27 September 2018

Gender Equality Legislation Submissions
C/- Department of Health and Human Services
50 Lonsdale Street
Melbourne VIC 3000

Dear Sir/Madam

Re: Submission to the Gender Equality Bill 2018 Exposure Draft

Thank you for the opportunity to provide a submission to the Exposure Draft of the Gender Equality Bill 2018 (the draft Bill). Council considered the Exposure Draft at its Ordinary meeting on 25 September 2018 and resolved to lodge this submission.

Council supports the principles of gender equality, however is concerned that some elements of the draft Bill are problematic in a practical sense, particularly for rural councils.

The draft Bill proposes a Gender Equality Action Plan be established unless the Secretary is satisfied that another report or document meets the requirements. Proposed changes to local government legislation includes the creation of a Workforce Plan that is to include measures to ensure gender equity, diversity and inclusiveness. Council believes there is a potential for duplication between these two legislative requirements and suggests this be corrected. This may be achieved by identifying the local government Workforce Plan in the gender equality legislation as a document that meets the requirements.

A further duplication between the Gender Equality Bill 2018 and Local Government Bill 2018 involves prescribed gender equality targets possibly specified in the Regulations. In addition to correcting any duplication, Council is concerned these targets may be difficult to achieve for rural councils due to a shortage of suitably qualified applicants for positions. Council believes the draft Bill should have regard to rural councils and the difficulties they experience with recruitment.

In relation to the proposed procurement guidelines by the Finance Minister, Council is extremely concerned this will be problematic for rural councils and that compliance costs are likely to increase for both rural councils and rural suppliers. Where possible Council supports local suppliers, however they may not be equipped to deal with gender equality requirements. Council believes the draft Bill should set financial thresholds for rural councils (or allow rural councils to determine the threshold) for procurement activities that must comply with the gender equality guidelines.

Should you require further clarification on the matters raised in this submission, please contact me on 5593 7100.

Yours faithfully

David Rae
Acting Chief Executive Officer