employees (%)			
Average remuneration gap for all employees (%)			
Analysis - What does this data gap mean to the organisation?			
Using the minimum standards, provide a minimum of one strategy to address the gaps presented.	Note strategy(ies) to be implemented, including: — Activity(ies) and how it will impact the data — Timeframe for implementation — Measurement of success		
Indicator 2 - Gender Composition of the workforce		Indicator 2 - Gender Composition of the workforce	
		Tender Submission	
Data Measure - Collect data and report on strategies to improve gender composition of all levels of the workforce.	Man	Woman	Self-Described
Gender composition of the occupation list, ordered in bands. These bands are intended to categorise positions based on their level of responsibility, seniority, and skills.			
Number of Band zero (CEO)			
Number of Band one (e.g. executives)			
Number of Band two (e.g. senior managers)			
Number of Band three (e.g. managers)			
Number of Band four (senior project engineers, assistant managers)			
Number of Band five (e.g. contract administration, project engineers)			
Number of Band six (graduates)			
Number of Band seven (cadets, trainees)			
Total number			
Analysis - What does this data mean to the organisation?			
Using the minimum standards, provide a minimum of one strategy to address the gaps presented.	Note strategy(ies) to be implemented, including: — Strategy and how it will impact the data — Timeframe for implementation — Measurement of success		

Organisation Wide GEAP - Updated RFT Template as at 1 July 2024			
Request for Tender - Template			
		Organisation Wide GEAP - Tender Submission	
		Date:	
Indicator 1 - Gender Pay Equity		Indicator 1 - Gender Pay Equity	
		Tender Submission	
Data Measure - Collect data on the gender pay gap across the organisation		Man and woman	Man and Self-Described
Average base salary gap for all employees (%)			
Average remuneration gap for all employees (%)			
Analysis - What does this data gap mean to the organisation?		Explain what the gap means to the organisation — Are there gaps in the data? — What is causing the gaps?	
Using the minimum standards, provide a minimum of one strategy to address the gaps presented.		Note strategy(ies) to be implemented, including: — Activity(ies) and how it will impact the data — Timeframe for implementation — Measurement of success	
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Gender composition of the occupation list, ordered in bands. These bands are intended to categorise positions based on their level of responsibility, seniority, and skills.			
Number of Band zero (CEO)			
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Number of Band three (e.g. managers)			
Number of Band four (senior project engineers, assistant managers)			
Number of Band five (e.g. contract administration, project engineers)			
Number of Band six (graduates)			
Number of Band seven (cadets, trainees)			
Total number			
Analysis - What does this data mean to the organisation?		Explain what the gap means to the organisation — Are there gaps in the data? — What is causing the gaps?	
Using the minimum standards, provide a minimum of one strategy to address the gaps presented.		Note strategy(ies) to be implemented, including: — Strategy and how it will impact the data — Timeframe for implementation — Measurement of success	

Contract reporting

As you have noticed, the organisation and project GEAPs have significant overlap, the only difference between the two, is that the organisational GEAP is submitted every 12 months, and contains data pertaining to the entire organisation, whereas the project specific GEAP is submitted every 6 months, containing only data pertaining to the individuals working on the project for the head contracting organisation.

Organisation wide GEAP	Under each indicator the organisation must provide: • Data • Analysis • Strategy	Every 12 months for the remainder of the project.	Submit final plan within 2 months of Practical Completion
Project specific GEAP	Under each indicator the organisation must provide: • Data • Analysis • Strategy	Every 6 months from project commencement	Submit final plan within 2 months of Practical Completion

Stages of completing a GEAP

You can separate the completion of GEAPs into 3 main stages.

- **Data** – Collect the data required under each of the indicators.
- **Analysis** – Analyse the data.
- **Strategy** – To address the gaps presented.

Data – Collect the data required under each of the indicators

The data contained in a GEAP is collected via a company audit. There is more detail on how to conduct a company audit available on buying for vic website if you are after it. But at a high level;

- **Identify the responsible people**
 - This person will be the main point of contact for audit activities and should be managing the audit.
 - This person is usually someone such as HR or payroll, who has access to the sensitive information required as a part of the gender audit.
- **Prepare records management approach**
 - Again, the content of the gender audit usually contains sensitive and private information, so setting up a secure location to store information and templates is important.
 - Documenting the process of collecting the relevant information and records. This will become important as this process needs to be repeated annually for the org GEAP, and for the project GEAP 6monthly. subsections of this audit, information about the members of the org working on the project in question will need to be accessed 6 monthly for the duration of any given project. So having a centralised location for the information will make this process easier.
- **Determine what data to collect**
 - The data required to be captured in a GEAP is data about;
 1. Pay gap information – presented as a percentage displaying the average base salary for men and average base salary for women and self described people. This can be found through reviewing salaries and total remuneration across the organisation by gender. It is advised that a sheet containing de-identified information about salaries of each employee, separated by gender, is used to calculate this. Total remuneration includes bonuses or other benefits.
 2. Employees – count of employees disaggregated by gender
 3. Governing body members – count of employees disaggregated by gender
 4. Number of commencements and promotions – disaggregated by gender
 5. Number of people working in the various occupations in the organisation or project disaggregated by gender.

6. Sexual harassment incidents – a count of incidents raised over the last 12 months.
 7. Flexible working arrangements and parental/carers leave – this is a count of the number of people accessing the different types of leave at the organisation as well as the number of hours accessed, disaggregated by gender.
- **Where will the workforce data come from**
 - Identify the systems this data will come from and who the system owners or responsible persons are.
 - Identify processes to request or access said info before undertaking the collection of data.

Analysis – Analyse the data

When it comes to GEAPs the analysis stage does not contain too much number crunching. It involves the amalgamation of the data against the various indicators.

- **Collecting and extracting audit data**
 - It is recommended that the process of collecting data is documented for future reference. As this process will need to be replicated over again with each submission of the GEAP.
 - Data should be collected in a separate location, such as a dedicated excel sheet securely stored. Collated and extracted data is what goes into the GEAPs
- **Data quality assurance**
 - Are there duplicates in the data, do the results make sense, are there any gaps in the data or not meaningful results? Is there any missing data?
- **Remove personal identifiers**
 - You are collecting data related to individuals claiming leave entitlements and pay. Deidentified data is what populates a GEAP. It may be more difficult to de-identify data in project level GEAPs. In these instances it is important that the GEAP be prepared by individuals authorised to see such data and submitted directly to the client without including it in things like monthly reports etc.
- **Populate the GEAP templates.**
 - pay attention to gaps in the data where your company could improve. I'm not talking about data gaps that is 'missing info'. I'm talking about gaps in the data for men and women in the organisation against the various indicators.
 - This forms part of the analysis – what does this data mean to the organisation. Use this as an opportunity to explain any data gaps or provide organisational context to the data that could explain any gaps.
- **Provide context for data collected and gaps identified**

Strategy – Provide a minimum of 1 strategy to address the gaps presented

1. Once the GEAPs have been populated, gaps have been identified, strategies can be developed to address the gaps.
2. Strategies should include the intended impact on the data, timeframe for implementation, measurements for success
3. Strategies for each indicator will likely appear across multiple. Each indicator makes up a piece of the puzzle and is interconnected, seeing movement in one indicator will likely see improvement in another.

Things to remember:

- Data in the GEAPs is only for the head contractor organisation, and for the project GEAP that is only for the team working on the project, this does not include subcontracted orgs.

Strategies should:

- Activity/ies to be undertaken
- Indicate the intended impact on data in the future
- Timeframes for implementation
- Measurements for success

Questions

Email your questions to vicspteam@icnvic.org.au