



Gender Equality Action Plan 2021 - 2025

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Contact us

Enquiry line	1300 292 153
NRS voice relay	1300 555 727 then use 1300 292 153
Interpreters	1300 152 494
Email	enquiries@veohrc.vic.gov.au
Website	www.humanrights.vic.gov.au
Twitter	twitter.com/VEOHRC
Facebook	facebook.com/VEOHRC

The Victorian Equal Opportunity and Human Rights Commission acknowledges and celebrates the Traditional Custodians of the lands throughout Victoria and we pay our respects to their Elders, past and present.

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A note on language

Women and woman

are used throughout this document to refer to both cisgender women and persons who identify as a woman who were not assigned that gender at birth, including trans women.

Non-binary

is used to refer to people whose gender is not exclusively female or male; and for the purposes of this document, is inclusive of those who have no gender (or 'agender').

Intersectionality

refers to the overlapping forms of disadvantage and discrimination that people experience based on attributes such as Aboriginality; age; disability; ethnicity; gender identity; race; religion and sexual orientation.ⁱ Disadvantage that is based on two or more of these traits compounds, rather than simply adds together, so that the person's experience of marginalisation is far greater than those with just one of these traits.

The Commission's approach to tackling intersectional gender inequality is underpinned by the knowledge that addressing gender inequality without considering how someone's race, class, age, sexual orientation, disability, religion and gender identity impacts the experience, is necessarily inadequate.

Social class or class

describes society by hierarchical strata, according to social, economic or demographic characteristics.ⁱⁱ Sheppard and Biddle have identified six classes in Australian society.ⁱⁱⁱ These range from positions of privilege to experiences of severe disadvantage; and are determined by measuring, along with savings and income (your economic capital), two other metrics: social capital and cultural capital each with multiple variables. Although class is measured using a number of these variables, the Commission will consider educational attainment as a measure of class for our first Gender Equality Action Plan as this will be achievable with the data we have at hand.

1. Overview

On 31 March 2021, the *Gender Equality Act 2020* (**the Act**) came into effect. The Act requires defined entities (including public service bodies, public entities, special bodies, councils and universities) to take positive action towards achieving workplace gender equality and promote gender equality in their policies, programs and services.

The Victorian Equal Opportunity and Human Rights Commission (**the Commission**) is required to:

- develop and implement a Gender Equality Action Plan every four years, which includes:
 - results of a workplace gender audit
 - strategies for achieving workplace gender equality
- publicly report on our progress in relation to workplace gender equality every two years
- promote gender equality in our workplace, policies, programs and services
- complete gender impact assessments when developing or reviewing policies and programs, and when services that have a direct and significant impact on the public.

As part of our obligations arising under the Act, the Commission conducted a workplace gender audit based on data from 30 June 2021. We collected workforce and employee experience data from payroll and HR systems and the People Matter Survey (**PMS**) 2021^{iv} to identify potential gaps in gender equality at the Commission and assess our capacity for change. The PMS included questions developed in consultation with the Commission for Gender Equality in the Public Sector to support reporting under the Act and to help defined entities in developing their Gender Equality Action Plans.

As part of the audit, we considered data related to the following gender equality indicators under the Act:

- gender composition of all levels of the workforce
- gender composition of governing bodies
- equal remuneration for work of equal or comparable value across all levels of the workforce, irrespective of gender
- sexual harassment
- recruitment and promotion practices
- availability and utilisation of terms, conditions and practices relating to family violence leave, flexible working arrangements and working arrangements for those with family or caring responsibilities
- gendered segregation within the workplace.

In line with legislative obligations, we used the results of the audit to inform consultations with staff, the Board, and the Community and Public Sector Union, and these consultations and findings informed our development of the Commission's first Gender Equality Action Plan. Consultation findings are summarised at Appendix A – Consultation summary.



2. The importance of intersectional gender equality

As Victoria's equal opportunity and human rights regulator, we recognise gender equality as a human right and precondition to achieving equality for all. Everyone deserves to be treated fairly. Women often face unfair treatment because of their sex and gender identity, based on gendered stereotypes. Women and non-binary people are more likely to be sexually harassed than men, which can prevent them from participating fully in paid work and/or public life. Women also experience discrimination, which leads to gender gaps in terms of payment, promotions, and employment opportunities.

In focusing on intersectional gender equality throughout this action plan, we are adopting an approach that considers the way people's identities can overlap, creating compounding experiences of discrimination.^v In terms of gender inequality, we know that other forms of disadvantage and discrimination can impact women and non-binary people's experience of gender-based discrimination, negatively impacting their experience of work and enjoyment of public life. Often, experiences of discrimination at work are considered on the basis of one attribute alone, for example, employees discriminated against on the basis of their disability or ethnicity. Considering discrimination along a single axis misses the nuance that these experiences cannot simply be added together, as they compound to oppress marginalised individuals within a society, community and/or organisation. Intersectional feminism, which underpins this action plan, centres the experiences and voices of those subject to overlapping forms of oppression in order to better understand the depth of these inequalities and address them.^{vi}

Just as rigid norms around gender binaries and roles of men and women have a negative impact on women and men, they also have a negative impact on non-binary people. When individuals don't conform to rigid gender stereotypes, they may be vulnerable to experiencing discrimination and unequal or unfair treatment. For non-binary people, gender stereotyping can also cause confusion, misgendering and discomfort.

The Commission has a strong history of fighting gender inequality and injustice, including the various forms in which discrimination manifests. The Executive, Leadership Team and Board of the Commission are all committed to achieving intersectional gender equality within the organisation. They are committed to implementing the strategies and measures outlined in this action plan, which have arisen in response to our 2021 workplace gender audit results.

Targeting intersectional gender inequality is a priority for the Commission in order to achieve a workplace culture in which women of all backgrounds are treated equally, acknowledging that greater focus and resources are required to target the most marginalised women and non-binary people. Taking an intersectional view to tackling gender inequality will enable us to achieve our goal of ensuring that women and non-binary people achieve equal treatment, conditions and opportunities as men, irrespective of the other forms of disadvantage and discrimination they may experience every day.

Gender equality initiatives at the Commission

In 2021, we completed and published Volume 1 of our Final Report of the Independent Review into Workplace Equality in Ambulance Victoria. The Report outlined widespread complaints of incivility, disrespect, discrimination, sexual harassment, bullying and victimisation. It put forward 24 best practice recommendations that can be made immediately by the organisation to address these issues and begin rebuilding a safe, respectful and inclusive workplace.

In 2021, we also released the *Equal pay matters: Achieving gender pay equality in small-to-medium enterprises* report. This report recognises that equal pay for work of equal or comparable value is a basic human right. The report focuses on three industries – the arts, financial services and healthcare and social assistance – in providing tailored recommendations to address pay inequality in small and medium organisations.

In 2020, the Commission published an updated sexual harassment guideline called *Preventing and responding to workplace sexual harassment* that provides information and recommendations for organisations across diverse sectors, industries and workplace settings. It includes six minimum standards that aids Victorian employers in complying with their positive duty to take measures to eliminate sexual harassment and victimisation.

Raise It! was a 2019 pilot program that focused on raising awareness of sexual harassment and workplace equality issues, including pertaining to flexible work arrangements, pregnancy and parental leave. Funded by the Victorian Office for Women, Raise It! was designed by the Commission to support and empower Victorian workers to have safe conversations based on the established drivers of violence against women to combat entrenched gender inequality, such as in the form of poor organisational responses to violence and low rates of reporting of sexual harassment and discrimination cases.

Practice Guidance: Understanding your rights in the workplace and Victorian anti-discrimination law was developed by the Commission in partnership with Our Watch in 2019. It supports employees in understanding their legal rights to protection from forms of discrimination, sexual harassment and victimisation, and to a safe and healthy workplace.

From 2015 to 2019, the Commission conducted an Independent Review into sexual discrimination and sexual harassment in Victoria Police. The Phase 1 report identified gender inequality as the key driver of sexual harassment and sex discrimination in Victoria Police, providing 20 recommendations that Victoria Police could implement to create transformative structural changes aimed to improve responses to and the prevention of harm. The Phase 2 audit assessed the organisation's progress in building a more diverse, inclusive and respectful culture. The Phase 3 audit analysed any measurable improvements from reforms and across key indicators of progress.

Finally, in June 2017, the Commission published *Pregnancy and work: Know your rights and obligations*, which is a resource that aims to provide people with information about their legal rights in the workplace during pregnancy. It outlines parental leave options, advice on returning to work and details about complaints in cases of discrimination.

Principles of the Gender Equality Act

The strategies and measures within the Gender Equality Action Plan are informed by the gender equality principles outlined in section 6 of the Gender Equality Act. Those principles are:

1. That all Victorians should live in a safe and equal society, have access to equal power, resources and opportunities and be treated with dignity, respect and fairness
2. Gender equality benefits all Victorians regardless of gender
3. Gender equality is a human right and precondition to social justice
4. Gender equality brings significant economic, social and health benefits for Victoria
5. Gender equality is a precondition for the prevention of family violence and other forms of violence against women and girls
6. Advancing gender equality is a shared responsibility across the Victorian community
7. All human beings, regardless of gender, should be free to develop their personal abilities, pursue their professional careers, and make choices about their lives without being limited by gender stereotypes, gender roles or prejudices.
8. Gender inequality may be compounded by other forms of disadvantage or discrimination that a person may experience based on Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes
9. Women have historically experienced discrimination and disadvantage on the basis of sex and gender
10. Special measures may be necessary to achieve gender equality.

These principles are reflected below in the table of strategies and measures.

Gender Pay Equity Principles

Strategies and measures that relate to gender pay equity are informed by the gender pay equity principles outlined in the Gender Equality Regulations 2020. These principles include:

- a) Equal pay for work of equal or comparable value, which refers to work valued as equal or comparable in terms of skill, effort, responsibility and working conditions, including different types of work;
- b) Employment and pay practices are free from bias and discrimination, including the effects of unconscious bias and assumptions based on gender;
- c) Employment and pay practices, pay rates and systems are transparent and information about these matters is readily accessible and understandable;
- d) Employment and pay practices recognise and account for different patterns of labour force participation by employees who undertake unpaid or caring work;
- e) Interventions and solutions are collectively developed and agreed to, sustainable and enduring;
- f) Employees, unions and employers work collaboratively to achieve mutually agreed outcomes.

People and Culture Strategy

The Commission is in the process of developing a People and Culture Strategy and Plan, which will combine the actions from various plans into one strategy. The principles of the People and Culture Strategy (**P&C Strategy**) will encompass key areas of focus for the Commission including employee safety and wellbeing; empathetic leadership; risk assessment and management and creating a culture of accountability within a flexible workplace. The P&C Strategy and plan will contain the strategies and measures within this Gender Equality Action Plan, as well as the Disability Action Plan, Aboriginal Community Engagement Strategy and the Diversity and Inclusion plan.



3. Workplace gender audit

The Commission welcomed the opportunity to undertake a workplace gender audit under the Gender Equality Act.

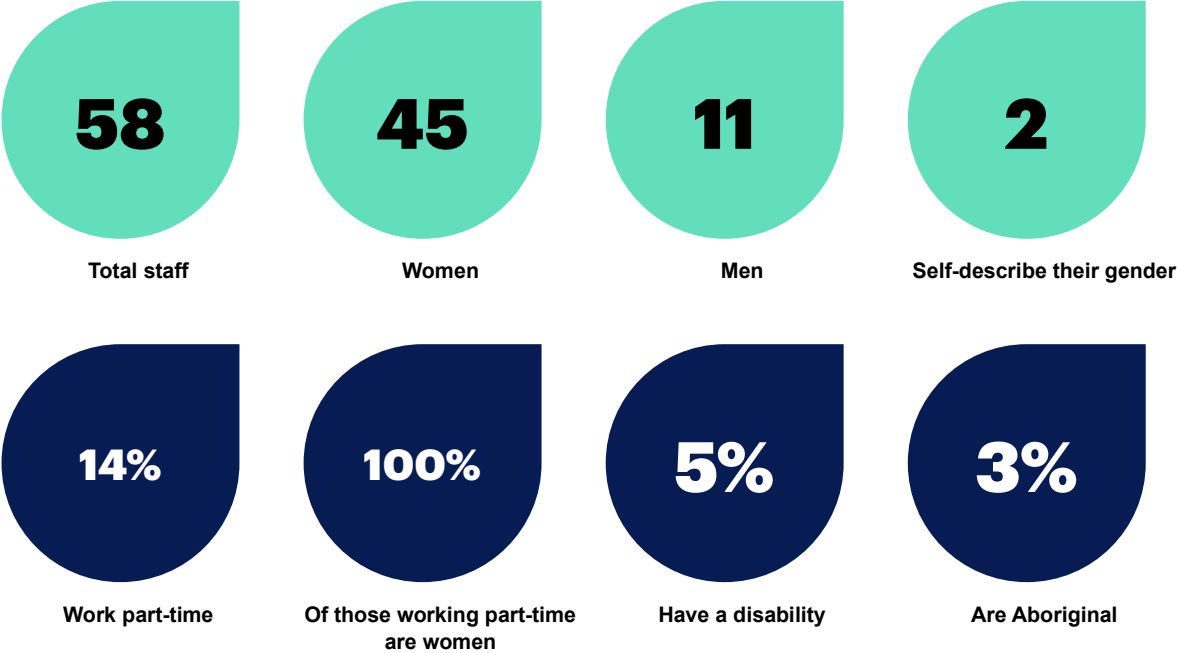
Conducting our workplace audit gave us the opportunity to consider whether our workforce data is accurate and up-to-date, and whether staff feel adequately comfortable to disclose relevant information. There may be a range of reasons that individuals choose not to share certain personal information with their workplace, and we plan to work with our staff to understand how we can best provide an environment in which they feel safe to disclose their information.

The audit has highlighted gaps in our workforce data (see findings below), which we intend to address to ensure a more comprehensive data set for future assessments of progress in achieving gender equality. One of these major gaps is diversity data that impacts the extent to which we can analyse intersectional gender inequality. This is due to factors such as a reliance on self-disclosures by staff and restrictions on publishing data in this audit.^{vii}

The relatively small size of the Commission (58 staff) means that we have small numbers of people identifying as gender non-binary, which at times means our data reinforces a binary understanding of gender and that our ability to apply an intersectional lens to our analysis has been limited due to the risk of identifying staff members. Protecting staff privacy is of the utmost importance and we have taken care not to publish any information that would inadvertently identify staff.



4.1 Gender composition – workforce



Women comprise a greater proportion of the Commission’s workforce at all levels, especially management and senior management roles. 78 per cent of the workforce at the Commission are women (n=45).

Most of our staff are employed full-time. Women are far more likely than men to take on part-time work, which is in line with trends within the Department of Justice and Community Safety (DJCS) more broadly. Men at the Commission all work on a full-time, permanent basis. In contrast, 62 per cent of women at the Commission are working on the same basis and the rest either working part-time, casual or on a fixed term contract.

There are some limitations regarding our intersectionality data. We know that our own workforce data around disability, for instance, is limited, as the PMS has demonstrated that in 2021, 18 per cent of respondents (n=8) identified as being a person with a disability, whereas 5 per cent of staff (n=3) identified as having disability in the workforce data. This suggests that staff may not be disclosing personal information to the Commission. This could indicate that the Commission should take more steps to communicate why this data is being collected and how it will be securely stored, and staff privacy maintained. Some staff may not feel safe to disclose, which is the responsibility of the Commission to rectify. Other reasons could also be playing out for some staff, such as the fact that some people wouldn’t necessarily perceive themselves as having a disability, so wouldn’t report it to the Commission; or the fact that workforce data is generally collected at the commencement of a person’s employment, and a disability may be acquired during an employee’s tenure or may be temporary. This issue will be explored by the Commission further.

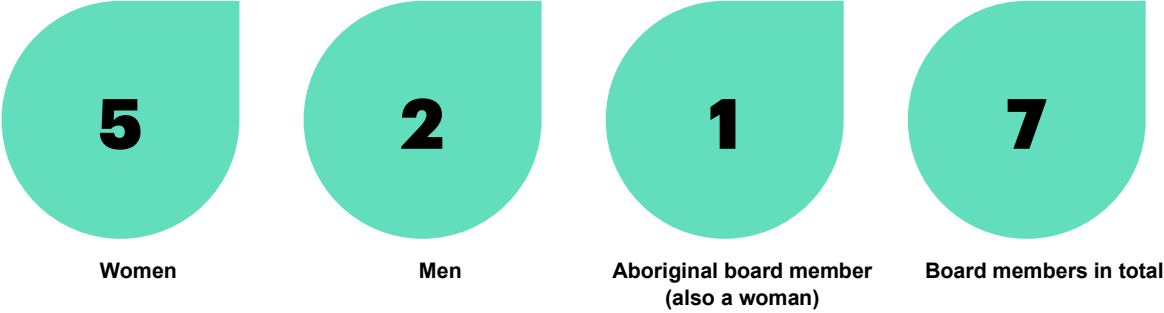
Under the Equal Opportunity Act, there is a prohibition on requesting discriminatory information unless this information is reasonably required for a non-discriminatory purpose. Collecting this information for the purpose of reporting on our progress in achieving intersectional gender equality at the Commission would therefore likely be a permitted reason.

Findings

- There are more women than men working at the Commission, and 3 per cent of staff self-describe their gender.
- All of the staff who work part-time are women.
- Our access to intersectionality data is limited and needs improvement.



4.2 Gender composition – Board



In 2020, the Commission’s Board comprised of 5 women (71 per cent) and 2 men (29 per cent). The Commission does not have existing knowledge of trans and/or gender diverse members on the Board. While the majority of Board members are women, including the Chair, the Commission has limited data on the extent of diversity within the Board in relation to other social categories of religion, sexual orientation, cultural identity, and disability. Gender matters, particularly for the Chair position,^{viii} in guiding leadership attributes and decision-making processes.^{ix}

Role modelling diversity on a Board requires an understanding of the nature and extent of demographic information. This requires proactive steps to understand a Board’s demographic composition, as well as its skills capability. By expanding the information requested of board members, the Commission can collect additional data to better assess broader diversity. An updated form for collecting personal information should provide an option ‘not to disclose’ to give members a choice regarding their privacy. Disclosures among Board members are valuable for assessing broader diversity, which provide an organisation with critical resources of different ideas, knowledge, and experiences.^x

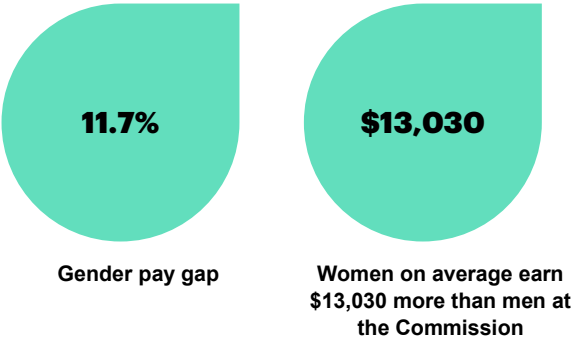
Once collected, the Commission should consider integrating this information into a Board Diversity Matrix. This is a means of identifying the nature and extent of diversity on a Board. This can be integrated with a standard skills matrix to identify gaps in skills and demographics. The Commission is limited in terms of its control of Board composition, as appointments are made by the Governor in Council on the recommendation of the Minister.

Findings

- Women represent the majority of Board members at the Commission.
- One Board member identifies as Aboriginal and Torres Strait Islander.
- There is a lack of information regarding other demographics, including disability, religion, sexual orientation, and cultural identity.



4.3 Equal remuneration for work of equal or comparable value



Women and men are entitled to equal pay for work of equal or comparable value and yet, the gender pay gap continues in many organisations. Pay discrepancies need to be investigated and responded to, to ensure all workers, irrespective of their gender, are paid equally for work of equal or comparable value.

The Commission has a gender pay gap of 11.7%, meaning that women are paid, on average, \$13,030 more than their male counterparts. Note that at the Commission, we have defined pay scales under our Enterprise Bargaining Agreement, so these differences are not due to negotiated salaries outside the set pay scale.

By contrast, gender pay gaps nationally and in Victoria result in men earning substantially more than women. As of May 2021, Australia’s national gender pay gap was 14.2%, meaning that on average women earned \$261.50 less than men each week. In Victoria, the gender pay gap was 12.2%, although this represented an increase of 2.6% since May 2020.

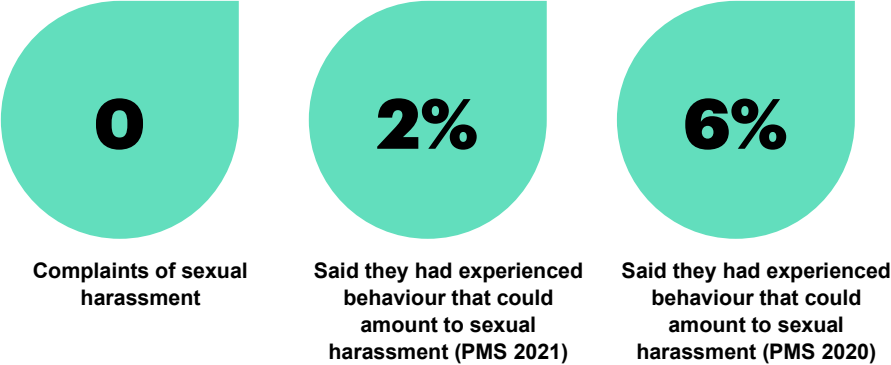
Given the number of women in leadership and managerial roles at the Commission, it is likely that this pay gap is a result of women occupying more senior positions than men. Further, more women appear to be receiving promotions and internal secondment opportunities. The Commission will need to understand and track this trend over time, including through the collection of more comprehensive demographic data that will assist in understanding the role of other attributes in determining pay discrepancies.

Findings

- On average, women out-earn men at the Commission by 11.7 per cent.
- More information is required to determine the nature of this pay gap and measures need to be introduced to ensure that all staff receive equal pay for work of equal or comparable value, irrespective of gender.
- Due to the limited broader workforce demographic data, it has not been possible for the Commission to determine the pay gaps that are unrelated to gender or arising on the basis of gender and one or more other attributes.



4.4 Sexual harassment



As Victoria’s equal opportunity and human rights regulator, the Commission understands that sexual harassment is a very significant workplace issue. We work with a number of organisations on preventing sexual harassment, discrimination and victimisation, and providing advice around best practice responses to unlawful conduct.^{xi}

Despite receiving no formal complaints of sexual harassment in the past year, the Commission will continue to assess risk to prevent sexual harassment and other forms of unlawful conduct, as well as consider ways to improve reporting avenues. In our sexual harassment guideline, *Preventing and responding to workplace sexual harassment*, and our work with other organisations, we advise employers that regardless of whether or not their employees make formal complaints, they should take steps to not only identify and mitigate risk, but also empower others through fostering a culture of speaking up.^{xii} There are a number of actions that the Commission can undertake in order to continuously promote reporting of unlawful conduct, including sexual harassment, and ensure that our processes reflect best practice.

The 2021 PMS results showed that 2% of staff experienced behaviour that could have amounted to sexual harassment; however, over that same period, no staff members made complaints of sexual harassment. The Commission urges staff who experience inappropriate workplace behaviour to make a formal complaint. The fact that no formal complaints were made points to a need to address the barriers staff face in reporting. These barriers may be addressed through utilising anonymous reporting tools at the Commission or promoting existing formal avenues to staff who may not be aware of the process for complaint-making.

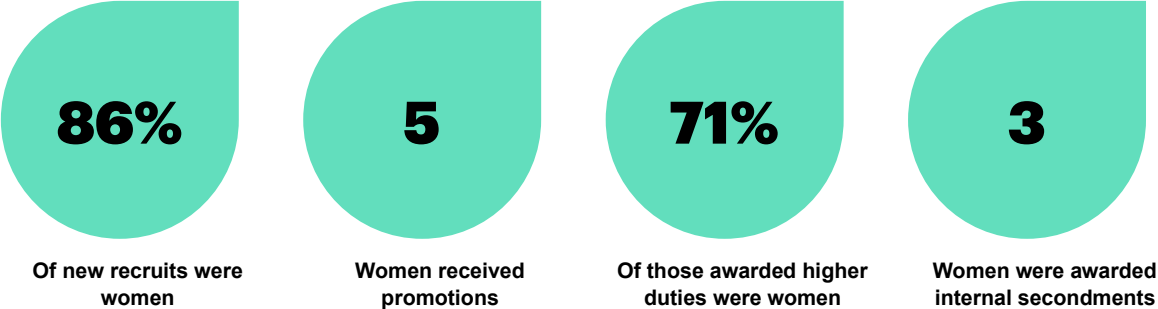
We note that PMS data is limited in that it doesn't provide details of the context of the particular sexual harassment incidents – for example, it doesn't tell us whether the perpetrator was a Commission staff member or someone external to the Commission, such as an education client of party to a conciliation. Therefore, we cannot conclude whether the conduct in question occurred between staff or a member of the public and a staff member.

In 2020, the PMS revealed that 6% of staff had experienced behaviour that could amount to sexual harassment. These instances were considered carefully by the Commission. The Commission is continuing to identify and implement actions to improve responses to and prevention of sexual harassment, as well as ensure full compliance with the Sexual Harassment Guideline – *Preventing and responding to workplace sexual harassment*.^{xiii} This Guideline provides six minimum standards that employers must meet to comply with their positive duty to eliminate sexual harassment. While it is not legally binding, the Guideline is authoritative – a court or the Victorian Civil and Administrative Tribunal may consider whether organisations have complied with the Guideline when hearing a case of sexual harassment.

Findings

- The Commission received no complaints of sexual harassment in the audit year. However, the PMS revealed that 2 per cent of staff had experienced behaviour that could amount to sexual harassment.
- The PMS data is limited in that it doesn't provide details of the context of the particular sexual harassment incidents, i.e. whether a fellow staff member was the perpetrator or a member of the public.
- The Commission is committed to fully complying with the Sexual Harassment Guideline in order to reduce risk and prevent instances of sexual harassment and other forms of unlawful conduct from occurring within the organisation.
- The Commission should adopt strategies that eliminate as far as possible unlawful conduct, including sexual harassment, and promote complaint avenues so that staff feel safe and encouraged to come forward. This should include strategies that are aimed at preventing sexual harassment in all contexts, even those occurring from members of the public or stakeholders.

4.5 Recruitment and promotion practices



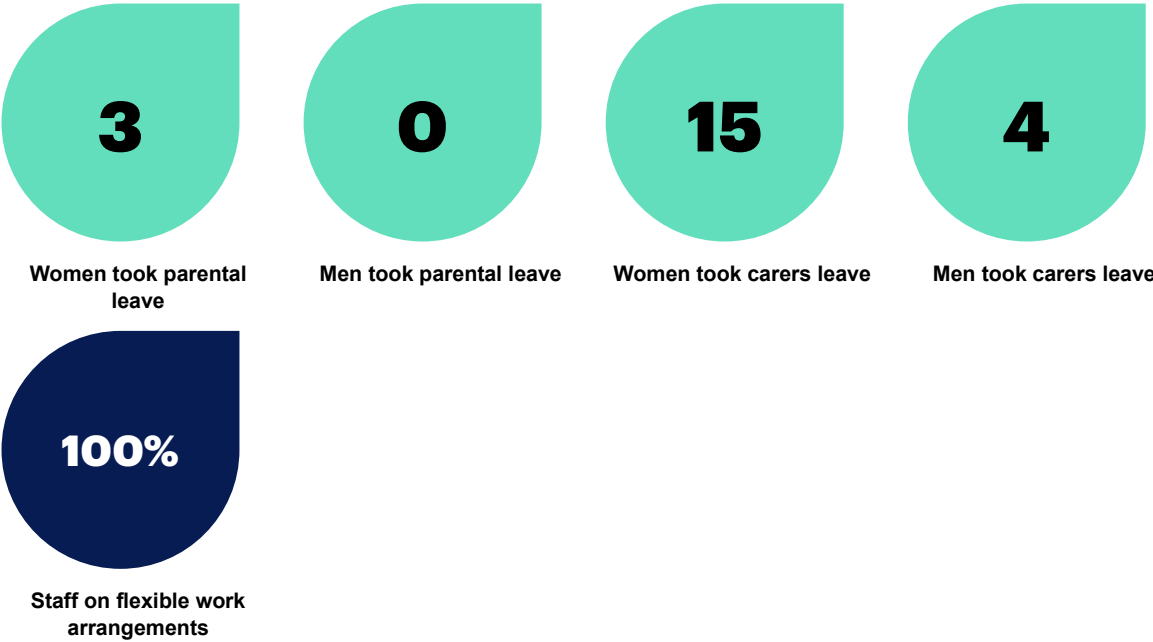
More women than men received promotions, higher duties and internal secondments, and more women were recruited to the Commission. This could be a result of the generally gendered nature of human rights and social justice work. Given the number of women is higher at the Commission, we would expect that more women would receive promotions, and that more women would be awarded higher duties and internal secondments, because this reflects the population within the Commission. For instance, 71 per cent of those who were awarded higher duties were women, which roughly corresponds with the gender breakdown of the workforce, where 78 per cent are women. It should be noted that at the Commission, there are limitations on how promotions are given, as a role must open up at the relevant branch level and be applied for, and availability fluctuates. This is different to other workplaces where promotions can be given without as much oversight.

It should also be noted that the statistics on recruitment don't include reappointments within the Commission as DJCS doesn't collect data on reappointments, meaning that this data isn't complete. This is also the case for internal secondments, as data is limited to secondments within the rest of DJCS, not within the Commission itself or the rest of the Victorian Public Service. Gathering more information on the diversity of staff recruited would help the Commission understand whether a range of women from different backgrounds are being recruited and receiving promotions and secondments.

Findings

- More women than men were recruited to the Commission, received permanent promotions, received higher duties and were granted internal secondments. This corresponds with the gender breakdown of the workforce, where 78% are women.
- Further workforce data needs to be recorded and analysed – for instance, internal secondments here only refers to internal secondments to other parts of DJCS, not to secondments within the Commission or within the VPS.

4.6 Family violence leave, flexible work and parent/carer working arrangements



The results reveal that the Commission has a culture of promoting flexible work. Our workforce data reveals that all our staff are working flexibly. The Commission has always had a culture of workplace flexibility; however, our ability to achieve this in practice was propelled by changes to our infrastructure and equipment and upskilling in remote working platforms brought about by COVID-19. We have adopted the VPS flexible work policy where the default schedule for full-time staff is three days in office, with the other 2 days worked from home, or another suitable location. We have an opportunity to track our use of flexible work overtime and drill down into what kinds of flexibility are offered and accessed.

The Leadership Team (comprised of the Commissioner, the Executive Director, and the five branch heads) is accessing a total of 15 flexible working options. Flexible working options include things like flexible start and finish times; compressed hours (working more hours over fewer days); job-sharing; flexible rostering; working from home or another location; ‘purchasing’ extra paid leave; unpaid leave; and taking rostered days off as two half days. Therefore, the Leadership Team are utilising more flexible work arrangements than just working from home, suggesting that they are not simply responses to COVID-19 impacting the adoption of flexible work.

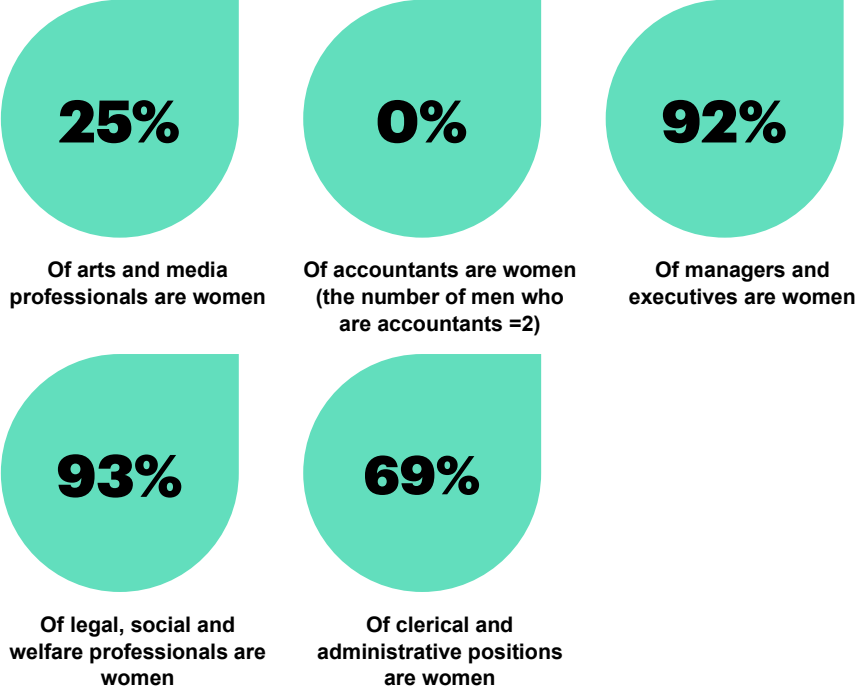
It’s important to note that we don’t have figures on how many people are parents or carers at the Commission, but given age and gender dynamics, the Commission has a key role to play in promoting equal parental leave policies and having more conversations with male-identifying staff.

Findings

- On average, more women than men accessed parental leave and carers leave; though this may be expected when more women than men work at the Commission.
- The Commission should nevertheless track this over time and promote parental and carers leave options for men working at the Commission.



4.7 Gender segregation within the workplace



The audit revealed that there was a level of gender segregation at the Commission. In particular, the proportion of accountants that are men (n=2) compared to the proportion of clerical and administrative positions that are women (69 per cent) point to this gender segregation. However, the Commission is a relatively small organisation (of 58 staff), and therefore many of these categories contain a very small number of employees. This is seen with the number of accountants at the Commission, where the percentage could be misleading, as there are only two positions. Nevertheless, this is an opportunity to track this data over time and consider how interventions could potentially help to address this segregation, such as by using a target.

As already discussed, the Commission is comprised of a majority of women. This is reflected in the number of managers and executive, with 92% of managers and executive being women (NB: this figure does not include non-binary members of the executive and leadership team). This result indicates that women are progressing through to becoming leaders, but more information is required to understand the particular demographics of women who are entering leadership positions and to ensure this positive trend is also intersectional.

Findings

- There is a gender divide between some professions within the Commission – with all the accountants at the Commission being men, and most of the leaders, lawyers and clerical staff being women.
- However, this trend could be tracked over time to ensure gender is not a barrier to working in different occupations within the Commission.



4. Strategies and measures

The *Gender Equality Act 2020* and regulations require that Gender Equality Action Plans must include:

- strategies and measures for promoting gender equality in the workplace, based on our gender audit results
- how the gender pay equity principles have been taken into account in the development of the action plan
- a discussion of gaps in audit data and the need to collect more holistic data to transcend single-axis analysis towards a more sophisticated method that considers multiple layers of discrimination and disadvantage
- an articulation of how the Commission has considered intersectional gender inequality.

The Commission has structured its strategies and measures into three desired outcomes, which are informed by our audit results and analysis, and consultations with staff, the CPSU, and the Board. Each outcome and the strategies that sits underneath are considered and applied with an intersectional lens. The strategies here are designed to be mutually reinforcing rather than separate, and the measures will help the Commission monitor our progress in achieving intersectional gender equality and an inclusive workplace.

- **Outcome 1:** Equal access to recruitment and career advancement opportunities and equal pay
- **Outcome 2:** Staff and leaders work proactively towards achieving intersectional gender equality
- **Outcome 3:** All staff are safe and respected at work

A note on 'diversity' and 'intersectional gender equality'

Intersectional gender equality refers to the goal of ensuring that women and non-binary people achieve equal treatment, conditions and opportunities as men, particularly considering that various forms of disadvantage further interact with gender-based discrimination. It means actively including women and non-binary people in efforts to improve the experiences of those working at the Commission, and it means dedicating resources and efforts into levelling the playing field for those who experience multiple, intersecting forms of disadvantage. We refer to intersectional gender equality through this document to acknowledge that this work needs to be more sophisticated than addressing gender-based discrimination on its own.

Based on the results of our workplace gender audit and consultation with staff and the CPSU, the Commission has identified key population groups to target in terms of achieving intersectional gender equality. These four traits are:

- race and ethnicity
- disability
- Aboriginality
- class

5.1 Equal access to recruitment and career advancement opportunities and equal pay

Strategies	Measures	Gender Equality Act Principles ¹	Accountability	Completion (Calendar year)
Recruitment				
Update recruitment policies to promote diversity at all levels of the workforce Intersectional focus	<ul style="list-style-type: none"> Undertake a review of recruitment policies and training resources with a view to recruiting more women and non-binary people who may experience intersecting forms of discrimination (i.e. women and non-binary people who are further disadvantaged by at least one of the four identified traits listed above. For instance, groups affected include women and non-binary people of colour, women and non-binary people with disability, 	1; 3; 4; 5; 6; 7; 8; 9; 10	Head of Corporate Services (Support: Policy and Research Branch)	2022

¹ Gender Equality Act Principles

1. That all Victorians should live in a safe and equal society, have access to equal power, resources and opportunities and be treated with dignity, respect and fairness

2. Gender equality benefits all Victorians regardless of gender

3. Gender equality is a human right and precondition to social justice

4. Gender equality brings significant economic, social and health benefits for Victoria

5. Gender equality is a precondition for the prevention of family violence and other forms of violence against women and girls

6. Advancing gender equality is a shared responsibility across the Victorian community

7. All human beings, regardless of gender, should be free to develop their personal abilities, pursue their professional careers, and make choices about their lives without being limited by gender stereotypes, gender roles or prejudices.

8. Gender inequality may be compounded by other forms of disadvantage or discrimination that a person may experience based on Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes

9. Women have historically experienced discrimination and disadvantage based on sex and gender

10. Special measures may be necessary to achieve gender equality.

Strategies	Measures	Gender Equality Act Principles ¹	Accountability	Completion (Calendar year)
	<p>Aboriginal women² and non-binary people and women and non-binary people from diverse backgrounds). <i>Data source: Corporate Services reporting</i></p> <ul style="list-style-type: none"> Review recruitment processes to attract greater diversity in terms of the four key population groups identified (such as by reviewing language in job descriptions, composition of interview panels, and shortlisting and appointment processes). Work with DJCS, as managers of the recruitment policy, to understand our recruitment data and advocate for better data tracking and policy updates that remove bias and promote inclusion. <i>Data source: Corporate Services reporting</i> 			
<p>Implement recruitment programs to target recruitment of staff from the four key cohorts.</p> <p>Intersectional focus</p>	<ul style="list-style-type: none"> Implement and utilise diversity recruitment programs to target candidates on the basis of gender, class, race/ethnicity, Aboriginality and disability. This includes programs such as the Indigenous Internship Program, Youth Employment Program, Refugee and Asylum Seeker program, and the Australian Network of Disability. <i>Data source: Corporate Services reporting</i> 	<p>1; 3; 4; 5; 6; 7; 8; 9; 10</p> <p>Gender pay equality principles³</p>	<p>Head of Corporate Services</p> <p>(Support: Policy and Research Branch)</p>	<p>2023</p>

² Aligning also with Objective 3 of the Commission's Aboriginal Community Engagement Strategy whereby Aboriginal representation is increased across the Commission and staff have knowledge and skills to provide culturally respectful services.

³ Gender Pay Equality Principles from the Gender Equality Act Regulations 2020

- a) Equal pay for work of equal or comparable value, which refers to work valued as equal or comparable in terms of skill, effort, responsibility and working conditions, including different types of work;
- b) Employment and pay practices are free from bias and discrimination, including the effects of unconscious bias and assumptions based on gender;
- c) Employment and pay practices, pay rates and systems are transparent and information about these matters is readily accessible and understandable;
- d) Employment and pay practices recognise and account for different patterns of labour force participation by employees who undertake unpaid or caring work;
- e) Interventions and solutions are collectively developed and agreed to, sustainable and enduring;

Strategies	Measures	Gender Equality Act Principles ¹	Accountability	Completion (Calendar year)
	<ul style="list-style-type: none"> Set targets for representation at leadership levels based on four key cohorts (VPS6 and above). <i>Data source: Corporate Services reporting</i> 			
Record, report on and analyse recruitment data with the aim of improving diversity across the Commission Intersectional focus	<ul style="list-style-type: none"> Work with DJCS to develop guidance on measurement, collection, monitoring and analysis of diversity data across the employee lifecycle to ensure consistent and robust data collection methods. <i>Data source: Corporate Services reporting</i> Collect qualitative data about how our intersectional gender composition aligns with outputs from the People Matter Survey. <i>Data source: People Matter Survey results and survey conducted by Corporate Services</i> 	1; 3; 4; 5; 7; 8; 9; 10	Head of Corporate Services (Support: Policy and Research Branch)	2023
Encourage diverse recruitment of Board members Intersectional focus	<ul style="list-style-type: none"> Develop alongside the Commission for Gender Equality in the Public Sector an updated Board Diversity Matrix and apply it to our Board. <i>Data source: Annual Report</i> Update the form for collecting personal information to provide an option 'not to disclose' to give members a choice regarding disclosures, while encouraging members to provide information that allows the Commission to assess broader diversity. <i>Data source: Corporate Services/DJCS</i> 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Head of Corporate Services	2023
Career development				

f) Employees, unions and employers work collaboratively to achieve mutually agreed outcomes.

Strategies	Measures	Gender Equality Act Principles ¹	Accountability	Completion (Calendar year)
<p>Establish networks and sponsorship for women and non-binary people from diverse backgrounds at the Commission</p> <p>Intersectional focus</p>	<ul style="list-style-type: none"> Collaborate with VPS employee networks on existing mentorship programs. Implement a mentorship program for employees from diverse backgrounds to have the opportunity to be mentored by senior staff (either at the Commission, or external to the Commission, particularly for those who are seeking a mentor with a similar lived experience). Promote existing networks that support LGBTIQ staff, Aboriginal staff, staff with disability and ethnically and culturally diverse staff. 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Policy and Research Branch	2023
<p>Improve career development pathways from an intersectional perspective</p> <p>Intersectional focus</p>	<ul style="list-style-type: none"> Review the current state of development pathways for diverse women and make recommendations for improvement. <i>Data source: interviews and consultations with staff at the Commission and the CPSU.</i> Increase the number of women and non-binary people with disability and women and non-binary people of colour who receive acting opportunities and/or who are internally promoted into leadership roles and/or offered ongoing positions. Implement recommendations from the above assessment of career development pathways. 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	<p>Head of Corporate Services</p> <p>(Support: Policy and Research Branch)</p>	2022
Pay equality				
<p>Reduce the gender pay gap at the Commission</p>	<ul style="list-style-type: none"> Undertake gender pay gap analysis every two years - <i>Data source: Internal workforce data</i> Analyse gender pay inequality with an intersectional lens. 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Head of Corporate Services	2025

Strategies	Measures	Gender Equality Act Principles ¹	Accountability	Completion (Calendar year)
Intersectional focus	<p><i>Data source: Corporate Services reporting</i></p> <ul style="list-style-type: none"> Develop an equal pay policy in response to the findings of the analysis. <p><i>Data source: Corporate Services reporting</i></p> <ul style="list-style-type: none"> Reduce pay inequality across gender, race and ethnicity, disability, and class. <p><i>Data source: Internal workforce data</i></p> <ul style="list-style-type: none"> Report on the gender pay gap to Commission staff and provide updates on progress made to reduce the gap. <p><i>Data source: Corporate Services reporting</i></p> <ul style="list-style-type: none"> Establish processes to raise concerns or make unequal pay complaints. <p><i>Data source: Internal workforce data</i></p> <ul style="list-style-type: none"> Allocate budget to conduct analysis and reduce gender pay inequality. 	Gender pay equality principles ⁴		

⁴ Gender Pay Equality Principles from the Gender Equality Act Regulations 2020

- g) Equal pay for work of equal or comparable value, which refers to work valued as equal or comparable in terms of skill, effort, responsibility and working conditions, including different types of work;
- h) Employment and pay practices are free from bias and discrimination, including the effects of unconscious bias and assumptions based on gender;
- i) Employment and pay practices, pay rates and systems are transparent and information about these matters is readily accessible and understandable;
- j) Employment and pay practices recognise and account for different patterns of labour force participation by employees who undertake unpaid or caring work;
- k) Interventions and solutions are collectively developed and agreed to, sustainable and enduring;
- l) Employees, unions and employers work collaboratively to achieve mutually agreed outcomes.

5.2 Our leaders and staff work proactively to embed intersectional gender equality

Strategies	Measures	Gender Equality Act Principles	Accountable	Completion (Calendar year)
<p>Build workforce capability and capacity to promote intersectional gender equality among staff and leaders</p> <p>Intersectional focus</p>	<ul style="list-style-type: none"> • Embed the Gender Equality Network to implement the Gender Equality Action Plan and other Gender Equality Act obligations – meeting once per quarter. • Provide whole of Commission Professional Development training on intersectional gender equality and anti-racism. • Provide training to managers around the VPS Enterprise Bargaining Agreement and staff entitlements. • Provide ongoing cultural and psychological safety training for all staff. • Create channels for diverse voices to provide input to the Leadership Team through existing networks (People of Colour Network, Pride Network and Enablers Network). • Host two cultural diversity workshops with staff to improve our knowledge base of intersectional gender equality, which can also inform other action plans at the Commission. 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	<p>Policy and Research Branch</p> <p>(Support: Corporate Services and Education and Engagement)</p>	2023
<p>Develop a coherent approach to intersectional practice that leverages the Commission’s purpose to eliminate discrimination, and promote and protect human rights</p>	<ul style="list-style-type: none"> • Provide whole of Commission professional development training on intersectional gender equality and the Commission’s role to promote equality and human rights. • Evaluate the efficacy of our intersectional practice through the delivery of our work programs and services. 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	<p>Director of Education and Engagement</p> <p>(Support: Corporate Services and Education and Engagement)</p>	2023

Strategies	Measures	Gender Equality Act Principles	Accountable	Completion (Calendar year)
Develop a framework and guidance on undertaking Gender Impact Assessments within the Commission	<ul style="list-style-type: none"> Develop a framework and guidance specific to the Commission for implementing GIAs. Commission staff are familiar and comfortable with the GIA process⁵ 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Policy and Research Branch	
Remove gender as a barrier to accessing carers leave, sick leave and working part-time, and continue to embed flexible work practices	<ul style="list-style-type: none"> Encourage more men to take carers leave and work part-time Cement flexible work gains achieved in response to COVID-19 by embedding flexible work as the 'new normal' going forward 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Head of Corporate Services (Support: Policy and Research Branch)	2023
Embed monitoring and evaluation of progress towards intersectional gender equality at the Commission	<ul style="list-style-type: none"> Share high-level de-identified information through a Consultative Committee (to be established) with the CPSU to pertaining to workplace equality. Work with DJCS to develop guidance on measurement, collection, monitoring and analysis of diversity data across the employee lifecycle to ensure consistent and robust data collection methods. Ensure gender equality strategies are implemented, and progress is monitored and reported to the Leadership Team and the Board regularly. <p><i>Data source: Leadership Team minutes and Board minutes</i></p>	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Head of Corporate Services (Support: Policy and Research Branch)	2022

⁵ NB: All managers will have carriage over this measure.

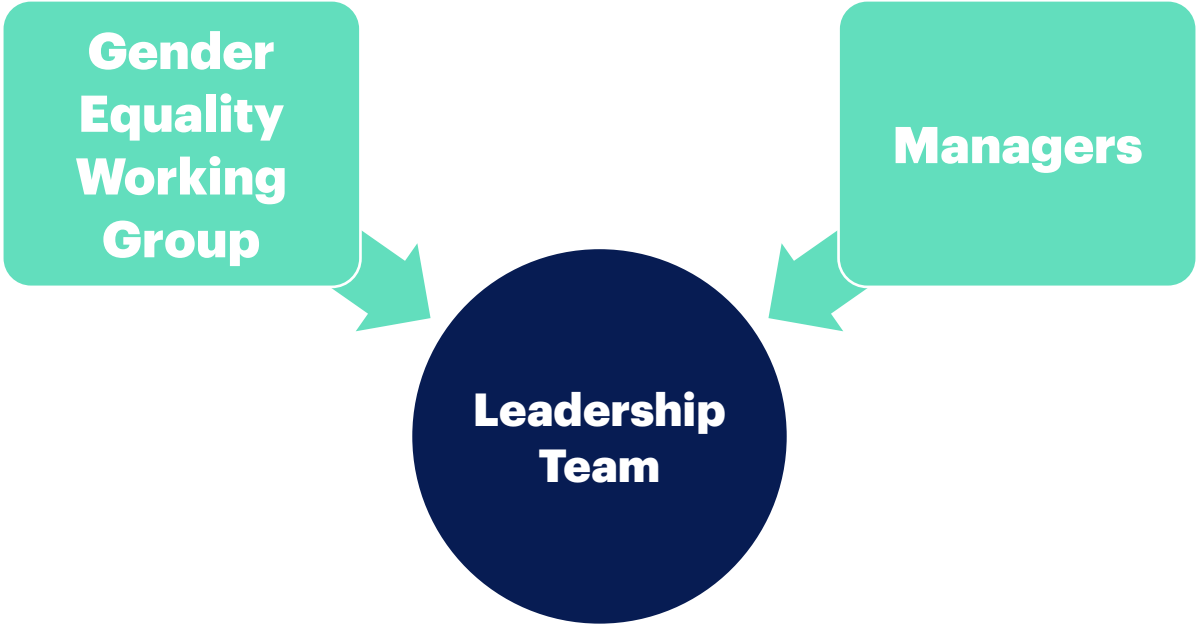
5.3 All staff are safe and respected at work

Strategies	Measures	Gender Equality Act Principle	Accountable	Completion (Calendar year)
Establish a Commission-wide approach to preventing sexual harassment, gender-based discrimination and gender-based victimisation.	<ul style="list-style-type: none"> Finalise a Prevention Plan for sexual harassment, discrimination and victimisation that aligns with the Commission's guideline on preventing and responding to sexual harassment. Ensure leaders and branches are aware of the prevention plan and are instituting any actions within their purview and updating the Gender Equality Working Group. Conduct an assessment of risk of sexual harassment at the Commission. Establish a Consultative Committee with the CPSU to share high-level de-identified information around sexual harassment, discrimination or victimisation. Develop a communications plan to promote positive workplace behaviours and direct people to relevant policies, training, support and reporting mechanisms. Advocate for the PMS to disaggregate sexual harassment data to determine whether the sexual misconduct occurred by an internal staff member or member of the public. 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Policy and Research Branch	2022
Ensure staff feel safe to report instances of sexual harassment, discrimination or victimisation.	<ul style="list-style-type: none"> Document processes for anonymous reporting of instances of sexual harassment, discrimination and victimisation in the workplace and communicating this process with staff. <i>Data source: Corporate Services.</i> Provide privacy and confidentiality training to managers and safety officers regarding complaints of sexual harassment and discrimination. Communicate with staff regarding the steps taken to ensure privacy regarding complaints of sexual harassment, discrimination and victimisation. 	1; 2; 3; 4; 5; 6; 7; 8; 9; 10	Head of Corporate Services (Support: Policy and Research Branch)	2023

6 Leadership and governance

Under the Gender Equality Act, the Commission is required to allocate adequate resources to developing and implementing the Gender Equality Action Plan.^{xiv} The allocation of dedicated resources, including a specific budget for the implementation of strategies and measures, is proportional to the strategies and measures outlined in the action plan, and is integral to ensuring this work is effective.

Numerous staff across the Commission will be involved in implementation of the Gender Equality Action Plan. These staff have been identified in the strategies and measures themselves, via nominated branch heads. Managers under designated branches will also be responsible for the implementation of strategies and measures. Further, the Leadership Team will regularly oversee implementation of the Gender Equality Action Plan, which will be guided by the Gender Equality Working Group.



It's critically important to the success of our Gender Equality Action Plan that implementation is supported by engaged and dedicated staff and a strong commitment from the Commission. Given the small size of our organisation, we will use existing resources across the Commission to lead, implement, and monitor our progress against the actions set out in this plan. The majority of this work will be led by Corporate Services and the Policy and Research branches.

7 Measuring progress

In line with requirements under the *Gender Equality Act*, the Commission will report our progress in relation to the strategies and measures every second year. We will also track progress on each of the Gender Equality Action Plan measures annually.

Progress on the Gender Equality Action Plan will be reported to the Leadership Team quarterly, and an achievement register will be used by members of the Gender Equality Working Group to update on our progress regularly.

Implementation of the Gender Equality Action Plan has already commenced, with some of these strategies and measures already underway. We have outlined which branch has responsibility for implementing the Gender Equality Action Plan, which means branch heads and managers will bear responsibility for measuring progress. Progress will also be tracked annually through PMS results and workforce data analysis completed by People & Culture.

Communication with staff and the CPSU will occur regularly through updates at all staff meetings and consultative committee meetings with the Union.



Appendix A

Consultation summary

Consultations were designed to maximise engagement with staff and representatives, communicate the purpose of the work, hear from a broad range of experiences and create people-focused actions. We had two rounds of consultation, phase one and two.

Phase one

3.1 Staff - 1 & 2 September 2021

The first staff consultations involved a presentation of the audit results and an open ended discussion of what the results mean, and whether we had gaps in our data. It also involved the collection of qualitative data on the experiences of staff at the Commission.

We heard from staff across both consultations that they wanted a workforce that reflects the Victorian community in terms of demographics and pathways. Many felt that there was a lack of diversity at the Commission, particularly in the Leadership Team.

Many wanted to examine how identity categories like class, age and ethnicity interact with gender to limit recruitment, progression and secondment prospects, calling for more data and analysis.

There was a resounding enthusiasm for celebrating diversity of thought through a diverse workforce – including focusing on class and race as they intersect with gender – which will be a key theme of the Gender Equality Action Plan.

Staff also called for more diversity on our recruitment panels themselves, noting that although attempts are made to achieve diversity on panels, the reality of the work is that sometimes diversity isn't able to be achieved. Finally, staff discussed the need to continue to ensure that behaviours that may amount to sexual harassment are reported, and that people feel comfortable and supported to report.

3.2 CPSU – 8 November 2021

The consultation with organisers, officers and delegates representing the Victorian arm of the Community and Public Sector Union (CPSU) involved a presentation on the results of the Commission's workplace gender audit and the outcomes from the staff consultations. The CPSU were presented with three broad themes that emerged from these consultations with staff. This related to recruitment, sexual harassment and safety at work and issues relating to data.

The CPSU supported raising the issue of class as an intersectional issue. They acknowledged that there have been fewer reports of sexual harassment since COVID-19. They said that in general, people tended to downplay verbal-based sexual harassment.

They said there was a lack of understanding in terms of gendered violence and non-binary people who experience workplace harassment. They suggested that complaints data needed greater focus on the experience of non-binary people.

During the data discussion, there was a suggestion to create a new survey or additional questions to the PMS to better gather intersectional data. There was a discussion of the use of non-binary data going forward. There was also an agreement that VEOHRC and the CPSU would share high-level de-identified information through a Consultative Committee, which would be established for this purpose.

The CPSU also recommended reconsidering how we draft position descriptions and considering ways to work together to improve recruitment practices. The soon-to-be established Consultative Committee would be the vehicle for continuing this work together.

3.3 Board – 24 November 2021

The Board was consulted in November 2021 regarding the results of the Workplace Gender Audit and the three key themes emerging from the audit and consultations.

Phase two

A final consultation with staff and the CPSU occurred in early March 2022. Staff and representatives from the CPSU were invited to provide written and/or verbal feedback. We held one-hour long session to go through the strategies within the Gender Equality Action Plan and pose discussion questions. We also had input from across the Commission – from members of the Gender Equality Act Compliance Working Group, the Leadership Team and Corporate Services.

This consultation phase allowed for a robust discussion of our approach to addressing intersectional gender inequality at the Commission and further refined our strategies and measures. We clarified points around inclusive language, and the difference between thinking about this work internally as opposed to the external work we perform. We heard that clarifications were required around the definitions of ‘class’ and ‘intersectionality’, as well as the need to consider further training for staff on cultural safety and psychological safety. We also heard overwhelmingly that staff and the CPSU were pleased with the focus on intersectionality and the three key domains chosen.

ⁱ Commission for Gender Equality in the Public Sector, accessed 15/3/22, 'Applying Intersectionality' <https://www.genderequalitycommission.vic.gov.au/applying-intersectionality>

ⁱⁱ Jill Sheppard and Nicholas Biddle, 'Class, capital, and identity in Australian society' *Australian Journal of Political Science*, 2017, Vol 52 No 4, 500-516, p 501.

ⁱⁱⁱ See Jill Sheppard and Nicholas Biddle, 'Class, capital, and identity in Australian society' *Australian Journal of Political Science*, 2017, Vol 52 No 4, 500-516.

^{iv} There was a 71 per cent staff response rate – n = 45

^v Kimberle Crenshaw, quoted in UN Women,

[https://www.unwomen.org/en/news/stories/2020/6/explainer-intersectional-feminism-what-it-means-and-why-it-](https://www.unwomen.org/en/news/stories/2020/6/explainer-intersectional-feminism-what-it-means-and-why-it-matters#:~:text=An%20intersectional%20approach%20shows%20the,class%2C%20sexualit)

[matters#:~:text=An%20intersectional%20approach%20shows%20the,class%2C%20sexualit](https://www.unwomen.org/en/news/stories/2020/6/explainer-intersectional-feminism-what-it-means-and-why-it-matters#:~:text=An%20intersectional%20approach%20shows%20the,class%2C%20sexualit)

[y%20or%20immigrant%20status.](https://www.unwomen.org/en/news/stories/2020/6/explainer-intersectional-feminism-what-it-means-and-why-it-matters#:~:text=An%20intersectional%20approach%20shows%20the,class%2C%20sexualit)

^{vi} [https://www.unwomen.org/en/news/stories/2020/6/explainer-intersectional-feminism-what-it-means-and-why-it-](https://www.unwomen.org/en/news/stories/2020/6/explainer-intersectional-feminism-what-it-means-and-why-it-matters#:~:text=An%20intersectional%20approach%20shows%20the,class%2C%20sexualit)

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^{vii} For instance, a system where you are required to self-report your Aboriginality through an employee portal, or in terms of restrictions on publishing data, privacy legislation that restricts the publication of data that could serve to identify someone.

^{viii} Mingzhu Wang and Elisabeth Kelan, 'The Gender Quota and Female Leadership: Effects of the Norwegian Gender Quota on Board Chairs and CEOs' (2013) 117 *Journal of Business Ethics*, 449–466.

^{ix} Anup Banerjee, Mattias Nordqvist, and Karin Hellerstedt, 'The Role of the Board Chair—A Literature Review and Suggestions for Further Research' (2020) 28 *Corporate Governance: An International Review*, 372–405.

^x Francisco Bravo, 'Does Board Diversity Matter in the Disclosure Process? An Analysis of the Association between Diversity and the Disclosure of Information on Risks' (2018) 15 *International Journal of Disclosure and Governance*, 104–114.

^{xi} See for example, our independent review into sex discrimination and sexual harassment within Victoria Police, our independent review into discrimination, sexual harassment, victimisation and bullying within Ambulance Victoria and our work with Champions for Change within fire services. We are also currently undertaking an investigation of sexual harassment within a major company.

^{xii} <https://www.humanrights.vic.gov.au/resources/sexual-harassment-guideline/>

^{xiii} <https://www.humanrights.vic.gov.au/resources/sexual-harassment-guideline/>

^{xiv} *Gender Equality Act 2020* (Vic) s 10(3).

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