



ASIC
Australian Securities &
Investments Commission

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ASIC
Rainbow
Action Plan
2020–21

Diversity and Inclusion at ASIC

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Foreword and vision

ASIC is committed to workplace diversity and fostering an inclusive environment where all our people, our stakeholders and our communities are treated with fairness and respect.

ASIC's Rainbow vision

To promote a workplace culture that embraces diversity, practices inclusion and supports lesbian, gay, bisexual, transgender, intersex and queer (LGBTIQ+) team members throughout their career at ASIC.

ASIC's [Code of Conduct](#) is the foundation of our inclusive and diverse workplace where all people are treated with fairness and respect. This is supported by ASIC's [Diversity and Inclusion Strategy 2020–2022](#), and [ASIC's Values](#) – Accountability, Professionalism, and Teamwork.

An inclusive and diverse workforce drives innovation, creativity and problem-solving by bringing a range of experiences, perspectives and ideas to the core of our decision-making.

Inclusion and diversity encompass fairness, acceptance and respect. They are about fostering inclusive behaviours and removing barriers to ensure all ASIC team members can reach their full potential.

Our commitment to inclusion and diversity is a key pillar of our culture and values. This ongoing commitment influences all aspects of the way we work.

We want ASIC to reflect the rich diverse communities of which we are a part, and continue to work for.

We commend the Rainbow Action Plan 2020–2021 (the Plan) and its goals to ensure that ASIC is wholly inclusive and supportive of LGBTIQ+ team members. We ask that all team members consider what they can do to contribute to an LGBTIQ+ inclusive ASIC.



Sean Hughes
Commissioner
Rainbow Sponsor



Jen Pallath
Diversity and Inclusion Manager
People and Development

Message from the Rainbow Chair

Rainbow has been part of our diversity and inclusion initiatives since 2015. Having led ASIC's participation in Mardi Gras, community events and LGBTQI+ days of significance, the shape of Rainbow has evolved with the appointment of three Deputy Chairs in late 2019.

Expectations of LGBTQI+ inclusion have changed over time, reflected in ASIC's performance against the national benchmark Australian Workplace Equality Index (AWEI).

We are taking the opportunity to better meet those benchmarks across the priority areas in this plan, and improve inclusion and the lived experience of LGBTQI+ team members at ASIC. This Action Plan is focused on ensuring that all team members have access to the full range of opportunities and engagement offered by ASIC, without barriers.

I look forward to working through our goals with colleagues across ASIC.



Leigh Coughlan
Rainbow Chair
Senior Manager, Financial Capability

Messages from the Rainbow Deputy Chairs

In November 2019, Leigh Coughlan was joined by three Deputy Chairs – Pauline Harbaugh, David Freyne and Jesse Brown – to help progress Rainbow objectives.

I am in the unique position of having worked with ASIC sixteen years ago. I returned to ASIC in 2018 and have been delighted to see so many positive changes. ASIC is now a much more dynamic working environment. The contribution of women is overtly celebrated and there is a strong diversity presence. I look forward to being able to form part of the experience of continuing ASIC's trajectory towards continuing this inherent celebration of diversity with an understanding of how far we have come. *Pauline leads Rainbow's visibility, training and awareness priority.*



Pauline Harbaugh
Rainbow Deputy Chair
Senior Manager, Superannuation

Having been at ASIC for some time, I am excited to get more involved in diversity initiatives like Rainbow. I am keen to work with Rainbow members, leaders and people across ASIC to identify requirements and opportunities to positively influence the experience of working at ASIC.

I aim to help the Rainbow Network (Rainbow) progress and deliver on measurable, objective goals; for example, ASIC's performance against the Australian Workplace Equality Index.

David leads Rainbow's organisation and culture priority.



David Freyne
Rainbow Deputy Chair
Senior Lawyer, Investment Managers

For me, Rainbow is fundamental in creating a safe, supportive and inclusive workplace. Being able to bring your whole self to work and ensuring people feel accepted are essential.

In my role as Deputy Chair, I hope to be able to bring my enthusiasm, new ideas, and passion for inclusion to make meaningful improvements to how LGBTIQ+ people experience ASIC. I am looking forward to working with the members of Rainbow and the other diversity committees to continue to make ASIC a truly inclusive and diverse place to work.

Jesse leads Rainbow's strategic partnerships and engagement priority.



Jesse Brown
Rainbow Deputy Chair
Executive Assistant and Senior Advisor (Projects), People and Development

Purpose

ASIC supports an inclusive culture where our people, including LGBTIQ+ people, can reach their full potential and have equal access to development, promotion, services and opportunities.

The Rainbow Action Plan 2020–21, building on the efforts of Rainbow since 2015, documents ASIC's strategy to continue to progress issues important to LGBTIQ+ team members. We have focused on three key priorities:

Priority 1: Organisation and culture

Develop an inclusive culture and key policies that provide team members with the ability to reach their full potential and have equal access to development, promotion, services and opportunities.

Priority 2: Strategic partnerships and engagement

Establish and maintain networks and partnerships with other regulators, organisations and individuals to achieve our goals.

Priority 3: Visibility, awareness and training

Promote visibility, training and support to increase the awareness of LGBTIQ+ issues within ASIC, and improve ASIC's capability to respond to those issues.

Where we are

Rainbow was established in 2015 under ASIC's Diversity Council as an informal employee network to support LGBTIQ+ team members.

ASIC began developing visible and targeted support for issues affecting LGBTIQ+ team members, outside of other policies and processes.

Membership of Rainbow continues to be open to everyone at ASIC.

Previous Rainbow outcomes

Since its establishment, Rainbow has:

- developed and launched the Walking in Rainbow Shoes online training, and held other LGBTIQ+ awareness training including as hosted by Pride in Diversity
- participated in community events including Sydney Gay and Lesbian Mardi Gras Fair Day (2018 and 2020) and Parade (2017)
- coordinated mentoring for LGBTIQ+ team members by senior members of Rainbow
- coordinated speakers and other arrangements for days of significance including International Day Against Homophobia, Biphobia, Intersexism and Transphobia (IDAHOBIT), Trans Day of Remembrance and Wear It Purple Day
- participated in the annual Australian Workplace Equality Index since 2017.

ASIC continues to demonstrate improvement in tracking across the Australian Workplace Equality Index, with the following scores: 40 (2017); 59 (2018); 66 (2019).

Following our submission in 2020, ASIC scored 50 points. The lower score came under a revised scoring template to reflect evolving community expectations for LGBTIQ+ inclusion that have moved beyond ASIC's previous actions.

The Plan considers the benchmarks of the Australian Workplace Equality Index and pushes ASIC to do more for LGBTIQ+ inclusion, visibility and organisational support.

Where we want to be

This Plan builds on Rainbow's past activities and takes into account the priorities in [ASIC's Diversity and Inclusion Strategy](#) and broader community expectations outlined in the Australian Workplace Equality Index.

Rainbow has identified three priority areas for 2020–2021:

1. **Organisation and culture**
2. **Strategic partnerships and engagement**
3. **Visibility, awareness and training**

Our aim is to significantly progress LGBTIQ+ inclusion at ASIC through achieving the actions outlined in the Plan.

Pictured: ASIC at the Sydney Gay and Lesbian Mardi Gras Fair Day 2020

Rainbow members and team members from ASIC's Superannuation, Markets, Financial Capability and People and Development teams attended the event in Sydney's Victoria Park. ASIC spoke to attendees about our Moneysmart financial capability resources available for all Australians.



Pictured: ASIC team members celebrating Wear it Purple Day

To celebrate Wear it Purple Day in 2019, ASIC team members showed their support by dressing in a variety of purple outfits and accessories.



Priorities

Priority 1: Organisation and culture

Goal 1.1: Improve access to ASIC's policies, procedures and resources for LGBTIQ+ team members

	Actions	Responsible areas	Timeline
1.1.1	Review all policies and procedures for use of inclusive language and application to LGBTIQ+ team members	Rainbow People and Development (P&D)	June 2021
1.1.2	Develop examples of LGBTIQ+ bullying, harassment and discrimination to supplement relevant policies and to demonstrate how they apply to LGBTIQ+ team members	Rainbow P&D	December 2020
1.1.3	Provide accessible information to LGBTIQ+ team members in relation to: <ul style="list-style-type: none"> • Harassment Contact Officers • Accessing LGBTIQ+ support through ASIC's Employee Assistance Program and Rainbow • Accessibility of domestic and family violence leave and support 	Rainbow P&D	December 2020
1.1.4	Engage relevant internal stakeholders to ensure the accurate collection of data on LGBTIQ+ bullying, harassment and discrimination events. Use this information to identify opportunities for training, awareness campaigns and improvement	Rainbow P&D	December 2020

Goal 1.2: Develop and implement policies and support for gender diverse inclusion

	Actions	Responsible areas	Timeline
1.2.1	Develop and implement a gender affirmation policy, including any changes to ASIC's leave policies to provide paid leave for team members to undertake or manage their gender affirmation	Rainbow P&D Rainbow Sponsor	June 2021
1.2.2	Develop and promote clear guidance on dress code for gender diverse team members	Rainbow P&D	June 2021
1.2.3	Review ASIC's internal systems, internal documents and forms to include non-binary gender options and language	Rainbow P&D Corporate Services Information Technology (IT) Corporate Affairs	June 2021

	Actions	Responsible areas	Timeline
1.2.4	Review ASIC's recruitment processes to ensure there are no barriers to participation for trans / gender diverse applicants	Rainbow P&D	June 2021

Goal 1.3: Establish Rainbow governance, accountability and role

	Actions	Responsible areas	Timeline
1.3.1	Develop Terms of Reference including: <ul style="list-style-type: none"> • Network Continuity Plan • Role of Network Leaders • Role of Rainbow Sponsor • Membership types and responsibilities 	Rainbow leads Rainbow Sponsor	December 2020
1.3.2	Monitor and report on progress under the Plan to Rainbow members, Rainbow Sponsor and ASIC's Diversity Council	Rainbow leads Rainbow Sponsor	Ongoing
1.3.3	Develop and promote a clear process for anyone in ASIC to contact leaders of Rainbow for guidance and advice	Rainbow leads	December 2020

Priority 2: Strategic partnerships and engagement

Goal 2.1: Establish and maintain connections with community organisations and other LGBTIQ+ networks

	Actions	Responsible areas	Timeline
2.1.1	Attend regular meetings with leaders of LGBTIQ+ groups in similar organisations to collaborate on ideas, policy, training and observing days of significance	Rainbow leads	Monthly
2.1.2	Engage with a private sector organisation to establish communication channels and a mentoring relationship on LGBTIQ+ matters	Rainbow leads	June 2021
2.1.3	Coordinate ASIC's participation in and promotion of at least one event to support the LGBTIQ+ community (e.g. Fair Day or Midsumma)	Rainbow	June 2021
2.1.4	Maintain membership with Pride in Diversity to engage in workplace inclusion initiatives and implementation of the Plan	Rainbow leads P&D	Annually

Goal 2.2: Participate in LGBTIQ+ accreditation programs to promote inclusivity at ASIC

	Actions	Responsible areas	Timeline
2.2.1	Complete ASIC's submission to Pride in Diversity's Australian Workplace Equality Index	Rainbow	March 2021 then annually
2.2.2	Provide ASIC team members with the opportunity to participate in the Australian Workplace Equality Index employee survey annually	Rainbow	January 2021 then annually

Goal 2.3: Increase engagement of Rainbow Members and internal stakeholders

	Actions	Responsible areas	Timeline
2.3.1	Implement quarterly meetings between Rainbow leads and the Rainbow Sponsor	Rainbow leads Rainbow Sponsor	Quarterly
2.3.2	Implement monthly communications to Rainbow members from July 2020	Rotating by Rainbow lead	Monthly
2.3.3	Implement bi-monthly meetings for Rainbow members from July 2020	Rotating by Rainbow lead	Bi-Monthly
2.3.4	Engage with ASIC's Diversity Council to partner on initiatives and events (i.e. intersectionality)	Rainbow leads & Diversity and Inclusion (D&I) Manager	Quarterly
2.3.5	Establish LGBTIQ+ measures in internal engagement and inclusion surveys and analyse data to identify action items/areas for improvement	Rainbow P&D	Ongoing

Priority 3: Visibility, awareness and training

Goal 3.1: Increase internal visibility and awareness of LGBTIQ+ matters and experiences

	Actions	Responsible areas	Timeline
3.1.1	Develop an intranet page promoting Rainbow, collating information and resources for members and publishing Network stories	Rainbow	Ongoing (Quarterly updates)
3.1.2	Coordinate ASIC's observation of four days of significance (e.g. IDAHOBIT, Wear it Purple, Trans Day of Remembrance, International Lesbian Day, Intersex Solidarity Day)	Rainbow Corporate Affairs	Four observations per year
3.1.3	Establish ways for Rainbow members and allies to show public support of the Network	Rainbow Corporate Affairs	December 2021

	Actions	Responsible areas	Timeline
3.1.4	Empower local champions in each office to lead events and initiatives	Rainbow leads	Ongoing
3.1.5	Partner with ASIC in the Community to verify three LGBTIQ+ charities to be included in ASIC's workplace giving program	Rainbow leads ASIC in the Community	June 2021
3.1.6	Publish quarterly articles and hold events on an area of focus for each quarter, such as: <ul style="list-style-type: none"> Cultural diversity and LGBTIQ+ people LGBTIQ+ women in ASIC Allies of trans/gender diverse and intersex people ASIC teams and specialty areas and their external LGBTIQ+ engagement (i.e. Moneysmart) 	Rainbow	Quarterly

Goal 3.2: Establish an LGBTIQ+ training strategy to raise awareness and increase the capability of team members

	Actions	Responsible areas	Timeline
3.2.1	Develop and implement expanded ongoing training to promote LGBTIQ+ inclusion across ASIC	Rainbow P&D/Learning People leaders	June 2021
3.2.2	Develop and promote opportunities for Rainbow members to attend external training, conferences and/or seminars focused on LGBTIQ+ leadership development	Rainbow leads P&D	Once per year
3.2.3	Develop a training program targeted at LGBTIQ+ allies, including related resources on being an effective ally	Rainbow leads P&D	Once per year
3.2.4	Identify and promote internal and external mentoring opportunities for LGBTIQ+ team members	P&D	June 2021

More information

About the Rainbow Network

Rainbow is comprised of representatives from a range of ASIC teams and levels. This wide representation is to ensure that the Network is able to have informed discussions about what ASIC already does and what it can do better for its LGBTIQ+ team members.

About ASIC's Diversity Council

ASIC's Diversity Council provides support and guidance to Rainbow and ASIC's other diversity committees. The purpose of ASIC's Diversity Council is to provide visible, strategic leadership on all of ASIC's diversity activities and to enable informed decisions that will deliver the best outcomes across the organisation.

Our current priorities are:

- **Attraction:** A fair and equitable approach to hiring practices that focuses on diversity of experience, 'culture add', and career progression
- **Storytelling:** Sharing the stories that make our people unique
- **Inclusion:** Nurturing a workplace where our people can bring their entire selves. Championing the action plans of our diversity committees to effect positive changes in the workplace
- **Capability:** Build the capability of our people to lead in an inclusive way by engaging with difference to optimise innovation and performance.

The Rainbow Chair is also a member of the Diversity Council.

More information about ASIC's priorities can be found in the [Diversity and Inclusion Strategy 2020–2022](#).

Contact

For any general enquiries about the Plan or LGBTIQ+ inclusion at ASIC, email rainbow@asic.gov.au

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