

Gender equality action plan

2023 - 2025

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Key issues

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The Victorian Gambling and Casino Control Commission (VGCCC) acknowledges all Aboriginal and Torres Strait Islander people, Traditional Owners, and custodians of the land on which we work and live as Australia's first peoples. We pay our respects to their Elders, past, present, and future.

Message from the CEO

We believe the VGCCC can be a place where the most talented, motivated people aspire to work. People will be united by a calling to serve the community and ultimately improve outcomes for Victorians through ensuring integrity, safety and fairness for all.

By 2025, we want to be renowned for delivering an exceptional employee experience. One of the ways we will achieve this is by supporting the wellbeing and psychological safety of our staff through an inclusive and values-driven culture.

We recognise gender equality as an essential element to delivering our responsibilities as a regulator. Gender equality is a human right and a precondition for social justice.

This gender equality plan is our first as the dedicated casino and gambling regulator. The VGCCC was established on 1 July 2022 and due to this we are not required to have a GEAP in place until the next planning cycle commencing in 2025. However, we have an opportunity to establish sustainable gender equality from the outset as we focus on establishing ourselves and building our workforce. We have therefore undertaken to develop a GEAP voluntarily and comply with reporting requirements, along with all other defined entities.

This initial plan sets out how we will support gender diversity at the VGCCC and the initiatives we will implement as we recruit to a full complement with a renewed regulatory approach and fit-for-purpose operating model. Using a strategic approach to diversity in the workplace we plan to address the requirements of the *Gender Equality Act 2020*. We anticipate that when we complete the next gender equality action plan in 2025, we will have a clearer representation of the status of gender equality and intersectional data in our workforce.

Over the past year, since becoming the dedicated casino and gambling regulator, we have undertaken a major recruitment drive and we formed a dedicated team to focus on activating our new purpose and culture to help support diversity in our workplace. This team has transitioned from staff representatives, to an extended leadership team, and will directly inform improvement opportunities and actions that will contribute to a more inclusive and diverse workplace that provides exceptional career opportunities for all staff, regardless of gender. We have also established a culture and inclusion group, led by one of our Commissioners, with the aim to get people more engaged in creating an inclusive workplace, and build understanding and awareness of diversity and inclusion.

We are also working to develop an employee value proposition that defines what our people should expect from a career with the VGCCC, in exchange for the capabilities, experiences and value they bring. This will better enable the organisation to secure talent as well as retain key staff.

I would like to thank our Gender Equality Action Plan Committee, which is comprised of staff representatives, a Community and Public Sector Union official and chaired by the Manager People and Culture. Multiple feedback rounds were incorporated into the final draft, which was endorsed by the Executive Management Team and Commission.

Annette Kimmitt AM Chief Executive Offier

By 2025 we want to be renowned for delivering an exceptional employee experience.

Our organisation

We are an independent regulator with a clear purpose to ensure integrity, safety and fairness for all.

A 2021 Royal Commission into the Casino Operator and Licence exposed reprehensible conduct by the casino operator and drew out shocking stories of the personal ruin and devastation it wreaked. To restore confidence in the sector, Victoria needed a regulator who could hold the casino and the broader gambling industry to account.

That's why we were created. From 1 July 2022, we have stronger powers and a dedicated focus to regulate gambling. And we won't shy away from using those powers. From the casino to community raffles, we are holding gambling operators to account in the interests of a fair and safe industry.

We are cracking down on operators who break the law, act dishonestly and don't protect people from the devastating harm that gambling can cause. Not just to individuals, but to their families, friends and the whole community. In fact, minimising harm is at the heart of all we do.

What drives us

One of the key things we want to be renowned for is an exceptional employee experience.

This will be achieved through:

- enabling each person who works at VGCCC to derive a deep sense of purpose in their work, and, in particular, to know that they are making a meaningful contribution towards ensuring the integrity, safety and fairness of the gambling industry
- supporting wellbeing and psychological safety through an inclusive and values-driven culture
- encouraging career progression and providing clarity on the skills and capabilities needed to succeed
- delivering highly effective learning and development through onthe-job experiences, coaching, mentoring and formal learning
- ensuring people feel valued for their contribution.

Our obligations

As a public sector organisation, we are required to:

- develop and implement a gender equality action plan, which includes:
- results of a workplace gender audit
- intersectional data
- how we will resource the plan's development and implementation
- promote gender equality in policies, programs and services that impact the public
- consult with our governing bodies, employees, employee representatives and other relevant people
- document our strategies and measures based on the results of the audit
- report our progress on the strategies and measures set out in our plan, at least every second year
- complete annual gender impact assessments.

Our ambitions

We aren't looking to just tick the boxes on gender equality. We want to create and embed a system that provides a sustainable approach to gender equality through policies and procedures that are aligned with gender equality principles, an engaged and aware staffing cohort, and proactive promotion of gender and intersectional issues.

What we stand for

Our values reflect not only how we act, make decisions and behave – but also our shared beliefs.



We work together, encourage and support each other. We consult to achieve shared goals and keep people informed. We develop and maintain positive working relationships, collaborate, and acknowledge and celebrate success.

We treat all people with respect, seek different perspectives and approaches, and value work/life balance.

We foster an environment where people give and receive constructive feedback and consider the ideas and contributions of others.

We are accountable for our actions.

We are honest, fair and reliable.

We approach our work with enthusiasm and commitment, apply sound judgement and common sense, and embrace personal and professional development.

We think and plan ahead, focus on agreed priorities, deliver on commitments and meet agreed timelines.

We are responsive and flexible, and strive for excellence.

We step back and ask 'why', developing a mindset of continuous improvement.

We courageously challenge the status quo when required.

We boldly act on our regulatory mandate to ensure integrity, safety and fairness for all.

Gender equality principles

Our GEAP has been developed in consideration of the gender equality principles outlined in the *Gender Equality Act 2020.*

Principles

The gender equality principles, as listed in section 6 of the Gender Equality Act 2020, are:

- 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.
- Gender equality benefits all Victorians, regardless of gender.
- Gender equality is a human right and precondition to social justice.
- Gender equality brings significant economic, social and health benefits for Victoria.
- Gender equality is a precondition for the prevention of family violence and other forms of violence against women and girls.
- Advancing gender equality is a shared responsibility across the Victorian community.

- 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.
- Gender inequality may be compounded by other forms of disadvantage or discrimination that a person may experience on the basis of Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes.
- Women and other genders have historically experienced discrimination and disadvantage on the basis of sex and gender.
- Special measures may be necessary to achieve gender equality.

...Our workforce is currently around 50% male and female. Women are well represented in all employment levels...



Gender diversity snapshot

As the dedicated casino and gambling regulator, we currently have a workforce with 82% of positions filled at time of this document's creation. So our first gender equality action plan will initially focus on the current workforce and detail initiatives to maintain our gender diverse workforce as vacancies are filled.

An active recruitment campaign was completed in the first half of 2023 to address the 80 vacancies that were created as a result of the former Victorian Casino and Gambling Regulator being split into two separate regulators – the VGCCC and Liquor Control Victoria. We anticipate that when the next gender equality action plan is created in 2025, we will have a full staffing cohort to analyse and provide a clear representation of gender equality and intersectional data in our workforce. To form baseline data sets, a baseline audit analysis of our workforce was completed to identify gaps and scope targeted approaches against gender equality indicators to ensure VGCCC will deliver exceptional employee experience, regardless of gender.

Firstly, our data capability is not at the level we need. This is a priority action and included as a key enabling priority as part of our 2025 organisational plan. We plan to establish remaining data sets regarding intersectionality, for example ethnicity, cultural identity, religion and sexual orientation. This would build capacity to allow more nuanced analysis in future and assist in better understanding our workforce and plan around further improving gender equality.

As of 30 June 2023, we had 163 employees (inclusive of Commissioners), with varied gender equality across levels and divisions. Currently, we do not have the data that captures the full spectrum of gender diversity; however this will be addressed as one of our goals is to improve our intersectional data collection. To address this shortfall in our data, we have explored broader issues affecting diversity and inclusion within workforces to set additional strategies.

Overall workforce

50% women 50% men 0% self-described

Commission

40% women 60% men 0% self-described

Executive

38% women 62% men 0% self-described

Information and Data Enablement.

Overall, VGCCC is proud to see women and men are well represented across all levels of our organisation.

As depicted in our divisional breakdown, there are some areas in our organisation where we see more substantial gendered workforce segregation including Corporate Services, Legal Policy and Harm Minimisation, and the Office of the CEO, where we see an overrepresentation of women. Comparatively, Information and Data Enablement and Regulatory Operations have more men filling roles in these respective divisions. Considerations into gendered norms, expected skillsets and role types can help VCGGG reimagine what success looks like to see shifts in composition in the future.

Interestingly, at Executive levels, there is a difference in gendered workforce composition, with women representing only 38% of positions held. Our Commission is comprised of 2 women and 3 men. Our Commission exists as our governing body, where our independent Commissioners make decisions on gambling matters, from approving new gaming venues or more gaming machines, to disciplinary actions and reviews.

Divisions	Women	Men	% women	% men	Total
Commission	2	3	40%	60%	5
Corporate Services	20	9	69%	31%	29
Information and Data Enablement	3	12	20%	80%	15
Legal, Policy and Harm Minimisation	10	4	71%	29%	14
Office of the CEO	4	1	80%	20%	5
Projects	1	1	50%	50%	2
Regulatory Operations	2	1	67%	33%	3
Casino	7	18	28%	72%	25
Gambling	18	15	55%	45%	33
Regulatory Services	14	18	44%	56%	32
Total	81	82	50%	50%	163

The gender pay gap is the difference between the average full-time base annualised salary earnings of women and men, expressed as a percentage of men's earnings.

The overall gender pay gap at VGCCC is 1.1%, indicating marginal imbalance in average income between men and women.

In more localised analysis, there is an increase in the pay gap when looking at:

- Workforce excluding CEO and Commissioners – 3.3%
- Regulatory Operations 4.2%

In comparison, the Victorian Public Service has a 6.8% gender pay gap.

People Matter Survey results provided key insights into sentiments held across the organisation about transparency, equity and accessibility of recruitment and promotion decisions. 65% of VGCCC staff agreed with the statement 'I believe the recruitment processes in my organisation are fair' and 56% agreed that they have an equal chance at promotion.

It is important that our workforce trusts the decisions being made, and that they are communicated clearly to be understood and respected. VGCCC is committed to ensuring we get the right people, to do good work for our organisation, and in turn, the community we serve.

Across the organisation, 11% of the workforce are employed on a parttime basis, and only 23% of People Matter Survey Respondents indicated they were not using any flexible work arrangements. 77% of People Matter Survey respondents indicated that they were confident that if they requested a flexible work arrangement, it would be given due consideration. Of our People Matter Survey respondents, 65 have caring responsibilities that influence their access of flexible working arrangements. In the measuring period, there were no reported instances of people accessing Family Violence Leave, however 70% of People Matter Survey respondents were confident that "My organisation would support me if I needed to take family violence leave."

VGCCC champions a zero-workplace harm culture where reporting any form of misconduct, including bullying, sexual harassment, discrimination or violence and aggression can be done in a culturally safe and accessible way.

Whilst there were no reports of sexual harassment in the reporting period, 2% of People Matter Survey respondents noted that they had experienced sexual harassment. When asked "My organisation takes steps to eliminate bullying, harassment and discrimination" 61% of respondents agreed. There is scope to further engage in reinforcing a positive culture by renewing reporting processes and ensuring all staff foster help-seeking professional relationships with their colleagues.





Source People Matters Survey

Key issues

We identified four focus areas and undertook a gender data audit, along with consultation with key parties across the organisation. The following issues related to gender equality have been identified through the audit of our available data, along with adoption of some issues more broadly identified through workforce research as diversity and inclusion flashpoints.

Focus area 1: Strategy and business alignment

What we learnt from data and staff consultations

- We are not sufficiently resourced with staff or technology to undertake required actions associated with the implementation of the GEAP.
- We are unable to robustly identify, measure and address the inequities experienced by diverse staff due to gaps in collection of intersectional workforce data.
- Our policies, programs and services have not completely been reviewed to align with gender

equality principles.

Focus area 2: Leadership and accountability

What we learnt from data and staff consultations

 Diversity and inclusion are seen as a HR/P&C issues and are not broadly incorporated in to leadership accountability, which potentially leads to inaction.

Focus area 3: Employment and careers

What we learnt from data and staff consultations

- There is occupational segregation and low representation of diverse staff within our workforce.
- There is an over-representation of men in senior roles or leadership (VPS-6 and above).
- Our inspectorate function is a male dominated area of our workforce
- Older staff and diverse groups tend to experience occupational segregation, devaluation, ageism, and lack of support, including through key life stages, such as career breaks, menopause and retirement.
- Pay gaps tend to affect staff from diverse groups. Our workforce is almost a 50/50 split male/female. The pay gap is evident in the higher percentage of females in lower classified, and therefore lower paid, roles.
- Gender pay gaps exist within divisions, position levels and types of employment.
- There is lower uptake of parental leave entitlements, flexible work arrangements and carers leave by male employees.
- There is inconsistent support for flexible working arrangements

adversely impact staff with parenting and carer responsibilities (including diverse staff).

There is low utilisation of family violence leave provisions

Focus area 4: Culture and safety

What we learnt from data and staff consultations

- The reporting frameworks, systems and processes for sexual harassment and other harmful behaviours are not visible, clear, trusted, transparent or always acted on.
- Staff from diverse groups tend to experience disproportionately higher rates of discrimination, harassment, racism and inappropriate behaviour, and additional barriers to reporting.
- Short-term interventions (such as mandatory online short courses) are compliance focused rather than genuinely building awareness and knowledge to effect cultural change.

Gender equality indicators

The VGCCC has considered the following gender equality indicators as set out in the *Gender Equality Act* in developing the strategies and measures in this plan:

Key: workplace gender equality indicators

- 1. Gender composition of the workforce
- 2. Gender composition of governing body
- 3. Pay equity
- 4. Sexual harassment
- 5. Recruitment and promotion
- 6. Leave and flexibility
- 7. Gendered segregation within the workplace



Gender equality strategies and measures

The following strategies and measures have been identified through an audit of our available data, along with adoption of issues more broadly identified through workforce research as diversity and inclusion flashpoints.

FOCUS AREA 1: STRATEGY AND BUSINESS ALIGNMENT

Strategies	Measures	GE indicator	Year 1 2023/24	Year 2 2024/25	Year 3 2025/26	Year 4 2026/27	Responsible
1.1 Assess organisational readiness to implement the GEAP							
1.1.1 Ensure sufficient resourcing and capability is available for the GEAP	Review resources and staff capability to undertake the respective components of this plan Reviewed annually	All	Yes From Q1	Yes Q1	Yes Q1	Yes Q1	Executive
1.2 Develop appropriate data collection and repo	ting systems						
1.2.1 Implement systems to centrally capture, analyse and share gender data, including intersectional gender data.	Data needs assessment and improvement plan completed and reviewed annually.	All	Yes From Q2	Yes Q1	Yes Q1	Yes Q1	P&C
	Improved data and reporting capability on diversity matters, including intersectional data	All	Yes From Q2	Yes Q1	Yes Q1	Yes Q1	P&C ICT
	Annual business process on data audit is set, including annual review of data needs assessment and data improvement actions	All	Yes From Q2	Yes Q1	Yes Q1	Yes Q1	P&C Executive
	Workplace gender audit is completed according to timetable	All	Yes Q3	Q3	Q3	Q3	P&C
	Report provided to the Executive and the Commission, and summary of actions undertaken.	All	Yes Q4	Yes 4	Yes 4	Yes 4	P&C
	Workplace gender audit data is provided to divisions and contributes to decision-making and actions	All	Yes Q4	Q4	Q4	Q4	P&C

1.2.2 Address barriers to employees sharing diversity data in systems and surveys	Increased diversity data, including intersectional data Deliver communications campaign to encourage staff to update demographic data using the available employee systems and through the People Matter Surveys	All	Yes From Q2	Yes	Yes	Yes	P&C Strat Comms
1.3 Review policies, programs and services to align	with gender equality principles						
1.3.1 Use gender impact assessments (GIA) to apply a gender lens to key in-scope external facing policies, programs and services.	GIA guidance and training provided	All	Yes From Q3	Yes	Yes	Yes	P&C
	Development of a central GIA repository Number of GIAs completed Annual evaluation of impact of GIAs and reporting into Executive	All	Yes From Q2	Yes	Yes	Yes	P&C Executive
1.3.2 Update our internal and public documents, including strategies, plans, guidelines, templates and web pages to ensure they are inclusive and free from discrimination	Amend the current registers across the organisation to include affirmation of review of material and include as criteria for future reviews Key business and human resources policies, programs and associated materials support gender equality and reduce structural inequities.	All	Yes From Q1	Imbed as BAU	BAU	BAU	P&C Executive
1.3.3 Implement a diversity and inclusion framework to complement this plan's strategies and outcomes.	Development, approval and publication of the framework	All	Yes from Q3	BAU	BAU	BAU	P&C
1.3.4 Review and amend writing style guidance to include advice to staff around inclusive language, gender equality and diverse gender identities and terms.	Writing style guidance amended and reviewed regularly in line with latest guidance.	All	Yes Q2	BAU	BAU	BAU	Strat Comms

FOCUS AREA 2: LEADERSHIP AND ACCOUNTABILITY

				No	No		
Strategies	Measures	GE indicator	Year 1 2023/24	Year 2 2024/25	Year 3 2025/26	Year 4 2026/27	Responsible
2.1 Ensure diversity and inclusion is more broadly incorporated into leadership accountability							
2.1.1 Establish an equality, diversity and inclusion committee to govern this plan and implement our diversity and inclusion framework	Establish a committee with clear reporting lines and accountability	All	Yes From Q1	Yes	Yes	Yes	OCEO Commission
	Forums established as appropriate to provide opportunities for staff engagement and lived experience input to GEAP implementation	All	Yes From Q1	Yes	Yes	Yes	OCEO Diversity & inclusion committee
2.1.2 VGCCC Executive to biannually discuss gender and intersectional equality in the VGCCC and how to ensure diversity on internal committees	 Included on Executive meeting schedule Annual gender data audit reviewed by Executive including: demographic data or intersectional attributes of our workforce (gender, Aboriginality, disability, ethnicity, race, religion and sexual orientation) demographic data or intersectional attributes of the Commission, Executive and internal committees. 	All	Yes From Q1	Yes	Yes	Yes	Executive
2.1.3 Increase organisational transparency and accountability for addressing gender inequalities.	Include gender equality on divisional management meeting agendas and provide feedback to Executive biannually	All	Yes From Q2	Yes	Yes	Yes	P&C
	Appoint gender equality champions from each division to drive understanding of requirements	All	Yes From Q2	Yes	Yes	Yes	P&C & Divisions
2.1.4 Divisional KPIs and targets to be included in Executive and senior manager PDP goal plans and work plans.	PDP goal plans and work plans include gender and intersectional equality KPIs and targets, as appropriate.	All	Yes Q2	BAU	BAU	BAU	P&C
21.5 Communicate to staff on the GEAP progress report and outcome of the Commission and Executive agenda item to demonstrate the commitment to increasing gender and intersectional equality.	Delivery of communications following consideration of biannual reporting to Executive. Other communications as identified throughout the year.	All	Yes Q2	BAU	BAU	BAU	Executive P&C

FOCUS AREA 3: EMPLOYMENT AND CAREERS

Strategies	Measures	GE indicator	Year 1 2023/24	Year 2 2024/25	Year 3 2025/26	Year 4 2026/27	Responsible
3.1 Identify and address barriers to employment, p	promotion, retention and uptake of entitlements of diver	se staff					
3.1.1 Implement best practice guidelines for inclusive recruitment, along with innovative recruitment and entry processes to attract	Recruitment statistics including gender composition of applicants and new starter/internal appointments	All	Yes From Q2	Yes	Yes	Yes	P&C
diverse staff and address inequalities in roles that show a gender imbalance	 Guidance material embedded in VGCCC recruitment policy for hiring managers on addressing pay inequalities through recruitment and selection processes including: New and innovative recruitment practices trialled and evaluated (in accordance with the Job & Skills Exchange policy) Graduate, trainee and internship processes aligned with GEAP outcomes Special measures roles implemented within identified roles or settings Diversity included as a factor of merit for recruitment purposes 	All	Yes From Q2	BAU	BAU	BAU	P&C
3.1.2 Increase transparency and accountability for addressing gender pay gaps by preparing targeted strategies to respond to pay gaps identified among diverse staff including applying special measure conditions to relevant higher classifications,	Recruitment statistics including gender composition of new starters/internal appointments Workforce data shows reductions in pay inequalities where they occur	All	Yes From Q2	Yes	Yes	Yes	P&C
manager or leadership positions	Pay equality metrics tabled at the executive annually Address new pay inequalities as they appear through appropriate monitoring		Yes Q2/4	Yes Q2/4	Yes Q2/4	Yes Q2/4	P&C

 3.1.3 Embed a flexible working mindset across the VGCCC and ensure flexible working arrangements are equitable, easy to navigate, effective and reflect the changing needs of staff. Offer and promote innovative job share arrangements and flexible working 	Flexible working and job design policies and practices reviewed, revised, streamlined and embedded in consultation with staff Guidance prepared on job and team design to facilitate flexible working arrangements that consider workload management and individual and team needs	6	Yes From Q2 Yes Q2	BAU	Yes BAU	BAU	P&C P&C
for staff with parenting and/or carer responsibilities (including diverse staff)	Organisation rollout of training session on flexible working arrangements (options available from Fair Work Ombudsman, VPSC, IPAA). Repeated every two years	6	Yes Q2		Yes		P&C
	Central repository of arrangements maintained in HR system and data included in annual reporting	6	BAU	BAU	BAU	BAU	P&C
	People Matter survey results indicate improvement in manager support for flexible work arrangements	6	Yes	Yes	Yes	Yes	P&C
3.2 Utilisation of leave							
3.2.1 Strengthen organisational responses and support for staff experiencing family violence through improved communications	Regular communications delivered on family violence responses (annual minimum)	6	Yes From Q2	Yes	Yes	Yes	P&C Strat Comms
and management awareness	Training and guidance provided to managers	6	Yes Q2/3		Yes		P&C
	Family violence leave uptake monitored annually via workplace gender audit	6	Yes	Yes	Yes	Yes	P&C

FOCUS AREA 4: CULTURE AND SAFETY

			1	1	1	1	1
Strategies	Measures	GE indicator	Year 1 2023/24	Year 2 2024/25	Year 3 2025/26	Year 4 2026/27	Responsible
4.1 Improve reporting frameworks, systems and p	rocesses for sexual harassment and other harmful beha	viours	,	,			
4.1.1 Establish an accessible, single, central intake and referral point for staff to report sexual harassment, violence, discrimination, bullying and other inappropriate behaviour, issues and risks and to increase perpetrator accountability.	Number of reported matters and summary of outcomes People Matter Survey indicators	All	Yes From Q2	Yes	Yes	Yes	P&C
4.1.2 Deliver targeted interventions for at- risk groups to encourage help-seeking behaviour, strengthen prevention and address barriers to reporting of sexual harassment in the workplace.	Number of reported matters and summary of outcomes	All	Yes From Q2	Yes	Yes	Yes	P&C
 4.1.3 Implement prevention actions targeting inappropriate and harmful behaviours such as: trans and gender diverse awareness training and resources bystander interventions to prevent and challenge harmful behaviours implementing Victorian equal opportunity and human rights commission program to address sexual harassment and sex discrimination around pregnancy, parental leave and access to flexible working arrangements implementing evidence-based awareness raising workshops on harmful gender stereotypes. 	Pride Network re-established	4	Yes Q3	Yes	Yes	Yes	P&C
	Recommendations from the Respect@Work Sexual Harassment National Report (2020) and Victorian Auditor General's Office (VAGO) report on sexual harassment in the public sector (2019) implemented	4		Yes Q1			P&C Executive
	Development/procurement of gender awareness training/workshops	4	Yes Q4		Yes		P&C
	Establish a bystander project to implement behaviourally informed bystander interventions.	4		Yes Q1	BAU	BAU	P&C

Glossary

Abbreviation	Definition
P &C	People and Culture team
Strat Comms	Strategic Communications team
BAU	Business as usual (this is part of our everyday work)
OCEO	Office of the CEO
KPIs	Key Performance Indicators
PDPs	Performance Development Plans
VPSC	Victoria Public Sector Commission
IPAA	Institute of Public Administration Australia

