



YWCA CANBERRA

**Submission to the Third Action Plan under the ACT Women's Plan  
2016-26**

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## **Acknowledgement of Country**

YWCA Canberra proudly recognises the rights of Aboriginal and Torres Strait Islander peoples to own and control their cultures and pays our respect to these rights. YWCA Canberra acknowledges the need to respect and encourage the diversity of Indigenous cultures and to respect Indigenous worldviews, lifestyles, and customary laws. We extend our respect to the Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and will continue to always be Aboriginal land.

## **About YWCA Canberra**

YWCA Canberra is a feminist not-for-profit organisation that has provided community services and represented women's issues in Canberra since 1929.

Our mission is 'We strengthen communities by supporting girls and women through our services and advocacy' and our vision is 'Girls and women thriving'.

We provide essential, quality services for women, girls and families in the ACT and surrounding regions. We work in the areas of children's services, community development, homelessness and affordable housing, youth services, personal and professional training, women's leadership and advocacy.

We are externally accredited against the [Quality Improvement Council \(QIC\) Health and Community Service Standards \(7th Edition\)](#). Accreditation against the QIC standards support us to improve client and community engagement, diversity and cultural appropriateness, management systems, governance and service delivery, while committing to a cycle of continuous quality improvement. In addition to the QIC standards, we are accredited against the following external client related service standards for our key areas of work:

- [Australian Charities and Not for Profit Commission](#)
- [National Quality Standard for Early Childhood Education and Care and School Aged Care](#)
- [National Regulatory System for Community Housing](#)
- [Registered Training Organisations Standards](#)

Through our national Affiliate Association with YWCA Australia, we are part of the World YWCA network, which connects 120 countries across the globe.

## **Introduction**

YWCA Canberra welcomes the opportunity to provide a submission to the Third Action Plan under the ACT Women's Plan 2016-26. Our submission to the development of the Third Action Plan reflects a long-standing advisory relationship with the ACT Government and ongoing commitment to working across directorates to improve the lives of girls and women.

This submission advocates for the Third Action Plan to reflect the government's priority of addressing women's safety by outlining measurable and gender-specific targets to embed the objectives of the ACT Women's Plan within a whole-of-government approach. It further makes the argument that the Third Action Plan does not conflate measures to improve women's safety in public spaces and on public transport with addressing gender-based violence – it is imperative the Third Action Plan and associated targets recognises the reality that women are most unsafe in their own homes and other intimate settings. We also call for the remit of the newly appointed Coordinator General for Housing to be directly integrated with and answerable to the ACT Government's broader commitments to women's safety under the National Plan to Eliminate Violence Against Women and Children.

As in previous submissions, YWCA Canberra draws attention to the Safer Families Levy and continues our advocacy to see a more robust level of transparency and accountability regarding the expenditure of the revenue it generates. In the face of growing demand on frontline services, an over-burdened workforce, and chronic under-resourcing, the Third Action Plan is a pivotal opportunity to develop an ambitious roster of actions to improve women's lives.

This submission covers the following priority areas:

1. The need for gender-specific targets
2. Measurable outcomes
3. An embedded response
4. Ongoing funding for specialist women's services

## **Discussion and Recommendations**

### **An embedded response**

The appointment of a Coordinator General for Housing to oversee the delivery of a suite of priorities – including improving housing access, affordability, and choice – presents a unique opportunity for the ACT Government to embed its housing strategy within broader safety and

social outcomes objectives. Acknowledging that around 150 women in Canberra return to an abusive partner to avoid becoming homeless<sup>1</sup>, a coordinated response between the ACT Women's Plan, the Coordinator General and the ACT Government's commitments under both the National Plan to End Violence Against Women and Children (National Plan) and National Housing Accord must consider the role of adequate housing supply in responding to Domestic and Family Violence. The Coordinator General is in an inimitable position to ensure actions included under each of these frameworks are aligned in their understanding of housing as integral to women's safety and wellbeing, and to make ambitious advancements to increase supply.

The new Office of the Coordinator General for Housing need not be the sole space where the ACT Government integrates its objectives with broader national housing and homelessness strategies. 73 per cent of private households in Canberra are experiencing rental stress (paying more than 30 per cent of their income to rent) – the highest rate in Australia.<sup>2</sup> Findings from the YWCA Canberra *Our Lives Survey* show this experience is significantly more acute for women who are a single parent and older women – with 43 per cent of single parents and 31 per cent of women aged over 45 spending more than half their income toward rent. Further, 61 per cent of single parents and 38 per cent of older women told us they had insufficient savings to maintain rental obligations for one payment cycle in the face of unexpected loss of income.<sup>3</sup> Just as the current housing and homelessness crisis is driven by both social and economic factors; the response to these pressures should endeavour to be informed by each social determinants, economic drivers, and gender.

YWCA Canberra supports measures to increase affordable supply of housing for low-income women living in the ACT and looks forward to the detail of how the ACT Government will support the National Housing Accord to meet its aspirational target of delivering one million new homes over five years from 2024 with its own projects and contributions. However, we stress the importance of social and supported housing not being forgotten in this target. It is crucial intersecting forms of precarity, particularly those affecting women, are considered, and embedded within any housing commitment/s.

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<sup>1</sup> This figure is extrapolated based on ACT population data, from the national estimation that 7690 women in Australia return to abusive partners to avoid homelessness  
[https://static1.squarespace.com/static/61b14c4abbc81a1543f55180/t/62185d457ad63d191d0af100/1645763920507/EE\\_Women+Housing\\_Domestic+Violence\\_WEB\\_SINGLES.pdf](https://static1.squarespace.com/static/61b14c4abbc81a1543f55180/t/62185d457ad63d191d0af100/1645763920507/EE_Women+Housing_Domestic+Violence_WEB_SINGLES.pdf)

<sup>2</sup> [2022 ACT Cost of Living Report \(actcoss.org.au\)](https://actcoss.org.au/2022-act-cost-of-living-report)

<sup>3</sup> [Portrait-of-women-in-canberra-2021-FINAL-Digital.pdf \(ywca-canberra.org.au\)](https://ywca-canberra.org.au/2021-final-digital)

Further, YWCA Canberra espouses the need for both the action plans under the ACT Women's Plan and the ACT Government response to the National Plan to be mutually reinforcing and to advance a whole-of-government approach to delivering key targets for women's safety. The Third Action Plan is a valuable opportunity for the ACT Government to advance its progress toward the government's core priority of women's safety by developing a target-based framework that aligns with its response to the National Plan.

YWCA Canberra's 2021 *Our Lives Survey* of more than 1200 women living in the Canberra region found approximately 20 per cent of respondents felt 'somewhat unsafe' accessing public spaces in general.<sup>4</sup> When asked to consider their perception of safety in public spaces after dark, this increased to 47 per cent. Based on this and other data, YWCA Canberra supports urban design measures, passive travel, and active transport improvements that contribute to public safety. We have also participated in the women's safety audits as they occur prior to significant public events in Canberra.

We are concerned however, that the Third Action Plan's focus on urban design and public transport detracts attention from the most significant factor when advancing policy for the safety of girls and women – violence at home and within intimate relationships. Women's safety and inclusion cannot be delinked from the reality that violence in the home or in intimate settings presents a much greater risk to girls and women's safety than random acts of violence perpetrated by someone unknown to them.

To fully embed the ACT Government's commitment towards women's safety, measurable actions included in the Third Action Plan should reinforce other government responses to gender-based violence, intimate partner abuse, and sexual violence such as the ACT Government response to the Sexual Assault Prevention and Response Report and the ACT Government's commitment to the National Plan. An embedded response would allow for robust monitoring of targets and outcomes, centralise the government's commitment to ending violence against women and improve the capacity of the Third Action Plan to create change across the community.

**Recommendation:** The Coordinator General for Housing oversees, and is accountable to, the ACT Government's housing commitments under the National Plan action plan.

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<sup>4</sup> [Portrait-of-women-in-canberra-2021-FINAL-Digital.pdf \(ywca-canberra.org.au\)](#)

**Recommendation:** The Office of the Coordinator General for Housing undertake research and analysis on the gendered determinants and outcomes of the homeless and housing crisis in Canberra.

**Recommendation:** The Coordinator General for Housing establish the ACT Government's first implementation plan to deliver on the priorities of the National Housing Accord in alignment with broader safety and social outcomes included under the ACT Women's Plan.

### **The need for gender-specific targets**

YWCA Canberra continues to support the objectives of the Women's Plan and welcomes its principles of equality, intersectionality, diversity, and safety. Policy areas such as housing and safety are intrinsic to women's health and wellbeing and this plan presents as a crucial opportunity to develop an ambitious roster of actions that prioritises measures to directly improve the lives of girls and women in the ACT.

We are concerned however that some actions announced under the previous two action plans did not advance beyond routine government functions and efficiency measures, repeated initiatives already announced, and do not represent ambitious aims to deliver a gender-specific benefit to women and girls. As the final Action Plan under the current Women's Plan, it is important the Third Action Plan addresses previous shortcomings to advance gender equity in the ACT.

In line with our consistent recommendations dating back several years, The Third Action Plan should be reinforced by a robust Women's Budget Statement\* developed within the Chief Minister's Treasury and Economic Development Directorate (CMTEDD). Such a statement would help ensure budget priorities contribute to greater wellbeing of women and girls in the community and provide an opportunity to foreshadow and mitigate any unintended consequences of Budget decisions that may disproportionately impact on women. Relocating the development of the Women's Budget Statement from the Community Services Directorate to CMTEDD would ensure it is imbued with the scope and influence of a central economic agency with oversight for the development, analysis, and release of future budgets.

\*Over a number of Budget cycles, going back to 2019-2020, we have provided evidence on notice of what a best-practice gender-informed budget would look like. Our evidence has directed the Committee to the GBA+ Annex of the 2019-2020 Canadian Budget which included a gender report analysing all measures against possible gender impact.<sup>5</sup>

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<sup>5</sup> Government of Canada, Budget 2019 <https://www.budget.gc.ca/2019/docs/gba-ac/sgba-ac-chap01-en.html>

## **Measurable outcomes**

YWCA Canberra believes it is imperative that the Third Action Plan outline clear and measurable targets. A target-based framework, accompanied by measurable actions (such as quantifiable improvements to service wait times or outcomes, and the number of girls and women assisted by a program) would better articulate to frontline services the tangible progress achieved in the community and enhance the accountability of yearly reporting. For example, Year Two reporting for Action 2.2 under the Second Action Plan states ACT high school students have been helped to pursue construction industry vocation training through 'work experience' and the 'facilitation of Australian School-based Apprenticeships' but does not disclose how many students have completed work experience placements or the number of students who were retained in the apprenticeship program.<sup>6</sup>

We also refer the government to our previous advice<sup>7</sup> on the need for the Gender Impact Analysis (GIA) tool to be formally embedded across the ACT Government to improve the measurability of its use and impact. Originally introduced to assist in applying a gender lens to government services, funding, and programs, the lack of requirements to track the GIA tools' use<sup>8</sup> inhibits the extent to which it is possible to determine its influence in the development of government programs and funding priorities.

## **Ongoing funding for Specialist Women's Services**

Funding remains a significant and ongoing issue for the specialist women's services that are the front-line responders to the thematic priorities in the Third Action Plan, including housing and homelessness, safety, and health. If the Government is to realise its goal of achieving equity for women and girls in the ACT, the acute need for ongoing funding across the sector must be directly addressed by the Third Action Plan.

Demand on our frontline services continues to exceed resource capacity and front-line reporting shows accessing support can be a cumbersome and drawn-out process for women living with violence. Data from our Domestic Violence Support Service exemplifies this reality: in 2022, the number of incoming referrals to the service increased by more than 15 per cent to a total of 216. Of these, our service provided support to 147 women. Due to oversubscription and under-

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<sup>6</sup> [Summary of Action Status for Year Two Reporting](#)

<sup>7</sup> <https://ywca-canberra.org.au/wp-content/uploads/2022/06/Budget-Submission-2022-2023.pdf>

<sup>8</sup> [https://www.parliament.act.gov.au/\\_data/assets/pdf\\_file/0007/1903714/HCW-QON-04-ANSWER-CSDHomelessness-Gender-Clay.pdf](https://www.parliament.act.gov.au/_data/assets/pdf_file/0007/1903714/HCW-QON-04-ANSWER-CSDHomelessness-Gender-Clay.pdf)

resourcing, 62 women were not accepted into the service\* and seven were diverted to a waitlist. This increasing demand for our community support services is replicated elsewhere across the sector, including at our Mura Lanyon Food Hub which signed up more than 100 new members in 2022.

At the time of its introduction in 2016, YWCA Canberra welcomed the Safer Families Levy as a sustainable revenue source to respond to domestic and family violence and support the work of frontline services without the uncertainty of budget cycles. We remain committed however, to seeing a more robust level of transparency and accountability regarding use of the levy. The ACT Government's promotion of the levy as an 'urgent action' to 'prevent violence against women and their children'<sup>9</sup> is at odds with the experiences of the women's sector and use of the revenue collected via the levy remains ambiguous. The Government's 2022-23 Budget Outlook reveals the line items 'delivering the family safety hub', 'safer families team', training initiatives, and 'future priorities' account for more than half of the total annual revenue collected via the levy. As we have made clear in several consecutive budget submissions, we are concerned by the proportion of the Safer Families Levy that funds core government expenditure such as national partnership funding obligations towards OurWatch and ANROWS, staffing costs, and in-house professional development.

Specialist frontline services continue to experience growing wait lists, burgeoning demand and a burnt-out workforce responding to increasingly complex cases without sustainable resourcing. As the Third Action Plan is developed, we continue to advocate for the Government to revisit its funding rationale and to realign with its core aim of 'improving outcomes for victims of domestic violence and their families'<sup>10</sup>. Without urgent direct investment in frontline services and immediate ancillary support across the sector, women leaving violence will continue to be met with services at breaking point and to be left unable to access the timely support and security promised to them.

\*The service was required to close its doors to referrals from Supportlink for approximately three months of 2022. As such, the real number of women not accepted into the service is predicted to be higher.

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<sup>9</sup> Safer Families Levy Bill 2016 Explanatory Statement

<sup>10</sup> [Safer families levy | ACT Revenue Office - Website](#)