



ASU Submission

Australian Government

Department of Social Services

Draft National Plan to End Violence against Women and
Children 2022-2032

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The ASU

The Australian Services Union ('ASU') is one of Australia's largest unions, representing approximately 135,000 members. ASU members work in a wide variety of industries and occupations in both the public, private and community sectors.

The ASU represents workers throughout the not-for-profit and the social and community services sector. The Union has members throughout every state and territory. Our members work with people who are living with family, domestic and sexual violence and the related protection of children and young people.

Of specific relevance, the ASU represents workers who are employed in the following areas:

- Youth and child protection
- Out of home care
- Refuges for women, children, families, young people and men
- Homelessness, housing and tenancy services
- Family support services
- Disability services
- Health and mental health
- Alcohol, gambling and other drugs of addiction and rehabilitation
- Aged care
- Rape, domestic and family violence
- Aboriginal services
- Migrant and settlement services
- Prisoner rehabilitation
- Community Legal Services
- Community and neighbourhood services
- Policy and advocacy services
- Community transport

ASU members are highly skilled practitioners. They hold qualifications in law, psychology, management, social sciences, welfare work, disability work, social work, youth work, child protection, aged care and community work, mental health, drugs and alcohol counselling and a long list of other specialist qualifications.

We support our members who work every day to end violence against women and children.

ASU response to the Draft National Plan to End Violence against Women and Children 2022-2032

Violence against women and children is a national crisis that requires immediate and meaningful action.

The Draft Plan offers a serious, if brief overview of the major issues confronting women and children living with violence in Australia. But it does little more than provided an overview of the prevalence, drivers and different forms of gender-based violence in Australia. The Draft Plan must include operationally specific commitments, including measurable outcomes, timelines or budgets. Further, it fail to engage meaningfully with the Statement of the Delegates to the National Women's Safety summit.

Women and Children have the right to live free from violence. Ending violence against women and children must be a priority for all Australian governments. The plan must address safety in the home, at work, and out in the community.

Ending violence against women and children also requires community wide prevention and response. The commitments we are requesting are response driven so we need an approach that addresses this crisis through our community and our systems of work.

Workplaces have a key role to play in ending the national family violence crisis. Women have the right to organise collectively in the workplace to demand protection against violence in the workplace and support when they experiencing violence away from the workplace. The ASU's members have won family and domestic leave and other workplace protections at many employers.

The National Plan should recognise the role of unions. However, a woman's safety should not depend on her employer. National action is needed to ensure that all women have the same rights at all workplaces.

Recommendations

The ASU's recommendations identify practical policy measures to ensure to end violence against women and children in Australia.

1. Introduce a universal entitlement to 10 days of paid Family and Domestic Violence Leave into the National Employment Standards.
2. Implement a funded portable training entitlement for workers in the disability sector.
3. Procurement in the community and disability sectors should be based upon a minimum 'floor price', with the six foundation planks:
 - Wages for all workers, cannot be lower than *Social, Community, Home Care and Disability Services Industry Award 2010* rates.
 - Provision will be made in the price for accrual of portable leave entitlements, including portable long service leave.

- Adequate overhead costs for all workers, regardless of the nature of their employment, including professional supervision, safe ratios, professional development and training and on-boarding.
 - End of contract considerations for all workers, who do not receive a casual loading, including redundancy and outplacement.
 - Continuity of service provisions; price should be modelled on maximising permanent employment rather than casual or fixed term contracts.
 - Providers required to comply with industrial law.
4. Fund a Community Languages and Cultural Competence Allowance (CLACCA) in the community sector, similar to that which is in operation in the public sector to recognise the specialist skills required to work with people from diverse backgrounds.

Answers to Survey Questions

Q6. Does the Draft National Plan reflect the needs and experiences of women and children?

The Draft National plan provides an overview of the prevalence, drivers and different forms of gender-based violence in Australia. However, a very significant deficit is its failure to properly address the impact on women in the workplace who are living with violence.

Q7. Does the Draft National Plan meaningfully reflect issues highlighted through stakeholder consultation and the National Summit on Women’s Safety, including the experience of victim-survivors?

No. The Draft Plan summarises the issues raised by stakeholders, the National Summit on Women’s Safety and the experience of victim-survivors. However, the Draft Plan fails to engage with those issues ‘meaningfully’ because it lacks clear commitments to act and fails to recognise the important leadership of community and representative organisations on this issue.

Women’s safety in the workplace

Domestic and family violence is a workplace issue and impacts upon workplaces in several ways. Workplaces have a key role to play in ending the national family violence crisis. Women have the right to organise collectively in the workplace to demand protection against violence in the workplace and support when they experiencing violence away from the workplace.

The Statement by Delegates to the National Women’s Safety Summit in September 2021 notes that:

Achieving gender equality is key to preventing violence: It must recognise the joint role of government, business and unions in coming together to develop universal access to paid family and domestic violence leave.

Delegates also recommended that:

All governments should continue to deliver on relevant recommendations to prevent and address sexual harassment in Australian workplaces. The Commonwealth Government must continue to prioritise delivery of all recommendations of the Respect@Work Report.

The Respect@Work report is only mentioned in passing and no detail is provided about its implementation or connection with the broader plan.

The Draft Plan should commit the Federal Government to providing a minimum of 10 days paid Family and Domestic Violence Leave and further assistance including subsidised loans, access to emergency housing and even emergency pet care. These initiatives make it easier for an employee to leave a situation that threatens themselves and/or their children.

Sexual harassment at work must be addressed by our WHS/OHS laws, our workplace laws and our anti-discrimination laws (including implementing every recommendation in the Respect@Work Report that the government has committed to adopting).

The national plan should be strengthened by broadening the definition of sexual harassment and addressing the urgent reforms needed in anti-discrimination, workplace, and work health and safety systems to prevent sexual harassment in the workplace.

Further, the Draft plan must be amended to recognise the important role that unions play in addressing violence against women.

Women with a disability

The Draft National Plan refers to the experience of people with disability, but provides few specific measures to address their needs.

Disappointingly, there is minimal reference at all to the Government's own *Australia's Disability Strategy 2021 – 31*, and no discussion of its recommendations, which set out a detailed measures and a strategy for dealing with violence and the risk of violence confronted by people with disability, based upon consultation with people with disability and the workforce.

The Draft National Plan refers to the experience of people with disability, but there is almost no reference at all to the Federal Government's *Australia's Disability Strategy 2021 – 31*, which specifically refers to the importance of coordination with the *Draft Plan to Address Violence against Women and Children*.

Australia's Plan for Disability 2021-31 recognizes the prevalence of violence in the lives of people with disability. In its *Policy Priority 3: Policies, processes and programs for people with disability* promote gender equality and prevent violence against groups at heightened risk, including women and their children it says:

To improve the safety of people with disability there is a need to take targeted action for groups at heightened risk of violence. Women, children and young people are at a

particularly heightened risk of violence, abuse, neglect and exploitation. Effective preventive actions targeting violence against women and children require an inclusive and collaborative effort across a range of settings. The Strategy should be considered in conjunction with other plans such as the next National Plan to Reduce Violence against Women and Children and the next National Framework for Protecting Australia's Children.

It goes on to say:

... Australian research has similarly found that women with disability were twice as likely to say they had experienced sexual harassment at work as those without a disability. This data and research is consistent with other research which has suggested that women with disability are at greater risk of violence than other people in the community.¹

Yet there is no response in the Draft Plan, no commitment to consult or work with those who developed *Australia's Plan for Disability 2021-31* and no detail that would suggest a real understanding of the issues that it raises.

There is a need to build capacity amongst the NDIS and broader disability workforce to address violence against women. The people most likely to identify the risk of violence, or the fact of violence are those frontline disability support workers. But this will require the further professionalization of that workforce. Investing in ongoing training and support for those frontline workers is absolutely essential as the most effective means of preventing, identifying and responding to violence for people with disability. To maximise the potential of the NDIS to deliver a suite of high-quality, individualised services to hundreds of thousands of individual participants who are currently living with violence, or at risk of violence, the system needs a strong and immediate strategy to facilitate ongoing investments in workforce development, training, and job quality.² This must be addressed in the Draft Plan.

Unfortunately, the reality is that rhetoric of the Draft Plan about the need for a well-skilled workforce as an essential part of working with people with disability is not matched by the reality of implementation. Market forces cannot autonomously resolve these fundamental shortcomings; it will require pro-active attention, fiscal support and a real Plan, that has practical, measurable outcomes and objectives to lead the ongoing investments in skills upgrading that the sector requires.³ These do not appear in the Draft Plan.

¹ Australian Human Rights Commission (2020) *Respect@Work: sexual harassment national inquiry report (2020)*.

² A Portable Training Entitlement System for the Disability Support Services Sector (2018) R Ryan, J Stanford The Australia Institute Centre for Future Work

³ *ibid*

First Nations women

In their Statement, delegates to the National Women's Safety Summit said:

Conversations at the Summit also emphasised that under the 2010-2022 National Plan, we have not seen improvements for Aboriginal and Torres Strait Islander women and children. Across all levels of government, not enough has been done to capture the voices of First Nations people and to embed community-led solutions developed and delivered by Aboriginal and Torres Strait Islander organisations.

Nothing in the Draft Plan commits the Federal Government concrete measures to work with with First Nation's people to end violence against women and children.

The Draft Plan sets out as a Foundation Principle, a commitment to 'Close the Gap', between Australia's First nations people and non-Aboriginal Australians. This section of the plan reveals a real lack of understanding and commitment to working *with* First Nations People, listening to and *hearing* their truth.

The Draft National Plan refers in its second pillar to ensure early intervention strategies for Aboriginal and Torres Strait Islander populations are culturally safe, community owned and delivered by prioritising funding for Aboriginal Community Controlled Organisations. This suggests that these organisations are not already there, deeply embedded in their communities and working in a culturally safe and appropriate way.

The problem is not that there are no organisations, but that they are under resourced, and over-extended. Specialist organisations that are community-controlled and employing First Nations people typically have short term funding contracts. Without clear commitments to improve funding and working conditions for these organisations, it is difficult to accept that the Government is genuinely committed to either closing the gap or addressing violence against First Nations women and children.

Diverse communities

These same issues apply when considering the experience of sexual, family and domestic violence for members of LGBTIQ+ communities, older women, women, children and young people in CALD communities, regional and remote communities and those living with mental health and the effects of alcohol and other drugs.

In the Statement by delegates to the National Women's Safety Summit, delegates made clear that a priority for the national Plan should be to:

Listen, engage and be informed by diverse lived experiences, particularly those of victim-survivors, who are crucial to informing the development of policies and solutions and understand what works. Race, age, disability, culture, gender, including gender identity, amongst others forms of identity, impact on this lived experience. Victim-survivors of gender-based violence must be involved in decisions that impact upon their lives, support gender equality and address the complex intersection of gender inequality with other forms of discrimination, inequality and disadvantage.

Delegates called for this to be considered across the Draft Plan's *Four Pillars* of primary prevention, early intervention, crisis and recovery, and across all service systems so that:

specialist support is available to all, including those who require more complex or nuanced service responses. Community-led responses must be prioritised.

The plan does not address these issues with clear, measurable, concrete commitments to action and diminishes the leadership shown by diverse communities in ending violence against women.

There are already specialist, culturally safe and community-controlled organisations working very successfully across all the four pillars and foundation principles. Yet they typically have only short-term funding and are hostage to a constant competitive tendering process that mitigates against cooperative wrap-around service delivery and collaboration.

Members of those communities who are skilled and experienced to work with their own communities have little or no job security and few if any of the conditions that would be available if they were to work as public sector workers, employed by the Government.

One concrete commitment would be to reward community sector workers for their proficiency in community languages and cultural competence. Similar schemes are in place for public sector employees in most states and territories. A Community Language Allowance Scheme, such as that which operates in NSW, would ensure that appropriately skilled workers are attracted to women's services.

Further, the Draft Plan presents 'intersectionality' as a one of their Foundation Principles in addressing violence against women and children. It points to evidence that LGBTIQ+ communities are at higher risk of violence and self-harm. Yet the Prime Minister and his Government have gone to extraordinary lengths, in the same weeks as they released their Draft Plan, to introduce legislation in the form of a new *Religious Discrimination Act* that specifically encourages discrimination against people on the basis of their identity, including their gender.

Q8. Do the Four Foundation Principles (gender equality, the diverse lived experiences of victim-survivors, Closing the Gap and intersectionality) appropriately underpin the National Pillars and actions within the Draft National Plan?

Gender equality, the diverse lived experiences of victim-survivors, Closing the Gap and intersectionality are appropriate Foundation Principles to underpin the Draft National Plan. However, the Draft Plan fails to meaningfully engage with those Foundation Principles. Below, we discuss the plans deficiencies with regard to women's safety in the workplace, the

Q9. Do the Four National Pillars in the Draft National Plan provide a holistic approach to identifying and responding to gender based violence?

The Four Pillars set out in the Draft plan are Prevention, Early Intervention, Response and Recovery. This is a useful way to audit the Government's policies and perhaps a useful way to

audit the availability of resources for women and children living with violence. Like the *Foundation Principles*, there is no value to the Four Pillars unless the Government is committed to *doing* something.

We have already mentioned the Respect@Work Report, which includes almost identical pillars: What it takes to live with violence, what it takes to plan to leave violence and what it takes to recover from violence. The Respect@Work report was endorsed by the Statement of Delegates to the National Women's Safety Summit. Yet there is no discussion of these detailed and budgeted policy proposals in the Draft National Plan. Instead, the Draft National Plan commits to implement the Government's own *Roadmap to Respect* which has been dismissed almost without exception by specialists in the sector as an inferior document that ignores major issues, such as the need for universal access to paid family and domestic violence leave.

Further, there is no commitment to addressing the most fundamental of issues underpinning violence against women and children in Australia. These include poverty, homelessness, the impact of alcohol and other drugs, physical and mental health issues, being a First Nations Person, a member of LGBTIQ+ communities, a person with disability and being an older woman. Specialist services in these areas, are most often provided by community-based organisations, which rely entirely or almost entirely upon government grants. They are all captive to a constant cycle of competitive tendering, which results in a race to the bottom on wages and conditions for the people employed to deliver services. Subsequently, they are chronically underfunded.

At a broader level, the plan must include commitments to address the disparity in wealth and income between men and women. Transfer payments, such as unemployment benefits, youth allowances, while pensions for older Australians remain stubbornly low. They must be increased. Further, superannuation must be reformed to address women's poverty in old age. The superannuation guarantee rate must be increased and new women-focused superannuation accumulation pathways must be developed.

If the Government presents these four pillars as the basis of review for their policies, then they cannot complain when the practical reality is exposed. People living with violence and the people who work with them need more than words – we need you to hear us, and we need you to *do* something.

Q10. Do the Four Pillars in the Draft National Plan reflect the family domestic and sexual violence system?

Yes, but they reveal an urgent need to review funding and support for the sector if it is to cope with its increasing workload and the expectations of the community and government.

Unless the Draft Plan is prepared to address these issues then it is very difficult to see how there can be a stable, skilled and committed workforce to deliver best practice standard services to women and children living with sexual, family and domestic violence.

In their Statement, Delegates to the National Women's Safety Summit pointed to the essential role played by the community sector, and by a collaborative approach in providing essential and specialist services under the four pillars of Prevention, Early Intervention, Response and Recovery.

Delegates said:

Partnerships for early intervention, prevention, response and recovery must be community-led [and that] a whole of community, multidisciplinary, wrap around responses are required.

Funding must take into account that programs must be localised, so that programs and models are developed and embedded within the systems of each area or jurisdiction.

Delegates went on to say that the Draft Plan must:

Recognise that community-led and place-based responses are critical in addressing diverse forms of gender-based violence through the promotion of strong and lasting partnerships with community organisations.

Programs and service delivery must be adequately resourced and supported so that they are capable of achieving the stated goals of governments. Investmentshould provide long-term service level funding for frontline services, including housing and advocacy and needs-based funding.

The Draft Plan must be amended to meaningfully respond to these demands.

Skilled workers are leaving the sector

Poor working conditions are driving skilled frontline workers away from services needed to end violence against women and children.

In a recent survey of HESTA superannuation fund members, a significant number of people working in the community and disability sectors reported that they were considering leaving these sectors. Those workers reported that while they 'love my job and the people I work with', they plan to leave the sector over the next twelve months. Their reasons for leaving the sector included the very high levels of stress in their work, low wages and job insecurity, combined with the lack of training opportunities and the lack of career opportunities as the main reasons for leaving the sector and seeking alternate career paths.

A 2022 survey of ASU members in the community and disability sectors produced similar results. Skilled and experienced professionals in the community and disability sectors told us that more than 30% of community workers and more than 40% of disability workers plan to leave their employer in the next twelve months.

There must be clear commitments to improve both wages and working conditions for frontline workers. This must include the disability workforce.

Competitive tendering is impairing service delivery

The services required to end violence against women are multi-layered and multi-disciplinary. These services are best delivered by a collaboration of government agencies and not-for-profit specialist community-based organisations. Each agency and organisation (and each of the workers in those organisations) plays an essential, specialist *but* interdependent role in lives of those living with, escaping or surviving violence. It is therefore damaging to the sector and ultimately to its clients when organisations and their workers are forced to compete for funding and other resources.

Since the 1990's, funding at all levels of government has been based upon 'competitive tendering'. In a survey of employers conducted by the ASU in the community services sector, the overwhelming concerns expressed in relation to funding was competitive tendering. This has resulted in organisations competing against each other to win government funding. As organisations race to have the lowest cost in this tender race, inevitably, they have tried to cut everything they can out of the labor costs, because this is the costliest part of their tender. There has been an increase in the 'on-demand' workforce, employed on insecure and fixed-term employment contracts. This impacts the quality of service provision.

We propose that all government tenders should be based upon a 'floor price' below which no tender can be lodged.

We propose a model floor price, based upon six elements:

1. Wages for all workers, cannot be lower than Federal Award (SCHADS Award) rates including:

- Annual wage increases.
- correct classification stream and level
- allowances
- penalties and loadings

2. Provision will be made in the price for accrual of portable leave entitlements including:

- Workers' compensation
- Annual leave including 5 weeks annual leave for shift workers.
- Personal leave
- Long service leave
- Paid Parental Leave
- Paid family and domestic violence leave

3. Adequate overhead costs for all workers, regardless of the nature of their employment, including:

- Provisions for adequate supervision ratio depending on nature of service.
- Professional (clinical) supervision

- Provisions for onboarding of staff – induction, buddy shifts
- Provisions for regular team meetings
- Provisions for ongoing professional development and training – including covering the cost and time of attaining any qualification requirement of the program (e.g., Diploma qualification for therapeutic care workers in out-of-home care services).
- Provisions for Workplace Health and Safety Representatives at a reasonable ratio to be trained and perform their work in accordance with legislation.

4. *End of contract considerations for all workers, who do not receive a casual loading, including:*

- Redundancy and notice requirements in case of contract not renewed.
- Outplacement services

5. *Continuity of service provisions including:*

- Price should be modelled on maximising permanent employment (Fulltime and Part time) rather than casual or fixed term contracts or rolling contracts.
- Price should enable experienced workers to be recruited and retained

6. *Providers required to comply with industrial law, including:*

- Requirement to consent to arbitration in contract.
- Capacity for dispute to be raised with the relevant funding body if industrial entitlements are not followed.

There is need for specialist training to deliver a trauma-informed service for those people living with sexual, family and domestic violence

In its Statement, Delegates to the National Women’s Safety Summit said:

Responses must be locally designed and delivered, and recognise specific challenges experienced by those at risk of gender-based violence in these communities.....counselling responses must be able to respond to localised challenges to ensure women receive appropriate support. Specialist sexual assault services must be available for women in all areas. Mainstream counselling responses must be able to respond to localised challenges to ensure everybody impacted by domestic, family and sexual violence is able to access culturally safe and trauma-specialist support. This must also reflect the specific and unique needs of people in remote and very remote communities, as well as the needs of Aboriginal and Torres Strait Islander people and other communities with diverse backgrounds (such as those living with disability, LGBTQIA+ people and CALD communities).

It is clear that people living with violence recognize the priority of specialist skills in those with whom they work. To deliver a trauma-informed service, frontline workers must have specialist training.

Low paid, casual employment prevents frontline workers accessing accredited training from reputable providers in the delivery of trauma-informed services and the pricing formula in the NDIS means that there is very little in-service training.

Frontline workers supporting with people living with sexual, family and domestic violence need adequate support to address vicarious trauma

We need to ensure that the people charged with ending violence against women are supported and protected in their work. Vicarious trauma is a significant problem for workers in the community sector. This is where a person is traumatised by the harrowing experiences of another person. We should also note that many workers in the community sector are themselves the victims of abuse and violence.

Working with people at risk of violence or living with violence is specifically recognised as a key factor in the diagnosis of vicarious trauma and other stress related illnesses in those who work in child protection.^[2] This is an issue that confronts workers in government and non-government organisations and agencies, faith based and secular services and affects all professions. It is an issue that has serious and potentially long-term harmful effects on the individual concerned, their family and work colleagues as well as on clients. Vicarious trauma impacts individual and organisational productivity and also has a financial impact in terms of workers compensation and other related health costs. Ground-breaking research and other work done by Rape & Domestic Violence Services Australia is now a preferred model for international best practice among organisations and agencies involved in trauma work. This approach to the prevention, diagnosis and treatment of vicarious trauma resulting from working in the field of child protection sexual assault and domestic violence has been shown to both prevent and mitigate the impact of vicarious trauma on workers and organisations.

We recommend that a joint consultative committee should be established that includes the directors of appropriate government departments and sector specialists and peaks, including People with Disability Australia, Incision Australia, peak bodies representing First Nations community-controlled organisations, LGBTIQ community-controlled organisations, migrant and settlement services and community sector specialists working with sexual, family and domestic violence. The consultative Committee should be charged with developing a training program and a program for professional clinical supervision for all agencies and services engaged with families, children and young people at risk and living with sexual, family and domestic violence.

To address this issue, the Draft Plan must provide for a portable training scheme in the disability and community sectors, to enable those workers to develop the specialist skills, including the delivery of trauma-informed service.

Training and development for the workforce

In Pillar 3, Focus area 1 of the Draft National Plan, it commits to:

Ensure a resourced service system with an appropriately skilled and qualified workforce is available to support all victim-survivors, including victims of sexual assault, and address perpetrator behaviour no matter where they are located or their individual characteristics, through frontline services provided by states and territories.

- *Account for the increased costs of providing services in remote communities.*
- *Support workforces to access training and information to build capability to deliver evidence based and trauma informed services to victim-survivors and perpetrators, including in areas of emerging forms of family, domestic and sexual violence, such as technology-facilitated abuse including new and emerging technologies.*
- *Establish a national minimum service level and ensure consistency in support across jurisdictions.*

This priority is reflected in the Statement of Delegates to the National Summit on Women's Safety, in which Delegates state that the National Plan should ensure:

there is training and workforce development and support across sectors such as the police, justice systems, and frontline services, to ensure responses and supports for domestic, family and sexual violence are appropriate for all people, regardless of their background or lived experience and across the spectrum of specialist prevention, intervention, response and recovery services.

There is no strategic approach, no measurable objectives, nor detail on how the Draft Plan will address these challenges and issues. Without any detail on how the Draft Plan will be implemented or measured, it is difficult to say how it will support building any evidence at all.

To address this issue, the Draft Plan must provide for a portable training scheme in the disability sectors, to enable those workers to develop the specialist skills, including the delivery of trauma-informed service.

Many employees in the NDIS work for multiple employers. This means they are not prioritised for training by *any of those employers*. A portable training scheme would allow individual workers to accumulate funding for professional development and training as they work in the NDIS system across multiple employers.⁴

⁴ A Portable Training Entitlement System for the Disability Support Services Sector (2018) R Ryan, J Stanford The Australia Institute Centre for Future Work

Regional Services

There is a pronounced shortage of appropriate services in regional areas. It is difficult for regional areas to address skills shortages by attracting and retaining workers from other areas due to a perception of poor infrastructure, services and amenity. As we have previously discussed, addressing issues around job security, career development, education and training, good wages and salaries are therefore vital, both in terms of capacity building for the local workforce and attracting and retaining workers from other areas in order to allow regional areas to support the skills needed in growth sectors of the workforce. The ABS and Government's Labour market Information Service both report consistent data that reflects long term skills shortages among those workers who deliver specialist sexual, family and domestic violence services in the healthcare and social assistance sector. The current expectation is that the sector is expected to require another 85,000 workers in regions through to 2023. With long lead times on professionals in these industries it is vital that action starts now to create the skills development pathways. These new areas of job growth require a policy focus on ensuring people in regional areas are ready and equipped with the right skills, knowledge and aspiration to successfully engage in and drive these growth areas in their local communities.

In its report, *The Future of Regional Jobs*, the Regional Australia Institute lists ten regions with the greatest projected increase in jobs. In most of these regions, job numbers are expected to be driven mainly by health care and social assistance. Together, these regions account for around 86,000 new jobs, including specialist child protection, sexual assault and family and domestic violence workers between 2019- 2023. The top ten regions include Gold Coast, Sunshine Coast, Newcastle and Lake Macquarie, Capital Region NSW, Geelong, Richmond-Tweed, Hunter Valley (excluding Newcastle), Illawarra, Cairns and Mackay. Newcastle and Lake Macquarie are projected to have the highest growth in regional Australia, expected to grow by 13,607 jobs by 2023, driven largely by around 6,584 health care and social assistance industry jobs (community and disability support jobs).

Given rapid growth in demand for similar types of workers in different regions, it is very likely that there will be intense competition for workers with similar skills sets over the next five years. With vacancy rates increasing sharply already in some regions, just to meet current demand for skilled labour, and there is the additional consideration of replacement for people who leave these industries.

In this context, some form of partnership approach to skills development and implementation is necessary for successful outcomes.⁵

This partnership strategy must ensure:

- Wages and working conditions attractive enough to recruit and retain tens of thousands of new workers.

⁵ The Future of Regional Jobs. Regional Australia Institute, April 2019 SIP.2018.2.1.2

- Good job quality, including employment security, autonomy and recognition.
- The development of a range of appealing career paths in the sector, so that workers can see a positive long-term future working in this field.
- A systematic strategy for training, qualifications and workforce development.

While recognising the importance of a partnership approach to skills development and implementation, it is nonetheless essential to recognise that there needs to be government stewardship and funding of a national training scheme in the sector. A national scheme cannot be effectively implemented when the parties include employers and employees but not government.

Q11. Does the Draft National Plan reflect the needs and experiences of women and children?

No, as we have said previously, the Draft National Plan is much more of a list of good things and commentary on bad things than an actual *plan*. There is little or no reference to the experience of women who work and are living with violence or the relationship between women's poverty and violence.

The financial cost for a woman of leaving a violent relationship, particularly if she has children, is prohibitive. There is also strong evidence that a woman who is secure in her employment is far more likely to leave a violent relationship and to stay out of that relationship. The Draft Plan should include a commitment to legislate for universal paid family and domestic violence leave, so that working women could keep their jobs. Newstart and other transfer payments must be increased. This will ensure that women who are not working have a sufficient income to leave a violent relationship without fear that they will throw themselves and their children into poverty.

There is little consideration of the needs of older women, many of whom have worked for their whole life, but find themselves without savings or the capacity to buy a home, and no income to pay private rent. A practical response to this issue would be to address the dysfunctional accumulation pathway that leaves so many women without savings or home ownership at the time of their retirement and so little capacity to leave a violent relationship. The word superannuation does not appear even once in the Draft plan.

It would be useful for the Draft Plan to the lack of access to secure housing is critical in the decision making of a woman when deciding to leave a violent relationship. Many women and children leaving violence cannot find secure medium and longer-term housing. There is a critical shortage of crisis accommodation, much less affordable housing for women and their children when they leave violence. These experiences are even worse for some people, including First Nations women and children, people with disability, older women, women from CALD backgrounds and people from LGBTIQ+ communities.

Q12. Does the Draft National Plan reflect the needs and experiences of diverse communities and individuals?

While the Statement of Delegates to the National Women's Safety Summit respectfully points to the systemic barriers of intersectionality that confront diverse communities, the Draft Plan is more of an esoteric commentary than a practical commitment to address these. If systemic barriers are to be confronted and overcome, there needs to be a genuine whole-of-government commitment to considering these features in the development of public policy and legislation. For example, it is difficult to believe that the Government genuinely recognises the significance of intersectionality as an issue in preventing violence against women and children when it has recently gone to extraordinary lengths to introduce legislation in the Religious Discrimination Act that specifically encourages discrimination against people on the basis of their identity, including their gender. Moreover, there is no doubt that in the very process itself of introducing this legislation, which would legitimise inequality for people of diverse identities, there has been a heightened fear of violence, including against LGBTIQ+ communities. There has also been a heightened risk of self-harm in those communities, which the Draft National Plan acknowledges already experience a higher risk of violence and self-harm.

Similarly, as we have said previously, there is no acknowledgement of the National Disability Strategy, or its recommendations, or measurable outcomes for address violence and trauma among people with disability. There is also no measurable outcome or plan for addressing violence in First Nations communities, or a practical address of the Closing the Gap targets. Worse, the Draft Plan appears to believe that there are no community-based organisations that currently exist or are having any success.

The Draft Plan demonstrates very little practical understanding of CALD communities. It implies that there is one homogeneous CALD community with similar or same issues. There is no recognition of the differences between women who are refugees, temporary visa holders, long term migrants, older women, and women from diverse cultural backgrounds and experiences – including those who have experienced trauma of their own in their country of origin and in the journey to Australia.

Q13. Does the Draft National Plan support building further evidence on what works for gender-based violence prevention, early intervention, response and recovery?

Unfortunately, the Draft Plan does not provide a sound basis for building further evidence on what works for gender-based violence prevention, early intervention, response and recovery. For example, while the Draft Plan makes some reference in its 'dot-points' addressing various concerns. This limit the value of any evidence derived from the plan.

Q14. Do the Draft indicators and outcome measures provide a strong framework for measuring progress towards the next National plan goals?

No. There is no practical operational plan, with a real budget, timeline for implementation, or measurable outcomes in the Draft Plan.

Q15. What would you NOT change about the Draft National Plan?

The Statement by Delegates to the National Women's Safety Summit is a serious, if brief overview of the major issues confronting women and children living with violence in Australia.