

Consideration of Broader Economic Benefits in Procurement – CFMEU Submission

Introduction

The Construction & General Division of the Construction, Forestry, Maritime, Mining and Energy Union (CFMEU) represents tens of thousands of members in the building and construction industry. As the union covering workers in one of the major industries where governments procure projects, the CFMEU is deeply familiar with representing workers who are underpaid, exploited or risk their lives in unsafe working conditions on jobs funded by Federal, state and territory governments. We also work closely with businesses who do the right thing by their workers and local communities, and are deeply familiar with strategies and targets that are effective in ensuring ethical business practices.

We welcome the opportunity to provide comments, feedback and suggestions on the current Consideration of Broader Economic Benefits in Procurement guidance, to help inform the development of new guidance.

Recommendations

Recommendation: The concept of economic benefit should be expanded to more accurately reflect the needs of the Australian economy and the policy priorities of the Commonwealth Government.

Recommendation: The tender evaluation stage should be broken into two steps to enable more effective and fair decision making. The first step should evaluate economic benefit, quality, fitness for purpose environmental sustainability and flexibility. The second step should evaluate price.

Recommendation: Stakeholders should be enabled and encouraged to submit referee reports on preferred suppliers.

Recommendation: The Department of Finance should measure KPIs in relation to compliance with the procurement guidelines and impose penalties for breaches.

Recommendation: The Department of Finance should create a checklist for decision makers based upon data/metrics collected by the Commonwealth Government to streamline the assessment process whilst providing more accurate information. The checklists could include information such as the existence of an enterprise agreement, gender pay gap data from WGEA, and compliance with the Australian Skills Guarantee requirements.

Recommendation: The guidance should provide greater detail and guidance in the case studies rather than broad statements or legal minimums.

Recommendation: The guidance should require successful construction industry applicants to demonstrate specific percentages of the workforce that are women and trainees/apprentices, in line with state and territory procurement codes.

Recommendation: The guidance should reduce the percentage requirements of procurement contracts to SMEs in construction, and instead introduce security of payment requirements into procurement contracts.

Overview

Procurement is a powerful mechanism for Government to drive positive change in the Australian economy. The Commonwealth Government should use its purchasing power to align with its economic policies and industry-specific aims. The Government has stated that “Australia’s labour market institutions are designed to ensure all workers share fairly in the benefits of economic growth and productivity improvements and are entitled to minimum standards.”¹ Procurement is one such labour market institution. With the right procurement framework, Government can drive change across the economy and encourage secure, well-paid jobs, sustainability, training and upskilling and business innovation. Government should engage with businesses that operate to a high ethical standard, producing economic benefit for Australia.

In states and territories across Australia, procurement policies have been incredibly successful in growing a fair economy.

This submission recommends two key changes to the current procurement guidelines. Firstly, the current framing of economic benefit is very narrow, and does not include key economic considerations. We recommend this concept is broadened, to incorporate key policy goals and priorities of the Commonwealth Government. Secondly, the structure of the procurement assessment process creates unnecessary difficulties for decision makers, requiring them to weigh factors against each other as opposed to considering factors consecutively. These two recommendations will be addressed in detail below.

Are there aspects of the guidance that require clarification and/or expansion?

Broadening the conception of economic benefit

“Shared economic benefit” is a key ambition of the Commonwealth Government and is central to the framing of the Government’s policy agenda, particularly in relation to investment in Australian industries.² The Commonwealth Government has stated it “will seek to promote a labour market with jobs that are safe, secure, fairly paid and provide mutually beneficial flexibility.”³ Recent budget announcements have identified that a “more diversified and more resilient economy” is built upon “secure, well-paid jobs” facilitated through private sector and

¹ <https://treasury.gov.au/employment-whitepaper/final-report>, p. 52

² <https://alp.org.au/news/investing-in-a-future-made-in-australia>

³ <https://treasury.gov.au/employment-whitepaper/final-report>, p. 47

Government investment in key industries.⁴ This is set out clearly in the 2023 “Working Future: The Australian Government’s White Paper on Jobs and Opportunities” which reiterates the Government’s objective to promote job security and strong, sustainable wage growth.⁵ Clearly, benefits to Australian workers are central to the Commonwealth Government’s view of *economic benefit*.

However, the current guidance on economic benefit does not reflect the policy priorities of the Commonwealth. The current guidelines overly emphasis the perspective of businesses, and place little emphasis on the perspectives of employees. This means key economic considerations are not being accounted for in the procurement process. As a result, businesses that operate with high labour standards are unintentionally hindered by the current guidelines, rewarding companies that do not comply with Australian industrial and work health safety law.

To address this, in addition to the current points in paragraphs 7 and 8 in the guidelines, the following aspects of economic benefits should also be included:

1. **Secure, well-paid employment for Australian workers.** The 2023 White Paper states that “the Government will seek to promote a labour market with jobs that are safe, secure, fairly paid and provide mutually beneficial flexibility to workers and employers.”⁶ This must be reflected in the procurement guidelines.
2. **Addressing the gender pay gap.** Gender segregation is a major contributor to skills shortage in the economy, reduces labour market dynamism, hinders productivity and increases gendered inequality.⁷ There is significant economic benefit in reducing the gender pay gap, and this should be considered in the procurement process.
3. **Work Health and Safety.** Research by Safe Work Australia found that the economic value of reducing work-related injuries and illnesses is the equivalent of \$28.6 billion to the Australian economy each year.⁸ Employers with poor safety records represent a significant cost to the Australian economy, whilst businesses with a strong safety history provide an economic benefit, that should be addressed in the procurement process.
4. **Upskilling Australian workers by employing apprentices and trainees.** A skilled workforce is a “competitive advantage for our economy” and investing in Australia workers skills is a key focus of the Government.⁹ The Australian Skills Guarantee (ASG) is now in effect, setting new national targets for the number of apprentices, trainees and paid cadets working on eligible Australian Government-funded projects. Yet this is not reflected in the current procurement guidelines.
5. **Australian tax law compliance.** Corporate tax avoidance costs billions of dollars annually in revenue for the Commonwealth Government. Procurement contracts should not go to companies that do not comply with their legal obligations.

⁴ <https://www.pm.gov.au/media/investing-future-made-australia>

⁵ <https://treasury.gov.au/employment-whitepaper/final-report>

⁶ Executive summary, p. viii, <https://treasury.gov.au/employment-whitepaper/final-report>

⁷ <https://treasury.gov.au/employment-whitepaper/final-report>, p. 59

⁸ <https://www.safeworkaustralia.gov.au/media-centre/news/safer-healthier-wealthier-economic-value-reducing-work-related-injuries-and-illnesses>

⁹ <https://treasury.gov.au/employment-whitepaper/final-report>, p. 97

- 6. Superannuation payment compliance.** Superannuation underpayment impacts an estimated 1 in 3 workers, equating billions of dollars each year.¹⁰ This is viewed as a form of wage theft by the Government.¹¹ The procurement guidelines must take into account compliance with superannuation requirements.

These factors have been identified by the Commonwealth as economic policy priorities, yet they have not been included in the current guidance on economic benefit. To ensure that the Commonwealth Procurement Guidelines align with policy agenda of the Government, these factors must be included.

Recommendation: The concept of economic benefit should be expanded to more accurately reflect the needs of the Australian economy and the policy priorities of the Commonwealth Government.

Should the guidance be expanded to cover any additional issues relating to the practical implementation of the policy?

The creation of a two-step process

The structure of the current procurement process creates unnecessary ambiguities, that create difficulties for decision makers. Decision makers are required to compare and weigh up factors that are often in contradiction to one another. The current framework makes it difficult for decision makers to consider multiple factors when assessing a tender. To address this, we recommend the creation of a two-step process in the tender evaluation stage. Variations of this model are currently used in the procurement codes of a number of States and Territories, including Victoria and the Australian Capital Territory.

The key problem with the current guidelines is that is very difficult to measure various economic benefit factors or environmental sustainability against the concept of value for money. If, for instance, a construction company has a history of serious workplace injuries or deaths, how would a human life be quantified against a cost saving of \$80,000 compared to the next tenderer? Does value for money account for 50% of the Government's decision compared to 10% for workplace health and safety? It is both undesirable and impractical to place a dollar amount on certain decision-making factors.

To avoid this dynamic, we recommend that the tender evaluation process occurs at two stages: firstly, factors including economic benefit, quality, fitness for purpose, environmental sustainability and flexibility are assessed. Based on these factors the tender may be approved to move to the next stage or rejected. In the second stage, the tender is assessed on price. This ensures that decision makers are not having to weigh dollar amounts against other factors, which in practice is not a straightforward process and inevitably leads to a prioritisation of lowest cost tenders to the detriment of broader policy goals and overall service to the Australian community.

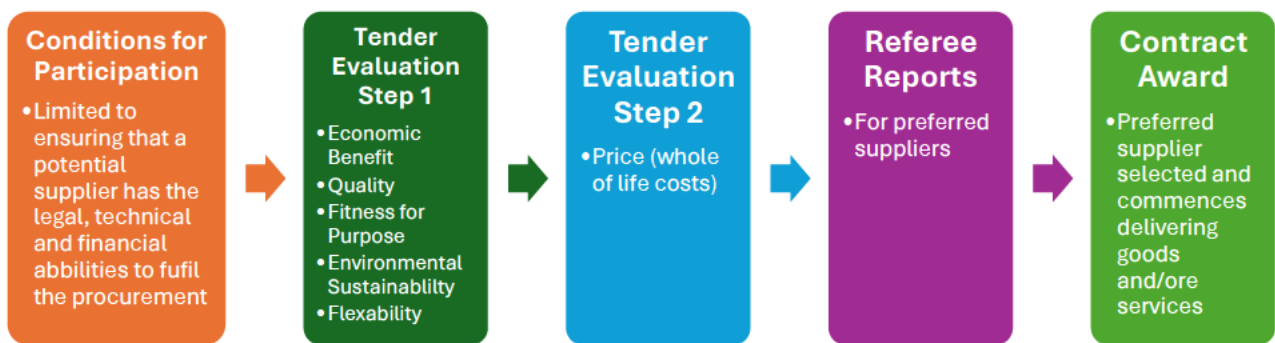
¹⁰ Super Scandal: Unpaid Super Guarantee in 2016-17' (Report, Industry Super Australia, 2019) 3.

¹¹ <https://ministers.treasury.gov.au/ministers/stephen-jones-2022/media-releases/government-enshrines-workers-right-superannuation>

Only with a two-step process, can the Commonwealth ensure that its procurement policy is driving economic benefit as opposed to playing lip service to it. Otherwise, the Commonwealth’s purchasing power will be used to create a race-to-the-bottom on conditions and penalise ethical business practices instead of rewarding them. This will encourage businesses to invest in their workforce, including engaging trainees and apprentices necessary to address skills shortages and develop sustainable practices, knowing this will be rewarded instead of penalised in the tender process.

Below is an updated process map which includes the two-step tender evaluation process.

Updated Process Map



Recommendation: The tender evaluation stage should be broken into two steps to enable more effective and fair decision making. The first step should evaluate economic benefit, quality, fitness for purpose environmental sustainability and flexibility. The second step should evaluate price.

Referee Reports

The Referee Reports stage provides a simple and effective opportunity for decision makers to audit the considerations of Tender Evaluation Step 1 and 2 by encouraging stakeholders to contribute as referees. The Department of Finance should invite relevant stakeholders to provide written feedback on preferred suppliers. Examples of stakeholders could include:

- The relevant trade union to provide information on an applicant’s compliance with industrial and work health and safety law.

- Training organisations to provide information on an applicant's use of trainees and apprentices on previous projects.
- Sub-contractor peak bodies to provide information on the timely payment of contracts on previous projects.
- An assessment of the delivery of previous Government projects.

Recommendation: Stakeholders should be enabled and encouraged to submit referee reports on preferred suppliers.

Assessing tenderers throughout the procurement lifecycle

Currently, the guidance does not assess and evaluate tenderers across the lifecycle of the contract. This incentivises businesses to address broader economic benefits of their bid in the initial stage only, requiring only that they are discussed as part of a bid, with limited mechanisms available to ensure they are carried out in practice. To ensure that any of the economic benefit principles are delivered in practice, there must be a process to assess measurable KPIs, with penalties for non-compliance.

The Department of Finance must take a proactive approach to measuring KPIs. This would align the Commonwealth with State and Territory counterparts, that assess compliance throughout the life of a contract. For example, the Fair Jobs Unit that monitors compliance for the Victorian Government's Fair Jobs Code.

A major issue in procurement is deliberate underquoting in bids. Some businesses employ a business model of underquoting and subsequently seeking contract variations. Businesses continually seek variations that extensively increase costs, with original bids not based on economic reality. These businesses specifically target government procurement contracts. This unethical practice leads to cost and timeline blowouts. An example of this is Snowy Hydro 2.0, originally costed at \$2bn and now estimated to cost \$12bn.¹² The main shareholder, Webuild, has an extensive history of underbidding on major projects, a deliberate strategy used by the company to win contracts ahead of competitors.¹³ Steps must be taken to address this practice. Assessing tenderers throughout the lifecycle of the contract and enforcing KPIs with penalties for non-compliance is essential to discourage businesses from engaging in this practice.

Therefore, we recommend that the Department of Finance:

- Maintain a register of breaches and complaints of businesses that are non-compliant with procurement policies;
- Undertake audits, investigations and reviews as appropriate;
- Engage with agencies and industry to educate, promote and facilitate compliance with the code;

¹² <https://www.theguardian.com/australia-news/2023/aug/31/snowy-hydro-2-project-scheme-billion-cost-blowout-kosciuszko-national-park#:~:text=The%20giant%20Snowy%202.0%20pumped,by%20the%20end%20of%202028.>

¹³ <https://www.smh.com.au/business/companies/snowy-hydro-uh-oh-the-infrastructure-upstart-with-sharp-elbows-and-sharper-pricing-20221006-p5bnw.html>

- Assess past performance and code compliance to inform future tenders; and
- Impose conditions and penalties on tenderers for breaching the code.

Recommendation: The Department of Finance should measure KPIs in relation to compliance with the procurement guidelines and impose penalties for breaches.

Practical ways to assess tenders

To assess tenders, decision makers must balance the need for the application process to be streamlined and accessible, with ensuring that the factors applicants are assessed on are reflective of the reality of the business. Currently, the guidelines do not emphasise the need to assess applicants against factors that can be independently verified. This can be easily addressed as much of this information is collected by Government.

For instance, what policies an applicant may or may not have in place is not a reliable indicator of how that business operates in practice. Policies are not enforceable documents and should not be treated as such in the tender process. Instead, greater weight should be placed on the Government's own databases. This is both more reliable and simpler for decision makers to implement. For example, the presence of an enterprise agreement, a legally enforceable instrument, should be viewed as an indicator that a business promotes well-paid and secure employment, compared to a policy document written by the business. Enterprise Agreements in the construction industry are likely to include legally enforceable apprenticeship and trainee minimums, high safety standards (such as a heat policy) and gender equity clauses such as training and the requirement to have PPE and facilities for women (which is a major barrier for women in construction). The existence of an enterprise agreement should therefore be treated as an indicator that a business is more likely to engage in ethical labour practices, beyond that of simply remuneration of employees. This is an objective factor that can be assessed through the Workplace Agreements Database, allowing decision makers to simply assess applicants against this metric.

Independent government-generated data should include:

- The existence of an enterprise agreement
- Gender pay gap data from Workplace Gender Equality Agency¹⁴
- Work health and safety compliance data from state and territory agencies and Safe Work Australia
- Compliance with indigenous Procurement Policy (IPP)¹⁵
- Compliance with the Australian Skills Guarantee¹⁶
- Compliance with the Australian Industry Participation Policy

¹⁴ Workplace Gender Equality Procurement Principles, <https://www.wgea.gov.au/what-we-do/compliance-reporting/wgea-procurement-principles>

¹⁵ Indigenous Procurement Policy, <https://www.niaa.gov.au/our-work/employment-and-economic-development/indigenous-procurement-policy-ipp>

¹⁶ Skills Guarantee Procurement Connected Policy, <https://www.dewr.gov.au/australian-skills-guarantee/resources/skills-guarantee-procurement-connected-policy>

- Australian Tax Office statement showing a satisfactory tax record¹⁷
- Compliance with payment times procurement policy¹⁸
- Previous procurement contract compliance

This information can be accessed by decision makers and can be relied upon to be correct and to provide an accurate picture of tender applicant. This will lead to more accurate decision making than relying solely on information provided by applicants. In addition, it can be easily added to a check list for individual decision makers to work from, streamlining the assessment process.

Recommendation: The Department of Finance should create a checklist for decision makers based upon data/metrics collected by the Commonwealth Government to streamline the assessment process whilst providing more accurate information. The checklists could include information such as the existence of an enterprise agreement, gender pay gap data from WGEA, and compliance with the Australian Skills Guarantee requirements.

More case studies

The case studies in the current guidelines are quite vague and provide little guidance. The examples given for a hypothetical tender are overly broad and lack the detail necessary to provide direction for decision makers. For instance, the examples of economic benefit considerations for Example Two include: “employing staff and contractors located in Australia, research and development investment in Australia, employing trainees and apprentices in Australia, taxes paid to the Australian Government on associated profits.” These examples are either legal requirements (tax compliance) or procurement requirements (the ASG) and would therefore apply to all tenders. Compliance with Australian law should not be viewed as a high standard: it is the legal minimum.

The examples should not be vague statements, but tangible policies. For example, instead of “employing trainees and apprentices in Australia” an example should say “10% of all labour hours on the project would be undertaken by trainees and apprentices, and a minimum of 6% of all apprentice/trainee labour hours would be undertaken by women” in accordance with the Australian Skills Guarantee. Similarly, instead of “employing staff and contractors located in Australia” the example should specify the instrument workers are employed under and how they are engaged. For example, employees are engaged under an enterprise agreement, or that workers are directly and permanently employed.

In addition, the case studies should provide comparisons, offering examples of multiple tenders for the same bid, and provide guidance on the suitability of each tender. This should include detailed practical examples, not one sentence as provided in the current case studies.

Example Case Study

This is an example of how the case studies should be structured.

¹⁷ Shadow Economy Procurement Connected Policy, <https://treasury.gov.au/publication/p2019-t369466>

¹⁸ Payment Times Procurement Connected Policy, <https://treasury.gov.au/publication/p2021-183909>

Commonwealth officials are procuring companies to construct a windfarm in Victoria. The value is expected to exceed \$4 million and therefore they are required to consider the economic benefit of the procurement to the Australian economy. Three principal contractors tender for the project. The following information was collected by the Department of Finance:

Contractor 1	Contractor 2	Contractor 3
<ul style="list-style-type: none"> • Employees are engaged on an enterprise agreement • No use of labour hire • 3 indigenous businesses will be engaged as sub-contractors • Satisfactory safety record certified by Safe Work Australia • History of non-compliance with payment times • Meets the targets of the Australia Skills Guarantee 	<ul style="list-style-type: none"> • Employees are engaged on an enterprise agreement • Use of labour hire in supply chain • Compliance with Workplace Gender Equality Procurement Principles, meets gender targets of the ASG • Compliance with payment times procurement policy • Does not use indigenous businesses in supply chain • Satisfactory safety record certified by Safe Work Australia 	<ul style="list-style-type: none"> • Employees predominantly engaged under labour hire practices, not directly employed. • History of Work Health Safety breaches • Compliance with Indigenous procurement Policy • Not compliant with Workplace Gender Equality Procurement Principles, or gender targets of the ASG

All three contractors provide examples of economic benefits and all three have areas of weakness. However, Contractor 3 has the most breached, and importantly, a history of poor work health and safety. This should be viewed as a major red flag by the decision maker. So too should the lack of an enterprise agreement. Contractors 1 and 2 should be considered favourably and move to stage 2 to be assessed on price, whilst Contractor 3 should be rejected.

Recommendation: The guidance should provide greater detail and guidance in the case studies rather than broad statements or legal minimums.

Would there be benefit in a more detailed discussion of retained economic benefits?

Guidelines for the Construction Industry

Specific guidance on what constitutes economic benefit in different sectors of the economy should be provided. This would ensure decision makers are able to evaluate the specific needs of particular areas of the economy.

This is particularly important for the building and construction industry for two key reasons. Firstly, procurement codes are an important tool at the disposal of Government to address issues in the construction industry. Secondly, the current economic benefit guidelines do not reflect the reality of the structure of the building and construction industry, specifically the role of Small and Medium Enterprises (SMEs).

Addressing Policy Issues in the Construction Industry

The construction industry has one of the highest rates of gender segregation in the labour market, with women making up 14% of the workforce.¹⁹ Of this, women make up only 1% of skilled trades across the industry, and 3% of trade roles in companies with 100 or more employees.²⁰ This gender segregation is both horizontal and vertical, with women concentrated in lower paid, less skilled and less secure work.²¹ The most recent data from the Workplace Gender Equality Agency found that construction had the second highest industry gender pay gap.²² Government procurement can be an immensely powerful tool to increase women's participation in construction, and to provide supportive and secure employment

The Victorian Government's Building Equality Policy (BEP) is an excellent example of how clear targets, with strong implementation compliance and monitoring mechanisms can increase women's participation in the construction industry.²³

Following the precedent of the BEP, increasing women's participation in the construction industry should be considered a central economic benefit in Commonwealth Government procurement. To be effective, procurement contracts must have participation rate requirements. Merely requiring gender equality policies or targets is not an effective mechanism.

For example, for the construction industry, there should be specific onsite targets to improve gender equality:

1. Trade covered labour: women are required to perform at least 3% of the contract works' total estimated labour hours for each trade position;
2. Non-trade Construction Award covered labour: women are required to perform at least 7% of the contract works' total estimated labour hours for each non-trade Construction Award covered position; and
3. Management/supervisory and specialist labour (staff): women are required to perform at least 35% of the contract works' total estimated labour hours for each staff position.

Similarly, the guidelines should require 10% of total hours on a Commonwealth project be completed by an apprentice or trainee, in line with the Australian Skills Guarantee (ASG). This is

¹⁹ <https://www.womenbuildingaustralia.com.au/news/growth-female-participation-building-and-construction-industry>

²⁰ Workplace Gender Equality Agency. (2020). Data Explorer: Construction Industry. Sydney: Australian Government.

²¹ Holdsworth, Sarah, Michelle Turner, and Orana Sandri. 2023. "Gender Bias in the Australian Construction Industry: Women's Experience in Trades and Semi-Skilled Roles" *Social Sciences* 12, no. 11: 627. <https://doi.org/10.3390/socsci12110627>

²² Workplace Gender Equality Agency. (2020). Data Explorer: Construction Industry. Sydney: Australian Government.

²³ <https://www.buyingfor.vic.gov.au/building-equality-policy>

essential to address skills shortages in the building and construction industry, including the chronically low completion rates for trade apprentices and trainees. Just 54% of apprentices who started in 2017 had completed the apprenticeship by the end of 2021.

The Structure of the Construction Industry

The current guidelines place considerable emphasis on encouraging SMEs to receive procurement contracts. Whilst this is an understandable policy goal, the current guidelines do not reflect how the industry operates and may lead to less desirable outcomes. Whilst SMEs make up a large proportion of construction businesses, they are typically engaged as sub-contractors or sub-sub-contractors within a supply chain. For major construction projects, a SME would be highly unlikely to have the capability or expertise to be engaged as a principal contractor. Realistically, only a large Teir-1 or Teir-2 builder such as Lendlease or Multiplex could complete a major project in the requisite time frame, within budget at a high quality whilst also meeting economic benefit and sustainability requirements.

Rather than requiring 35 per cent of procurement contracts valued up to \$20 million to go to SMEs in the construction industry, emphasis should instead be placed on the supply chain. Particularly, requiring principal contractors to pay sub-contractors within a specific time frame and address security of payment issues, a major concern in the industry. This would provide considerable benefit to SMEs and reflect the way the building industry operates.

Recommendation: The guidance should require successful construction industry applicants to demonstrate specific percentages of the workforce that are women and trainees/apprentices, in line with state and territory procurement codes.

Recommendation: The guidance should reduce the percentage requirements of procurement contracts to SMEs in construction, and instead introduce security of payment requirements into procurement contracts.

Interaction with other Procurement Policies

The current economic benefit guidelines do not adequately refer to other procurement guidelines. This includes the following procurement policies:

- Workplace Gender Equality Procurement Principles
- Indigenous Procurement Policy
- Skills Guarantee Procurement Connected Policy
- Shadow Economy Procurement Connected Policy
- Payment Times Procurement Connected Policy
- Australian Industry Participation Policy

These policies all relate to an aspect of economic benefit, yet they are not addressed in the economic benefit guidelines. The guidelines should make specific reference to other procurement policies and embed them within the concept of economic benefit.

Conclusion

In summary, procurement is an immensely powerful tool for government to drive policy outcomes in the Australian economy. The current Consideration of Broader Economic Benefits in Procurement guidance should be emended to enable it to address the policy goals of the Commonwealth Government. As outlined in this submission, there are two key changes that should be made to the guidelines to do this. Firstly, the concept of economic benefit as it currently stands is unduly narrow and does not capture key factors within the Australian economy. In particular, it does not mention factors that are key policy priorities of the Commonwealth Government and is not in alignment with the over all policy framework of this Government. Secondly, the structure of the procurement guidelines creates ambiguities for decision makers, frustrating the application of the procurement principles. This issue should be addressed through the implementation of a two-step tender evaluation process, to ensure that decision makers can weigh factors consecutively rather than weighing factors that may conflict with one another.

References

<https://treasury.gov.au/employment-whitepaper/final-report>

<https://alp.org.au/news/investing-in-a-future-made-in-australia>

<https://www.pm.gov.au/media/investing-future-made-australia>

<https://www.safeworkaustralia.gov.au/media-centre/news/safer-healthier-wealthier-economic-value-reducing-work-related-injuries-and-illnesses>

Super Scandal: Unpaid Super Guarantee in 2016-17' (Report, Industry Super Australia, 2019) 3.

<https://ministers.treasury.gov.au/ministers/stephen-jones-2022/media-releases/government-enshrines-workers-right-superannuation>

<https://www.theguardian.com/australia-news/2023/aug/31/snowy-hydro-2-project-scheme-billion-cost-blowout-kosciuszko-national-park#:~:text=The%20giant%20Snowy%202.0%20pumped,by%20the%20end%20of%202028.>

<https://www.smh.com.au/business/companies/snowy-hydro-uh-oh-the-infrastructure-upstart-with-sharp-elbows-and-sharper-pricing-20221006-p5bnow.html>

<https://www.wgea.gov.au/what-we-do/compliance-reporting/wgea-procurement-principles>

<https://www.niaa.gov.au/our-work/employment-and-economic-development/indigenous-procurement-policy-ipp>

<https://www.dewr.gov.au/australian-skills-guarantee/resources/skills-guarantee-procurement-connected-policy>

<https://treasury.gov.au/publication/p2019-t369466>

<https://treasury.gov.au/publication/p2021-183909>

<https://www.womenbuildingaustralia.com.au/news/growth-female-participation-building-and-construction-industry>

Workplace Gender Equality Agency. (2020). Data Explorer: Construction Industry. Sydney: Australian Government.

Holdsworth, Sarah, Michelle Turner, and Orana Sandri. 2023. "Gender Bias in the Australian Construction Industry: Women's Experience in Trades and Semi-Skilled Roles" *Social Sciences* 12, no. 11: 627. <https://doi.org/10.3390/socsci12110627>

<https://www.buyingfor.vic.gov.au/building-equality-policy>