

ANROWS

AUSTRALIA'S NATIONAL RESEARCH
ORGANISATION FOR WOMEN'S SAFETY
to Reduce Violence against Women & their Children

Select Committee on Workforce Australia Employment Services

Parliament House
Parliament Drive
Canberra ACT 2600

By email: waes.reps@aph.gov.au

Re: Inquiry into Workforce Australia Employment Services

Dear Andrew McIntyre

ANROWS thanks the Select Committee on Workforce Australia Employment Services for the opportunity to respond to the Inquiry into Workforce Australia Employment Services.

ANROWS is an independent, not-for-profit company established as an initiative under Australia's *National Plan to Reduce Violence against Women and their Children 2010–2022* (the National Plan). Our primary function is to build the evidence base that supports ending violence against women and children in Australia. ANROWS is embedded in the National Plan architecture and will continue to deliver and develop this function across the next decade under the *National Plan to End Violence against Women and Children 2022–2032*. Every aspect of our work is motivated by the right of women and their children to live free from violence and in safe communities. We recognise, respect and respond to diversity among women and their children, and we are committed to reconciliation with Aboriginal and Torres Strait Islander Australians.

Primary funding for ANROWS is jointly provided by the Commonwealth and all state and territory governments of Australia. ANROWS is also, from time to time, directly commissioned to undertake work for an individual jurisdiction, and successfully tenders for research and evaluation work. ANROWS is registered as a harm prevention charity and deductible gift recipient, governed by the Australian Charities and Not-for-profit Commission (ACNC).

The information provided below is focused on the Inquiry's interest in the sufficiency of Workforce Australia's recognition of diverse jobseeker needs, and alternative responses to these needs; how best to provide specialist services for disadvantaged groups; and system changes that could be made to embed a more supportive and less punitive approach to mutual obligations requirements. It draws on evidence from rigorous peer-reviewed research, including relevant ANROWS research. We would be very pleased to assist the Committee further, as required.

Yours sincerely



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Chief Executive Officer

17 March 2023

Submission: Workforce Australia employment services

Background

Workforce Australia is the national employment service delivered by the Australian Government Department of Employment and Workplace Relations. Replacing the “jobactive” service in July 2022, Workforce Australia is designed to assist participants find employment; it is not solely available to individuals on income support, but to all Australians of working age.

For individuals who *are* on income support, when mutual obligation requirements are in place they will be referred to one of two services:

- Workforce Australia Online, which provides access to online tools and resources
- Workforce Australia Services, when individuals are identified as requiring additional support.

Those in the Workforce Australia Services stream are connected with providers to provide “tailored support”, and the Workforce Australia website (Australian Government Department of Employment and Workplace Relations, 2022b, n.p.) notes that “in certain locations there will be specialist providers to deliver personalised services to cohorts including culturally and linguistically diverse (CALD), Indigenous Australians, ex-offenders, and refugees”. However, the increased risk of experiencing domestic and family violence (DFV)¹ among these populations is not explicitly accounted for in these “tailored” and “personalised” responses. Particularly concerning is the failure of the Workforce Australia Services design to meaningfully take into account the experiences, perspectives and needs of DFV victims and survivors. Reports used to inform the design of the current model, including the report stemming from the evaluation of jobactive, make only sparing references to women’s experiences of violence, if they mention these at all (see Australian Government Department of Employment and Workplace Relations, 2022a; Australian Government Department of Jobs and Small Business, 2018; Employment Services Expert Advisory Panel, 2018).

To meaningfully meet the needs of participants, consideration of the experiences of DFV are fundamental to the service response. This submission will focus on the ways in which these needs are not currently being met. While we have separated the information out by headings, many of the issues discussed recur across sections, indicating the need for a wholesale re-evaluation of the service system’s response to participants who have experienced or are currently experiencing DFV.

Noting that the Select Committee on Workforce Australia Employment Services is considering the ParentsNext program separately, we have not focused on, nor made recommendations relating to this

¹ A note on terminology: “domestic and family violence (DFV)” and “intimate partner violence (IPV)” will both be used in this submission to reflect the terminology used in specific research reports.

program within this submission. ANROWS has made a submission focusing exclusively on ParentsNext to the separate inquiry, but key themes recur across the two submissions.

Experiences of DFV among participants in the employment services system

While data on the Workforce Australia caseload are not publicly available, caseload data from jobactive – the antecedent employment services program, in operation until July 2022 – provided to the Senate Education and Employment Committee in October 2020 show that almost half (48%) of participants were female, 25 per cent were aged 50 years and older, 23 per cent were culturally and linguistically diverse, 17 per cent were people with disability, and 8 per cent were Indigenous (Australian Government Department of Education, Skills and Employment, 2020, n.p.). These groups have all been identified as “vulnerable populations” in terms of facing increased risk of experiencing DFV, or family violence for First Nations peoples (AIHW, 2019).

There is a risk that Workforce Australia is not designed to adequately respond to the needs of these populations. To address this risk, greater awareness of the following is required: victims’ and survivors’ experiences of DFV, their perspectives on what would be most helpful when engaging with Workforce Australia, and their needs (in particular, needs for safety and economic security). In addition to considering the circumstances of people currently in the service, Workforce Australia needs to consider the context in which people are arriving into the system: changes in women’s employment status that can lead to participation in employment services have been found to increase the risk of experiencing intimate partner violence (IPV) for the first time. ANROWS research examining the relationship between economic insecurity and IPV during the COVID-19 pandemic found that, in comparison to women whose employment was not affected during the pandemic, women who had lost their job, or had their pay cut or hours reduced, were significantly more likely to have experienced IPV for the first time (Morgan & Boxall, 2022).

Understanding that there are groups with a higher likelihood of experiencing DFV, and that in many cases these groups are overrepresented in the participant cohort for Workforce Australia, the service should be acutely aware of the impact of DFV and be able to support participants who are also victims and survivors of this violence.

DFV as a barrier to meeting system requirements

ANROWS research conducted by Cortis and Bullen (2015) found that women who have experienced DFV, when compared to those who have not, are twice as likely to experience difficulty accessing welfare services. When victims and survivors *can* access these services, DFV also acts as a barrier to meeting system requirements. The report of the Senate Education and Employment References Committee’s examination of the appropriateness and effectiveness of jobactive, *Jobactive: Failing those it is intended to serve* (2019), identified this barrier as a key issue. Given the heightened risk of experiencing DFV faced by the caseload populations mentioned above, there is a critical need to address the barriers that can prevent victims and survivors from meeting system requirements – for example, mutual obligation requirements (which are enforced using the Targeted Compliance Framework).

Mutual obligation requirements are in place for a number of payments administered under Workforce Australia, including the JobSeeker payment, the Youth Allowance payment, the Parenting Payment when the recipient's youngest child turns six, and the Special Benefit.

Victim and survivor participants in the system are at risk of failing to meet these requirements if they are experiencing DFV, and in particular, coercive control, economic abuse and systems abuse – forms of DFV that specifically interfere with employment participation and performance. Cortis and Bullen (2015) outline common controlling behaviours used by perpetrators that can impact a victim's and survivor's ability to meet mutual obligation requirements, including prohibiting women from seeking work, sabotaging transport or childcare, and undermining women's capacity to obtain employment.

Workforce Australia's use of the Targeted Compliance Framework enables the awarding of penalties against victims and survivors as a result of actions taken by perpetrators of DFV. Included in the "serious failures" listed on the Workforce Australia site, which may lead to payments being cancelled, are accepting a suitable job offer but not starting the job, or "voluntarily" leaving a suitable job (Workforce Australia, 2023). There is a need to consider perpetrators' controlling behaviours designed to interfere with women's employment as a contributing factor to these "failures": what might look like a voluntary resignation could in fact stem from a victim's and survivor's need to protect themselves from perpetrator disruptions (for example destroying work or documents, harassing women's colleagues and humiliating them in front of their colleagues; Cortis & Bullen, 2015).

Cancelled payments can affect victims' and survivors' financial independence and security, which increases vulnerability to further DFV and impacts a victim's and survivor's ability to leave a violent relationship (Cortis & Bullen, 2015). While exemptions and suspensions are available, these do not appear to be extensively given for "domestic violence or relationship breakdown". Data contained in *The evaluation of jobactive: Final report* (Australian Government Department of Employment and Workplace Relationships, 2022a, p. 137) show that these suspensions accounted for only 0.1 per cent of jobactive suspensions, and the current employment service would better meet its aim to provide tailored support to job seekers by increasing its capacity to suspend mutual obligation requirements while women seek safety (see Cortis & Bullen, 2016).

The "serious failures" discussed above are only perceived as such because they are the result of a one-size-fits-all approach, and ANROWS suggests that there is instead a need for holistic responses to individual needs. For example, for women who are participating in the service while experiencing DFV, employers could be screened to ensure that the jobs are appropriate and sustainable in terms of a particular victim's and survivor's context and needs (see Cortis & Bullen, 2015). This would reduce the risk of the "serious failure" of voluntarily leaving what appears to be a suitable job.

There is also a clear need for DFV training for staff. Participants in Cortis and Bullen's (2016) research perceived that one of the ways in which employment services' practices were insufficient to meet women's needs was through a lack of training: employment service consultants are not trained in DFV across the board and lack knowledge of the impacts of violence on job search and employment.

One [participant] explained how violence could be misrecognised [by employment services staff], with women experiencing violence seen to be “making excuses” and treated punitively for missing appointments, or for appearing “scattered”, “vague”, “defensive” or “angry” in interviews. (Cortis & Bullen, 2016, p. 69)

DFV training would encourage greater sensitivity towards the barriers that participants face in applying for exemptions or being able to safely disclose experiences of DFV. It would also increase the ability of staff to accurately recognise and identify where participants may be experiencing violence, to connect participants to appropriate supports, and to make decisions on exemptions appropriately.

This training should include information on coercive control and non-physical forms of violence. ANROWS’s 2017 *National Community Attitudes towards Violence against Women Survey* indicated that Australians are more likely to recognise obvious physical violence than they are to understand social, emotional and financial forms of abuse and control as forms of violence against women (Webster et al., 2018). Particularly in the context of supporting participants’ economic security, it is important that staff are able to recognise coercive controlling tactics, as these may be used by perpetrators to actively interfere with a victim’s and survivor’s financial independence (Cortis & Bullen, 2015). It is critical that service providers are trained to be able to understand the impact of economic abuse on a participant’s potential ability to comply with the requirements of the Workforce Australia service and be able to provide appropriate support for their ongoing participation.

To be most effective, training needs to take place within an authorising environment that actively implements DFV-informed policy and procedure and encourages mentorship, with changes supported by and implemented both from the top down (senior management) and the bottom up (customer-facing staff and team leaders; see ANROWS, 2020b; Healey et al., 2018; Humphreys et al., 2020).

Recommendation 1: Provide comprehensive DFV training for Workforce Australia service provider staff to recognise physical and non-physical forms of violence, and support staff, through continuing to foster an authorising environment involving backing from senior management, to implement this training in practice.

Recommendation 2: Replace the one-size-fits-all approach contained within the Targeted Compliance Framework by assessing individual needs when responding to perceived failures to meet mutual obligation requirements and connecting participants with appropriate supports.

Structural and cultural barriers impacting victims’ and survivors’ ability to access support

As noted above, ANROWS research has found that women who have experienced DFV are twice as likely to experience difficulty accessing welfare services than women who have not experienced violence (Cortis & Bullen, 2015). As many participants in Workforce Australia face increased risk of experiencing DFV, it is critical that structural barriers to accessing and participating in the service are addressed, as social security provides material means of escape and alleviates poverty for many women ending a violent relationship (Cortis & Bullen, 2016).

First Nations women experience compounded barriers to seeking and accessing government support. The impact of historical and ongoing removal and displacement of First Nations children from their families can mean that First Nations mothers and caregivers are often reluctant to use services due to their fear of child removal and Centrelink's perceived connection to other services such as child protection (Langton et al., 2020). This prevents First Nations women from being able to disclose experiences of violence in a safe, culturally appropriate and trauma-informed way, and this barrier to disclosure may also prevent First Nations victims and survivors from being granted exemptions to mutual obligation requirements.

Women from CALD backgrounds also face specific and exacerbated barriers to accessing government support. These can include, for example, lack of access to information, economic dependence, lack of familial support or social isolation, limited proficiency in English, immigration regimes that promote dependence, previous adverse experiences, fear of deportation, and concerns about discrimination (see Day et al., 2018; Mitra-Kahn et.al., 2016; Vaughan et al., 2016). ANROWS research outlines several of the common factors that shape the capacity of services to support CALD women who are experiencing DFV, including communication barriers between staff and clients (Vaughan et al., 2020). All of these barriers may impact the ability of a victim and survivor to access Workforce Australia and participate in associated activities.

Attention is also needed to barriers faced by women with disability. ANROWS research points to social and physical barriers and accessibility issues that can prevent women with disability from being able to access services (Mitra-Kahn et.al., 2016). Additionally, poor recognition of tactics of violence that are specific to women with disability can compound issues with accessing and making use of appropriate supports (Day et al., 2018).

Recommendation 3: Address structural and cultural barriers to access and participation in Workforce Australia Employment Services, particularly for women experiencing domestic and family violence, First Nations women, culturally and linguistically diverse women, and women with disability.

Recommendation 4: Conduct research directly with victims and survivors to understand their experiences of employment services, focusing on First Nations women, culturally and linguistically diverse women, and women with disability.

Responses to key questions from the *Submission Guide*

In determining questions from the *Submission Guide* to respond to, ANROWS has chosen to focus on those that invite discussion of how better to acknowledge and meet the needs of women who are participating in Workforce Australia and experiencing DFV.

1. Is the diversity of jobseeker needs sufficiently recognised?

ANROWS suggests that the needs of the specific populations outlined above are not sufficiently recognised within the current service framework. In their review of the literature focusing on women's economic wellbeing in the context of DFV, Cortis and Bullen (2015) found that a commonly addressed need related to

improv[ing] the capacity of Australia’s income support and employment service systems to screen for and address violence, to support women in their disclosures, and ensure consistency, transparency and fairness in the treatment of women who have experienced violence. (Cortis & Bullen, 2015, p. 3)

In particular, they cited a qualitative study from 2011 that found the policies and procedures of the income support system did not address the *specific needs* of women experiencing violence (Braaf & Meyering, 2011 as cited in Cortis & Bullen, 2015). While this study (and others considered in Cortis and Bullen’s [2015] literature review) was conducted more than 10 years ago, ANROWS notes the findings remain relevant in light of the Chair’s statement in the *Submission Guide*, in which Mr Julian Hill MP acknowledges that key aspects of the employment services system have not changed in decades. The findings are also supported by and echoed in more recent research: see, for example, Summers (2022) and Senate Education and Employment References Committee (2019).

Among the range of difficulties reported by women accessing income support payments in Braaf & Meyering’s (2011) study were waiting times for payments, administrative errors resulting in payments being cut off, and having to retell their experiences of DFV to each new staff member they engaged with. The authors cited systemic issues identified by women and service workers “impacting on women’s capacity to achieve economic security, including inadequate levels of payments, and strict welfare to work requirements which failed to recognise the impact of domestic violence” (Braaf & Meyering, 2011 as cited in Cortis & Bullen, 2015, p. 12).

Building capability in employment service provision – particularly through collaboration with specialist DFV services – would enable providers to identify experiences of DFV among women in the service and recognise that DFV is a barrier to work, and in turn would lead to better outcomes for women (Cortis & Bullen, 2015; see further answer to Q4 below).

Recommendation 5: In collaboration with the domestic and family violence sector, improve Workforce Australia’s capacity to identify and respond to women’s needs in the context of domestic and family violence and employment service engagement.

2. Are there currently cohorts in employment services who are not able to benefit from the assistance on offer? Are there better alternatives to respond to the needs of these jobseekers?

The cohorts identified above as facing a higher risk of experiencing DFV, compared to the general population, overlap with cohorts that are “increasing[ly] concentrat[ed]” within Workforce Australia. Caseload data presented at the Committee’s first public hearing, in November 2022, identified these cohorts: people from CALD backgrounds, First Nations Australians, refugees, people experiencing homelessness or living in insecure housing, and ex-offenders (see p. 9 of *Submission Guide*).

As mentioned earlier, these cohorts face increased risk of experiencing DFV (see ABS, 2019; AIHW, 2022; Day et al., 2018; Salter et al., 2020) and may not be able to benefit from the assistance currently on offer from Workforce Australia. Clients can also belong to multiple cohorts and experience intersecting oppressions, compounding both the risk of experiencing DFV (The Equality Institute, 2018 as cited in Victorian Government, 2021) and the barriers to accessing support or complying with obligations.

ANROWS suggests that better alternatives to respond to the needs of this cohort would include a holistic approach and services that directly address specific needs.

For example, in ANROWS research focusing on the impact of complex trauma on women seeking safety from violence, Salter and colleagues (2020) acknowledged that rates of PTSD and exposure to trauma are high among refugee populations and people experiencing homelessness, which suggests the need for a trauma-informed approach to meeting the needs of and supporting these jobseekers.

Culturally safe responses to disclosures of DFV experiences are best practice among First Nations, CALD and refugee populations (see particularly Langton et al., 2020; Vaughan et al., 2016), particularly when considering migration stressors and displacement experienced by refugee women (Salter et al., 2020), and the impact of historical and ongoing removal and displacement of First Nations children from their families, which, as noted above, can mean that First Nations mothers and caregivers are often reluctant to use social services due to their fear of child removal and Centrelink's perceived connection to other services such as child protection (Langton et al., 2020).

The connections between experiencing homelessness and participation in employment also warrant focused consideration. An ANROWS meta-evaluation of "safe at home" programs (initiatives designed to address homelessness and safety risks for women and children experiencing DFV; Breckenridge et al., 2016) found that all 20 included evaluations recognised that leaving violent relationships puts women at risk of homelessness and financial insecurity. The meta-evaluation noted:

A woman's capacity to maintain a rental tenancy can be compromised by a perpetrator damaging the property and/or harassing her in the workplace which could affect her employment and potentially her capacity to pay rent and remain financially independent. (Breckenridge et al., 2016, p. 16)

In addition, 30 women interviewed as part of Kaspiew and colleagues' (2017) research on DFV and parenting reported experiencing financial abuse following separation from a DFV perpetrator; some of these women experienced homelessness or housing instability, loss of employment and poverty as a result of the abuse.

There is also a demonstrated need to improve the safety of women following incarceration, with research advocating for reintegration services that address concerns about access to employment (as well as housing, education and social connection): attaining a level of stability in their lives will make seeking help for IPV following release much easier (Sotiri, 2015 as cited in Day et al., 2018). There is an established link between experiences of DFV and/or sexual violence and imprisonment: studies show that the majority of women in custody (70–90%) have experienced emotional, sexual and/or physical abuse, often perpetrated by partners or spouses, with 75 to 90 per cent of incarcerated Aboriginal women experiencing these kinds of abuse, often in multiple forms (see ANROWS, 2020a, p. 5). Services offered to women upon release, including employment services, must therefore address potential DFV experiences and their ongoing impacts when engaging with this cohort.

The recommendations made above regarding the need for training across the board are also relevant to this question.

3. ***Who is best placed to provide specialist services for disadvantaged groups, including the long-term unemployed?***
4. ***Where does the system need more collaboration with other human services? How could this be built into the employment services system?***

ANROWS suggests that it might not be solely a question of *who* is best placed to provide specialist services for disadvantaged groups, but also *how* these specialist services are provided. There is a need to avoid siloed service provision and instead to work across sectors to prevent secondary victimisation, which is “the additional harm and sense of betrayal experienced by victims [and] survivors of domestic and family violence when they receive inappropriate service responses” (Laing, 2017 as cited in ANROWS, 2020b, p. 3; on risks created by gaps in, and a lack of coordination across, systems, see ANROWS, 2020b, *passim*). Service providers need to be aware of unintentionally replicating tactics of coercive control – as identified in the “DFV as a barrier to meeting system requirements” section, there is a risk that the requirements in place within services and systems (in the Workforce Australia context, this would specifically be the mutual obligation requirements and the use of the Targeted Compliance Framework) are felt by victims and survivors to reproduce the experience of coercive control tactics, which limit a victim’s and survivor’s ability to choose and diminishes their power (ANROWS, 2020b).

In our answer to Q1, we suggested that building capability in employment service provision through collaboration with specialist DFV services would lead to better outcomes for women experiencing DFV in the employment service system.

Cortis and Bullen (2015) further argue that prevention of and responses to the multifaceted nature of DFV (and its economic dimensions) require integrated responses across policy areas, including employment, and note that these integrated responses need to expand to include income support and employment services and support. These kinds of responses are not readily available from a single service system such as Workforce Australia, which cannot adequately respond to and support victims and survivors of DFV, especially during times of crisis. Workforce Australia has limited direct communication with other relevant services that participants experiencing DFV may be engaged with: while participants can be referred to local specialist services by their Workforce Australia Services provider, to be most effective, integrated service support provision should be taking place from the moment of engagement with the service. This would also serve to remove the responsibility of seeking support and/or exemptions from the participants of the program who are experiencing the impacts of DFV.

Again, compulsory DFV training for staff – including information on coercive control and non-physical forms of violence – would increase their ability to recognise and identify where participants may be experiencing violence and connect them to appropriate supports. This connection could be achieved by collaboration across services, including through referral pathways, which has been identified as valuable in supporting early DFV intervention (Cortis & Bullen, 2015).

Recommendation 6: Ensure greater integration with other services and systems that participants may engage with to reduce the administrative strain of requesting support and exemptions to mutual obligation requirements for participants.

5. *Should jobseekers be subject to financial penalties, such as suspension or cancellation of income support payments, for failing to meet their obligations?*

ANROWS recommends that financial penalties are removed from the Workforce Australia service model, particularly for victims and survivors of DFV. Women's workforce participation is an essential component of their economic security (see ANROWS, 2022a), but in the absence of employment there is a need for employment services to provide financial stability for victims and survivors. Economic security is crucial for women's safety and security, and financial penalties could instead lead to economic hardship or financial stress, which is associated with women experiencing DFV. For example, women surveyed during the COVID-19 pandemic who were experiencing high levels of financial stress were 4.6 times more likely to have experienced physical or sexual violence for the first time in the preceding three months compared to those experiencing no financial stress (Morgan & Boxall, 2022, p. 15). As mentioned above, there is substantial evidence of the association between changes in financial status and IPV; financial stress and economic inequality can also trap women within abusive relationships, and individual victims of violence unfairly bear its economic burden (Cortis & Bullen, 2016).

Recommendation 7: Remove financial penalties from the Workplace Australia service model to avoid contributing to economic hardship or financial stress for victims and survivors of domestic and family violence.

6. *In light of stakeholder criticism of the current mutual obligations regime as overly punitive and harmful, what changes should be made? How and where in the system might a more supportive and less punitive approach be employed?*

A more supportive approach requires creating conditions of safety and stability for women, which would aid both in securing employment and in sustaining it over the longer term. Pre- and post-employment support needs to be trauma-informed, culturally sensitive, holistic and individual-focused.

A holistic approach would help to move away from the current emphasis on securing work as the main goal for all participants. Viewing workforce participation as one aspect of the mutual obligation requirements of the Workforce Australia service severely limits participants' autonomy in making decisions best suited to their interests for career development and personal circumstances. Evidence shows that participants in welfare-to-work programs typically experience lower quality of life and lower job satisfaction (Cortis & Bullen, 2015); for Workforce Australia participants who have also experienced violence, these effects can compound the existing negative impact of violence on victims' and survivors' job satisfaction and remuneration, and reduce their employment stability (Cortis & Bullen, 2015).

Delivering a more person-centred approach that is flexible, relevant and adaptive to the needs of participants would support greater workforce participation. Research has shown that responding to individual needs and situations, including victims' and survivors' needs for safety and stability, is preferable to a blanket approach that assumes employment will always be beneficial (Cortis & Bullen, 2015). Person-centred delivery would enable Workforce Australia to support its participants to make the best decisions for employment according to their unique circumstances.

Recommendation 8: Adjust the mutual obligations regime to respond to individual needs and situations, including victims' and survivors' needs for safety and stability, rather than adopting a blanket approach that assumes that employment will always be beneficial.

Summary of recommendations

1. Provide comprehensive DFV training for Workforce Australia service provider staff to recognise physical and non-physical forms of violence. Support staff by fostering an authorising environment involving backing from senior management, to implement this training in practice.
2. Replace the one-size-fits-all approach contained within the Targeted Compliance Framework by assessing individual needs when responding to perceived failures to meet mutual obligation requirements and connecting participants with appropriate supports.
3. Address structural and cultural barriers to access and participation in Workforce Australia Employment Services, particularly for women experiencing domestic and family violence, First Nations women, culturally and linguistically diverse women, and women with disability.
4. Conduct research directly with victims and survivors to understand their experiences of employment services, focusing on First Nations women, culturally and linguistically diverse women, and women with disability.
5. In collaboration with the domestic and family violence sector, improve Workforce Australia's capacity to identify and respond to women's needs in the context of domestic and family violence and employment service engagement.
6. Ensure greater integration with other services and systems that participants may engage with to reduce the administrative strain of requesting support and exemptions to compulsory participation for participants.
7. Remove financial penalties from the Workplace Australia service model to avoid contributing to economic hardship or financial stress for victims and survivors of domestic and family violence.
8. Adjust the mutual obligations regime to respond to individual needs and situations, including victims' and survivors' needs for safety and stability, rather than adopting a blanket approach that assumes that employment will always be beneficial.

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