

economic Security4Women (eS4W) welcomes the opportunity to provide this submission to the Select Committee on COVID-19 to contribute to the Australian Government's response to the COVID-19 pandemic. eS4W applauds the establishment of the Senate Select Committee to review Australian Government's COVID-19 response and other related matters.

We acknowledge Australia's women leaders on the Senate Select Committee chaired by Senator Katie Gallagher, women leaders on the national cabinet and the women who hold the positions across Australia of Chief Health or Medical Officers.

In our submission eS4W has provided a gender lens on the Australian Government's response to the COVID-19 pandemic.

economic Security4Women

economic Security4Women (eS4W) is a national women's alliance, funded by the Australian Government through the Office for Women in the Commonwealth Department of Prime Minister and Cabinet.

It is an alliance of women's organisations united in the belief that economic wellbeing and financial security are essential for women and will enable women of all ages to have an equal place in society.

The role of eS4W is to:

- bring together women's organisations and individuals from across Australia to share information, identify barriers to women's economic security and to identify solutions by prioritising the key issues for action to bring about change.
- engage actively with the Australian Government on policy issues as part of a better more informed and representative dialogue between women and government.

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Overview

In 2018, eS4W produced a white paper "[Defining the concept of economic security for all women living in Australia](#)". The paper's objective is to raise awareness and contribute effectively to development and implementation of policy that impacts all women living in Australia and ensures women's equal place in society, in the Government's policy priority area of improving women's economic independence and financial security. The paper brings together research and analysis of specific issues that contribute to the overarching issues of economic and financial security for women.

The paper found that the pre-COVID-19 policy approach to childcare, superannuation, education, jobs and financial literacy was not keeping up with changes in social attitudes, structural changes in the economy and demographic changes.

To address these issues that women face impacting on their economic security, eS4W has and will continue to recommend government social policy changes that should be implemented to ensure effective early steps in addressing economic security for women.

In addition eS4W's second 2019 White Paper, released in November 2019 on "[The impact of unpaid care work on women's \(and men's\) economic security](#)" outlines the costs to individual carers, and the financial benefits to the Commonwealth and State and Territory budgets from those who undertake unpaid care for their loved ones.

Subsequently, eS4W has held Roundtables across the country in 2018-2020. The findings from the roundtables highlighted that the key areas that impact women's economic security are:

- Carer payments and allowances
- Carer Financial Contribution
- Superannuation contribution for Carers
- Skills Assistance for carers re-entering the workforce
- Parental Leave enhancements
- Work-place flexibility
- Child Support
- ParentNext
- Job Seeker (formerly NewStart)
- Legislation and Law reform

We acknowledge the Australian Government for recognising some of these issues in their economic response to COVID-19 and propose that the Government review the findings and our responses tabled and implement changes in the COVID-19 Recovery stage.

The effects on women's economic security of the Australian Government's Response to COVID-19

Job Keeper Payment

The Job Keeper payment is a proactive step toward providing a social security safety net for people living in Australia who are impacted by the COVID-19 pandemic. However, we have concerns about the rules for eligibility for the payment which may prevent women from benefiting equally and therefore supporting and maintaining their economic security.

According to the ABS, women in Australia are more likely to be working casually than men,ⁱ but are also more likely to take extended breaks from paid work while having and caring for children. This means that the restrictions of the Job Keeper payment to employees who have been employed continuously for the previous 12 months is more likely to disadvantage women. Indeed, early analysis of the Job Keeper payment suggests that more than half of the 950,000 casual workers who are estimated to be excluded from the payment are women.ⁱⁱ This restriction will have negative impacts for women's economic security in the short-term and increase barriers to women's equal workforce participation in the longer-term as well as impacting any superannuation and retirement income. Research on other disasters in Australia, such as in the 2011 floods, demonstrated that when women forgo or lose work during a crisis period, it has ongoing negative consequences for their economic security, and which render women extremely susceptible to economic harm when perhaps also experiencing domestic and family violence.ⁱⁱⁱ As such, these restrictions would work against the aims of the Australia's Women's Economic Security Statement.

As stated, above women are overrepresented within the casual work force particularly because of trying to balance caring responsibilities for children and aged relatives.

In Australia, researchers from Macquarie University point out that women's over-representation in more precarious employment, including casual work without access to paid leave, makes them particularly vulnerable during this current crisis.^{iv} The sectors thought to be immediately affected by COVID-19, which includes hospitality, entertainment, travel, and personal care work, employ slightly more women (56%).^v While the Job Keeper Payment allows businesses to access a subsidy to continue to pay eligible employees,^{vi} an analysis from the Bankwest Curtin Economics Centre (using various

sources from the Australian Bureau of Statistics (ABS)) estimates that 950,000 casual workers may not be eligible for the Job Keeper payment. These workers are mostly employed in the accommodation and food services, retail trade, and health care and social assistance sectors, where more casual workers are women.^{vii}

The Government direction “No job keeper for casual workers unless they have worked for more than 1 year being a regular and systematic employee” is relevant to a small employer (employer with less than 15 employees) under the Fair Work Act 2009 (FWA 2009) as the worker is required to work more than 1 year to show they are a regular and systematic employee. However, when we look at the FWA 2009 casual workers who had work regular and systematic hours for a large employer (an employer that has more than 15 workers) for over six months have an expectation of ongoing employment. Because of this government direction around Job Keeper at this time, casual workers who are regularly and systematically employed for a large employer were unable to access Job Keeper and thus allowed the employer to stand down these casual workers with no wages, and no guarantee of returning. Therefore, this process allowed employers to dismiss staff and by this very direction, removed access to the unfair dismissal process.

In addition, businesses who were subsidiary companies, whose turnover met the Job Keeper criteria, (but because they were subsidiaries of larger companies that did not have eligible fall in turnover) did not qualify for the Job Keeper. Most of these companies were in the hospitality industry. For example, Epicure Catering at Taronga Zoo, is a subsidiary of Spotless which is a subsidiary of the Downer Group. The Downer Group was not eligible to claim Job Keeper, therefore all their subsidiaries were not eligible and therefore all the staff at Epicure Catering were not eligible and were stood down. We acknowledge that those employees could apply for Job Seeker and that will be discussed in the next section.

On 30 March 2020 the Federal Government made clarifications to Vulnerable people in the workplace:

National Cabinet endorsed the AHPPC advice on vulnerable people in the workplace, specifically that the following people are, or are likely to be, at higher risk of serious illness if they are infected with the virus:

- Aboriginal and Torres Strait Islander people 50 years and older with one or more chronic medical conditions
- People 65 years and older with chronic medical conditions. Conditions included in the definition of ‘chronic medical conditions’ will be refined as more evidence emerges.
- People 70 years and older
- People with compromised immune systems^{viii} (see Department of Health website).

National Cabinet noted that the new AHPPC advice on the higher risk categories for people 65 years and older with chronic conditions had changed based on more up to date medical advice.

Firstly, it is important to note that non-indigenous workers were moved to 65yrs as opposed to 55yrs of age. This allowed employers to risk assess these group of workers and allowed for standing them down on no wages. The biggest concern here is the Federal Government is looking to remove the more reasonable payment for Job Seeker to a much lesser amount and potentially places these workers in the position of seeking other work, which places them at higher financial and health risk.

eS4W Member Organisation, Working Women Queensland, has identified thus far that Indigenous women who have been stood down are now applying for Job Seeker.

Recommendations:

- The government pay Job Keeper to all regular and systematic casuals that worked for a large employer (employer that has 15 or more employees) which aligns with the Fair Work Act 2009 that these employees have an expectation of ongoing employment.
- The government look to continue to pay Job Keeper to all employees stood down because they fall into a high risk category and whom are now on Jobseeker and having no future prospect in the near future to being returned to their substantive paid positions. We go further to say that this payment would stay in-place for these Workers at high risk beyond the September timeline until the Federal Government's Health Advisors deem it safe for them to be returned to their roles.
- Alternatively, for the Federal Government to align a special payment of no less than \$750 per vulnerable person as defined above. To align with the ongoing concerns in relation to the potential risk to these particular workers, including risk of death in relation to covid-19.
- WWQ would recommend the Federal Government commit to allocating the Job Keeper unused budget of \$60 billion to cover the Workers in Australia that fell through the gaps. As it is concerning that the Federal Government sees this as a wind fall to negate the debt, rather than an opportunity to assist those workers: who were employed in subsidiaries of larger companies, students, casual workers that have worked less than 1 year, workers that are on visa's approved by the Federal Government.

Job Seeker Payment

We acknowledge the Australian Government's increase to the Job Seeker payment (formally known as Newstart Allowance) was an initiative to stimulate the economy.

While we note that the increase was short-term and appreciate that it is not economically sustainable over the long-term, the pre-COVID-19 Job Seeker Payment was considerably under a livable wage and forced many Australians to live in poverty.

In 2019 economic Security4Women and Equality Rights Alliance provided a submission to the Senate Community Affairs References Committee inquiry into the Adequacy of Newstart and related payments and alternative mechanisms to determine the level of income support payments in Australia.

Our recommendation then was that the Newstart Allowance be increased by at least \$75 per week, in recognition of the fact that for many women, including the 52% who receive payments for longer than 2 years, and other vulnerable groups including people who identify as transgender, Aboriginal and Torres Strait Islander women, people with a disability, women from culturally and linguistically diverse backgrounds, and women with migration experiences, Job Seeker constitutes an important social protection foundation and a realisation of the right to social security.

eS4W is therefore are recommending that the Job Seeker Payment does not revert back to the pre COVID-19 rate of \$550 per fortnight but to a minimum of \$700 a fortnight.

We also acknowledge that the changes to double the partner income test is likely to significantly benefit women with partners whose income is approx. \$40,000-\$80,000. Similarly, exemptions from asset testing and waiting periods will help those with partner assets.

Unfortunately, the following vulnerable groups (often more women e.g. carers) have missed out on the COVID supplement (extra \$550/fn):

- Youth Allowance students and non-students
- Migrant workers who are not residents

- International students
- TPV or SHEV visa holders who are only eligible for Special Benefit if they have less than \$5000 in liquid funds
- People seeking asylum who receive SRSS payments or have had their SRSS payments removed
- Carers
- Disability Support Pension recipients
- Age Pension recipients
- People subject to Compensation Preclusion Periods and Income Maintenance Periods

A note of current government policy inconsistency on age criteria for applying for a Youth Allowance is 22 years old. The Department of Social Services deems a 22 year- old as a dependent if they have not sustained employment for 30 hours per week for 18 months in a 2-year period or if their parent earns above \$80,000 per year. However, the Australian Tax Department deems a child over 21-year-old independent regardless of whether they have been employed.

The system to apply for Job Seeker is very convoluted. Below is a story from a member of the Community in Barwon South West, Victoria who responded to our partner organisation Women's Health and Wellbeing Barwon South West to their "Reflections from a Distance" during COVID-19:

womenshealthgne

These words come from one of the respondents to our Reflections from a Distance story-gathering project, a project that is not only revealing the confusion, frustration and feelings of despair that have resulted from isolation and economic hardship, but also the resilience of people and relationships.

This rural-based story-teller told us her income was cut off when the pandemic reached Australia, and that tight household finances meant she had to apply for Centrelink support - the first time she had ever done so.

After several hours of waiting on the phone, she was assisted by a Centrelink staff member, who also had to seek management help to complete her application.

"He [the Centrelink staff member] commented that he had no idea it was all so complex/contradictory, that the questions were so whacko etc. so it's not just me!

"...we submitted the Jobseeker form early afternoon. I was spent but strangely hysterical and still wonder just how anyone can complete that form without help - what if you are compromised in some way, English not your first language etc. It is simply a nightmare.

"I now find that I'm receiving the funds, which are helping get us over the line 'til summer, but am also receiving bulletins about jobs I should apply for/must provide proof that I've applied for and not got the job etc.

"It's an alien world if you're not used to it and one that seems to work on making you feel guilty and diminished because you needed some financial help.

"Maybe I should work on my own resilience - being more resilient in the face of baffling bureaucracy!!"

Recommendations:

- Increase the Job Seeker Payment and Youth Allowance by a minimum of \$150 per fortnight after the \$550 per fortnight supplement ceases.
- Simplify and streamline the process for applying for all government allowances, including Job Seeker, Youth Allowance, Carer Payment, etc.
- Consider the contribution of unpaid work and care to the Australian economy when reforming Job Seeker/Newstart and other income support payments
- Consider increasing the age pension at the same rate or higher than Job Seeker.
 - With homelessness and poverty on a rapid upward trajectory for older women, it is prudent to increase the age pension. This is what women with insufficient or no superannuation and few assets rely on and with a shortage of Government housing women are finding themselves in dire circumstances. Losing their job through COVID-19 and being in a position to less likely to be reemployed will push more older women into this vulnerable position.

Accessible and affordable childcare

“Improving access to affordable childcare and paid parental leave will encourage a higher workforce participation rate for women. Subsidies for childcare could be an important step.” eS4W’s 2018 white paper [“Defining the concept of economic security for all women living in Australia”](#).

COVID-19 lockdown highlighted the need for accessible and affordable childcare to ensure women (and men) could participate in the workforce within the essential female dominated industries of which are Carer roles in the education, health and cleaning sectors.

At first sight we heralded this incentive, however, when you start to pull it apart, the child care business would only be receiving the government subsidy, which impacted enormously on the Child Care System as they were now operating on a lot less money, this includes Family day care and smaller operators which looking to the near future more than likely cause shut down.

Another reality of this incentive impacted on workers which are primarily women as some of the childcare businesses were struggling with how this would work and whether they could afford to continue to operate.

Recommendations:

eS4W recommends that the Federal Government needs to invest money into the Child Care system which will:

- Increase workforce participation
- Close the gender and superannuation pay gap
- prevent probable shut down and shortage of child-care

Early access to Superannuation

On the surface early access to superannuation to provide a way to survive financially during COVID-19 was a good idea. However, it should have only been made available to those who were at risk of ongoing poverty and do not have access to other forms of financial assistance.

The government’s move to allow early access to super will have a greater long-term impact on women’s savings than on men’s. Women are already retiring with 47 per cent less super than men.

APRA data shows 1.35 million people have withdrawn money from their superannuation accounts in line with the government policy. According to the ATO this was made up of:

- 772,300 men who withdrew an average \$8400 (approx. 2.5% of the average balance)
- 581,700 women who withdrew with an average of \$7942 (approx. 4.5% of the average balance)

Based on current average balances^{ix}, if you withdraw the maximum \$20,000 from your super, women's savings will be reduced by roughly 50 per cent more than men's, resulting in even greater inequalities in retirement nest eggs due to the multiplier effect of the loss of compound interest.

Industry Super Australia^x analysis of accessing super early showed that a 20-year-old who accesses the full \$20,000 could lose more than \$120,000 from their retirement balance, while a 30-year-old could lose about \$100,000 when they move to retirement, and a 40-year-old could lose more than \$63,000.

The average superannuation balance for a woman in her early 40s is just under \$62,000, withdrawing the maximum amount and reducing that balance by almost a third effectively negates the benefits of compound interest gained by that woman through the system so far.

eS4W's partner organisation, Women's Legal Service Victoria has warned that women experiencing family violence almost always experience economic abuse, which could take the form of being forced into accessing their super early by violent partners.

Recommendations:

- Legislation is Introduced that ensures all employers continue to provide superannuation guarantee contributions to staff while on maternity and paternity leave.
- The superannuation contribution is increased to at least 12 per cent with the express purpose of reducing the future call on the age pension. This is important as it would then allow for those who still fall through the cracks without adequate superannuation to receive a higher pension. Increase the level of the age pension for those with insufficient superannuation savings.
- Remove legislative gaps in SG coverage, particularly the wage threshold of \$450 per month for SG contributions.
- As referenced in eS4W's White Paper - [The impact of unpaid care work on women's economic security in Australia](#) recommends that contributions to the carer's superannuation fund should be made on a regular (annual) basis, depending on a means and superannuation balance test.
 - At a minimum, the government payment should be \$5,000 per annum (indexed to the CPI), which is a level that would supplement retirement savings while the carer is away from paid employment. This would help to ensure that on retirement, there is a greater probability of a viable retirement nest egg.
 - This is not a new "idea" but one that has been suggested in various forms and many times over the years by:
 - Productivity Commission Inquiry – valuing unpaid caring work
 - Australian Human Rights Commission: Investing in care: Volume 1: Research Report 2013
 - Many countries with social insurance-based public pension schemes which have introduced the means of crediting a person's public pension scheme while they are out of the workforce providing care. Some of the countries which have caring credit systems effectively operating include France, Germany, Sweden, Canada, Finland and the UK.
 - In conclusion at a time when superannuation contributions are seen as an important factor in reducing the call on the public pension over the longer term, a near term financial cost of the contribution to superannuation would have lifelong benefits of great financial security in retirement, including for carers.

Job Maker Plan

The newly announced Job Maker Plan that will hand industry greater power in shaping Australia's future skills and training system is a welcomed initiative.

COVID-19 reversed all the gains women made in STEM, according to a new report commissioned by the federal government^{xi}. Australia's scientific and technical services industry, according to the peer-reviewed report, recorded job losses of 5.6% from mid-March to mid-April 2020, with jobs down 6.3% for women compared to 4.8 % for men. The report states that among the potential causes for the disparity, women carry a greater share of responsibilities when it comes to caring for children and helping with distance learning duties during isolation.

A high proportion of women are employed in short-term contract and casual jobs, which have been lost due to COVID-19. Many did not qualify for Job Keeper or Job Seeker payments.

The Labour Force Survey data released on 15th May^{xii} shows a decline in hours worked has disproportionately affected working women, who have seen their hours drop by 11.5 per cent, compared to 7.5 per cent for men during COVID-19. Plus, the labour force participation rate for women has fallen more than men: Overall, the labour force participation rate decreased 2.4 pts to 63.5% in April 2020 and was 2.3 pts lower than in April 2019. Female participation decreased 2.9 pts to 58.4%, and male participation rate decreased 1.9 pts to 68.9%.

Recommendations:

- Support women in pursuing economic opportunities and small and medium enterprises
- Provide all unpaid carers skills and training to secure and maintain rewarding and sustainable employment. When taking time out of the workforce to care, carers find themselves left behind with the rapid advancement of technology and systems.
- Provide job opportunities to Australian Citizens and Residents and current visa holders as a priority.
- Taking into consideration the large number of workers no longer in employment, cease allowing employers by way of visas to employ overseas workers. (As inferred in the point above this does not include the visa workers already living in Australia today.)
- Collect gender disaggregated data during the pandemic
- Improve career pathways for women and girls in emergent 'green' industries and non-traditional occupations.
- Gender inclusive policy action is needed now as matter of urgency to address skills shortages, enhance national productivity and target women's skills development in particular industries including those of the emergent 'green economy' and in mining and construction.
- National VET policies that focus on gender equity and acknowledge the complexity and challenges associated with gender and when gender intersects with Aboriginal and/or Torres Strait Islander background, with disabilities, with culturally and or linguistically diverse backgrounds, with low socio economic backgrounds, with geographical isolation.

Further Recommendations

eS4W recommends the Australian Government take up the UN Women's recommendations for all actions responding to COVID-19 in Asia and the Pacific^{xiii}

- All COVID-19 response, relief and recovery plans and programs must be gender-responsive and effectively address the disproportionate impact of the crisis on women and address their distinct needs, priorities and identified solutions.

- Continuing Women’s inclusion, participation and leadership in all decision-making processes for economic COVID-19 recovery measures by private and public sectors must be ensured, based on mitigation strategies that specifically target the economic impact of the pandemic on women’s lives and livelihoods.
- Economic stimulus packages and other economic support should target not only big business but also be channelled to workers, including in the casual sector, and small and medium enterprises (SMEs) who underpin the economy in Australia. Specific attention should be aimed at sectors such as manufacturing, tourism and hospitality, and other businesses where women are predominantly employed on precarious contracts and particularly vulnerable to a global economic recession.
- All migrant populations, women and men, must be provided with full and equal protection and in compliance with international law, and employers should fulfil their responsibilities of decent employment and extend additional necessary support that is inclusive and gender-responsive for their migrant workers and their families.
- The pandemic has laid bare girls’ and women’s disproportionate share of unpaid care and work across the world. As a crucial part of the recovery, solutions must be explored to identify and develop models for accessible, affordable and quality care services to meet the needs of families and households as women and men return to work.
- As part of their short- and longer-term COVID-19 recovery, companies must include gender-sensitive measures to ensure that women are not left behind in the workplace and across their entire value chains at a challenging time. Applying a gender lens to business recovery strategies will secure a stronger, more inclusive and sustainable resilience against future challenges. As has already been proven, the integration of gender equality principles into business practices and culture brings economic and multiple other benefits. The Women’s Empowerment Principles, established by UN Women and the UN Global Compact, provide guidance and tools for companies that are committed to this agenda

Conclusion

eS4W reiterates that we commend the Australian Government for taking swift steps to ensure that many Australians were economically relatively stable during this time; however, we note that over two million Australians have been markedly left behind financially.

Moving forward we encourage the Government to apply a gender lens on all policies, in particular the policies related to the new Job Maker Plan. Women’s economic empowerment will be essential if we are to ensure effective and sustainable economic recovery from COVID-19 in Australia. Women have been disproportionately affected during COVID-19. They make up the majority of front-line workers in care, and education and are overrepresented in precarious employment, including in the informal sector, where their benefits and protection are inadequate or lacking.

For women to achieve economic security and wellbeing in retirement, the following issues must be addressed:

- Eliminate the gender pay gap
- Ready access to affordable and accessible childcare
- Provide ongoing superannuation contributions for absence from workforce
- Support ongoing opportunities to strengthen women’s skills, training and education
- Support strategies to increase rising workforce participation
- Provide a pension similar to a higher basic wage for those who, for whatever reason, do not accumulate sufficient superannuation

ⁱ ABS (2018). ‘Data Cubes: 1. Economic Security – Working Population’, *4125.0 Gender Indicators, Australia, Sep 2018*, available from:

<https://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/4125.0Sep%202018?OpenDocument>, accessed 3 April 2020.

ii Cassells, R. and Duncan, A. 'Job Keeper payment: How will it work, who will miss out, and how to get it?', *The Conversation*, 31 March 2020, available from: <https://theconversation.com/jobkeeper-payment-how-will-it-work-who-will-miss-out-and-how-to-get-it-135189>, accessed 3 April 2020.

iii economic Security4Women (eS4W) (2012). *Women's Voices from the Flood Plains: an economic gender lens on responses in disaster affected areas in Queensland and Victoria*, Victoria: eS4W, JERA International, available from: https://www.security4women.org.au/wp-content/uploads/eS4W_Womens-Voices-from-the-Flood-Plains_Report.pdf, accessed 6 April 2020.

iv Dados, N & Taksa, L (2020), Pandemic's economic blow hits women hard, Macquarie University The Lighthouse, <https://lighthouse.mq.edu.au/article/april-2020/Pandemics-economic-blow-hits-women-hard> accessed 27 May 2020.

v Cassells, R, Duncan, A, Dockery, M, Kiely, D & Mavisakalyan, A (2020), Potential job losses in the COVID-19 pandemic, Bankwest Curtin Economic Centre Research Brief COVID-19 #2

https://bcec.edu.au/assets/2020/03/BCEC-COVID19-Brief-2_Potential-Job-losses_FINAL-2.pdf. Accessed 27 May 2020

vi Australian Taxation Office (ATO) (2020), JobKeeper Payment, <https://www.ato.gov.au/General/JobKeeper-Payment/>. Accessed 27 May 2020

vii Cassells, R & Duncan, A (2020), JobKeepers and JobSeekers: How many workers will lose and how many will gain?, Payment https://bcec.edu.au/assets/2020/03/BCEC-COVID19-Brief-3-Job-Seekers-and-Keepers_FINAL-1.pdf. Accessed 27 May 2020

viii Australian Government Department of Health

<https://www.health.gov.au/funnelback/search?query=People%20with%20compromised%20immune%20systems> accessed 26 May 2020

ix Q Super: What's an average balance <https://qsuper.qld.gov.au/news-hub/articles/2019/08/07/06/10/what-is-an-average-super-balance>, accessed 21 May 2020

x Industry Super Funds, Accessing super should be a last resort

<https://www.industrysuper.com/media/accessing-super-should-be-a-last-resort/> accessed 21 May 2020

xi Australian Academy of Science: The impact of COVID-19 on women in the STEM workforce

<https://www.science.org.au/covid19/women-stem-workforce> - accessed 27 May 2020

xii Australian Bureau of Statistics - 6202.0 - Labour Force, Australia, Apr 2020

<https://www.abs.gov.au/ausstats/abs@.nsf/mf/6202.0> – access 27 May 2020

xiii UN Women's Recovery Post COVID 19 https://www2.unwomen.org/-/media/field%20office%20eseasia/docs/publications/2020/04/200409_covid%20action_v11.pdf?la=en&vs=710

accessed 12 May 2020