

Australian Government



2021 - 22 Compliance Program

Submitted by:

GPT Management Holdings Limited (ABN:67113510188)

#Workplace overview

Policies and strategies

1: Do you have a formal policy and/or formal strategy in place that specifically supports gender equality in the following areas?

equality in the following areas:	
Recruitment	Yes(Select all that apply)
Yes	Policy Strategy
Retention	Yes(Select all that apply)
…Yes	Strategy
Performance management pro	cesses Yes(Select all that apply)
Yes	Strategy Policy
Promotions	Yes(Select all that apply)
Yes	Strategy Policy
Talent identification/identificati potentials	on of high Yes(Select all that apply)
…Yes	Strategy
Succession planning	Yes(Select all that apply)
Yes	Strategy Policy
Training and development	Yes(Select all that apply)
Yes	Strategy Policy
Key performance indicators fo relating to gender equality	r managers Yes(Select all that apply)
…Yes	Strategy

2: Do you have formal policy and/or formal strategy in place that support gender equality overall? Yes(*Select all that apply*)

Yes	Policy
165	Strategy

3: Does your organisation have any of the following targets to address gender equality in your workplace?

Reduce the gender pay gap

Increase the number of women in leadership positions

4: If your organisation would like to provide additional information relating to your gender equality policies and strategies, please do so below.

Governing bodies

GPT Management Holdings Limited	
1: Does this organisation have a governing body?	Yes(Provide further details on the governing body(ies) and its composition)
1.1: What is the name of your governing body?	Board of Directors
1.2: What type of governing body does this organisation have?	Board of directors
1.3: How many members are on the governing body and who holds the predominant Chair position?	
Chairs	
Female	1
Male	0
Non-binary	0
Members	
Female	2
Male	4
Non-binary	0
1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members?	Yes(Select all that apply)
	Policy
1.5: Has a target been set to increase the representation of women on this governing body?	No(Select all that apply)
	Governing body has gender balance (i.e. 40% women / 40% men / 20% either)
1.6: Do you have a formal policy and/or formal strategy in place on the gender composition of your governing body?	Yes(Select all that apply.)
	Policy
1.1.a.3: How many members are on the governing body and who holds the predominant Chair position?	

2: If your organisation would like to provide additional information relating to governing bodies and gender equality in your workplace, do so below.

#Action on gender equality

Gender pay gaps

1: Do you have a formal policy and/or formal strategy on remuneration generally? Yes(Select all that apply)

Yes	Policy Strategy
1.1: Are specific pay equity objectives included in your formal policy and/or formal strategy?	Yes(Select all that apply)
Yes	To achieve gender pay equity To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at annual salary reviews, out-of-cycle pay reviews, and performance reviews)

- 2: What was the snapshot date used for your Workplace Profile? 31-Mar-2022
- 3: Does your organisation publish its organisation-wide gender pay gap? Yes(Select all that apply.)

Yes	Shared internally with governing body members Shared internally with employees Shared internally with shareholders Shared externally

4: Do you give WGEA permission to publicly publish your organisation-wide gender pay gap? Yes

5: If your organisation would like to provide additional information relating to gender pay gaps in your workplace, please do so below.

Employer action on pay equity

1: Have you analysed your payroll to determine if there are any remuneration gaps between women and men (e.g. conducted a gender pay gap analysis)?

Yes(Provide further details on the most recent gender remuneration gap analysis that was undertaken.)

1.1: When was the most recent gender remuneration gap analysis undertaken?	Within the last 12 months
1.2: Did you take any actions as a result of your gender remuneration gap analysis?	Yes(Select all that apply)
	Created a pay equity strategy or action plan Identified cause/s of the gaps Reviewed remuneration decision-making

1.2: Did you take any actions as a result of your gender remuneration gap analysis? Yes	processes Analysed commencement salaries by gender to ensure there are no pay gaps Analysed performance pay to ensure there is no gender bias (including unconscious bias) Set targets to reduce any organisation-wide gap Reported pay equity metrics (including gender pay gaps) to the governing body Reported pay equity metrics (including gender pay gaps) to the executive Reported pay equity metrics (including gender pay gaps) to the executive Reported pay equity metrics (including gender pay gaps) to all employees Reported pay equity metrics (including gender pay gaps) externally Trained people-managers in addressing gender bias (including unconscious bias) Corrected like-for-like gaps
1.3: You may provide details below on the type of gender remuneration gap analysis that has been undertaken (for example like-for-like and/or organisation-wide)	In addition to measuring the organisation wide gender pay gap, GPT takes a multifaceted approach to examining pay equity and analysing our performance in several ways: » Average remuneration by seniority – examining the average remuneration of female and male employees by role level, where different roles with different market values are grouped and compared by level of seniority » Like-for-like role comparison – assessing the remuneration of female and male employees in like forlike roles, and » Industry comparison – considering the average median comparatio of female and male employees, in which the remuneration of GPT employees is compared to the median remuneration to equivalent roles in the external labour market.

2: For organisations with partnership structures: Have you undertaken a gender remuneration gap analysis ('gender pay gap analysis') in the current reporting period to determine if there are any remuneration gaps between women partners and men partners in your organisation?

3: If your organisation would like to provide additional information relating to employer action on pay equity in your workplace, please do so below.

GPT is committed to pay parity for all employees in equivalent roles that is, those within the same job function and same job level. Our efforts are championed by GPT's CEO as a WGEA Pay Equity Ambassador. The average median comparatio for total compensation

was 1.08 for females and 1.09 for males in 2021, which is within an acceptable tolerance of a plus or minus 2% difference. 2021 saw GPT further reduce its gender pay gap to 20.73%, a 17% reduction from the prior year, and improvement of 9 percentage points when benchmarked against the non-residential property sector.

Employee consultation

1: Have you consulted with employees on issues concerning gender equality in your workplace during the reporting period?

Yes(Provide further details on the employee consultation process.)

1.1: How did you consult employees?	Survey Focus groups Exit interviews
1.2: Who did you consult?	ALL staff

2: Do you have a formal policy and/or formal strategy in place on consulting employees about gender equality?

Yes(Select all th	hat apply.)	

...Yes

Policy Strategy

- 3: On what date did your organisation share your previous year's public reports with employees? 9-Sep-2021
- 4: Does your organisation have shareholders?

Yes

4.1: On what date did your organisation share your previous year's public reports 9-Sep-2021 with shareholders?

5: Have you shared previous Executive Summary and Benchmark reports with the governing body?

Yes

6: If your organisation would like to provide additional information relating to employee consultation on gender equality in your workplace, please do so below.

#Flexible work

Flexible working

1: Do you have a formal policy and/or formal strategy on flexible working arrangements? Yes(Select all that apply)

Yes	Policy Strategy
A business case for flexibility has been established and endorsed at the leadership level	Yes
Leaders are visible role models of flexible working	Yes
Flexible working is promoted throughout the organisation	Yes
Targets have been set for engagement in flexible work	No(Select all that apply)
No	Other (provide details)
Other (provide details)	We have not set specific targets in relation to the uptake of formal Flexible Working since the Covid pandemic as we have shifted to a hybrid way of working and have a formal policy on this which has seen a large proportion of the workforce working flexibly in some form.
Targets have been set for men's engagement in flexible work	No(Select all that apply)
No	Other (provide details)
Other (provide details)	We have not set specific targets in relation to the uptake of formal Flexible Working among the male population since the Covid pandemic as we have shifted to a hybrid way of working and have a formal policy on this which has seen a large proportion of the workforce working flexibly in some form.
Leaders are held accountable for improving workplace flexibility	Yes
Manager training on flexible working is provided throughout the organisation	Yes
Employee training is provided throughout the organisation	Yes
Team-based training is provided throughout the organisation	Yes

	Employees are surveyed on whether they have sufficient flexibility	Yes
	The organisation's approach to flexibility is integrated into client conversations	Yes
	The impact of flexibility is evaluated (e.g. reduced absenteeism, increased employee engagement)	Yes
	Metrics on the use of, and/or the impact of, flexibility measures are reported to key management personnel	Yes
	Metrics on the use of, and/or the impact of, flexibility measures are reported to the governing body	Yes
2:	Do you offer any of the following flexible workir	ng options to MANAGERS in your workplace?
	Flexible hours of work	Yes(Select one option only)
	Yes	SAME options for women and men(Select all that apply)
	SAME options for women and men	Formal options are available Informal options are available
	Compressed working weeks	Yes(Select one option only)
	Yes	SAME options for women and men(Select all that apply)
	SAME options for women and men	Formal options are available
	Time-in-lieu	Yes(Select one option only)
	Yes	SAME options for women and men(Select all that apply)
	SAME options for women and men	Informal options are available
	Telecommuting (e.g. working from home)	Yes(Select one option only)
	Yes	SAME options for women and men(Select all that apply)
	SAME options for women and men	Formal options are available Informal options are available
	Part-time work	Yes(Select one option only)
	Yes	SAME options for women and men(Select all that apply)
	SAME options for women and men	Formal options are available
	Job sharing	Yes(Select one option only)
	Yes	SAME options for women and men(Select all that apply)
	SAME options for women and men	Formal options are available
	Carer's leave	Yes(Select one option only)
	Yes	SAME options for women and men(Select all that apply)

SAME options for women and men	Formal options are available Informal options are available
Purchased leave	Yes(Select one option only)
Yes	SAME options for women and men(Select all that apply)
SAME options for women and men	Formal options are available
Unpaid leave	Yes(Select one option only)
Yes	SAME options for women and men(Select all that apply)
SAME options for women and men	Formal options are available

3: Are your flexible working arrangement options for NON-MANAGERS the same as the options for managers above?

Yes

4: Has your organisation implemented an 'all roles flex' approach to flexible work? Yes

5: Did you see an increase, overall, in the approval of FORMAL flexible working arrangements for your workforce during the 2021-22 reporting period?

No

6: If your workplace includes hybrid teams (i.e. some employees in a team work remotely while other employees in a team work at the organisation's usual workplace), have any of the following measures been utilised to ensure the fair treatment of all employees regardless of work location?

Training for managers on how to work with flexible and remote/hybrid teams Training for all employees on how to work with flexible and remote/hybrid teams Employee performance is measured by performance and not presenteeism All team meetings are held online

Training for non-managers on how to work with flexible and remote/hybrid teams

7: If your organisation would like to provide additional information relating to flexible working and gender equality in your workplace, including specific changes due to the impact of the COVID-19 pandemic on your workplace, please do so below.

In 2021 GPT undertook a substantial review of our ways of working and our flexible working policy and moved to a hybrid way of working.

#Employee support

Paid parental leave

1: Do you provide employer funded paid parental leave regardless of carer's status (i.e. primary/secondary) in addition to any government funded parental leave scheme?

Yes, we offer employer funded parental leave (using the primary/secondary carer definition)

1.1: Do you provide employer funded paid parental leave for primary carers in addition to any government funded parental leave scheme?	Yes(Please indicate how employer funded paid parental leave is provided to the primary carers.)
1.1.a: Please indicate whether your employer-funded paid parental leave for primary carers is available to:	All, regardless of gender
1.1.b: Please indicate whether your employer-funded paid parental leave for primary carers covers:	Birth Adoption
1.1.c: How do you pay employer funded paid parental leave to primary carers?	Paying the employee's full salary
1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave?	Yes, on employer funded parental leave
1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided?	16
1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals?	91-100%
1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave?	No
1.1.h: Do you require primary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Yes
1.1.h: Do you require primary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Within 12 months
Yes	

1.2: Do you provide employer funded paid parental leave for secondary carers in addition to any government funded parental leave scheme?	Yes(Please indicate how employer funded paid parental leave is provided to the secondary carers.)
1.2.a: Please indicate whether your employer-funded paid parental leave for secondary carers is available to:	All, regardless of gender
1.2.b: Please indicate whether your employer-funded paid parental leave for secondary carers covers:	Birth Adoption
1.2.c: How do you pay employer funded paid parental leave to secondary carers?	Paying the employee's full salary
1.2.d: Do you pay superannuation contribution to your secondary carers while they are on parental leave?	Yes, on employer funded parental leave
1.2.e: How many weeks (minimum) of employer funded paid parental leave for secondary carers is provided?	3
1.2.f: What proportion of your total workforce has access to employer funded paid parental leave for secondary carers, including casuals?	90-100%
1.2.h: Do you require secondary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Yes
1.2.h: Do you require secondary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Within 12 months
Vee	

.. Yes

2: If your organisation would like to provide additional information relating to paid parental leave and gender equality in your workplace, please do so below.

Support for carers		
1: Do you have a formal policy and/or formal strategy to support employees with family or caring responsibilities?		
Yes(Select all that apply)		
Yes	Policy Strategy	
2: Do you offer any of the following support mechanisms for employees with family or caring responsibilities?		
	Yes(Please indicate the availability of this	

Employer subsidised childcare	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites

On-site childcare	No(You may specify why the above support mechanism is not available to your employees.)
No	Other (provide details) Insufficient resources/expertise
Other (provide details)	Not feasible given the size of the workforce and relatively small numbers in each of our locations
Breastfeeding facilities	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites
Childcare referral services	No(You may specify why the above support mechanism is not available to your employees.)
No	Not a priority
Internal support networks for parents	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites
Return to work bonus (only select if this bonus is not the balance of paid parental leave)	No(You may specify why the above support mechanism is not available to your employees.)
No	Not a priority Other (provide details)
Other (provide details)	We offer a child care allowance rather than a return to work bonus
Information packs for new parents and/or those with elder care responsibilities	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites
Referral services to support employees with family and/or caring responsibilities	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites
Targeted communication mechanisms (e.g. intranet/forums)	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites
Support in securing school holiday care	No(You may specify why the above support mechanism is not available to your employees.)
No	Other (provide details) Not a priority
Coaching for employees on returning to work from paid parental leave	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites
Parenting workshops targeting mothers	Yes(Please indicate the availability of this support mechanism.)
Yes	Available at ALL worksites
Parenting workshops targeting fathers	Yes(Please indicate the availability of this support mechanism.)

1 63				Y	es	
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... Other (provide details)

No

3: If your organisation would like to provide additional information relating to support for carers in your workplace, please do so below.

To assist employees to return to work following the birth or placement of their child, GPT provides eligible employees with a Childcare Allowance to contribute to the cost of childcare. The childcare allowance is \$42 (gross) per full day (7.5 hours) worked, capped at 12 months from the date of return to work, to a maximum of \$10,000. Payments are made on a monthly basis as part of eligible employee's regular monthly pay.

Sex-based harassment and discrimination

1: Do you have a formal policy and/or formal strategy on sex-based harassment and discrimination prevention?

Yes(Select all that apply)	
Yes	Policy
1.1: Do you provide a grievance process in any sex-based harasssment and discrimination prevention formal policy and/or formal strategy?	Yes

2: Do you provide training on sex-based harassment and discrimination prevention to the following groups?

All managers	Yes(Please indicate how often is this training provided (select all that apply):)
Yes	At induction Every one-to-two years
All employees	Yes(Please indicate how often is this training provided (select all that apply):)
Yes	At induction Every one-to-two years

3: If your organisation would like to provide additional information relating to sex-based harassment and discrimination, please do so below.

During 2021 we rolled out targeted face to face (where possible) training with a specialist provider in this space. This was run for specific groups including the Leadership team, the People team and People Leaders. In addition we rolled out a Sexual Harassment module which was assigned to all employees who did not receive the abovementioned training. We also have a Sexual Harassment Prevention Onboarding module as part of our orientation approach. In 2021 this had a 100% completion rate among our new starters.

Family or domestic violence

1: Do you have a formal policy and/or formal strategy to support employees who are experiencing family or domestic violence?

Yes(Select all that apply)

...Yes

2: Other than a formal policy and/or formal strategy, do you have the following support mechanisms in place to support employees who are experiencing family or domestic violence?

Employee assistance program (including access to psychologist, chaplain or counsellor)	Yes
Training of key personnel	Yes
A domestic violence clause is in an enterprise agreement or workplace agreement	No(Select all that apply)
No	Other (provide details)
Other (provide details)	We do not have any enterprise agreements or workplace agreements in place at GPT – our DFV policy applies to all of our employees and is a Group policy
Workplace safety planning	Yes
Access to paid domestic violence leave (contained in an enterprise/workplace agreement)	No(Select all that apply)
No	Other (provide details)
Other (provide details)	We do not have any enterprise agreements in place at GPT – our DFV policy applies to all employees which is uncapped leave. Paid Leave is available on a case by case basis (no cap in place).
Access to unpaid domestic violence leave (contained in an enterprise/workplace agreement)	No(Select all that apply)
No	Other (provide details)
Other (provide details)	We do not have any enterprise agreements in place at GPT – our DFV policy applies to all employees which is uncapped leave. Unpaid Leave is available on a case by case basis (no cap in place)
Access to paid domestic violence leave (not contained in an enterprise/workplace agreement)	Yes(Is the leave period unlimited?)
Yes	Yes
Access to unpaid leave	Yes(Is the leave period unlimited?)
Yes	Yes
Confidentiality of matters disclosed	Yes
Referral of employees to appropriate domestic violence support services for expert advice	Yes

Protection from any adverse action or discrimination based on the disclosure of domestic violence	Yes
Flexible working arrangements	Yes
Provision of financial support (e.g. advance bonus payment or advanced pay)	Yes
Offer change of office location	Yes
Emergency accommodation assistance	Yes
Access to medical services (e.g. doctor or nurse)	No(Select all that apply)
No	Other (provide details)
Other (provide details)	Under consideration - not currently captured in policy
Other (provide details)	No

3: If your organisation would like to provide additional information relating to family and domestic violence affecting your workplace, please do so below.

In 2021 GPT revised it's Domestic and Family Violence Policy to bring it into line with best practice guidance articulated in the Champions of Change Research Report, 'Playing Our Part'. This included determining leave offered on a case by case basis (i.e. no cap) and also some support mechanisms for those using Domestic and Family Violence.

#Diversity and inclusion

Voluntary section

1: Do you have a formal policy and/or formal strategy on diversity and inclusion in your organisation?

Yes(Select all that is covered.)

Yes	Aboriginal and/or Torres Strait Islander identity Cultural and/or language and/or race/ethnicity background Sexual orientation Gender identity Age

2: Do you collect data on whether employees identify as Aboriginal and/or Torres Strait Islander? Yes

If this data can be shared and is not confidential, please complete the below table:	
Aboriginal and/or Torres Strait Islander Managers Female	0
Aboriginal and/or Torres Strait Islander Managers Male	0
Aboriginal and/or Torres Strait Islander Managers Non-binary	0
Aboriginal and/or Torres Strait Islander Non-managers Female	1
Aboriginal and/or Torres Strait Islander Non-managers Male	2
Aboriginal and/or Torres Strait Islander Non-managers Non-binary	0

3: Do you currently collect data on any of the following dimensions of employees' identities?
Cultural and/or language and/or race/ethnicity background
Disability
Sexual orientation
Gender identity