

Expert Report of Dr. James Stanford

Fair Work Commission

**FAMILY & DOMESTIC VIOLENCE LEAVE
REVIEW (AM2021/55)**

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Glossary of Acronyms

ABS – Australian Bureau of Statistics

ANROWS – Australia’s National Research Organisation for Women’s Safety

EA – Enterprise Agreement

FDV – Family and Domestic Violence

FWC – Fair Work Commission

NES – National Employment Standards

WAD – Workplace Agreement Database

Introduction

1. I am pleased to provide this expert report on economic aspects of the ACTU's proposal for variations in Modern Awards to provide up to 10 days paid leave to employees grappling with FDV.
2. My report is organised according to the following structure. Part I provides a general discussion of the economic costs of domestic violence, including its impacts on work, absenteeism, productivity, retention and turnover, and other variables. Part II reviews evidence regarding the current extent of access to FDV leave provisions in Australian workplaces. This is relevant in that the extent of current coverage will help determine the incremental cost of the extension of that coverage through the Modern Awards system. Part III provides some evidence regarding the experience of employers which presently offer paid FDV leave, including utilisation of those provisions by covered employees. Part IV provides some simulation modeling, based on that coverage and utilisation research and other relevant economic parameters, of the likely economic impacts of the extension of paid FDV leave to a wider group of Australian workers through the Awards system. In Part V, I discuss the three specific questions addressed to my attention by the Australian Council of Trade Unions. The Conclusion summarises my views.
3. Sources consulted in developing this report include:
 - a. Review of ABS data regarding reported incidence of domestic violence, labour market outcomes (employment, wages, labour costs), and macroeconomic variables.
 - b. Review of data regarding provisions in enterprise agreements maintained and published by the Dept. of the Attorney General of the Commonwealth Government.
 - c. Review of relevant published information in media reports, academic journals, and government documents; sources consulted in the course of that research, and referred to in my report, are listed in the Bibliography.

- d. Communication with selected individual employers regarding their experience with paid FDV leave provisions (as documented in the report and in the Attachment).
4. This expert testimony also draws on my previous research into the economic aspects of paid FDV leave provisions (Stanford 2016). That report assembled statistical evidence available at that time to estimate the likely utilisation of paid FDV provisions, and their potential impact on labour costs of employers.

Part I: Economic and Labour Market Impacts of Domestic Violence

5. Considerable research has been undertaken in recent years regarding the very significant economic costs associated with FDV. Researchers have used various methodological approaches to explain and estimate the impact of FDV on employment, employee turnover, productivity, output, personal and national incomes, fiscal outcomes of government, and other relevant measures.
6. Attempting to describe the economic consequences of this problem should not diminish concern with the human, familial, and social costs of FDV. In those terms, the impacts of FDV cannot be measured in terms of dollars and cents: they are measured, instead, in terms of lives damaged, ruined, or tragically ended (including impacts on family members, work colleagues, friends, and innocent bystanders, as well as the direct victims of FDV).
7. Nevertheless, a consideration of the economic dimensions of FDV provides useful perspective to policy deliberations aimed at reducing the incidence of FDV, and supporting victims in resolving and escaping from those situations. First, it highlights the important stake that many stakeholders (including employers, governments, and taxpayers) have in reducing FDV and its consequences.
8. Second, it provides important context for any discussion of the costs associated with measures to prevent FDV, and support its victims. Appreciating the enormous costs of the current situation, in which FDV is all-too-common and its victims inadequately supported (including in many workplaces), is relevant to discussion of the costs associated with prevention and victim support. At present, FDV imposes enormous costs on victims, and on broader society, and hence the costs associated with initiatives to reduce or resolve the crisis of domestic violence must be compared to the costs of inaction, and tolerating the current costs imposed by this social and economic crisis.
9. Several studies have attempted to describe and quantify the economy-wide costs of domestic violence in the Australian context. PricewaterhouseCoopers Australia (2015) estimated the broad economic costs of violence against women from their partners¹ to

¹ Partner violence against women constitutes just a portion of all family and domestic violence, which also includes violence against women from other family members or non-partner intimate relationships, as well as family or

total \$12.6 billion per year – or around three-quarters of one percent of GDP at that time. KPMG (2016) developed very similar estimates of the broader economic cost of FDV: including \$12 billion per year of costs associated with violence against women and their children, and another \$10 billion arising from the costs associated with stalking and other forms of emotional abuse.

10. Both reports found that these economic costs are distributed broadly across stakeholders in society. The most dangerous and substantial costs, of course, are those borne by the victims of domestic violence. But others bearing substantial costs include governments at all levels, employers, broader society, children, and even the perpetrators. Costs to employers from domestic violence include lost work time (even if that time is unpaid it still reduces output and disrupts operations), reduced productivity, higher turnover (resulting in increased recruitment and training costs), the risks of violence spilling over into the workplace itself,² and reputational risk to the employing organisation arising from inadequate support offered to employees in need.
11. Previous Australian studies have also documented the enormous magnitude of economic costs arising from FDV. These reports include research by the National Council to Reduce Violence Against Women and their Children (2009). The Council estimated the total economic cost of violence against women (both domestic and non-domestic) at \$13.6 billion in 2009 (more than 1% of GDP at the time). Similarly, Access Economics (2004) estimated the overall economic cost of domestic violence against women at \$8.1 billion in 2002-03 (1% of GDP at the time). Laing (2001) provides a useful compendium of earlier (pre-2000) estimates of FDV costs.
12. The finding that the economic costs of FDV cumulate to around 1% of national GDP therefore seems relatively robust, supported by various studies utilising varying methodologies and data sources. In present-day terms, that corresponds to aggregate costs of over \$20 billion per year across the national economy for the costs of FDV experienced by women (not counting broader and related costs from stalking, emotional

domestic violence experienced by men. PricewaterhouseCoopers estimated the total cost of violence against women (from all perpetrators) to equal \$21.7 billion, or over 1.25 percent of GDP.

² McFerran (2011) discusses the dangers of abusers stalking victims at their places of work, threatening or attacking colleagues, and other forms of spillover; one fifth of FDV victims reported that violence and threats extended into their workplaces (p. 17).

abuse, etc.). This provides important context for my estimates, described below, of the costs associated with paid FDV leave for victims of FDV.

13. Moreover, these results are consistent with the findings of research in other countries. Numerous international researchers have also concluded that the direct and indirect economic costs of domestic violence are substantial, and distributed widely across stakeholders in society (including employers and governments). Helpful surveys and compendia of this international research have been assembled by Day, McKenna, and Bowlus (2005); Walby (2009); U.S. Department of Health and Human Services (2003); and Equality Division of the Council of Europe (2014).
14. There is evidence both from Australia (Kennedy, 2020) and internationally (Bullinger et al., 2020) that the incidence of FDV increased during the COVID-19 pandemic and associated lockdowns and economic downturn. Causal factors contributing to this increased violence during the COVID crisis include family members spending weeks confined to home, challenges of combining work and caring activities within the household, additional economic and other stresses arising from the pandemic and recession, greater incidence of mental health problems, and others. This experience is consistent with other research noting a correlation between broader community hardship (such as natural disasters) and increased FDV (in the Australian context see, for example, Parkinson, 2019). Thus the afore-mentioned estimates of the broader economic costs of FDV are, if anything, likely to understate the current incidence and costs of this problem, in light of the additional familial, economic, and health challenges resulting from the pandemic.
15. Providing paid leave from work to support victims of FDV in addressing and escaping their situations will not in itself end all FDV, so the costs of paid leave programs cannot be directly weighed against these estimates of the overall costs of FDV in a formal cost-benefit mode of analysis. But being able to undertake legal, medical, relocation and other measures to address their situations, without the risk of losing income or losing their employment entirely, has been proven to enhance the likelihood of victims' escaping violence and hence preventing its reoccurrence. Moreover, by sending a high-profile and authoritative message in workplaces that domestic violence is an important problem, one which all segments of society (including employers) are prepared to take

action against, workplaces can support the broader change in attitudes and expectations that will be essential for reducing domestic violence.

16. Estimating the extent to which the provision of paid leave to employees experiencing FDV would reduce the incidence of FDV (both to themselves, and to other workers) is a complex exercise, given the many factors contributing to the incidence of FDV, and the gradual way those factors evolve over long periods of time. Approaches to scientifically estimating these impacts could include comparing the experience of those who were supported with paid leave in addressing their situations, to the experience of those with no such employment or income protections, and then quantifying resulting differences in the rate of recurrence of violence. Other approaches could involve exploiting cross-industry or cross-jurisdictional variation in the coverage of paid FDV leave measures, to see if any correlation exists with reductions in violence. Such research is well beyond the scope of this report, and may be pursued by researchers from various disciplines as paid domestic violence leave provisions are becoming more widespread.
17. Nevertheless, there is clear evidence that access to paid leave to support employees trying to resolve or escape FDV helps to reduce the recurrence of violence. And evaluation of the costs associated with paid FDV leave provisions can thus be reasonably considered in the context of the magnitude of costs (in the order of 1% of GDP) that continue to be imposed on Australians (including employers) every year as a result of FDV. We cannot say with precision how much those costs would be reduced by the economy-wide provision of FDV leave programs (presumably in concert with other education and support measures to prevent FDV). But they will certainly help to reduce those costs, which are very large, and the potential economic savings resulting from reduced FDV offer a significant incentive (secondary, of course, to the goal of preventing violence and harm experienced by the victims of FDV) for all measures aimed at preventing the occurrence or reoccurrence of FDV.

Part II: Existing Coverage of Paid FDV Leave Provisions

18. Over the past decade, growing awareness of the personal, social, and economic costs of FDV has led many employers in Australia to develop and implement supports for their employees who may be grappling with these challenges. Acknowledging the importance of supporting FDV victims to retain their employment and incomes through these episodes of intense personal and familial crisis, employers have recognised not only their responsibility to assist employees in these situations, but also the economic and operational benefits to the firm of doing so.

Unpaid FDV Entitlements

19. In 2018 the FWC granted an entitlement to 5 days of unpaid leave per year for employees dealing with situations of FDV, to apply as a standard feature of 123 Modern Awards.

20. Later in 2018, through the *Fair Work Amendment (Family and Domestic Violence Leave) Act 2018*, the federal government extended this entitlement by including the right to 5 days unpaid FDV leave in the National Employment Standards.

21. In theory, virtually all employers in Australia should now have implemented systems for:

- a. Communicating the existence of this entitlement to their staff.
- b. Establishing management systems to track attendance and payroll adjustments associated with use of the entitlement.
- c. Establishing a workplace culture in which taking leave to deal with FDV is legitimated and normalised.

22. In this regard, the existing unpaid leave entitlement reduces the incremental cost of establishing a paid FDV leave system, as the above costs have already been incurred and digested by employers.

Paid FDV Leave Provisions in Enterprise Agreements

23. The provision of paid FDV leave entitlements has become a common feature of employment policy in thousands of Australian workplaces. The growing coverage of this benefit has been driven by both the unilateral decisions of employers to offer the benefit (sometimes as part of more comprehensive workplace FDV policies), and through the process of union-management enterprise agreement negotiations.
24. Formal economy-wide data on the prevalence of paid FDV leave programs is not available. Some published research has provided estimates of the prevalence of these provisions.
25. Breckenridge et al. (2015) conducted a survey of 102 workplaces in NSW. Three-quarters of responding firms reported the existence of a formal workplace FDV policy, most of which included provisions for employees experiencing FDV to take leave from work to address their situations. Those programs reflected a mixture of paid and unpaid FDV leave.
26. Family and Community Services NSW (2018) also conducted a survey of 123 leading NSW employers, to investigate their policies regarding support for employees experiencing FDV. Of the 33 workplaces that responded, 18 had policies providing paid FDV leave to employees, and 21 had policies providing unpaid FDV leave.³
27. The provision of paid DV leave in those workplaces was roughly equally split between workplaces that provided that benefit as the result of a provision in an enterprise agreement, and those that provided it unilaterally as a matter of corporate policy (see Family and Community Services NSW, 2018, p. 13).
28. The Family and Community Services NSW (2018) data also confirm that paid FDV leave provisions are monotonically more common among larger workplaces. Among workplaces with between 1000 and 5000 employees, over one-third provide paid FDV

³ The total of those two groups (39) exceeds the number of respondents, indicating that some firms provide both paid and unpaid FDV leave opportunities.

leave. Among those with between 5000 and 10,000 employees, over half offer paid FDV entitlements. And among very large enterprises (those with over 10,000 employees), over 80% provide paid FDV leave programs. For this reason, therefore, the proportion of Australian workers with access to paid FDV entitlements will be substantially larger than the proportion of workplaces which offer it.

29. To supplement this previously published research on the prevalence of paid FDV entitlements in Australian workplaces, this section of my report presents data on the incidence of paid FDV leave in federally-registered EAs approved by the FWC between 2016 and 2019.
30. EAs are a major method for establishing terms and conditions of work in Australia, with around 1.9 million or 18% of all Australian employees covered by a current federally-registered agreement at March 2021.⁴ The impact of EAs on pay and entitlements is larger than this, however, for several reasons: some EAs are registered with state industrial relations systems rather than federally-registered (and a very few are not registered at all); the provisions of EAs continue to apply even after their nominal expiry dates (until they are either replaced or terminated); and the provisions of negotiated EAs are often replicated in individual contracts by many employers. A broader measure of EA coverage is presented by the ABS's *Employee Earnings and Hours* survey (which does not differentiate between expired and current agreements). According to that source, the proportion of employees paid according to terms of an EA was around 38% in 2018.
31. By either measure, EAs are an important factor in the determination of wages and entitlements for Australian workers. And the incidence of paid FDV leave provisions in EAs is relevant to this review for various reasons. First, the growing provision of paid FDV leave entitlements through the collective bargaining system attests to their growing application across workplaces more generally. Second, some of the organisations which provide paid FDV leave through terms of EAs may also have some employees (in other

⁴ 'Current' EAs are those that have commenced operating and have neither expired nor been terminated. Total employees covered by current agreements is based on data from Commonwealth Government, Dept. of the Attorney General (2021). Total employees data is from ABS *Labour Force, Detailed*.

departments, locations, or classifications) whose terms and conditions are set according to the Modern Awards; in some cases, those workers may already be covered by paid FDV leave (where employers have opted to extend the practice negotiated in an EA to apply to all employees of the firm).

32. The following analysis is based on is an inventory of all federally-registered EAs maintained by the Dept. of the Attorney General of the Commonwealth Government, the Workplace Agreements Database. The WAD includes records of every EA approved by relevant federal industrial authorities (presently the FWC) since the introduction of enterprise bargaining in October 1991. This includes information about the year of approval by the FWC; the industry, sector, number of employees covered; and conditions included in each approved agreement. Instances of FDV leave in approved EAs have been recorded in the WAD only since January 2016. Hence Table 1 below reports the incidence of domestic violence leave provisions for the period 2016 to 2019 (most recent available at the time this report was prepared).
33. Table 1 reports the total number of new EAs approved by the FWC each year, and the number and proportion of those EAs containing paid FDV leave provisions. Table 1 also reports the average number of paid days leave provided. The WAD uses a “dummy” code (“555”) for cases in which the number of days paid leave is either not specified in the EA, or is not quantifiable due to variance between groups of employees. Table 1 reports an unweighted average number of days of paid domestic violence leave calculated from those EAs with quantifiable numbers of days leave.
34. To capture the wider existence of FDV leave, we also present data on the total number of approved EAs that include *any* FDV leave clause. These include paid leave, unpaid leave, access to other types of leave or other entitlements, provisions for carers of domestic violence victims, and clauses which include the right to request unpaid leave (as outlined in the National Employment Standards). Agreements may include one or a combination of these FDV clauses.

35. Due to limited data availability in the WAD, we are unable to present employee coverage estimates, nor information regarding the prevalence of FDV leave provisions across EAs in different industries.⁵
36. As indicated in Table 1, the number of agreements with paid FDV leave provisions grew from 1096 agreements in 2016, to 1502 in 2019. That represented an increase of about half over 2016 numbers. EAs with paid FDV leave have accounted for close to 30% of all approved EAs since 2018 – also representing an increase of about half since 2016.
37. In my judgment, the proportion of employees covered by EAs with paid FDV leave provisions is certainly significantly higher than the proportion of EAs with those provisions. This is because of the prevalence of paid FDV leave provisions in larger EAs covering workers in public sector settings, and larger private companies (which are more likely to feature more comprehensive employee benefits, including FDV leave). This is consistent with the data reported above from Family and Community Services NSW (2018) that larger workplaces are far more likely to provide paid FDV leave entitlements.
38. Most agreements with paid FDV leave specify the number of days leave, and most of those agreements specify 10 days of leave (suggesting a growing consistency in leave entitlements around that level of benefit). The average number of paid days leave provided in all 2019 approved EAs with that entitlement was 9.8 days (measured across the 1368 EAs which specify the number of days of leave).
39. Unpaid FDV leave provisions have also become more common in approved EAs, especially in 2019 (following the introduction of 5 days unpaid FDV leave in Modern Awards by the FWC, and their later inclusion in the National Employment Standards).

⁵ We have liaised with the Dept. of the Attorney General to seek further information, including from the most recent WAD release for the year 2020. In the event we attain updated or more disaggregated data regarding the prevalence of FDV leave in current EAs, I will submit an update to this report.

40. The number of agreements approved with *any* FDV provision more than doubled from 1475 to 3212 between 2016 and 2019. By 2019, over 60% of approved EAs contained some form of FDV leave provision (close to half of which provided paid leave).

**Table 1.
FDV Leave in Enterprise Agreements 2016-19**

	Total EAs Approved	EAs With Any FDV Clause ¹	EAs With Paid FDV Leave					EAs With Unpaid FDV Leave	
			Total EAs Paid Leave	Proportion EAs Approved (%)	Specified #Days	Unspecified #Days	Avg. Number of Days Paid Leave ²	EAs Unpaid Leave	Avg. Number of Days Unpaid Leave
2016	5,199	1,475	1,096	21%	1,036	61	9.7	67	N/A ³
2017	3,543	1,078	720	20%	642	78	9.4	184	
2018	3,865	1,611	1,240	32%	1,088	152	9.3	395	
2019	5,285	3,212	1,502	28%	1,368	134	9.8	1,583	5

Source: Workplace Agreements Database (WAD), Attorney General’s Department. Most recent data available for 2016-19.

1. FDV Leave clauses include paid leave, unpaid leave, access to other types of leave, other entitlements, provisions for carers of FDV victims, and minimalist clauses outlining Right to Request unpaid FDV leave (as per the NES). Agreements may include one or a combination of FDV clauses.
2. Average across EAs with specified number of days.
3. WAD did not provide data on number of days unpaid leave until 2019.

41. There has been a trend increase in the proportion of newly approved agreements with paid FDV leave – growing from around 1 in 5 (21%) in 2016/17 to nearly one-third (32%) of all agreements in 2018. The proportion of agreements extending paid domestic violence leave then moderately declined in 2019 to 28% of all agreements.
42. There is therefore a clear trend toward increasing paid FDV leave entitlements in Australian enterprise agreements. This trend increase suggests public and business expectations are becoming more receptive to the introduction of paid work supports for staff impacted by FDV.
43. As more and more newly approved EAs include paid FDV leave provisions, the prevalence of this provision in the stock of EAs has been increasing, more gradually. Based on these trends among newly approved EAs, it seems likely that close to 30% of all current EAs would now include paid FDV leave provisions.⁶
44. Recall also that the survey conducted by Family and Community Services NSW (2018) indicated that as many workplaces have implemented paid FDV policies outside of the enterprise bargaining system, as have done so as the result of an EA. Their findings, moreover, confirmed that paid FDV leave is much more common in large organisations.
45. All state governments have now implemented paid FDV programs through most or all of their respective public sector workforces. Many federal government departments have done so, as well, through enterprise bargaining and/or unilateral HR policy. Many large private sector companies (including banks, utilities, and transportation firms) have done so, as well. On this basis it is safe to assume that at least 30% of Australian employees,⁷

⁶ The data in Table 1 extend only to 2019; assuming that agreements approved in 2020 and 2021 feature at least as large a prevalence of paid FDV leave as in 2018 and 2019, and noting the average length of EAs is about 3 years, the resulting turnover of EAs should ensure that the proportion of all current EAs with paid FDV leave provisions should be approaching a similar level (close to 30%).

⁷ Public sector employment accounts for around 15% of all employment in Australia. The ABS reports that employment at “large businesses” (those with over 200 employees) accounted for over one-third of total business employment in 2019-20 (*Australian Industry*, “States and Territories by Business Size”).

and perhaps as many as 50%, already have access to paid FDV leave entitlements through either EA coverage or corporate HR policy.

46. It is important to note that EA coverage has been in decline in Australia since 2013, especially in the private sector. Current EAs cover around 700,000 fewer employees in the private sector than at the end of 2013.⁸ As a share of employment, current private sector EA coverage has halved from 22% in 2013 to 11% at March 2021.⁹
47. One consequence of eroding EA coverage is growing reliance on Modern Awards in pay-setting. A greater proportion of workers receives only the minimum “floor” levels of pay (and other conditions), with a 5-percentage point increase in the share of employees paid through Awards from 2012 to 2018.¹⁰ Women comprise 61% of all Award-dependent workers. This shows there is an increasing reliance of workers, and women in particular, on improvements to the system of minimum employment conditions set by the Fair Work Commission.
48. For this reason, the expansion of paid FDV leave benefits through the enterprise bargaining system constitutes at best the partial implementation of this benefit. Further coverage will require its extension as an entitlement through Modern Awards. Given the greater concentration of women workers in lower-paid, Award-dependent jobs,¹¹ the extension of this entitlement through the Awards system is a vital precondition to ensuring that paid FDV benefits are available to those who most need them.

⁸ For more information on the dynamics, causes and consequences of the decline in enterprise agreement coverage in Australia’s private sector, see Pennington (2018).

⁹ Coverage estimates based on number of workers covered by *current* agreements as a proportion of total private sector employment.

¹⁰ Commonwealth Government, Dept. of the Attorney General (2021), notes table.

¹¹ As noted in Fair Work Commission (2021), para. 163.

Part III: Utilisation Experience of Employers with Paid FDV Leave Provisions

49. The first publicly reported paid FDV leave provisions were introduced in some Australian workplaces over a decade ago.¹² The practice has spread rapidly since then (as discussed above). Many employers therefore now have many years of experience with providing this entitlement, and this generates a growing body of evidence regarding the utilisation of the measure (and hence its cost). Here we consider two sources of data regarding utilisation: findings of previously published research, and results of our own inquiries with selected employers undertaken in the course of preparing this report.

Previous Published Research

50. Some published research has attempted to describe and analyse the utilisation of paid FDV leave provisions on the basis of administrative data, surveys of employers, and other methodologies. Findings from several published reports are listed in Table 2.

51. Breckenridge et al. (2015) surveyed 102 workplaces of various sizes in NSW regarding their provisions for leave for workers experiencing FDV (both paid and unpaid). Of those workplaces, 77 (about three-quarters of the responding sample) offered either paid or unpaid FDV leave. Of those, less than half (36) had reported *ever* having an employee make a claim. There were 31 workers who took leave under paid FDV leave provisions; the average total length of time (over the relevant 12 month period) claimed by these workers was 43 hours (or 5.7 standard work days). 24 claims were received for unpaid FDV leave; they covered an average¹³ of just 19 hours per claim (in total over the relevant 12 month period). This indicates the importance of paid leave in facilitating FDV victims to take more time to resolve their situations.

¹² A paid FDV leave system negotiated by the Surf Coast Shire Council in Victoria, through an enterprise agreement with the Australian Services Union, may be the first publicly reported example of this program (Schneiders, 2010).

¹³ Trimmed mean, excluding one outlier observation.

Table 2
Published Estimates of Paid FDV Leave Utilisation

Source	Employer(s)	Leave Entitlement (days)	Years Covered	Dates	Workers Covered	# Claims	Annual Rate of Claims	Days Leave Taken	Average Days/Claim	Utilisation Rate¹
Breckenridge et al. (2015)	NSW survey	Various	Various	Various					5.7	
Stanford (2016)	5 selected employers	10 or more	Various	Various	35345					.001% to .013%
Wahlquist (2018)	VIC Public Service	20	1.6	July 2016-Dec 2017	52000	143	0.17%	1033	7.2	0.0057%
Parlmt. of WA (2019)	WA Public Service	10	2.5	Aug 2017-Feb 2020	76642			1807		0.0043%
Ryan (2021)	8 NZ employers	10	2	April 2019-March 2021	8300	<40	<0.25%	<200	<5	<.0055%

Source: Author's compilation from indicated sources.

1. Days paid FDV leave as proportion total days worked.

52. My previous research on economic aspects of paid FDV leave (Stanford, 2016) reported findings from an informal survey of employers with publicly-reported paid FDV leave provisions. Five Australian employers provided data on the utilisation of their leave programs in the course of that research (reported in Table 1 on p.15 of that 2016 report). The utilisation of paid leave was rare. Calculated as a proportion of total working time in each workplace, the utilisation of leave ranged from one-thousandth to just over one-hundredth of one percent of total worktime (0.001% to 0.01%).
53. Wahlquist (2018) reported initial government data regarding the utilisation of paid FDV leave in the Victorian public service (which implemented a policy of 20 days paid leave in May 2016). During the first 1.6 years of that program, across a subset of Victorian state departments (with combined employment of over 50,000 workers), 143 workers claimed paid leave – representing an average of 0.17% of workers making a claim each year.¹⁴ The average amount claimed was just over 7 days in length (measured cumulatively over the 1.6-year period). This implies an average utilisation rate of the benefit equal to 0.0057% of all working time across those surveyed departments.
54. In response to a question on notice in the state parliament (Parliament of Western Australia, 2020), the government of Western Australia provided data regarding the utilisation of the 10 days paid FDV leave program implemented in that state’s public service beginning in mid-2017. The data excludes the Department of Health.¹⁵ A total of just over 1800 days paid leave was claimed across the public service in the first 2.5 years of the entitlement.¹⁶ That corresponds to a utilisation rate of 0.0043%.
55. The government of New Zealand implemented a 10 days paid FDV leave entitlement across the national labour market effective 1 April 2019. In the first two years of that program, evidence suggests that utilisation was also very low, in the same range as indicated in the published Australian research reviewed above. Ryan (2021) reports findings from a survey of 8 major employers (who participate in an initiative called ‘DVFREE Tick’ to combat FDV). In all cases less than 0.5% of employees claimed the

¹⁴ We define annual claim rate in Tables 2 and 3 as the proportion of employees in a workplace covered by the benefit who submit an FDV claim at any point during the year.

¹⁵ The Dept. of Health accounts for just over one-third of the total state public service workforce; Public Sector Commission of Western Australia, 2020.

¹⁶ Excluding the Dept. of Health, the state public sector workforce exceeds 75,000 workers in total.

benefit at any time in the first two years (for a claim rate under 0.25% per year), and in all cases the average length of claim was less than 5 days (less than half the annual entitlement). This implies a utilisation rate of the benefit equal to less than 0.0055% of working time.

Experience of Selected Employers

56. In preparation for this report, my research team contacted over 40 Australian private- and public-sector employers which have long-standing paid FDV leave provisions. This informal outreach is necessarily indicative in nature and scope, not comprehensive. The collection of more comprehensive and systematic data regarding the utilisation of FDV leave programs constitutes an important topic for further research in this area.
57. Employers contacted as part of our research include: all state governments; federal government departments which are known to have adopted this provision early in its spread; major banks and accountancy / consulting firms; and about 20 other major employers (with 500 or more employees) who are known to have adopted paid DV leave benefits at least 5 years ago (by 2016 or earlier). The full list of employers contacted through our outreach is provided in the Attachment.
58. Several of the employers we contacted were reluctant or unable to respond to our request for data on utilisation, for various reasons: confidentiality, lack of administrative data or systems, or other reasons. We have yet to receive final replies from many of the employers we contacted; in the event we receive further positive responses to this outreach we will provide the Commission with our findings in the form of an update to this report.
59. By the deadline for this report, we received sufficient data from three of the employers we contacted to calculate company-specific utilisation rates for the benefit. The experiences of these employers are summarised in Table 3. One of the employers requested that it not be publicly identified as a condition of providing us with the data; this company (a major Australian-based private-sector firm) is listed as Company A in Table 3.
60. These three companies have had paid FDV leave programs (providing 10 or more days paid leave) in place for two to six years. Table 3 reports the extent of the leave

entitlement, the size of the workforce, and data regarding the incidence and duration of claims.

61. On average, workers claiming the leave at private-sector Company A took about 5 days paid leave per claim (measured cumulatively across all absences associated with each claim). At the other employers, average leave length was 10-11 days per claim (also measured cumulatively across all absences associated with that claim).¹⁷
62. The experience of these three employers is consistent with the findings above: namely, that the utilisation of this entitlement is rare, never accounting for more than one-hundredth of one percent of total worktime. Estimated utilisation rates range from a low of 0.0027% of worktime at Energy Queensland, to a high of 0.0078% of worktime at Mackay Regional Council.

¹⁷ All three of the employers included in Table 3 permit over 10 days paid leave when required. An individual may claim paid FDV leave more than once within a given period of time (such as one year); these statistics indicate the cumulative total number of days' leave associated with each workers' FDV leave in that period.

Table 3
Selected Employers, Experience with Paid FDV Leave Utilisation

Employer	Leave Entitlement (days)	Years Covered	Dates	Workers Covered	# Claims	Annual Rate of Claims	Days Taken	Average Days/Claim	Utilisation Rate¹
Mackay Regional Council	20	4	2017-2020 (cy)	1100	7	0.16%	75	10.7	0.0078%
Energy Queensland	10 or more	2.1	June 2019- July 2021	7526	8	0.05%	92	11.6	0.0027%
Company A ²	10 or more	6.5	Dec 2015 - Present	25000	294	0.18%	1489	5.1	0.0042%

Source: Author's compilation from communications with employers.

1. Days paid FDV leave as proportion total days worked.

2. Company requested confidentiality as condition of providing the data.

Part IV: Simulating the Impact of Paid FDV Leave on Total Employment Costs

63. The data regarding utilisation of paid FDV leave (from both previously published research, and from our own communications with selected employers) suggests that the provision of paid leave to victims of FDV does not lead to the loss of significant amounts of working time in workplaces which provide this benefit.
64. In none of the published sources, nor in the company-specific inquiries which we undertook in preparation of this report, did the cumulative total of paid days FDV leave account for more than one-hundredth of one percent of total working time. In some instances the aggregate utilisation was much smaller (as low as one-thousandth of one percent of total working time).
65. The experience of existing paid FDV leave programs, therefore, has not led to any significant change in aggregate employment costs. To illustrate this, consider that the all-in cost of labour compensation (including superannuation contributions and other fringe benefits) for Australian workers averaged \$44 per hour worked in 2019.¹⁸
66. The provision of paid FDV leave equivalent to the high end of the estimates cited above – 0.01% of working time – would thus represent an increase in aggregate labour costs of 0.4 cents per hour worked.
67. Keep in mind that a significant proportion of Australian workers already have access to a paid FDV leave entitlement (as discussed above). Hence the extension of this benefit through its inclusion as an entitlement in Modern Awards is likely to have an even smaller impact on net employment costs. For example, if one-quarter of Award-dependent workers are already covered by this benefit (as a result of corporate policy), then its extension would imply an increment in overall employment costs across all

¹⁸ Calculated from ABS *National Accounts* data (Table 7) and *Labour Force* (Table 21). We use 2019 data as the benchmark for this calculation due to the dramatic impacts of the COVID-19 pandemic and recession on 2020 labour market outcomes.

Award-dependent employers of 0.3 cents per hour worked (three-quarters the figure cited above).

68. Across the entire Australian workforce, the combined cost of providing this benefit would total less than \$100 million per year (based on 2019 employment and labour compensation levels¹⁹). That is equivalent to less than 0.005% (one five-hundredth of one percent) of national GDP. Again, that figure is lowered by considering the proportion of Australian workers who already have access to this entitlement.
69. Based on the observed experience of workplaces which have this benefit in place, therefore, it is clear that the incremental cost (for employers, for governments, or for the national economy) will not be significant nor even likely measurable in aggregate data (since normal errors in measurement and sampling in economic and employment data are far larger than the magnitudes implied by this analysis, and hence will not be distinguishable in aggregate data).
70. It is possible that the utilisation of paid FDV leave provisions could increase, above the very low utilisation rates experienced by employers which have implemented this measure so far. Possible reasons for an increase in utilisation could include: greater employee awareness that the benefit exists; improved communication with employees, so they know they can access the benefit conveniently and confidentially; increased social acceptance of individuals taking action to prevent or escape from situations of FDV; and others.
71. Below I generate what I consider to be a high-end estimate of the conceivable upper limit of employment cost increases associated with 10 days paid FDV leave. This estimate is generated on a bottom-up basis, using aggressively high-cost assumptions regarding the incidence of FDV, its impact on work attendance, and average length of leave claimed.

¹⁹ Total labour compensation across the Australian economy equaled \$942 billion in 2019, 10,000 times more than the estimated aggregate cost of 10 days paid FDV leave across the whole labour force.

72. The Personal Safety survey conducted by the ABS provides some data regarding the prevalence of violence from intimate partners, and the impact of that violence on victims' regular habits (including employment). The most recent data published through this survey is for 2016 (ABS 2017).

73. According to this data, 1.76% of adult Australians experienced sexual or physical violence, or the threat of such violence, from an intimate partner (including current or previous cohabitating partner or non-cohabitating boyfriend/girlfriend) within the preceding 12 months. Women were close to twice as likely to experience such violence or the threat of it (2.26% of women in the last 12 months) than men (1.26%). These findings are summarised in Table 4.

Table 4			
Incidence of Sexual or Physical Violence from Intimate Partner, Last 12 Months			
	Assault	Threat	Total
Women			
Number (000)	187.0	50.4	211.7
% All Adults	1.99%	0.54%	2.26%
Proportion of Victims of Violence ¹ Missing Work in Next 12 Months			15.49%
Men			
Number (000)	96.6	19.2	113.9
% All Adults	1.07%	0.21%	1.26%
Proportion of Victims of Violence ¹ Missing Work in Next 12 Months			10.77%
Total			
Number (000)	283.5	72.1	323.1
% All Adults	1.54%	0.39%	1.76%
Proportion of Victims of Violence ¹ Missing Work in Next 12 Months			13.00%
Source: Author's calculations from ABS, "Personal Safety, Australia," 2016, Tables 5.1, 10.1, and 11.1. Totals do not add due to overlapping categories.			
1. Including victims of any form of violence.			

74. The ABS data also confirm that the experience of violence commonly has disruptive impacts on work patterns of employed victims, also summarised in Table 4. Among employed women who experienced violence of any kind,²⁰ over 15% reported needing to take time off work in the subsequent 12 months after the incident, and significant numbers reported changes in their normal work schedule. Among men, a smaller proportion (over 10%) reported taking time off work because of violence. Across all genders, 13% of victims of violence took time off work in the following 12 months.
75. The ABS data on incidence of FDV does not provide information regarding the employment status of FDV victims. However, Cox (2015) notes that 62% of women who experienced FDV were employed. That is approximately equal to the proportion of adult women who participate in the labour market (which was also almost 62% in 2020²¹). It thus seems reasonable to assume that the incidence of FDV experienced by working women is roughly equivalent to the overall incidence experienced by all women.
76. It is interesting to note that the product of the proportion of Australians experiencing actual or threatened violence from an intimate partner in a given year (1.76%), and the proportion who experienced absences from work as a result of violence (13%), equals an estimated 0.23% of workers who experience an absence of work due to FDV. That is higher than the proportion of employees who claimed paid FDV leave in workplaces which provide that benefit, as reported above: in the five instances included in Tables 2 and 3 above for which an annual claim rate (representing the proportion of employees who claim paid FDV in a given year) could be calculated, the unweighted average claim rate was 0.16%.²² In other words, the ABS already reports that a larger share of employees is experiencing work absences as a result of FDV each year, than the proportion of workers who claim FDV leave in workplaces that provide that benefit. This reaffirms the conclusion that provision of this leave (which makes the possibility of

²⁰ The ABS survey data on the impact of violence on victims' regular activities does not distinguish between different types of experienced violence.

²¹ ABS *Labour Force* data.

²² Of course, as noted above, the robustness of that average is limited by the small number of data points presently available; further research in this area would help to enhance our understanding of the utilisation of FDV benefits.

paid leave more safe and secure for FDV victims) does not ‘open the floodgates’ for individuals to stay away from work.

77. However, the broader provision of a paid FDV leave entitlement, and growing awareness and social acceptance of its use, may lead to more frequent claims. As an upper-end ceiling, assume that twice the proportion of victims of FDV claim the benefit (26%), as currently experience work absences as a result of experiences with violence (13%). This implies an overall claim rate of 0.46% per year (the product of the 1.76% share of the population experiencing FDV in a given year, and the assumption that 26% of them will miss work as a result). That is substantially higher than the claim rate indicated by the experience of employers which currently provide this benefit. By this estimate, less than one-half of one percent of employees would claim the entitlement each year.
78. The evidence summarised above also indicates that employees do not on average claim the maximum benefit entitlement. But to provide an upper-end cost estimate, we assume that the average claim equals the prescribed benefit: 10 days.
79. With that proportion of the workforce taking 10 paid leave days for FDV reasons in a given year, the workplace will lose 0.021% (barely one-fiftieth of one percent) of total working time in a year. That number, although very small, is nevertheless several times higher than the observed utilisation rates described above. This upper-boundary estimate of a utilisation rate reflects the high-cost assumptions made at each stage of the calculation.
80. At that high-end rate of utilisation, a workplace with 1000 full-time workers could expect to incur about 45 additional days of paid leave per year. That represents about 20 minutes of extra paid leave per worker per year. A workplace with 100 full-time workers could expect to incur less than 5 additional days of paid leave per year. A workplace with 10 full-time workers would normally expect to incur less than half of one additional day of paid leave per year.

81. Compared to overall labour costs in Australia's economy, even this deliberately high-end estimate of utilisation could not generate a noticeable change in employment costs. The costs of the benefit at that high-end utilisation rate (0.021% of working time) would equal less than \$200 million per year across the whole economy, or less than 0.01% of national GDP. Again, this does not account for the significant proportion of the workforce which already has access to this benefit; the incremental economy-wide cost of extending this benefit to all employees, even under deliberately high-cost assumptions would be as little as half this much. Again, the economic cost of extending this entitlement would not be distinguishable from the normal measurement and sampling errors which are associated with the gathering of these data.

Part V: Responses to Specific Questions

82. In this section of my report, I will respond to the specific questions addressed to me by the Australian Council of Trade Unions in their instruction letter, dated 18 June, 2021.

Question 1: Likely Utilisation

83. The first question addressed to me by the ACTU was as follows: “What is your estimate of the likely utilisation (if any) of an entitlement in all modern awards for 10 days paid family and domestic violence leave?”

84. On the basis of previous published research, our original inquiries to selected Australian employers, and statistical data regarding the incidence of domestic violence in Australia, I estimate that a 10-day paid FDV leave provision would be partially or wholly utilised by between 0.29% and 0.58% of all female employees covered by the benefit each year, and by between 0.16% and 0.32% of all male employees covered by the benefit each year. That implies a weighted average claim rate (representing the proportion of employees who make a claim for FDV leave in a given year) of between 0.23% and 0.46% of all employees covered by the benefit each year.²³

85. The experience of employers which presently offer paid FDV leave provisions to their employees suggests that, on average, each employee utilising the paid leave entitlement utilises significantly less than the maximum benefit entitlement. In the case of 10 days paid FDV leave entitlement, this implies an average of 7-8 days paid leave taken by a claiming employee over the course of a year.

86. Combining the low incidence of utilisation of this entitlement, with the partial utilisation of available days of paid leave, suggests that the use of paid FDV leave provisions will account for between 0.0073% and 0.0166% of total working time in covered

²³ The low end of those ranges reflect the product of the reported incidence of intimate partner violence and the proportion of victims of violence who took time off work in the following 12 months. The high end reflects twice that proportion.

establishments. In other words, less than one-sixtieth of one percent of total working time would be lost to the exercise of this entitlement by victims of FDV.

Question 2: Labour Costs and Productivity

87. The second question addressed to me by the ACTU was as follows: “What is your estimate of the likely aggregate impact (if any) of the provision of 10 days paid family and domestic violence leave in modern awards on businesses employing award- covered workers, including small and medium sized businesses, in terms of:
- a) Employment costs (including providing paid leave);
 - b) Productivity;
 - c) Performance; and
 - d) Regulatory burden?”
88. The preceding discussion indicated that the utilisation of paid FDV leave provisions will reduce overall working time by a tiny proportion of working days: one-sixtieth of one percent of normal work time. This is an insignificant change in working hours that would not be observable in aggregate economic data.
89. There would be no observable impact of the extension of this benefit to the broader workforce on overall employment costs.
90. There would be no observable negative impact on productivity from the extension of this entitlement to all workers. Indeed, if there were any impact on productivity at all it would likely be positive (as a result of the causal relationships discussed in Part I of this report between FDV and worker attendance, attention, retention, and productivity). Any measures which serve to reduce the incidence of FDV, and assist victims of FDV in escaping from or resolving those situations more quickly and effectively, will have positive implications for realised productivity.

91. The impact on business or organisational performance of extending this measure will be positive. The extension would have no significant negative impact on labour cost. Employee attitudes and loyalty to the employer will be strengthened by the knowledge that the employer will offer support to them in the event of the very negative circumstances of FDV. The business or workplace's public brand may also be enhanced by showing its commitment to this ethical and responsible treatment of its workforce.
92. I do not anticipate any significant impact from the extension of this benefit for the processes or costs of regulatory compliance. Employers are already required by the National Employment Standards to provide up to 5 days unpaid leave in cases of FDV, and hence have already been required to establish internal information, accounting, payroll, and management functions to implement and oversee those responsibilities. I do not anticipate any significant change in regulatory functions required as a result of converting that to paid leave. In fact, since the leave is paid, it would actually eliminate steps in the previous management system (associated with stopping and then re-starting the employee's pay).

Question 3: Macroeconomic Performance

93. The third question addressed to me by the ACTU was as follows: "What is your estimate of the likely impact (if any) of an entitlement in all modern awards for 10 days paid family and domestic violence leave on:
- a) Employment growth;
 - b) Inflation;
 - c) The sustainability, performance and competitiveness of the national economy; and
 - d) Workforce participation?"
94. There will be no significant or even measurable impact arising from the extension of paid FDV leave to all employees covered by Modern Awards on overall labour costs.

The incidence of this benefit will not be sufficient to drive any significant reduction in working time or increase in employment costs.

95. There is no reasonable channel through which the extension of this benefit could conceivably affect the trajectory of overall employment growth in Australia, one way or another. It will likely have positive impacts on workforce participation decisions by victims of FDV, but those effects will not be of sufficient size (from an economy-wide perspective) to alter the overall level of labour force participation.
96. There will be no measurable impacts of this measure on unit labour costs, and no significant (but likely positive) impacts on productivity. The measure will thus have no measurable impact on inflation.
97. The sustainability and performance of the national economy will be incrementally strengthened by the extension of this benefit through the Modern Awards.
98. The continued employment and income of FDV victims will be enhanced. This reinforces the possibilities for them to resolve or escape from abusive or violent situations. It also reduces the call on publicly-funded social services and supports. And it generates ancillary benefits for employers arising from reduced turnover, reduced absenteeism (when the leave is over), and improved productivity.
99. On a net basis, the likely economic impacts of this measure are positive, including for Australian employers. More than offsetting the insignificant and (in aggregate terms) unmeasurable increase in employment costs associated with increased paid leave, are firm-level benefits arising from improved retention, ultimately improved attendance (as FDV situations are resolved, with employers' help), better safety (including for the FDV victims' coworkers), enhanced productivity, firm reputation, and other benefits.
100. The extension of this benefit through the Modern Awards would send an important signal (to workers, businesses, and domestic and foreign customers of Australian-made products) that will enhance the reputation and competitiveness of Australian businesses.

Conclusion and Declaration

101. My original research (conducted with the support of members of my research team) of the economic dimensions of paid FDV leave provisions indicates that the impact on employment costs of the extension of these provisions to more workplaces (through inclusion in Modern Awards) will be insignificant and imperceptible.

102. At the same time, there are important economic and social benefits that would arise from the extension of this benefit.

103. I have made all the inquiries that I believe are desirable and appropriate and no matters of significance that I regard as relevant have, to my knowledge, been withheld from the Commission.

Signed,

A handwritten signature in black ink, appearing to read 'J. Stanford', written in a cursive style.

Dr. James Stanford
Economist and Director
Centre for Future Work
28 July, 2021

Bibliography

Australia's National Research Organisation for Women's Safety. 2019. *Paid Domestic and Family Violence (DFV) Leave: Summary of the Evidence*. Sydney: ANROWS.

Australian Bureau of Statistics. 2017. "Personal Safety, Australia (2016)," August 11, <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/latest-release#data-download>.

Breckenridge, J., Cale, J., Hameed, S., McCaskie, L., & Tzoumakis, S. 2015. *Implementation of Domestic Violence Clauses: An Employer's Perspective*. Sydney: Gendered Violence Research Network, UNSW.

Bullinger, L., Carr, J., and Packham A. 2020. "Covid-19 and Crime: Effects of Stay-At-Home Orders on Domestic Violence," Working Paper 27667. Cambridge: National Bureau Of Economic.

Commonwealth Government, Dept. of the Attorney General. 2021. *Trends in Federal Enterprise Bargaining Report*, March Qtr 2021.

Cortis, N., & Bullen, J. 2016. *Domestic Violence and Women's Economic Security: Building Australia's Capacity for Prevention and Redress*, Horizons Research Report #5/2016. Sydney: ANROWS.

Cox, P. 2015. *Violence Against Women: Additional Analysis of the Australian Bureau of Statistics' Personal Safety Survey, 2012*, Horizons Research Report #1/2015). Sydney: ANROWS.

Day, T., K. McKenna, and A. Bowlus. 2005. *The Economic Costs of Violence Against Women: An Evaluation of the Literature* (New York: Secretary General, United Nations), 66 pp., <http://www.un.org/womenwatch/daw/vaw/expert%20brief%20costs.pdf>.

Equality Division, Council of Europe. 2014. *Overview of Studies on the Costs of Violence Against Women and Domestic Violence* (Strasbourg: Council of Europe),

<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168059aa22>.

Fair Work Commission. 2021. *Decision, Annual Wage Review, 2020-21* (Melbourne: Fair Work Commission), 16 June.

Family and Community Services, State of NSW. 2018. *Domestic and Family Violence Leave (DFV) in NSW*. Sydney: Family and Community Services.

Kahui, S., Ku, B., & Snively, S. 2014. *Productivity Gains from Workplace Protection of Victims of Domestic Violence*. Wellington: New Zealand Public Service Association.

Kennedy, E. 2020. "The Worst Year': Domestic Violence Soars in Australia During Covid-19," *The Guardian*, 30 November.

KPMG. 2016. *The Cost of Violence Against Women and their Children in Australia*. Canberra, ACT: Department of Social Services.

Laing, L. 2001. *Australian Studies of the Economic Costs of Domestic Violence* (Sydney: Australian Domestic and Family Violence Clearinghouse, UNSW), <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.564.3754&rep=rep1&type=pdf>.

McFerran, Ludo. 2011. *Safe at Home, Safe at Work? National Domestic Violence and the Workplace Survey (2011)*. Gendered Violence Research Network. Sydney: UNSW.

National Council to Reduce Violence Against Women and their Children (2009). *The Cost of Violence Against Women and their Children* (Canberra: Commonwealth of Australia).

Parkinson, D. 2019. "Investigating the Increase in Domestic Violence Post Disaster: An Australian Case Study," *Journal of Interpersonal Violence* 34(11), pp. 2333-2362.

Parliament of Western Australia. 2020. "Question on Notice No. 6196 asked in the Legislative Assembly on 28 May 2020 by Mr P.A. Katsambanis." Perth: Parliament of Western Australia, <https://www.parliament.wa.gov.au/parliament/pquest.nsf/viewLAPQuestByDate/0AE151B726616D454825857500371F8F?opendocument>.

Pennington, A. 2018. *On the Brink: The Erosion of Enterprise Agreement Coverage in Australia's Private Sector*. Canberra: Centre for Future Work.

PricewaterhouseCoopers Australia. 2015. *A High Price to Pay: The Economic Case for Preventing Violence Against Women* (Sydney: PricewaterhouseCoopers Australia), November.

Public Sector Commission of Western Australia. 2020. *State of the WA Government Sector Workforce*. Perth: Public Sector Commission.

Ryan, K. 2021. "Domestic Violence Victims Protection Act: Two Years On," *DVFREE News*, 31 March, <https://www.dvfree.org.nz/news/domestic-violence-victims-protection-act-two-years-on/>.

Schneiders, B. 2010. "Leave Deal for Victims of Domestic Violence," *Sydney Morning Herald*, September 24.

Stanford, J. 2016. *Economic Aspects of Paid Domestic Violence Leave Provisions*. Canberra: Centre for Future Work.

U.S. Department of Health and Human Services. 2003. *Costs of Intimate Partner Violence Against Women in the United States* (Atlanta: Centers for Disease Control and Prevention).

Wahlquist, C. 2018. "Victorian Public Servants have Taken More than 1,000 Days of Family Violence Leave," *The Guardian*, 6 February.

Walby, S. 2009. "The Cost of Domestic Violence: Up-date 2009," UNESCO Chair in Gender Research, Lancaster University, www.edvitaly-project.unimib.it/wp.../12/Cost_of_domestic_violence_update-1.do.

Attachment

List of Employers Contacted for Information Regarding Utilisation of Paid FDV Leave

ACT Public Service	Geographe Bay Community Enterprises Ltd	SA Water Corporation
ANZ	Goodstart Early Learning	Southern Cross Residential Care (WA)
Austrade (Australian Trade and Investment Commission)	Healthscope Group	Southern Cross University
Australian Department of Education, Skills and Employment	IAG Insurance	St. Vincent's Health
Australian Department of Health	KPMG Australia	Surf Coast
BreakThru	Mackay Regional Council	Svitzer Australia
Brightwater Care Group	Macquarie Group	Synergy
Cabrini Acute Care	National Australia Bank	Tasmanian Public Service
City of Greater Dandenong	NSW Public Service	Telstra
Commonwealth Bank	NT Public Service	University of Canberra
Deloitte	PwC	University of the Sunshine Coast
DP World Transport	QLD Public Service	Victorian Public Service
Energy Queensland	Queensland Rail	WA Local Government Association
EY	RSL Care	WA Public Service
Federal Express	SA Public Service	Westpac
Gate Gourmet		

Selected employers have total employment of at least 500 employees, and have been reported as having paid FDV leave benefits in place (through corporate policy and/or EA provisions) for at least 5 years.