

WiDA Australia Ltd
T/A Women in Defence Association

22/04/2025

Subject: Federal Government's Productivity Commission Review of the National Mental Health and Suicide Prevention Agreement

Attn: Productivity Commission
CC: Victorian Women Lawyers Association Inc

Women in Defence Association Overview:

Founded in 2024, the Women in Defence Association (WiDA) is a registered charity with the Australian Charity and Not for Profits Commission (ACNC). WiDA represents over 700 members nationally across the defence sector including defence industry, ADF, Veterans, Academia and Defence families. Our mission is advancing gender diversity and inclusion in the defence sector by providing strategic initiatives, advocacy and resources that invest in women, promote equity and drive impactful change.

Support of Recommendations

WiDA offers its endorsement and support of all recommendations laid out by the Victorian Women Lawyers Association Inc by email on 4 April 2025 for its submission to the Australian Government Productivity Commission Review of the Mental Health and Suicide Prevention Agreement. Specifically, WiDA highlights its views further in relation to the below items:

- **Pg 5 - a) Increased funding for safety regulators: Items i through v.**
WiDA further builds on Recommendation A, Item V to emphasize the necessity of Trauma-Informed Practice Training in the workplace as part of structured mental health programs.
- **Pg 5 b) Expand adverse action protections:** *Introduce further workplace protections, in the Fair Work Act, to recognise that adverse action should not be taken against employees who raise psychological safety issues, noting that psychological safety issues often overlap with workplace behaviour concerns.*

WiDA builds on this recommendation and requests that reports made in the workplace due to psychological safety issues should be reported through to Comcare as a 'notifiable incident' under the Commonwealth Work Health and Safety Act. As it stands, "An incident is notifiable if it results from the conduct of a business or undertaking and causes the death of a person, serious injury or illness of a person, or a dangerous incident." Psychological safety issues that demonstrate a risk to life must be afforded the same level of significance as physical safety issues.

Thank you for your attention to this important matter.

Rachel Falzon, Founder/National President, president@womenindefenceassociation.org |
<https://www.womenindefenceassociation.org>

23 April 2025

Tracey Horsfall

Admin & Project Officer

Mental Health Review

By email to: mentalhealthreview@pc.gov.au

Dear Tracey

Re: Supportive submission - Safety Regulation for Gendered Violence Prevention - National Mental Health & Suicide Prevention Agreement Review

This submission is made in support of Victorian Women Lawyers Association Inc (VWL)'s submission dated 4 April 2025 ([VWL Submission](#)) to the Australian Government Productivity Commission Review of the National Mental Health And Suicide Prevention Agreement (**National Agreement**).

The National Agreement recognises that workplaces provide a critical opportunity for prevention and that Governments at all levels should support and promote a legislative framework for work-related psychological health, ensuring that psychological health and safety is as important as physical health and safety (see paragraph 3 on page A-3 of the National Agreement).

We support VWL's observations that:

1. A key gap in the National Agreement is the absence of express commitments for nationally consistent safety regulatory controls for occupational violence, bullying, and sexual and gender-based harassment, which disproportionately impact women.
2. Women comprise 57.8% of all serious claims for mental health conditions and are disproportionality impacted by bullying, harassment and occupational violence (Safe Work Australia, 2024).
3. In 2021 - 2022, women accounted for the majority (59%) of accepted workers' compensation claims for occupational violence (Safe Work Australia, 2024).
4. Work-related gendered violence can contribute to serious physical and mental injury, leading to feelings of isolation, anxiety, depression, PTSD, heart disease, and, in the worst cases, even suicide (WorkSafe Victoria, 2022).
5. Currently, compliance is left to guidelines and codes of practice which do not impose minimum mandatory controls in all businesses. Instead, codes of practice are admissible "after-the-fact", in safety prosecutions, as evidence of what should have been known about hazards and risks, and the means of controlling them.
6. Safety regulations can provide minimum mandatory controls to prevent the risk of harm. Safety regulatory controls have been found to halve the rate of injury if they are complied with (Gun, R, T, 1993).
7. It has been estimated that the current cost of inactivity on work-related gendered violence is \$30 billion per year (Ballard, A, & Bozin, D, 2023). The significant cost associated with the absence of express controls for work-related gendered violence, and the comparatively lower cost of regulation, suggests that there could be significant social and economic benefits for Australia if these behavioural hazards, which disproportionately impact women, are properly regulated, with minimum enforceable regulatory controls.

Recommendation: Governments at a Federal, State & Territory level should commit to developing nationally consistent model safety regulatory controls to prevent occupational violence, bullying, and sexual and gender-based harassment, which disproportionately impact women.

Safety regulatory controls, achieved via amendments to model safety laws, and implemented Federally, and in each State and Territory, would be distinct from and complement protections under the Sex Discrimination Act 1984 (Cth).

Yours faithfully

Abbey Kendall

CEO

Working Women's Centre Australia



24 April 2025

**Australian Gender
Equality Council**

Tracey Horsfall

Admin & Project Officer

Mental Health Review

By email to: mentalhealthreview@pc.gov.au

Dear Tracey

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National Mental Health & Suicide Prevention Agreement Review

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Coral Ross AM
AGEC Chair