Working with Women Alliance

Employment Services Submission

Submission

August

Contact:
Dr Gemma Killen
Executive Director – Working with Women Alliance
Equality.policy@wwwa.org.au

Acknowledgment of Country

The Working with Women Alliance acknowledges the Traditional Custodians of the land on which we work and live.

We pay our respects to Aboriginal and Torres Strait Islander Elders past and present, and we value the enduring connection Aboriginal and Torres Strait Islander people have to this land.

We value Aboriginal and Torres Strait Islander histories, cultures, and knowledge.

About WwWA

The Working with Women Alliance (WwWA) brings together a diversity of voices, expertise, and lived experience to inform and guide national policy on women's equality, leadership, and safety. We are one of five national women's alliances, funded through the Department of the Prime Minister and Cabinet to ensure that women's voices are central to policy development.

The Working with Women Alliance (WwWA) represents two key portfolios: gender-based violence and gender equality. The WwWA connects the critical areas of gender-based violence and the advancement of women's economic equality and leadership, bridging these important policy fields for greater impact.

We work with members and stakeholders, including the Australian Government, to provide expertise and advice on gender equality and women's safety.

Executive Summary

The Working with Women Alliance (WwWA) welcomes the Australian Government's commitment to reforming the employment services system and supports the proposed shift towards more tailored, person-centred approaches that recognise the diverse barriers people face in securing sustainable employment. To succeed, however, these reforms must address the specific experiences of women and gender diverse people, particularly those who have experienced domestic, family and sexual violence (DFSV).

Australia's current employment services system does not adequately respond to the impacts of trauma, abuse and gender inequality. Women who have experienced violence, including physical, sexual, emotional or economic abuse, are significantly less likely to participate in the labour force than women who have never experienced abuse. The employment gap is 5.3 percentage points for women who have experienced abuse and rises to 9.4 percentage points for those who have experienced economic abuse specifically.[1] These figures demonstrate the profound impact that violence can have on women's economic security and workforce participation.

Women are also disproportionately represented among the long-term unemployed. While women make up less than half of JobSeeker recipients, they typically spend longer on income support than men. Department of Social Services data shows that there are currently more than 100,000 women who have relied on JobSeeker for more than five years, with women also overrepresented among those receiving the payment for more than a decade.[2] This reflects the structural barriers women face in securing and maintaining employment, including trauma recovery, caring responsibilities, occupational segregation, workplace discrimination, harassment and limited access to flexible work. It's likely this also reflects high access barriers to more suitable payments such as the Disability Support Pension

While Australia has made significant progress in improving women's workforce participation through reforms such as paid parental leave, expanded rights to flexible work, family and domestic violence leave, and strengthened workplace protections, employment services have not kept pace with these broader efforts. Employment outcomes remain poor, with Workforce Australia's 26-week employment outcome rate reaching just 11.7 per cent between June 2024 and June 2025, well below the 15 per cent target.[3] These outcomes suggest a system focused on short-term placements rather than supporting people into secure and sustainable employment.

For women, particularly victim-survivors of DFSV, this can result in repeated cycles of insecure, low-paid work and ongoing economic vulnerability. Employment services must move beyond a narrow compliance model and instead invest in people's

capabilities, skills and long-term aspirations. Effective employment support should be integrated with broader social services and specialist supports that address barriers to participation and enable long-term economic security.

WwWA believes that responding to DFSV and supporting victim-survivors into safe and sustainable employment should be recognised as core – and priority – business for employment services. Employment service providers must be equipped to deliver shame and trauma-informed support, and system settings should avoid practices that can replicate experiences of coercion and control. In particular, mutual obligations and compliance frameworks should be reviewed to ensure they do not reinforce trauma or create additional barriers for people recovering from violence and abuse.

Employment services reform presents an important opportunity to create a system that genuinely supports women's economic equality. To achieve this, reforms must be gender-responsive, trauma-informed and aligned with broader government strategies to address occupational segregation, close the gender pay gap and increase women's economic security, as well as activities under the Second Action Plan to End Violence Against Women and their Children. A reformed system should not merely move women into jobs, but support them into safe, secure and sustainable employment that enables long-term workforce participation and financial independence.

This submission builds on previous work by WwWA, including our policy briefs on Employment Services and Mutual Obligations, and our submission to the consultation on the Second Action Plan to End Violence Against Women and their Children.

Recommendations

1. Ensure employment services explicitly acknowledge the impacts of domestic and family violence on women's workforce participation and economic security and require Workforce Australia designate victim-survivors as a specialist employment services cohort.
2. Strengthen mutual obligation exemptions and safeguards for victim-survivors.
3. Expand the exemption pathway for victim-survivors experiencing violence outside of intimate partner violence.
4. Design Stream 3 Intensive Services as a recovery-to-employment pathway.
5. Directly fund specialist women's employment services.
6. Ensure stream design can identify victim-survivors who need specialist support across all streams.
7. Embed shame-sensitive and trauma-informed practice across triage and assessment processes.

Conceptual reframing

Employment services policy must move beyond framing gender-based violence (GBV) as a "complex personal circumstance" that affects an individual's capacity to participate in the labour market. Domestic, family and sexual violence are not individual problems but structural manifestations of gender inequality that directly undermine women's economic participation and security. Perpetrators frequently use coercive control, harassment, financial abuse and sabotage of employment as deliberate tactics to limit women's independence and access to income. These dynamics intersect with broader structural barriers, including the gender segregation of the workforce and persistent gender inequalities in pay, caring responsibilities and access to secure work. As a result, violence should be recognised as a labour market and economic security issue, rather than solely a personal or social welfare concern.

This reframing has important implications for the objectives of employment services. The prevailing assumption that employment is the primary goal of the system does not reflect the realities facing many women experiencing violence. For these women, safety is the immediate priority, with employment serving as a critical mechanism for achieving long-term independence and security. The goal of the system should therefore be broadened from workforce participation alone to economic security and sustainable, meaningful employment. This approach would better recognise that employment outcomes are only effective where they support safety, dignity and long-term wellbeing. In this context, the Alliance strongly supports the principle that the employment services system should be designed and stewarded by the Australian Public Service to drive continuous improvement, ensuring that services are responsive to the lived realities of women and are grounded in trauma-informed, shame-informed and safety-oriented practice.

Trauma informed and shame-sensitive practice

Employment services play a critical role in supporting women experiencing domestic and family violence but these services must recognise that experiences of violence are often accompanied by profound shame, stigma and self-blame. A shame-informed approach acknowledges that many victim-survivors enter service systems expecting judgement, punishment or disbelief and the system therefore requires deliberate efforts to normalise their experiences and demonstrate that services are designed for them, not that they are an exception within the system.

Shame-informed practice is closely aligned with trauma-informed approaches. As Wu and Salter argue, trauma-informed practice seeks to avoid inadvertently reproducing abusive, coercive or disempowering interactions by creating safe environments,

recognising triggers, supporting autonomy and dignity, and prioritising collaborative approaches that focus on “doing with” rather than “doing to” people.[4] In employment services, this means moving beyond compliance-focused interactions and acknowledging the significant impact that DFV can have on women's capacity to secure, sustain and progress in employment.

Without this understanding, service interactions can themselves become sites of stigmatisation, particularly when women are required to repeatedly disclose traumatic experiences or justify the impacts of violence on their employment pathways. A shame-informed system should minimise re-traumatisation, reduce unnecessary disclosure requirements, and ensure victim-survivors are met with respect, flexibility and appropriate support.

To strengthen responses, Workforce Australia should immediately designate victim-survivors of domestic and family violence as a specialist cohort within the employment services system, enabling access to tailored supports and specialist expertise. Federal, state and territory governments should also trial embedding employment and related support services within existing trusted human services, including women's refuges and specialist DFV services, to improve accessibility, reduce stigma and support pathways to economic security.

Assessment and triage

WwWA supports the development of a more tailored assessment and triage framework within employment services. However, reform must recognise that even a well-designed intake and assessment process is unlikely to identify all experiences of domestic, family and sexual violence (DFSV) when a person first enters the system.

Disclosure of violence is rarely determined by the quality of an intake questionnaire alone. Rather, it is often influenced by relationships of trust, the physical environment in which conversations occur, the skills and confidence of frontline staff, and the extent to which systems support safe information sharing. Many victim-survivors do not disclose experiences of violence until they have built a trusting relationship with a particular worker. WwWA members have described situations in which women waited years before disclosing abuse to a trusted employment services staff member who had been on leave. This is especially important for victim-survivors experiencing compounding marginalisation, such as migrants and refugees, women with disabilities, older women and members of LGBTIQA+ communities. These experiences demonstrate why assessment cannot be treated as a one-off event and why ongoing opportunities for reassessment and disclosure are essential.

For this reason, WwWA strongly supports a targeted reassessment process and the application of a genuine "tell it once" principle across the employment services system. Job seekers should not be required to repeatedly recount traumatic experiences to multiple providers or staff members in order to access appropriate supports. Achieving this will require improved information-sharing arrangements between employment services and specialist support services, supported by strong privacy protections and client consent processes. Trusted staff should be able to record and share relevant information safely so that victim-survivors receive consistent support across different points of contact.

Recent evidence highlights the limitations of current assessment arrangements. Between July and September 2024, Services Australia determined that more than half of job seekers assessed were not capable of meeting the job plan requirements assigned by providers. [5] Notably, 60 per cent of these determinations occurred only after the individual disclosed new information following their initial assessment.[6] This raises significant concerns about the capacity of current assessment processes to identify complexity at the outset, as well as the effectiveness of information-sharing mechanisms across the employment services system.

Importantly, employment services reform must acknowledge that violence is complex and recures across the life-course of a victim-survivor. It can take years and repeated attempts to leave domestic violence, and victim-survivors face heightened risk of repeat victimisation, with research suggesting that abuse is cumulative and recurrent, rather than a single isolated event. This can make it hard to capture the impacts of violence at a single-entry point assessment.

Victim-survivors of violence will not be confined to a single service tier. Women who have experienced violence may present across all levels of service intensity and at different stages of their recovery and employment journey. Some will be experiencing active violence and coercive control. Others may be rebuilding their economic security following separation from a perpetrator. Still others may be living with the long-term impacts of past violence, including trauma, interrupted work histories, health impacts and reduced confidence. Assessment frameworks must therefore be capable of identifying both current and historical experiences of violence, as well as the ongoing risk that perpetrators may actively interfere with workforce participation, employment retention or financial independence.

The effectiveness of any triage system will ultimately depend on the capability of frontline staff. Evidence suggests that Workforce Australia staff capacity, training and service design are currently inadequate to meet the needs of job seekers facing complex barriers to employment, particularly women.[7] Limited training in trauma-informed practice and gender-responsive service delivery means that many non-

specialist employment services staff are not equipped to recognise the impacts of violence, engage safely with disclosures, or provide appropriate referrals and supports. As a result, structural and systemic barriers are too often interpreted as individual deficiencies in motivation, compliance or work readiness.

For many women, interactions with employment services can themselves be triggering or retraumatising. High staff turnover disrupts continuity of care and frequently requires women to repeat personal and traumatic experiences to new workers. This undermines trust, reduces engagement and can discourage future disclosure. At the same time, the physical design of some service environments presents additional barriers. Women are often expected to discuss experiences of violence in open-plan offices or public waiting areas, environments that are neither conducive to disclosure nor consistent with trauma-informed practice.

A reformed employment services system must therefore go beyond improved triage tools and invest in the conditions that support safe disclosure, effective assessment and service connectivity. This includes comprehensive training in trauma-informed and gender-responsive practice, greater workforce stability and continuity of support, stronger information-sharing arrangements, and the provision of private and respectful service environments. Together, these measures will help ensure that assessment and triage processes identify support needs more effectively, reduce the burden on victim-survivors, and connect women with the services they need to achieve safe, sustainable employment outcomes.

Mutual obligations

There is a significant risk that the mutual obligation system can and is being weaponised by perpetrators of domestic and family violence. Perpetrators can prevent access to devices needed to fulfill requirements, keep women from attending job interviews or other required activities and otherwise interfere with the intention of threatening a victim-survivor's economic security.

Even without interference, mutual obligations can be burdensome for women who are attempting to leave violence and attend to the administration required to keep themselves and their children safe.

The research is clear that exiting domestic violence takes time, and that the experience has a long tail. The National Plan to End Violence against Women and Children 2022-2032 states that "recovery and healing takes time and victim-survivors will, in many cases, require life-long support through dedicated and tailored services and interventions" (emphasis added).[8] Studies show that almost all domestic violence victim-survivors experience post-separation abuse[9] with one study pointing out that

abuse can intensify for years post-separation and recommending that supports need to be accessible for a minimum of two years.[10]

In 2008, the Participation Review Taskforce was commissioned by the Federal Government to examine the participation rules for parents and mature-age job seekers receiving income support payments.[11] The Taskforce made several recommendations in relation to mutual obligation exemptions, including replacing the 16-week case-by-case exemption for parents experiencing domestic violence with an automatic 12-month exemption.

The Government agreed to all and implemented most of the Taskforce's recommendations in relation to parents, however the domestic violence exemption was never extended to 12 months. As a result of the Taskforce's recommendations, 12-month exemptions currently apply for kinship care, large families, caring for a child with disability or medical condition, home schooling and distance education, and foster carers.

It is not clear why the domestic violence exemption remains at 16 weeks, aside from anxiety that an exemption may lead to disconnection from services that could provide support at times of crisis. This anxiety could be managed by providing an opt-in, voluntary service, as modelled by Parent Pathways.

Currently, the exemption category for domestic violence also includes 'relationship breakdown'. There are two perverse consequences of this grouping:

- The equation of domestic violence to relationship breakdown
- Perpetrators can access the same exemption period as victim/survivors of domestic violence.

The Working with Women Alliance strongly recommends implementing a 12-month exemption from mutual obligations for domestic and family violence victim-survivors immediately. At a minimum, the current exemption should be extended from 16 weeks to 26 weeks, with a simple extension process where violence-related barriers continue. Victim-survivors should not be required to repeatedly prove violence to maintain an exemption, and violence-related non-attendance should also not trigger compliance action while an exemption or extension is being assessed.

At a minimum, the current exemption should be extended from 16 weeks to 26 weeks, with a simple extension process where violence-related barriers continue. Victim-survivors should not be required to repeatedly prove violence to maintain an exemption, and violence-related non-attendance should also not trigger compliance action while an exemption or extension is being assessed.

This would recognise the experiences of victim-survivors who are affected by violence from family members, carers, kin or other household members, but who may not fit service pathways designed around intimate partner violence. Women experiencing violence from male family members, including brothers, fathers and sons, are a cohort that is often invisible in policy and service design.

Data collection and reporting

Current, publicly available data on participation and experiences of employment services fail to capture the extent to which domestic and family violence can impact engagement with employment. Additionally, the structure of current data does not allow a fulsome view of the impacts or effectiveness of services in relation to women, especially those that have been long-term unemployed. These women have often been subject to abuse from an early age, have experienced intergenerational poverty, or have serious health conditions that have prevented them from working.

Quality and progress surveys through Workforce Australia do not currently capture the potential impacts of domestic and family violence. Further, public reporting on Workforce Australia outcomes and duration of income support are not currently disaggregated by gender. This data will help shape future reviews of services and illuminate the services required to meet the specific needs of women within the income support and employment services system.

---

[1] Summers, A., Shortridge, T., Sobeck, K., (2025) *The cost of domestic violence to women's employment and education*, University of Technology Sydney
[2] Department of Social Services, (2026) *JobSeeker Payment and Youth Allowance – monthly profile – June 2026*, https://www.data.gov.au/data/dataset/jobseeker-payment-and-youth-allowance-recipients-monthly-profile/resource/087d5ce8-b62b-4764-b5a4-9bfbbee8c278
[3] Department of Employment and Workplace Relations, 2025, *Annual Report 2024-25*, Australian Government, https://www.dewr.gov.au/download/17273/department-employment-and-workplace-relations-annual-report-2024-25/41762/department-employment-and-workplace-relations-annual-report-2024-25/pdf
[4] Qianqian Wu, Michael Salter, (2025) Women's experiences of shame while seeking care for complex trauma: Towards shame-sensitive practice, *The British Journal of Social Work*, https://doi.org/10.1093/bjsw/bcaf101
[5] Commonwealth Ombudsman, (2025) *Fairness in the Targeted Compliance Framework: when decisions are made beyond your control*, https://www.ombudsman.gov.au/__data/assets/pdf_file/0015/323205/Fairness-in-the-Targeted-Compliance-Framework.pdf

[6] Commonwealth Ombudsman, (2025) *Fairness in the Targeted Compliance Framework: when decisions are made beyond your control*
[7] System 2, The Behavioural Insights Team, Paul Ramsay Foundation, (2023) *Reimagining the Employment Services System of Australia: Solution prototypes and implementation plans*,
[8] Department of Social Services, 2022, The National Plan to End Violence against Women and Children 2022-2032, Commonwealth of Australia, page 87, accessed at: https://www.dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and children-2022-2032.pdf
[9] Hulley, J., et al, 2022, Continuous Traumatic Stress: Examining the Experiences and Support Needs of Women After Separation From an Abusive Partner, Journal of Interpersonal Violence, Vol 38(9-10), https://pmc.ncbi.nlm.nih.gov/articles/PMC10052415/pdf/10.1177_08862605221132776.pdf
[10] Kelly, L., Sharp, N., Klein, R., 2014, Finding the costs of freedom: How women and children rebuild their lives after domestic violence, Solace Women's Aid, London Metropolitan University, https://repository.londonmet.ac.uk/1483/1/SWA-Finding-Costs-of-Freedom-Report.pdf
[11] Department of Education, Employment and Workplace Relations, 2009, Participation Review Taskforce Report, Australian Government, accessed at: https://apo.org.au/sites/default/files/resource-files/2009 05/apo-nid14441.pdf