



Equality Rights Alliance

Women's Voices for Gender Equality

Pre-Budget Submission of the Equality Rights Alliance

8 February 2019

Equality Rights Alliance

Equality Rights Alliance (ERA) is Australia's largest network advocating for women's equality, women's leadership and recognition of women's diversity. We bring together 64 non-government organisations and social enterprises with a focus on the impact of policy or service delivery on women.

We are one of the six National Women's Alliances, funded by the Commonwealth Office for Women.

We thank you for the opportunity to make this submission. We have outlined 40 recommendations to advance gender equality across a number of areas covering gender aware policies and processes, housing affordability, income support and economic security, education, health, feminist foreign policy and women, peace and security.

The Sustainable Development Goals

The 17 Sustainable Development Goals of the 2030 Agenda are a transformational roadmap for the planet, peace and prosperity. The SDGs have been in train since the multilateral agreement of all 193 UN Member States in September 2015. The achievement of gender equality is included in the 2030 Agenda as goal 5 and is also an essential pre-condition of the remaining 16 goals. The 2030 Agenda is a shared vision for the world's governments *and* a point of unity for Australia's local, state, territory and federal governments. Consequently, it is vitally important that the Federal budget process should:

- Include consideration of the implementation of the goals into domestic policy through the proposed budget measures; and
- Provide for monitoring and reporting on the alignment of budgetary measures to the Sustainable Development Goals and their respective targets.

Recommendation:

1. **The Federal Budget must introduce publicly available reporting of Budget measures against each and all of the 17 Goals of the Sustainable Development Agenda.**

Gender Responsive Budgeting

The Women's Economic Security Statement released by the Minister for Women in November is an excellent first step on the long road to bringing women into the public policy arena. The Statement contains positive steps towards improving economic outcomes for women and, hopefully, begins a process of ensuring that Federal policy makers are focusing on the needs of women.

The next logical step in that process is the establishment of gender responsive budgeting at Federal level. Gender Responsive Budgeting advances gender equality by:

- tracking government expenditure to improve accountability and transparency for the government's gender equality goals, in line with our SDG commitments;¹
- recognising and making visible differential impacts across genders of all budgetary measures;

¹ Indicator 5.C.1 of SDGs is *Proportion of countries with systems to track and make public allocations for gender equality and women's empowerment*

- comprehensively linking policies across areas through a gender equality lens to address policy incoherence and siloed approaches to gender equality;
- using this analysis to influence budgetary decision-making so as to limit the negative impacts on women of revenue or expenditure measures and identify measures to advance gender equality.

A gendered analysis of the Budget is required to implement the Government's gender equality commitments of increasing women's safety, strengthening women's economic security and supporting more women into leadership. Gender budgeting should "eradicate gender asymmetry in budgets"² by covering expenditure and revenue measures. This process should include analysis of the investment required to achieve gender equality in Australia in order to translate gender equality goals into budgetary commitments.³ It is critical gender analysis is incorporated into tax and transfer measures to identify and address differential impacts across genders and remove tax settings that exacerbate gender inequality.⁴

In line with our Goal 5 commitments under the 2030 Agenda, the Australian Government must commit to a process of gender budgeting throughout the budget cycle, which is engaged with civil society, participatory and part of a revitalised gender machinery within government. Without this process, the Budget risks embedding and exacerbating gender inequalities and remains an untapped opportunity to advance gender equality.

Recommendation:

- 2. Investigate and consult on models of gender responsive budgeting for integration into the budget process.**

Women's Economic Wellbeing

Recognise, Value and Redistribute Unpaid Work

ERA welcomes the reinstatement of the Time-Use Survey (TUS) as part of the Women's Economic Security Statement. This measure is long overdue and will provide critical data to inform evidence-based policy on women's participation in employment.

Following from this first step, there is a range of policy measures which would better recognise unpaid work and ensure women's economic wellbeing which should be considered for inclusion in the Budget.

- Strengthen Social Security

Recommendations:

- 3. Urgently increase Newstart and associated payments to address and alleviate poverty.**
- 4. Investigate an independent commission to set income support rates.**
- 5. Reinstatement the Single Parenting Payment for single parents whose youngest child is up to 16 years old.**
- 6. Improve social security system responsiveness to domestic and family violence through implementation of the National Social Security Rights Network's recommendations from How well does Australia's social security system support victims of family and domestic violence?**

² Cecelia Ng, *Gender Responsive & Participatory Budgeting: Imperatives for Equitable Expenditure* (Switzerland: Springer International Publishing, 2015) 2

³ Sharp in Ng, 6

⁴ The Senate Standing Committee on Economics Report "A Husband is Not A Retirement Plan" recommended that the issue of effective marginal tax rates for second earners be referred to the Productivity Commission, noting the significance of women's workforce participation.

7. Ensure publicly available gender impact statements/assessments accompany all welfare reform proposals.

Women are not only the primary performers of unpaid work in Australia – both within households and in the broader volunteering community they also perform the majority of unpaid work which is for the benefit of others.⁵ Their role in the Australian economy is vital, but the inequitable gendered distribution of unpaid work comes at a significant cost to women’s economic security. The social security system plays a critical role in ensuring that women with unpaid caring responsibilities are protected from poverty and economic insecurity. Women are the majority of income support recipients⁶ and tend to require income support payments for longer periods.⁷ Working-age women in receipt of income support also draw a larger proportion of their income from income support payments.⁸ But decreases in the real value of Newstart and associated payments and changes to the Single Parenting Payment have conspired to undermine this security net for unpaid carers, while the imposition of onerous conditionality, excessive waiting periods and punitive approaches to social security affect women’s access to the safety net and breach women’s rights to social security.

We support the call by ACOSS to increase Newstart, Youth Allowance and related payments for single people by at least \$75 a week.⁹ According to ACOSS and UNSW, 3.05 million people in Australia (13.2% of the population) are living in poverty.¹⁰ Women make up 49.3% of people in receipt of Newstart and are more likely to be in receipt of Newstart for longer periods, making up 52% of people in receipt of Newstart for 2-5 years and 54% of people in receipt for 5+ years. This is reflected in the fact that women experience poverty for longer periods.¹¹ Women also make up 66% of part-rate recipients of Newstart and make up 65% of the one fifth of Newstart recipients reporting employment earnings. This shows that Newstart is a crucial supplement for the low income, part-time and casual work that women are over-represented in.¹²

It is estimated that a \$75 a week increase to Newstart and Youth Allowance would cost the Budget approximately \$3.3 billion.¹³ In the long-term, the Government should investigate Anglicare Australia’s proposal for an “arms-length commission or tribunal– much like the Fair Pay or Remuneration commissions – that could properly consider the cost of living people on pensions and allowances, and set them accordingly.”¹⁴

While Newstart can provide support to some women performing unpaid care work, the National Council of Single Mothers and their Children points out that Newstart is not a payment that is structured for sole parent families.¹⁵ The single parenting payment recognises the care work of single parenting and the competing demands of paid work and unpaid work single parents navigate. Women comprise 94.8% of people in receipt of the single parenting payment.¹⁶

⁵ Lyn Craig and Abigail Powell, “Shares of Housework Between Mothers, Fathers and Young People: Routine and Non-routine Housework, Doing Housework for Oneself and Others,” *Social Indicators Research*, 136. No. 10 (2016)

⁶ data.gov.au, “DSS Demographics June 2018,” *Australian Government data.gov.au*. June 2018 <https://data.gov.au/dataset/ds-dga-cff2ae8a-55e4-47db-a66d-e177fe0ac6a0/distribution/dist-dga-57c91779-cce6-4ec4-b94f-50464ca55a77/details?q> (accessed 14/11/18)

⁷ Roger Wilkins, *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 15* (Melbourne: Melbourne Institute Applied Economic & Social Research, 2017). 41

⁸ Ibid.

⁹ ACOSS, “Myth Busting Newstart,” 2018 <http://www.acoss.org.au/raisetherate/> (accessed 15/11/18)

¹⁰ ACOSS and UNSW Sydney, *Poverty in Australia 2018*. (Sydney, 2018). 12

¹¹ Australian Government, “Indicator 1.2.1 Proportion of population living below the national poverty line, by sex and age” *Sustainable Development Goals Data*. 17 July 2018, <https://www.sdgdata.gov.au/goals/no-poverty/1.2.1> (accessed 24/10/18)

¹² 2018 data on Newstart commissioned from Department of Social Services by ERA.

¹³ Deloitte Access Economics and ACOSS, *Analysis of the impact of raising benefit rates* (Melbourne, 2018). ii

¹⁴ Anglicare Australia, “Adequate Income Position Statement” June 2016 <http://www.anglicare.asn.au/docs/default-source/default-document-library/adequate-income-position-statement---plain-logo.pdf?sfvrsn=4> (accessed 23.11.18)

¹⁵ National Council of Single Mothers and their Children, “A Small Investment for a Significant Gain – Budget Submission” 2016 <http://www.ncsmc.org.au/wp-content/uploads/2016/02/Budget-Submission-2016.pdf> (accessed 6.11.18)

¹⁶ data.gov.au, “DSS Demographics June 2018”

ERA endorses the 32 recommendations contained in the National Social Security Rights Network's (NSSRN) report *How well does Australia's social security system support victims of family and domestic violence*.¹⁷ The report found significant issues within how the social security system responds to domestic and family violence and has made 32 recommendations to address these issues, including recommendations on the application of special circumstances, payment levels, waiting periods for newly arrived residents, care of children and Centrelink's service environment. The following recommendations are pertinent to the Budget and have been identified as the most likely to be implemented quickly and easily:

- Increase the time period from the occurrence of the extreme circumstances within which a claim for Crisis Payment must be made from 7 days to 14 days.
- Extend the eligibility for Crisis Payment from four to six times per year
- Establish a Departmental Domestic Violence Hotline
- Remove or at very least reduce the Newly Arrived Residents Waiting Period for Special Benefit and family payments

Finally, gender impact assessments should accompany all welfare and social security reform proposals. These should include a detailed gender break down of recipients impacted, the extent of the financial impact (e.g. gendered breakdown of full and partial payment recipients) and the consideration of how proposed reform interacts with other gendered issues such as domestic and family violence and caring responsibilities.

- Reform Welfare to Work and Employment Services

Recommendation:

- 8. Redesign ParentsNext in line with recommendations and findings of the recent Good Shepherd report *Outside Systems Control my Life* and consultation with single mother-led and Aboriginal and Torres Strait Islander organisations.**

Welfare to Work policies and the concomitant job services system continue to throw up challenges to the economic wellbeing of single parents, most of whom are women. Good Shepherd Australia New Zealand has recently launched a report into the experiences of single mothers who interact with Welfare to Work titled "*Outside Systems Control my Life*."¹⁸ The research has found that Welfare to Work is not meeting any of its stated goals pursuant to single mothers: it is not improving workforce participation, increasing self-reliance, or improving financial security. The policy does not take into account the time-intensive nature of parenting, the complexities that many women face in their everyday life in addition to parenting and employment (for example, experiences of domestic violence, disability, clinical diagnosis and/or intensive caring duties), or the systemic barriers many women, especially single mothers, face regarding re-entering paid employment. The women in this research found little to no help in their job search or in achieving their long-term plans for financial security; rather compliance requirements were an additional barrier to the wellbeing of their family. Further, the targeting of Aboriginal and Torres Strait Islander women and single mothers through automatic enrollment of people based on sex, race and age all raise questions about the discriminatory nature of the program.¹⁹

"*Outside Systems Control my Life*" recommends a wholesale redesign of the jobactive program from the current "one size fits all" approach. In line with the report's findings, the redesign should incorporate the following:

¹⁷ Sally Cameron, *How well does Australia's social security system support victims of family and domestic violence*, (Surry Hills: National Social Security Rights Network, 2018)

¹⁸ Juanita McLaren, Susan Maury and Sarah Squire, "*Outside Systems Control my Life*" *The Experiences of Single Mothers on Welfare to Work* (Abbotsford: Good Shepherd Australia New Zealand, 2018)

¹⁹ Beth Goldblatt, "More than Unpopular: How ParentsNext Intrudes on Single Parents' Human Rights" *The Conversation Australia*, 16 January 2019, <https://theconversation.com/more-than-unpopular-how-parentsnext-intrudes-on-single-parents-human-rights-108754> (accessed 29.1.2019).

- Greater recognition and acknowledgment of the unpaid work of parenting and the need to balance any employment with this, and, additionally the barriers to employment that exist for single parents such as unavailable or unaffordable child care;
- Support should be tailored to the circumstances of the individual. Currently the program is standardised and inflexible to individual circumstances. A case in point is the exemptions which are temporary and for short timeframes, which is not going to be appropriate in a number of cases namely domestic and family violence and housing crisis.
- Greater accountability to jobactive clients. Currently the voices and experiences of ParentsNext participants are sidelined in the program. Good Shepherd recommends a client-focussed accountability framework to be embedded in a redesigned pre-employment program. Assessments of outcomes should be based on client experience. For example, outcome payments can be awarded to providers for short-term and precarious work that may not be related to the career aspirations of the client.
- The removal of punitive compliance measures which undermine social security rights (i.e. through partial or full loss of payment). Of particular concern is the arbitrary way payments can be cancelled without due process.
- The introduction of a voluntary rather than mandatory system.

Given a high proportion of participants that are Aboriginal and Torres Strait Islander and Aboriginal and Torres Strait Islander organisations and groups. Finally, the redesign should occur in consultation with single mother-led organisations and ParentsNext participants. The current Senate Inquiry into the program should serve as an avenue to consider these views and experiences in depth.

- Strengthen Paid Parental Leave (PPL)

Recommendations:

9. **Extend the Superannuation Guarantee to the statutory Paid Parental Leave scheme.**
10. **Investigate mechanisms and reform to achieve greater gender balance in the uptake of PPL as part of a broader review of PPL.**

Paid parental leave should be strengthened to ensure the superannuation guarantee is included in, at least, the government statutory scheme. As Women in Super highlight “it is unfair and discriminatory in modern Australia that the one type of leave directed predominantly at women does not include superannuation guarantee payments.”²⁰ The Productivity Commission’s 2009 report into Paid Parental Leave recommended the eventual inclusion of superannuation into PPL and the 2013 Australian Human Rights Commission report *Investing in Care* offered the extension of the superannuation guarantee to PPL as an option for reform.²¹

Further, a broader review of PPL is required to investigate how greater gender balance in paid parental leave could be achieved. According to data from HILDA, unpaid work distribution in heterosexual couples is shared *relatively* equally, prior to having a first child.²² Following the birth of a first child, the prime load of unpaid care shifts to the female partner. PPL is therefore a critical opportunity to redistribute unpaid caring responsibilities across genders and set in train a more equal distribution of unpaid care within the family unit. Currently, co-parents in Australia who do take Dad and Partner Pay leave are taking an average of just over

²⁰ Women in Super, “2018-19 Pre-Budget Submission” *Women in Super Submissions and Discussion Papers*, 14 December 2017, <https://clarety-wis.s3.amazonaws.com/userimages/WIS%20Submissions/Women%20in%20Super%202018-19%20Pre-Budget%20Submission.pdf> (accessed 18.10.18)

²¹ Australian Human Rights Commission, *Investing in Care: Recognising and valuing those who care Volume 1-Research Report* (Sydney, 2013), 15.

²² Inga Lass, “Who is doing what on the homefront?” *Pursuit UniMelb*. 31 July 2018 <https://pursuit.unimelb.edu.au/articles/who-is-doing-what-on-the-homefront> (accessed 18/10.18)

12 days leave.²³ In Iceland, “the introduction of specific periods for each parent has led to a substantial increase of fathers taking parental leave from around 3% to 34% in 2008 in terms of days.” We must shift PPL from being a maternity/primary carer entitlement only and transition PPL to a sharable family entitlement with incentives to encourage men to take a significant part of the total leave entitlement.²⁴

Promote Women’s Economic Independence and Safety

Recommendations:

11. Address women’s economic insecurity resulting from high effective marginal tax rates.

When a person decides whether to take on additional work, they will take into account not only the tax payable but the value of any means tested benefits lost as a result of the increased income. For example, the *2017 Gender Lens on the Budget* released by the National Foundation for Australian Women²⁵ showed that the combination of changes to the Medicare levy, HECS, benefits and the relevant income tests could result in an effective marginal tax rate in excess of 100%.

The analysis becomes more complex when considering the effects of EMTRs on the income earned by the second earner in a household. Much of the evidence on EMTRs relates to the impacts of the tax-transfer system on jobless families moving from income support payments into the paid labour force²⁶ and is not specific to the second income earner in a couple, although labour economists have established that the female labour supply is very elastic, particularly in respect of married women.²⁷

12. Address interpersonal and systemic economic disadvantage through:

- a. Increase resourcing to organisations that work with refugee and migrant women to provide support for those who are experiencing family violence and economic abuse;**
- b. Ensure a workable process for child support to be paid that doesn’t place women in contact with abusers;**
- c. Enshrine paid domestic violence leave policy into law to ensure women’s employment is protected through the protracted, complex and often dangerous time of separating from an abusive partner;**

Economic abuse is a form of intimate partner violence that negatively impacts a person financially and undermines their efforts to be economically independent. It manifests in a wide range of ways, making it difficult to identify, but results in controlling women’s access to money or resources with the intent to control or limit her behaviours. Economic abuse often co-presents with other forms of abuse, and is often particularly intertwined with emotional and legal systems abuse. ERA welcomes the *Small Claims, Large Battles* and specialist domestic violence units and health justice partnership measures contained within the Women’s Economic Security Statement. Targeted support for women from CALD backgrounds, who may or may not know their rights or lack ready access to legal and other forms of support is required, including through “greater resources to organisations that work with refugee and migrant women to provide support for those who are experiencing family violence and economic abuse, including support for visa issues and family violence support.”²⁸

²³ Bill Martin, Marian Baird, Michelle Brady, Barbara Broadway, Belinda Hewitt, Guyonne Kalb, Lyndall Strazdins, Wojtek Tomaszewski, Maria Zadoroznyj, Janeen Baxter, Rachael Chen, Meraiah Foley, Duncan McVicar, Gillian Whitehouse, Ning Xiang, *PPL Evaluation: Final Report* (Brisbane: Institute for Social Science Research, 2014), 130

²⁴ Workplace Gender Equality Agency, *Towards gender balanced parental leave – Australian and international trends Insight Paper* (Sydney: Australian Government, 2017).

²⁵ National Foundation for Australian Women, *Gender Lens on the 17-18 Budget* (Canberra, 2017)

²⁶ Peter Whiteford, *Family Joblessness in Australia* (Canberra: Australian Government, 2009).

²⁷ Patricia Apps, “Taxation and Labour Supply,” *Australian Tax Forum* 22, no. 3 (2007)

²⁸ Owen Camilleri, Tanya Corrie and Shorna Moore, *Restoring Financial Safety: Legal Responses to Economic Abuse* (Abbotsford: Good Shepherd Australia New Zealand and Wyndham Legal Service, 2015), 9.

Women's recovery from economic abuse is exacerbated by unsupportive and at times oppressive systems. In relation to child support, it should be incumbent on the State to guarantee these payments to the woman, and then to collect the debt from the abuser. Legal protection should include all types of abuse, including economic abuse, as abusers often target employment in order to disrupt wage earnings. As the National Council of Single Mothers and their Children and Economic Security 4 Women have highlighted, ensuring a State Guaranteed Payment would sever the use of Child Support as an avenue to practice abusive and controlling behaviour.²⁹

While unpaid domestic and family violence leave is now covered under the National Employment Standards, paid leave is largely determined by Enterprise Agreements.

Address the Gender Pay and Retirement Gaps

Recommendations:

- 13. Investigate increasing equal pay data transparency through the Workplace Gender Equality Agency (WGEA).**
- 14. Strengthen the disaggregation and intersectional data collection of WGEA.**

One recommendation from the Inquiry into Gender-based Occupational Segregation is to investigate the recent introduction of gender pay gap transparency measures in Britain.³⁰ Under the regulations, companies with 250 or more employees must publish their gender pay gap information, including gendered information on bonuses. Similar public reporting of gender pay gap information is instituted in Belgium, Austria and Germany.³¹ Australia already has a comprehensive infrastructure for gender pay data and reporting in the Workplace Gender Equality Agency. Companies with over 100 employees are required to report to WGEA through robust processes. However, these data are aggregated by sector and industry before being made publicly available. Emerging research indicates that the increased profile and attention to gender pay gaps as a result of the newfound transparency narrows the gender pay gap.³²

Data collected by WGEA provides a comprehensive and detailed picture of the gender pay gap. However, there is no further disaggregation on other axes of economic inequality discrimination. The collection of information on race and disability would enable this and would facilitate more targeted action on pay gaps experienced by women experiencing multiple and intersecting disadvantage. The ABS Gender Indicators should also publish intersectional, disaggregated data.

Recommendations:

- 15. Government policy must continue to recognise the age pension as the fundamental pillar of the retirement income system, with superannuation as a supplement.**
- 16. Investigate a carer's credit to be provided to full time carers that are in receipt of income support or have the care of a pre-school child.**

²⁹ National Council of Single Mothers and their Children, *Child Support Opportunities and Options* (economic Security 4 Women, 2017), 15.

³⁰ Senate Finance and Public Administration References Committee, *Gender segregation in the workplace and its impact on women's economic equality* (Canberra: Parliament House, 2017), 11.

³¹ Workplace Gender Equality Agency, "International Gender Reporting Schemes," <https://www.wgea.gov.au/international-gender-reporting-schemes> (accessed 18.10.18)

³² Morten Bennedsen, Elena Siminitzi, Margarita Tsoutsoura and Daniel Wolfenzon, "Research; Gender Pay Gaps Shrink When Companies Are Required to Disclose Them," *Harvard Business Review* 23 January 2019, <https://hbr.org/2019/01/research-gender-pay-gaps-shrink-when-companies-are-required-to-disclose-them> (24.1.19)

Economic insecurity among older women is increasing, particularly among older single women.³³ Other research indicates that poverty among older Australians is related to gender, home ownership and marital status.³⁴ The flaw in the design of Australia's superannuation guarantee system is that the system is based on lifetime earnings. A worker who has a stable continuing work pattern over their working life will see this reflected in their retirement savings. For many women, this is not their experience of the workforce.

The mandated Superannuation Guarantee is one pillar of Australia's retirement income system, with the other pillars being the age pension and voluntary savings (which may be accumulated within a superannuation account). Home ownership can also be regarded as the fourth pillar of the retirement income system. A proposal to legislate the objective of superannuation as being "to provide income in retirement to substitute or supplement the Age Pension" has been stalled in the Parliament.³⁵ The role of the age pension in the retirement income system must be protected, to provide peace of mind to retirees without superannuation.

Currently women hold superannuation balances that are significantly less than their male counterparts. In 2015-16 men held around 61.2% of the superannuation investment pool, with women holding 38.7%. Men also held a greater proportion of balances over \$100,000: 52.5% of all accounts compared to 29.7% held by women.³⁶

However, lower workforce participation is not the only cause of lower superannuation balances. The link to employment earnings means that the effect of the gender pay gap is also reflected in retirement balances. As noted above, the superannuation gap is apparent from the 20 to 24 age group, which is the age group where most people enter the workforce, and in the 25 to 29 age group women's balances are 80% of their male counterparts.³⁷ The most important steps that can be taken to reduce the superannuation gap is to address the gender pay gap (*see other recommendations contained in Economic Wellbeing section*).

In addition to superannuation on Paid Parental Leave (discussed earlier), carer credits paid during other periods when a person is a full time carer will also contribute to a more secure retirement.³⁸

Women's financial literacy and capability

Recommendations:

- 17. Implement financial capability programs in schools that take gender into account and ensure respectful relationships education in schools includes education about healthy financial relationships.³⁹**
- 18. Create and fund a national awareness campaign about financial abuse.**

Women's Information and Referral Exchange's (WIRE's) 2007 research on Women's financial literacy found that "women's relationship with money is driven by personal life experience. Unless financial information acknowledges and understands this, it will not readily affect this relationship. Fundamentally, gender is pivotal in all areas of providing financial information, programs and products."⁴⁰ The relationship between money and gender is complex and affects women in different ways, depending on their lived experiences and the different structural barriers they encounter. Financial capability programs and policies should take into account the structural barriers that impact on women's financial wellbeing, not just focus on literacy.

³³Senate Economics References Committee, 'A Husband is not a Retirement Plan' *Achieving economic security for women in retirement* (Canberra: Parliament House, 2016), 13.

³⁴ ACOSS and UNSW Sydney, *Poverty in Australia 2018*.

³⁵ https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r5762

³⁶ Ross Clare, *Superannuation account balances by age and gender* (Sydney: The Association of Superannuation Funds of Australia, 2017), 20-21

³⁷ Ibid. Table 1.

³⁸ Australian Human Rights Commission, *Investing in Care*, 10. and Stephen Koukoulas, *Defining the concept for economic security for all women* (Sydney: economic Security 4 Women, 2018), 22.

³⁹ Cara Gleeson, Sarah Kearney, Loksee Leung and Joanna Brislane, *Respectful Relationships Education in Schools* (Melbourne: Our WATCH, 2015)

⁴⁰ Women's Information and Referral Exchange (WIRE), *Women's Financial Literacy Research Report* (Melbourne, 2007)

Equal Access to Housing for Women

Recommendations:

19. **Develop a gender-responsive national housing strategy which includes ambitious goals to reduce homelessness and increase affordable housing stock.** It must include actions and measurable targets to create additional permanent social and affordable housing options for women in each State and Territory, and particularly for single women – to complement the NHHA. To this end, **the recommendations from the Retiring into Poverty report to address older women’s housing insecurity should be adopted.** Specifically, a Seniors Housing Gateway Program must be established and the Assistance with Care and Housing for the Aged Program must be expanded.⁴¹ Finally, further research must be undertaken to obtain data on the housing needs of women in their diversity.
20. **Ensure services that are appropriately specialised, competent, inclusive, accessible and culturally safe are resourced to meet the needs of women experiencing domestic and family violence and their children.**
 - a) All agreements (bilateral or overarching) that address homelessness need to be progressively amended to include the requirement not only that State/Territory strategies include measures to support women and children escaping violence but also that funding spent under these strategies goes to services with specialist capability to address the gendered dynamics of violence and homelessness⁴² (i.e. specialist women’s services and/or generalist services with documented specialist capability.)
 - b) Adequate and sustainable funding is needed to meet demand for homelessness services, while ensuring that funding goes to services that are appropriately specialised, competent, accessible and culturally safe for the full range of diverse groups of women and children who need them.
 - c) There must be increased transparency of the NHHA to include clear tracking of funding to all specialist homelessness services.
21. **Refund the Remote Housing Agreement with coverage of SA and QLD.**
22. **Undertake tax reforms to curb negative gearing, such as limiting negative gearing to income from investment, and reduce the capital gains tax exemption.** Redirect revenue generated from tax reform to the capital gains tax exemption and negative gearing should be redirected to housing support systems for low-income households.
23. **Reform housing assistance.** Currently individualised housing assistance, such as Commonwealth Rent Assistance (CRA), is “standardised rather than tailored to individual preferences and need.”⁴³ A diversity of housing assistance measures should be available according to need, rather than where income is sourced. The base rate and indexation of CRA should also be examined and reformed with a view to addressing the fact that over 40% of recipients remain in housing stress.
24. **Implement National Minimum Standards on tenancy reform to protect victims/survivors of domestic and family violence.** Although some progress has been made on tenancy reforms, on the whole the commitments made in the Third Action Plan of the National Plan in relation to housing and homelessness still need to be implemented. The following principles should inform minimum tenancy standards:
 - a) A victim-survivor of DV should be able to end their lease without liability (i.e. break fee) in circumstances of DV.

⁴¹ Mercy Foundation, Women’s Property Initiatives, Dr Maree Petersen, Shelter South Australia, Micah Projects Inc, Housing for the Aged Action Group, YWCA Canberra, Dr Selina Tually, Gloria Sutherland, Midland Women’s Health Care Place, Women’s Housing Company, Equality Rights Alliance, *Retiring into Poverty – A National Plan for Change Increasing Housing Security for Older Women* (Canberra, 2018).

⁴² Australian Women Against Violence Alliance, *The Unique Role of Specialist Women’s Services in Ending Violence Against Women* (Canberra, 2016).

⁴³ Keith Jacobs, Kath Hulse, Wendy Stone and Ilan Wiesel, *Individualised Housing Assistance: findings and policy options* (Melbourne: AHURI, 2016), 1.

- b) A perpetrator should be responsible for the damage caused by a perpetrator and a DV victim-survivor should not be liable at all in such circumstances.
- c) Prohibition of a victim's information from being listed on a Tenancy Database - In addition to a prohibition of listing a DV victim-survivor's info, we recommend 'Prohibition of listing is accompanied by a penalty if listing happens in circumstances of DV'. (Otherwise there is no incentive not to list and there are significant costs to listing - eg homelessness, possible removal of children).
- d) There needs to be a reversal of burden – i.e. rather than a victim-survivor having to go to the tribunal to get their name removed from the database, in circumstances of DV you cannot list prior to tribunal hearing a matter and the landlord would bring such an application.
- e) There is also the issue of debt in relation to DV (eg rent arrears where the victim-survivor has left the property but not terminated the residential tenancy agreement). It is important the tribunal has discretion to deal with these matters and has the power to hold only one party liable or limit liability.

The high levels of women's housing needs are reflected in the use and demand for housing assistance and support. For example, the typical social housing tenant is a woman. In public housing she is a woman over 55 and living alone; in State Owned and Managed Indigenous Housing, she is a woman aged 25-54 with dependent children, and in community housing, she is a woman over 45 and living alone.⁴⁴ Moreover, housing support systems are ill-equipped to meet this (gendered) demand. As a result, the under-resourcing of housing safety nets disproportionately impacts women and undermines the Australian Government's gender equality objectives.⁴⁵ For example, of the people in receipt of the maximum rate of CRA, 47.5% are single women (25% single men and 27.4% couples). Of the people who remain in housing stress *after* receiving CRA, 50% are single women (30.3% single men and 19.6% couples).⁴⁶ Further, women aged 15+ make up 63% of people assisted by specialist homelessness services, but 70% of unassisted requests for homelessness services.⁴⁷

Current government policy on gender-based violence also draws the significant connections between housing affordability and domestic and family violence. The Third Action Plan of the National Plan to Reduce Violence Against Women and their Children commits the government to strengthen safe and appropriate accommodation options for women and their children through addressing immediate, medium-term and long-term accommodation needs of women escaping violence and increasing the stock of affordable, accessible and social housing and ensuring women and their children can stay in their own homes. The Third Action Plan also includes actions to assess the effectiveness of Victoria's Individual Flexible Support Packages for further broader rollout.⁴⁸

Funding is currently skewed towards ownership and investment while the social housing and rent assistance systems heave under pressure. A reprioritisation and redirection of federal housing funding is needed. While estimates vary, the Parliamentary Budget Office posits that the budget impact of negative gearing is *at least* \$2 billion.⁴⁹ Compare this to the \$1.5 billion allocated to the NHHA annually. The gendered implications of this resource distribution point to the inequities at the heart of housing policy: "the typical negatively-g geared investor is male, aged in his mid-to-late forties; employed full-time and has a tax assessable income of \$91 000"⁵⁰ and, as previously mentioned, the typical social housing tenant is a low-income woman.

⁴⁴ Australian Institute of Health and Welfare, "Social housing tenants," *Housing Assistance in Australia 2017*, 13 July 2017, <https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia-2017/contents/social-housing-tenants> (accessed 11.04.18).

⁴⁵ Committee on the Elimination of Discrimination Against Women, *Concluding Observations on the eight periodic review of Australia CEDAW/C/AUS/8* (Geneva, 2018).

⁴⁶ 2018 data on Commonwealth Rent Assistance commissioned from Department of Social Services by ERA.

⁴⁷ Australian Institute of Health and Welfare, "Specialist homelessness services annual report 2016-17 – Data Tables National" *Data*, 12 February 2018, <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-2016-17/data> (accessed 10.10.18)

⁴⁸ Department of Social Services, *Third Action Plan 2016-19 of the National Plan to Reduce Violence Against Women and their Children* (Canberra: Commonwealth of Australia, 2016).

⁴⁹ Tarek Dale, "Budget impacts of negative gearing," *Parliamentary Library*, Parliament of Australia, 4 August 2015, https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/FlagPost/2015/August/Budget-impact-negative-gearing (accessed 11.04.18)

⁵⁰ Alan Duncan, Helen Hodgson, John Minas, Rachel Ong and Richard Seymour, *The income tax treatment of housing assets: an assessment of proposed reform options – Evidence Summary* (Melbourne: AHURI, 2018), 1

A gender-responsive approach to housing and homelessness policy in Australia is needed to engage effectively with the structural disadvantages experienced by women generally as well as the particular situations of different groups of women facing housing insecurity and unaffordability. A gender-responsive housing policy acknowledges and addresses the gendered drivers of women's experience of violence and homelessness. Such an approach needs to focus on preventing homelessness that results from domestic and family violence and support victims/survivors through specialist services. A gender-responsive strategy would be founded on the principles of visibility, capability and accountability. Visibility ensures that women in their diversity are named and included. Capability ensures that housing systems are *adequately resourced* to meet the housing needs of women in their diversity. And accountability would ensure that such a policy includes gender indicators in the performance framework. Australia should seek guidance from Canada's National Housing Strategy, which has quarantined 25% of its funding for projects and services that directly address the needs of women and their families.⁵¹

Improve Housing Outcomes for Women Experiencing Violence on Temporary Visas

Recommendation:

25. Governments in all jurisdictions need to work together to extend access to government-funded services, including crisis payments and emergency housing, to all victims/survivors of domestic, family, sexual and intimate partner violence, irrespective of current visa status, across all states and territories. Governments should:

- a) Expand eligibility for relevant payments and services, including crisis and welfare payments and emergency housing, to all victims/survivors of domestic, family and sexual violence, irrespective of current visa status, across all states, territories and federal legislation.
- b) Ensure all relevant service providers offering support to women with no income on temporary visas experiencing violence—including crisis housing, health, legal, domestic, family and sexual violence crisis services and community organisations—receive adequate funding to cater to the additional needs of these victims/survivors.
- c) Ensure all relevant service providers offering support to women with no income on temporary visas experiencing violence are sufficiently funded to undertake extensive training on cultural competency, trauma-informed practice and family violence.
- d) Ensure access to free independent interpreters to all disadvantaged populations via appropriate funding of interpreter services to community organisations in the areas of family violence, migrations, sexual assault support services, multicultural services and others.

The Path to Nowhere: Women on Temporary Visas Experiencing Violence and their Children report released in December 2018, found that among the 387 women on temporary experiencing violence and accessing services, “crisis and long-term housing was the service most needed by clients that organisations were unable to provide.”⁵² The Third Action Plan also includes commitments on migration rules and eligibility requirements for support services that would enable victims of violence to leave violent relationships. These include:

- a) Ensure migration rules and eligibility requirements for support services do not disempower victims of violence or discourage them from leaving violent relationships.
- b) Develop appropriate visa arrangements for temporary residents who are experiencing violence.
- c) Revise eligibility requirements to enable more victims of violence to access support.
- d) Work with service providers to improve access of temporary residents to available support services.

⁵¹ Government of Canada, *Canada's National Housing Strategy* (Ottawa, 2018), p.11

⁵² Monique Dam, Sarah Morris, Brianna Delahunty, Chris Hartley and Tina Dixson, *Path to Nowhere: Women on Temporary Visas Experiencing Violence and their Children* (National Advocacy Group on Women on Temporary Visas Experiencing Violence, 2018)

Recommendation:

26. Determine and implement the public subsidy and/or direct government investment required to generate social and affordable housing through the National Housing Finance and Investment Corporation.

ERA welcomes the National Housing Finance and Investment Corporation, recognising the bond aggregator as a critical measure to increase housing supply. It is vital that the bond aggregator is understood as part of an overall housing affordability response to generate supply. The Senate's 2015 majority report into housing affordability made it clear that housing supply bonds are complementary and must fit into a broader housing strategy and not replace existing government funding for social housing.⁵³ In order to generate housing for people on the lowest incomes and in the greatest housing need, the bond aggregator must be underpinned by additional resources to cover the financing gap.⁵⁴ The public subsidy or direct government investment required to bridge this funding gap could take a number of forms "including through examining the levels of direct subsidy needed for affordable low-income rental housing, along with the use of affordable housing targets, planning mechanisms, tax settings" as canvassed in the Affordable Housing Working Group's reporting on complementary measures.⁵⁵ Direct government investment in the National Housing Finance and Investment Corporation is required.

Funding must be allocated for specialist community housing providers with expertise in the housing needs of women in their diversity. Funding must also be made available to build stock in rural and remote areas. According to the Australian Institute of Health and Welfare there are approximately 815 community housing organisations (mainstream and Indigenous). We estimate that approximately 7 gender specialist and women specific community housing organisations in Australia provide long-term housing.⁵⁶ With the Bond Aggregator, the community housing sector is projected to continue its expansion. Women's housing agencies are critical in meeting women's housing needs.

Education

Gendered Research and Data

Recommendation:

27. Funded research into the education and training related status of and issues confronting Australian women and girls in all their diversity be conducted to redress ballooning knowledge gaps as a matter of urgency.

Australia is perceived nationally and internationally as a high achiever in education, with adult literacy scores in Australia among the highest in the OECD.⁵⁷ However, recent OECD figures show a decline in status.⁵⁸ Given that the increase in numbers of girls finishing Year 12 and women enrolled in university study exceeds that of boys and men, little or no attention has been directed to gender issues in education across all sectors

⁵³ Senate Economics References Committee, *Out of Reach? The Australian housing affordability challenge* (Canberra: Parliament House, 2015), 405-408.

⁵⁴ Judith Yates, *Overview- Housing Australia* (Melbourne: Committee for Economic Development Australia, 2017), 29

⁵⁵ Affordable Housing Working Group, *Supporting the Implementation of an affordable housing bond aggregator* (Canberra: Council on Federal Financial Relations, 2017), 2

⁵⁶ Based on desk research by ERA from State and Territory Government websites

⁵⁷ Organisation for Economic Cooperation and Development, *Education Policy Outlook 2018: Putting Student Learning at the Centre* (Paris: OECD Publishing, 2018), p.178

⁵⁸ Organisation for Economic Cooperation and Development, *Education at a Glance 2018: OECD Indicators*. (Paris: OECD Publishing, 2018)

since early 2000's. However, for example, as advised by OECD⁵⁹ despite increasing overall attainment, 'socioeconomic status still has a big impact on learning, which in turn affects people's earnings and lifestyle'. The over-reliance on broad-based statistics with little if any attention to disaggregated data obscures both inequities and the many gender issues that are prevalent in education in contemporary Australia, in each and all sectors. A gender lens on education is required to highlight and address issues associated with intersectionality that confront girls and women in all their diversity. For example, the paucity of research & data available for education in relation to women and girls with disability remains a significant gap.⁶⁰

Although Australia was once a leader internationally, to our national shame there are no current overarching national policies that focus on gender in education in Australia. Policies have become selective, such as the current focus on STEM, without deeper consideration of longer-term implications. This dearth in policies for women and girls impacts not only on policy *per se* but also impacts negatively on research, including research funding.

Vocational Education and Training

Recommendations:

- 28. Government funding for vocational education and training must be increased, with targeted funding to provide courses, gender appropriate curriculum, and support mechanisms for women and girls undertaking skill qualifications and access courses.**

The increasing cost of VET courses resulting from marketisation is causing problems in terms of participation, as some VET courses will cost more than university courses, without necessarily leading to the same monetary returns through employment. VET and adult education should be accessible to all students without leading to high levels of debt. VET providers including TAFE, which has traditionally provided programs to meet the specific needs of disadvantaged groups, including women,⁶¹ have increasingly cut access and Certificate I and II courses. It is these entry level courses that can provide the initial skills and confidence needed to enter the workforce or to progress to an industry-recognised qualification or to higher education. There is evidence to suggest that these funding cuts and the concomitant increases in fees disproportionately impact women. Research into the Victorian VET system in 2012 found that funding cuts were disproportionately targeted at courses with high female enrolment. Gendered analysis of the Commonwealth changes to employer subsidies for apprentices and trainees in 2011 and 2013 also indicates a disproportionate impact on female dominated industries.⁶²

Early Childhood Education

Recommendation:

- 29. Recognise the professionalism of early childhood education teachers in terms of qualifications, pay and conditions.**

Early Childhood Education must be recognised as an integral part of the formal education sectors, highlighting the need for high quality and accessible care and early learning opportunities. It, like the VET sector, has been subjected to marketisation and lack of regulation, with variable quality of pre-school education. It is important that every child, irrespective of their parents' work circumstances receive access to at least two days (24 hours) of subsidised early learning a week.

⁵⁹ Organisation for Economic Cooperation and Development, *Education Policy Outlook 2018: Putting Student Learning at the Centre*

⁶⁰ Women with Disabilities Australia (WWDA), *Submission to CRPD 13th Session. Day of general discussion on the right to education for persons with disabilities.* (2015)

⁶¹ Veronica Volkoff, Kira Clarke and Anne Walstab, *Impact of TAFE Inclusiveness strategies* (Adelaide: National Centre for Vocational Education Research, 2008)

⁶² Sally Thompson, "Women, work and poor pay," *Australian TAFE Teacher*, 49, No. 3, (2015):24

Early Childhood Education is of considerable concern to women, both those working and those not currently in the workforce, and quality accessible care can make the difference between women being able to access employment or not.

Australia's lack of investment in the development and ongoing professional support of the early childhood workforce, largely female, continues to be of considerable concern in terms of quality educational programs delivered for children and the need to put early childhood education on par with primary school education in terms of pay and conditions.

Higher Education

Recommendation:

- 30. Reverse cuts to the HEPP program made in the 2017-2018 budget and changes to the HELP program.**

The Higher Education Participation and Partnerships Program (HEPPP) funding, which supports outreach programs for students from low SES and CALD backgrounds, has been cut. At present the majority of undergraduate (58%) and almost half of postgraduate students (48.6%) are women.⁶³ Research suggests that the majority of mature-age students are women and they are more likely to gain entrance to university through alternate pathways.⁶⁴ Consequently, they may need more support than students entering directly from school. Cuts to HEPP funding are likely to reduce support services to disadvantaged students, including mature-age students, with adverse effects on retention and completion rates.

Changes to the repayment of HELP debts also discriminate against women graduates who, in general are paid less than male graduates.⁶⁵ The impact of these cuts has fallen disproportionately on women, both university staff and students. Many junior academic staff also have ongoing HECS debts. Jericho argues that women graduates are more vulnerable to changes to the HELP program as they are more likely than men to be the second income earner in a family and are more likely to be paid less than the median taxable income.⁶⁶ Increases in the cost of university degrees may have the effect of deterring women students. Research undertaken in the UK indicates that women students are more debt averse than students on the whole.⁶⁷ Some women may delay enrolling in the hope that university study will become more affordable in future, or be deterred altogether. It is likely this will disproportionately impact women from low SES backgrounds, rural women, Aboriginal and Torres Strait Islander women and women from other disadvantaged populations.

Health

Development of a Women's Health Strategy

Recommendation:

- 31. Ensure adequate funding for the 2020-2030 National Women's Health Strategy, including funding for evaluation.**

⁶³Department of Education and Training, *Selected Higher Education Statistics: 2017 First half year student data summary tables* (Canberra: Australian Government, 2017)

⁶⁴Cathy Stone & Sarah O'Shea *Transformations and self-discovery: Stories of women returning to education* (Illinois: Common Ground Publishing, 2012)

⁶⁵Australian Bureau of Statistics, "4125.0 - Gender Indicators Australia," 25 September 2018, <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4125.0>. (accessed 18.10.18)

⁶⁶Greg Jericho, "Why the coalition's university changes are just a great big new income tax," *The Guardian*, 4 May 2017 <https://www.theguardian.com/au> (accessed 18.10.18)

⁶⁷Nigel Kettley, Joan Whitehead & John Raffan, "Worried women, complacent men? Gendered responses to differential student funding in higher education," *Oxford Review of Education*, 34, No. 1 (2008): 111

32. **Ensure funding for an independent evaluation of the National Maternity Services Plan to inform the development of the National Strategic Approach to Maternity Services.**
33. **Fund an independent, civil society women’s health peak body.**

It has been eight years since the publication of the *National Women’s Health Policy 2010*. Consultation is currently underway to develop a National Women’s Health Strategy for 2020-2030. Whilst improvements have been made in women’s health, gaps still exist across genders, and within particular groups of Australian women. We need gender-responsive policies that acknowledge the needs of women to ensure that an equal health status is achieved. In addition, policies must be informed by the social determinants of health so that all Australian women, regardless of socio-economic status, race, age, or geography, have what is needed to maintain good health and quality of life. The development of the 2020-2030 National Women’s Health Strategy must be adequately supported and funded, with funding earmarked in the forward estimates to deliver the Strategy into the future. Further, funding for an independent, civil society women’s health peak body must be restored following the defunding of the Australian Women’s Health Network in 2016.

The development of a Women’s Health Strategy also provides an opportunity to connect the strategy to the National Plan to Reduce Violence Against Women and Their Children. There is a need for specialised training in domestic and family violence and sexual violence for health workers. Further, effective prevention of violence against women programs operating in health contexts should be investigated for scaling up. The Baby Makes 3 program is a case in point.⁶⁸

The development of the National Strategic Approach to Maternity Services (NSAMS),⁶⁹ which is currently underway. However, there has been no independent evaluation of the previous National Maternity Services Plan. Such an evaluation should inform the NSAMS. The absence of which represents a significant failure in public sector accountability and governance which needs to be strengthened to ensure that Australian health services are held accountable for implementing NSAMS commitments.

Myalgic Encephalomyelitis

Recommendation:

34. **Invest \$10 million per annum in biomedical research into Myalgic Encephalomyelitis and Chronic Fatigue Syndrome and develop new guidelines that treat ME as a medical illness not a psychosocial condition.**

Greater attention to and investment in conditions that have previously been sidelined as a result of gender bias is required. Myalgic Encephalomyelitis and Chronic Fatigue Syndrome is a case in point. Emerging and ground-breaking research in Australia through the National Centre for Neuroimmunology and Emerging Diseases (NCNED) is showing that ME and CFS cells *are* different and, as a result, ME and CFS cannot be solved by non-biomedical interventions. This puts to bed the harmful, misconceived and gender-based notion that it is “all in the mind.”⁷⁰ Greater investment in this research is required to inform further research into a biomarker and treatment. An investment of \$10 million per annum in biomedical research into ME is required to fund this work and recognise the historical under-funding of research in this area. Finally, new guidelines that treat ME as a medical illness, not a psychosocial condition, are necessary. This would be done by the Government consulting with leading biomedical researchers in ME, clinicians and patient organisations on

⁶⁸ Dr Helen Keleher and Emma Hutcheson, *Baby Makes Three* (Melbourne: Keleher Consulting for Carrington Health, 2015).

⁶⁹Sowaibah Hanifie, “Call for Senate inquiry into reduced maternity services in rural and remote areas,” *ABC News*, 16 August 2018, <https://mobile.abc.net.au/news/2018-08-16/reduced-maternity-services-rural-and-remote-areas-inquiry-call/10126274?pfmredir=s> (accessed 10.10.18)

⁷⁰Sasha Nimmo, “Calcium Channel Ion Defects: Research from Australia’s Griffith Uni,” *#MEACTION*, 16 March 2017 <https://www.meaction.net/2017/03/16/calcium-channel-ion-defects-research-from-australias-griffith-uni/> (accessed 30.10.18)

how to consider recommendations from the National Health and Medical Research Council (NHMRC) advisory committee on ME and CFS.⁷¹ The current NHMRC committee includes people still attached to the psychosocial model and is unlikely to produce an appropriate outcome.

Feminist Foreign Policy

The following Budgetary recommendations would facilitate moves towards a feminist foreign policy:

35. **Reverse cuts to the international development budget and recommit to reaching the internationally agreed target of 0.7% of GNI.**
36. **Maintain the commitment to ensuring that 80% of Australia's development program will effectively address gender issues and set a new target to increase expenditure on aid investments which set gender equality as a principal objective.**
37. **Increase funding support for women's rights organisations and networks, lifting aid coded as supporting 'women's equality organisations and institutions' above current levels.**
38. **Continue to champion sexual and reproductive rights as a core part of Australian Aid in the Indo-Pacific region and uphold the previous commitment at the 2012 Family Planning Summit to invest at least AU \$50 million per year in contraception and contraception-related information and services.**

DFAT's ability to enact Australia's international gender equality commitments has been impeded by significant cuts to Official Development Assistance over the past several years. Australia's current contributions have been cut by over a quarter since 2014 and are at a record low, amounting to just 0.23% of Gross National Income (GNI) and projected to continue to fall to 0.19% of GNI by 2021-22.⁷² In contrast, by 2021, for every dollar spent on ODA, Australia will spend \$11 on defence and divert an additional \$3.8 billion (the equivalent of the annual aid budget) towards arms manufacturers.⁷³ A diminished overall aid budget reduces Australia's ability to contribute to gender equality and the advancement of the rights of women and girls.

Targeted investments in programs that contribute to women's rights are critical. One area of underinvestment is in women's rights organisations. Women's rights organisations focus on women-led solutions that are firmly rooted in local communities, contexts and needs. They tackle the day to day issues that affect women's lives and are expert at providing programmes that are appropriate to women's needs. Women's rights organisations continue to face financial unsustainability and current funding trends often constrain the ability of these organisations to access funding. Flexible long-term core funding is vital for sustaining the long-term movement building work that underpins progress towards gender equality.⁷⁴ In Australia, support for women's equality organisations and institutions represented only 1.22% (22.379 USD million) of total sector-allocable aid in 2016.⁷⁵ Additionally, greater investment is needed in sexual and reproductive health and rights, and to address gaps in disaggregated data collection to ensure programs can be targeted to those most in need.⁷⁶

⁷¹Sasha Nimmo, "Australian Government's ME and CFS Advisory Committee," *ME Australia*, 23 April 2018

<https://meaustralia.net/2018/04/23/australian-governments-me-and-cfs-advisory-committee/> (accessed 30.10.18)

⁷² Australian Council for International Development, *ACFID Analysis of the 2018-19 Federal Budget* (Canberra: ACFID, 2018)

⁷³ ACFID, IWDA & CARE, *Mixed Results and Skewed Priorities: Gender equality, development, defence and the Australian Budget 2018-2019* (2018)

⁷⁴ Srilatha Batliwala, *Women Moving Mountains: The Collective Impact of the Dutch MDG3 Fund* (Ontario: Association for Women's Rights in Development, 2013).

⁷⁵ As reported to the OECD Creditor Reporting System, purpose code 15170 as a percentage of total sector allocable aid 2016.

Organisation of Economic Cooperation and Development (OECD), "QWIDS Query Wizard for International Development Statistics," *OECD*,

<https://stats.oecd.org/qwids/#?x=1&y=6&f=2:262,4:1,7:1,9:85,3:280,5:3,8:85&q=2:262+4:1+7:1+9:85+3:51,301,280+5:3+8:85+1:2,3+6:2012,2013,2014,2015,2016,2017> (accessed 21.11.18)

⁷⁶ Commonwealth of Australia, ANU & International Women's Development Agency (IWDA). *Individual Deprivation Measure: Commission on the Status of Women 62 Brief* (2018)

There has been increased focus in recent years on the concept of a feminist foreign policy, after Sweden launched its feminist foreign policy in 2014.⁷⁷ The Centre for Feminist Foreign Policy describes feminist foreign policy as “a framework which elevates the everyday lived experience of marginalized communities to the forefront and provides a broader and deeper analysis of global issues.”⁷⁸

In practical terms, a feminist foreign policy approach for Australia would incorporate a range of policies and approaches. The following outlines priority areas for action in shifting Australia’s approach towards a feminist foreign policy:

- **Strengthening institutional mechanisms for understanding the gendered impacts of foreign policy**
- **Pursuing gender equality through diplomacy and multilateral engagement**
- **Taking action on climate change**
- **Conducting gender analysis on all trade and economic policy**
- **Lifting Australia’s commitment to ODA and applying intersectional gender analysis**
- **Targeted investment in gender equality initiatives and women’s rights organisations**

Women Peace and Security

Recommendation:

39. Adequately resource Australia’s second National Action Plan on Women Peace and Security, including the participation of civil society in its implementation, monitoring and evaluation.

With consideration given to the following options:

- core funding for a CSO platform/WPS Coalition to: share knowledge; provide technical advice to governments; monitor, and evaluate NAP commitments in particular and WPS commitments more broadly (e.g. shadow reporting etc.); raise awareness on WPS issues/NAP; serve as a convening body that brings diverse CSOs to discuss WPS issues (roundtables/annual dialogues/regular reflections etc.).
- increase resources allocated to the Office for Women for their role in coordinating the work of government NAP stakeholders and engagement with CSOs.
- commit to a fee for service model for advice provided to individual government NAP stakeholders by CSOs or CSO platform/WPS Coalition.
- co-design a resourced Civil Society-Government engagement strategy that recognises the need for a range of approaches to engage with diverse civil society actors and groups (e.g. but not limited to annual dialogues, communities of practice, webinars, website, teleconference meetings etc.).⁷⁹

Australia’s first National Action Plan (NAP) was released in 2012⁸⁰ and the Government is now in the process of developing the second NAP.

The Independent Interim Review of the current Australian National Action Plan on Women Peace and Security (NAP) found the NAP to be relevant and consistent with approaches adopted by other UN Member

⁷⁷ Government Offices of Sweden. *Handbook: Sweden’s feminist foreign policy*. (Stockholm: 2014)

⁷⁸ Centre for Feminist Foreign Policy. “Feminist Foreign Policy,” 2016, <https://centreforfeministforeignpolicy.org/feminist-foreign-policy/> (accessed 21.11.18)

⁷⁹ See more information on key stakeholders in this area at the Australian Women, Peace and Security Coalition <http://wpscoalition.org/>

⁸⁰ Women’s International League for Peace and Freedom (WILPF), “Member States,” <http://www.peacewomen.org/member-states> (accessed 3.12.18)

States. With respect to its implementation, however, the Review found gaps and challenges with the level of institutionalization, awareness, funding and resource allocation across implementing agencies. While the Australian Government was noted to value the role of civil society in implementing the women peace and security agenda, opportunities for formal engagement were limited, with engagement from civil society limited by access to resources.⁸¹

The development of the second Australian NAP therefore provides a space for policy makers, implementing agencies and civil society to adopt a gendered lens in elucidating Australia's approach to security, peacebuilding, conflict prevention and resolution.

In Australia, the government's contribution has been to fund Annual Civil Society Dialogues and Reports (since 2013). Funding the Annual Civil Society Dialogues and Reports has been a positive foundation for the engagement of government with civil society once a year. However, reduced funding has affected the ability to build broader and more inclusive participation in the Annual Dialogues. Also, there is a lack of core resourcing for the WPS Coalition to carry out its role in organising the Dialogues, sustaining ongoing engagement with members and other civil society organisation (CSO) partners, and in representing civil society on NAP governance bodies, which is a fundamental challenge. These activities are maintained on behalf of civil society by individual volunteers and in-kind contributions from CSOs.

In line with the pre-budget submissions from Australian Women Against Violence Alliance (AWAVA) and Prosecute; don't perpetrate, ERA supports the recommendation:

40. That the Australian Government investigate and prosecute Australians who have used sexual violence in armed conflict.

In the context of refugee women who've experienced sexual violence in armed conflicts, access to justice is in question. In order for the Australian Government to help end impunity for sexual violence in armed conflict, the government should commit to the investigation and prosecution of Australians who fought with Da'esh for their use of sexual violence in armed conflict.⁸² ERA endorses the pre-budget submission put forth by Prosecute; don't Perpetrate.

⁸¹ Humanitarian Advisory Group, *Independent Interim Review of the Australian National Action Plan on Women, Peace and Security 2012-2018* (Canberra: Australian Government, 2016)

⁸² See more at: Prosecute Don't Perpetrate campaign <https://prosecutedontperpetrate.com/>