# TWENTY YEARS OF THE SEX DISCRIMINATION ACT

## Assessing its achievements[1]

BETH GAZE

Australian women have many reasons to be grateful to Senator Susan Ryan, and other women who worked to draft the *Sex Discrimination Act* and get it passed by the Commonwealth Parliament in 1984. This was a vital commitment by the Parliament of the Commonwealth on behalf of the people of Australia that sex discrimination was unacceptable and should be prohibited by law.

However, this commitment was 20 years after the United States had first adopted federal sex discrimination law and seven years after Victoria and New South Wales had adopted sex discrimination laws. It was, therefore, hesitant and rather ambivalent, and since then progress has been slow and uneven under the law. Although our anti-discrimination laws were based on the United Kingdom versions, which were based on the American law as it developed after 1964, the form of Australia's legislation was and remains weaker than in either the United Kingdom or the United States.

Women are still far from equality in Australia, on income, employment position, or any other measure. Poverty is still mainly experienced by women, particularly in old age. Women are still inadequately protected from sexual assault and domestic violence.

This article focuses on women's position in employment. When women have equal access to economic resources, many other changes in their lives will follow. Girls and women in Australia are still in a double bind. They are told that they have equality and can pursue a career and the opportunities offered by the world equally with boys, but when they get into the workforce they find that they face unequal pay, discrimination in access to good jobs and advancement in the workforce, and that they are still assigned primary responsibility for childcare by a society that devalues both motherhood and children, and is reluctant to provide adequate public support for the care and education of all its children. On the one hand girls are told they are equal and they can have what boys have. On the other they are told that there are natural differences between men and women and they are expected to conform to the feminine role of altruistic domestic caregiver, even if they want to maintain a workforce role.

Effective change in the public sphere of employment cannot occur without some change to the gendered division of labour in the private sphere of the family. However the ideology of natural differences between men and women and naturally different roles is still strong in Australia and limits progress towards sex equality. There are signs that some younger men are changing, in wanting to play a greater role in their children's lives, but the majority are not yet prepared to compromise their careers for this as women routinely must. Even if they wanted to, access to adequate paternity or parental leave to allow couples a real choice about who is to be the carer is not on the radar.[2]

The *Sex Discrimination Act* (*SDA*) was never going to reform the whole world for women, and perhaps too much was expected of it. In the optimism of the 1970s and 1980s, it was assumed that laws could change social practices in the areas of race and sex discrimination. Experience has since shown that it can be very difficult to change entrenched practices and the understandings on which they rest. Having lived for 20 years with sex discrimination outlawed, it can be easier to see the *SDA*'s current limitations than the changes it has wrought.

### Assessing the achievements

To assess the achievements of the *SDA*, we must begin by asking what was it intended to achieve? What was hoped for? And what could it realistically achieve? The objects of the *SDA* in 1984 as expressed in s 3 included:

- 'to give effect to certain provisions of the Convention on the Elimination of all Forms of Discrimination Against Women'
- 'to eliminate, so far as is possible', various forms of discrimination on the grounds of sex, marital status, pregnancy or potential pregnancy in the areas of work, accommodation, education, the provision of goods, facilities and services, etc including sexual harassment at work and in education
- 'to promote recognition and acceptance within the community of the principle of the equality of men and women'.

The operative object of the *SDA* is the elimination of discrimination 'so far as is possible'. The third object does not refer to legal change at all, but to the development of community knowledge and understanding. Like equality, eliminating discrimination is one of those motherhood ideas that no-one disagrees with in the abstract. However, actually eliminating discrimination entails transferring resources

REFERENCES

1. This paper is a revised and expanded version of a talk given at the seminar on Women Work and Equity in Sydney in August 2004, organised by HREOC and the Department of Work and Organisational Studies, School of Business, Faculty of Economics and Business, University of Sydney. It was first published in a condensed form as 'The SDA after Twenty Years: Achievements, Disappointments, Disillusionment and Alternatives', University of NSW Law Journal Forum (2004) 27 *UNSWLJ* 914.

2. The right to a year's parental leave which can be shared by both parents in Division 5 of *the Workplace Relations Act* 1966, is completely unpaid, which means it is not a practical option.

or power away from some people towards others, and will not occur without a struggle.

Eliminating discrimination is also a limited concept: it aims to give everyone an equal chance to run the race, an equal chance to achieve, but not to ensure any reasonable degree of actual equality in outcomes or resources. Even if it is achieved, in current circumstances that would only allow women the chance to be treated the same as men in the current workforce, where all are increasingly exposed to insecure employment in a 'long hours culture' under the pressures of work intensification. Current workforce conditions are making the reconciliation of family responsibilities and work more and more difficult for both men and women, and particularly difficult for workers, mainly women, who are in the lowest employment levels. Anti-discrimination and equal opportunity laws are not the answer to broader problems of the general deterioration of working conditions. Nor are they likely to provide greater equality in outcomes in general. That is not what they are designed to do.

Further, the *SDA* fails to acknowledge the diversity among women, and that sex may be combined with attributes like race, disability or sexuality to produce quite specific forms of disadvantage which need to be addressed in their own terms. 'Women' cannot be thought of as all facing similar problems, modelled on the concerns of white middle class women. This denies the specific experiences of 'other' women and fails to remedy their disadvantage.

Despite its importance, the *SDA* is limited in coverage. It covers only selected public areas of activity and within those areas it contains many exclusions. Within this limited scope, it is directed only to equality of opportunity through the elimination of discrimination as defined in the *SDA*, not to achieving substantive equality. The *SDA* is primarily based on a model of equality as same treatment of men and women (although indirect discrimination provides an opening for different treatment and thereby some movement towards equality in substance). Its definitions of discrimination are not wide, and have been further limited by technical interpretations by courts. Discrimination as defined in the *SDA* does not cover all forms of systemic discrimination that exist in our society.

### *Social meaning*

The social meaning of the *SDA* refers to its significance as a national expression of commitment against sex discrimination. Its adoption was a vital public and symbolic condemnation of discrimination against women, with a significant impact on our understandings of the world we live in. It created a space and vocabulary for a different understanding of sex discrimination, not just as something that happened, but as something unlawful. At the simplest level, there is now 'a law against it'.

### *Situation of women*

What are the concrete achievements of the *SDA* in reducing women's inequality? How can we assess its achievement? Even if we can measure change in women's position in the workforce, it is almost impossible to identify any particular cause for identified changes, as so many variable factors affect outcomes at the same time, including, of course, the presence of anti-discrimination laws in all the states and territories.

The *SDA* and these laws have removed most formal legal barriers to women's choosing what they want to do, although some areas remain, such as the limitations on women in combat-related positions in the defence forces, and in sport through exemptions in the *SDA*. This has ensured women greater access to employment, and they have moved into the workforce in much greater numbers, so we now take for granted many basic rights that did not exist before sex discrimination laws.

However, while the *SDA* has helped women, other changes have undermined their position. The deregulation of the workplace with its consequences of ballooning casualisation of work and exposure of workers to employer flexibility requirements with little protection have made the current environment very different from that in 1984 when the *SDA* was passed. Hunter has pointed out that the *SDA* has been outflanked by those changes, which have made it even more difficult for women to thrive in the workforce, and as a result, it has had quite limited purchase on eliminating women's disadvantage in employment.[3]

### *Legal meaning*

Finally, we should look at the state of legal precedents and enforcement of the law. Has the legislation been understood, and given its intended effect, by the (mainly male) courts? Have individuals been able to use it to seek redress for unfair treatment?

3. Rosemary Hunter, 'The Mirage of Justice: Women and the Shrinking State' (2002) 16 *Australian Feminist Law Journal* 53.

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As a result of sex discrimination laws in the states and the *SDA*, overt or explicit discrimination in Australia has virtually disappeared. However, it has been followed by more covert and subtle forms of discrimination which are more difficult to prove. It has been suggested that the problems in enforcing the law and in its interpretation that make it difficult for women to succeed with a claim mean that the rights against sex discrimination which it purports to confer are illusory.[4]

### *Direct discrimination*

The *SDA* is supposed to provide a vehicle for women to challenge both decisions and practices which are discriminatory. But making out a case can be quite difficult. Cases of direct discrimination, where a woman is treated less favourably than a man would have been, depend on her proving the reason for the respondent's decision. Unless there is clear evidence of the employer's reason for acting, which is rare, they are hard to prove. Nevertheless there have been cases establishing important rights in relation to employment interviewing and selection, employment benefits, and the rights of women to return to the same job after maternity leave.[5]

### *Sexual harassment*

The prohibition of sexual harassment has been more successful,[6] perhaps because it does not depend on showing a reason for acting, but merely establishing that unacceptable conduct took place and its effects. But even if the *SDA* has provided women with a remedy for sexual harassment, there is no indication that it has made real changes in the power structures that expose women to sexual harassment. The significant changes in attitudes and behaviour brought about by sexual harassment law have been ineffective in eliminating the structural and social factors that limit women's progress in the workforce and thereby keep them largely in subordinate positions at work. Anti-discrimination legislation has not been sufficient to get women into higher level jobs in reasonable numbers.

### *Indirect discrimination*

As a result of the difficulty in showing direct discrimination, attention turned to indirect discrimination, which allows practices to be challenged on the basis that they disadvantage women or other protected groups. This could be an extremely important avenue for challenging systemic practices of disadvantage. However such practices are not necessarily unlawful even if they disadvantage women. If they are (in the court's view) reasonable, then they will be acceptable. This test for the scope of indirect discrimination is vague and sets a standard significantly lower than the tests in the United Kingdom or the United States that seriously blunts the *SDA*'s challenge to systemic discrimination. Courts have also handed down decisions that have interpreted the law narrowly and technically to limit the impact of indirect discrimination.[7]

It was through indirect discrimination law that in recent years women returning from maternity leave have established a right to be taken seriously by their employers when they seek part-time work to accommodate conflicting work and family obligations.[8] But as one might expect, there have also been steps backward, and one court has held that a contractual requirement to work full-time was not a 'condition, requirement or practice' which could be challenged within the legislation, and hence there was no right to have the employer consider whether part-time work could actually be made available. Because the employer did not offer flexible work generally to its staff, it could be refused outright to new mothers in its workforce.[9]

When courts engage in technical and narrow readings of these provisions, the scope for the *SDA* to remedy women's workforce disadvantage is seriously affected. The court decisions do not alter the fundamental problems women face in a workforce designed for men as unencumbered workers with domestic support. Interpreting the Act narrowly to exclude a finding of discrimination leaves women exposed to disadvantage at work without any legal assistance.

### *Sex Discrimination Commissioner*

One very important achievement of the *SDA* was to create the position of Sex Discrimination Commissioner. Even without the previous role in conciliation and dispute resolution, the Commissioner has powers to carry out research, policy development and advocacy in public and political debate. We have been well served by the succeeding Sex Discrimination Commissioners, who have done excellent work on unequal pay, systemic discrimination at work, sexual harassment at work, pregnancy discrimination and most recently the case for government funded maternity leave. They have provided an authoritative voice in women's interests in policy debates and agenda setting which is vital. The importance of having a public and courageous advocate for women's claims cannot be underestimated.

4. A Parachar, 'The Anti-Discrimination Laws and the Illusory Promise of Sex Equality' (1994) 13 *Univ Tas Law Rev* 83.

5. See eg *Thomson v Orica Australia Pty Ltd* [2002] FCA 939 (30 July 2002).

6. See eg *Elliot v Nanda* [1999] HREOCA 10 (12 April 1999), *Horne v Press Clough Joint Venture* (WA) (1994) EOC 92-591, *Hopper v Mount Isa Mines Ltd* [1997] QADT 3 (29 January 1997), (1997) EOC 92–879.

7. See the discussion below under Weak Substantive Provisions, and the cases cited below at notes 12 and 13.

8. See eg *Hickie v Hunt & Hunt* [1998] HREOCA 8 (9 March 1998), *Mayer v ANSTO* [2003] FMCA 209 (6 August 2003). Important decisions from other jurisdictions include *Bogle v Metropolitan Health Services Board* (WA EOT) (2000) EOC 93–069, and, under the carer's responsibilities provision of the NSW *Anti-Discrimination Act 1977*, *Reddy v International Cargo Express* [2004] NSWADT 218 (30 September 2004).

9. *Kelly v TPG Internet Pty Ltd* [2003] FMCA 584 (15 December 2003). Although Driver FM in *Howe v Qantas Airways Ltd (No.2)* [2004] FMCA 934 (17 December 2004) disagreed with many of the views and interpretations of Raphael FM in *Kelly*, they have not been overruled, and clarification must await a Federal Court decision on these issues.

### *Legislative change*

The *SDA* has been strengthened by parliament at various times. Exemptions in the law have been reduced since it was adopted, for example those relating to superannuation and insurance, other Commonwealth laws such as workplace relations, and combat duties. The indirect discrimination provisions have been strengthened by requiring the respondent to show that a practice which has a disproportionate impact on women is reasonable, instead of the complainant showing it is not reasonable. Proving a negative has never been an easy task, and this change makes the law workable, and has helped the development of the cases on work flexibility I have referred to. However recent government attempts to amend the *SDA* have all been to reduce its protection, for example the response to *McBain*'s case concerning access to infertility treatment, the 2004 debate over scholarships for male teacher training, and the reintroduced Bill to remove the specialist commissioners of HREOC. These have not so far been successful, but with the re-election in 2004 of the Howard government, these Bills either have been or are likely to be pursued again.

## Disappointments

Among the reasons for disappointment with the scope and operation of the *SDA*, I will identify a few major problems relating to the design and operation of the system.

### *Weak substantive provisions*

First, the *SDA*'s substantive provisions are relatively weak. I have already referred to the test for the acceptability of apparently neutral practices which have a disadvantaging effect on women as being whether the practice is reasonable. The comparable countries on whose law this is based have stronger laws: the United Kingdom requires it to be 'justified' and the American test is business necessity. The meaning of the reasonableness test has been an ongoing battleground, and judges have not been able to clarify the test and how it is to be applied, so as to provide adequate guidance for subsequent courts and tribunals. In the first case to consider what it meant in 1989, Wilcox J at first instance held that the reasonableness test required the court:

> to ascertain the reasons underlying a respondent's insistence upon the relevant requirement or condition and to ask whether, having regard to such discriminatory effects as it is shown to have and considering the question in a practical and not merely theoretical way, it is, under all of the circumstances, objectively justified.[10]

This was quite a strong statement. On appeal a majority of the Federal Court agreed, adding that the reasonableness test is 'less demanding than one of necessity, but more demanding than a test of convenience,'[11] and commented that it was 'unnecessary to decide whether "reasonable" differs from "justifiable" in s 1(1)(b)(ii) of the British legislation'. However they disagreed with Wilcox J on assessing the actual reasonableness of the respondent's actions, and overturned his finding of discrimination. This pattern has been repeated many times by reviewing courts. One judge has suggested that the test should be as low as whether the respondent can state 'a logical and understandable basis' for a practice.[12] That view has not prevailed, but in many cases the reviewing court's objection to the application of the test by lower courts and tribunals has been that they have put too much weight on the disadvantage to the complainant or not paid enough attention to matters put forward by the respondent in favour of reasonableness.[13] Because of its open texture as a test, 'reasonableness' can be a vehicle for transmission of traditional views of social practices and rejection of any requirement for change.[14]

### *Enforcement*

Second, the enforcement mechanism in the *SDA* has structural problems. The *SDA* relies on complaints and legal action being taken by individual women affected, or by groups of them. Complainants are given very little assistance in doing this: discrimination cases at federal level have virtually no access to legal aid for representation at a hearing. They are left to their own efforts to obtain advice and representation, which many feel is essential in such a technical area of law. This approach is completely inadequate.

### *Resource disparities between parties*

Complainants often face large and well-resourced respondents who may be repeat players in the sex discrimination field. Given the lack of help for complainants, what litigation there has been in the superior courts has usually been brought by respondents appealing against a tribunal finding of liability. Litigation has operated in the interests of these respondents, who are able to afford teams of the best lawyers. In response to their arguments, courts have developed stringent requirements for proof of discrimination, and technical readings of the legislation. These advantage respondents, and have made the law

10. *Re: Styles And Secretary of the Department of Foreign Affairs and Trade* (Federal Court of Australia; 18 October 1988) para 74

11. Bowen CJ and Gummow J in *Re Secretary of the Department of Foreign Affairs And Trade and: Styles* (1989) 88 ALR 621 23, FCR 251 (Full Federal Court, 28 August 1989), paras 51–52.

12. *Commonwealth v HREOC and Dopking* (Full Federal Court; 21 December 1995) per Sheppard J at para 6.

13. See eg *Commonwealth Bank v HREOC and Finance Sector Union* [1997] 1311 FCA (28 November 1997), *State of Victoria v Schou* [2004] VSCA 71 (30 April 2004) (Victoria, Court of Appeal), *State of Victoria v Schou* [2001] VSC 321 (31 August 2001) (Supreme Court of Victoria).

14. See eg *Schou*, above n 13, *Kelly*, above n 9.

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complex and difficult for complainants to use, especially given their relative lack of resources and access to expert legal help.

***Agencies cannot assist***

Because Australian equal opportunity agencies have the role of conciliating disputes, they are required to act impartially and cannot provide assistance to complainants to counterbalance the size and experience which the often large respondents bring. By contrast in the United Kingdom, conciliation is conducted by a separate organisation, and as in Canada and United States, the equality agencies are free to resource the bringing of litigation in a strategic way in order to develop the case law effectively in the interests of the disadvantaged. This has been possible in Australia only in Western Australia and South Australia. Unlike agencies overseas, HREOC and the Sex Discrimination Commissioner have not been funded to assist with strategic litigation in developing the law. Changing even this single aspect could make a huge difference to the operation of the *SDA*.

***Damages***

Even where a complainant succeeds, the damages available have been relatively low. We have read recently of settlements in the United Kingdom and the United States of large amounts against Merrill Lynch, and Morgan Stanley, the former an individual claim, the latter a group action. In Australia, a woman partner in a law firm, who lost her career and position, and would have been marked in the legal community thereafter, was awarded $160,000 in total compensation.[15] This is the largest award in 20 years, but it is hard to see how it can compensate for the loss of a career as a law firm partner. Most awards for someone who loses a job through sexual harassment are well under $10,000. This is not enough to give individuals a sufficient incentive to undergo the stress of complaining and the pressures and risks of litigating.[16]

The emphasis on conciliation and settlement without adjudication exacerbates this problem. As a result the enforcement system fails to ensure that there is sufficient decision-making to develop the law adequately. After 20 years, much of the law is still based on interpretations of the legislation by tribunals and lower courts. The few higher court decisions on the law that exist almost all favour respondents.

***Weak pro-active response to discrimination***

Finally, the affirmative action provisions of the Sex Discrimination Bill were regarded as too controversial and their passage was delayed for two years until the *Affirmative Action Act* was finally passed in 1986. (This Act was weakened further when it was amended after review to become the *Equal Employment for Women in the Workforce Act 1999*). The rationale for affirmative action or equal employment opportunity is not to provide special advantages for some groups, but to acknowledge that they suffer disadvantage as a result of systemic practices in the workforce and may in some circumstances need different treatment (or need practices changed) in order to be treated equally. It also rests on an acknowledgment that the elimination of discrimination will be most effective when it occurs pro-actively at the systemic level, rather than leaving individuals affected to try to pursue their own individual rights. However Australia's laws have virtually no teeth and little resourcing and have had to rely on persuasion and encouragement for their implementation. This means their impact has been muted and patchy.

## Disillusionment?

Given the limitations of the system outlined above, is the existence of rights against sex discrimination an illusion? We should have serious doubts about how adequately this system protects working women's rights, and in particular about how effectively it is helping to systematically change practices in the workforce that limit women's ability to participate on an equal basis.

Sex discrimination law is not the only avenue for progressing women's rights. Other important areas include the industrial relations system, campaigns for reform of sexual assault and family violence laws as well as child support and family law, and the policies embodied in tax and social security law. But the *SDA* remains the major vehicle available to individuals for establishing their own rights in the workforce. For those of us who hope to actually approach gender equality in our own (or our daughters') time, the *SDA* needs to be effective (even if not complete) in bringing about change. It must continue to be relevant to modern circumstances, and if workforce change and court interpretations have undermined its effectiveness, it may need to be strengthened and other changes considered.

15. *Hickie v Hunt & Hunt* [1998] HREOCA 8 (9 March 1998). As HREOC had no power to award costs, this was all that Hickie received but successful complainants in current cases would be entitled to an award of costs in addition to their damages.

16. The courts' attraction to technical arguments makes it very difficult to predict outcomes in this area, and the loser will have to pay the legal costs of the winner, including, perhaps, a senior counsel's fee. This increases the pressure not to litigate or to accept a low settlement in conciliation.

After 20 years of the *SDA* I suggest it is time for a review of its effectiveness and the need for change, perhaps along the lines of the Productivity Commission's review of the *Disability Discrimination Act* which has recently been published,[17] or a review by HREOC of progress in reducing sex discrimination in comparable countries with recommendations for reform. Any review should focus on the need to improve the substantive provisions of the law and clarify the basic issues such as proof and the tests for direct and indirect discrimination, and the workability and effectiveness of its enforcement mechanisms, given power and resource disparities between complainants and respondents. Alternative models are available in the changes brought about in the United Kingdom over the last eight years or so, partly in response to pressure in the form of Directives from the European Union.

## Alternatives

As noted above, the *SDA* deals with rights against sex discrimination in a limited area of activity. It does not, for example, prevent the government from discriminating against women in legislation. That is the province of constitutional equality protection, and Australia is the last developed country without any form of constitutional rights protection. However adopting a Bill of Rights with a guarantee of equality may be of limited assistance for women if judicial decision making continued to reflect social stereotypes and assumptions about women and their natural roles. Australia could put a toe in the water by adopting provisions for legislative rights protection similar to those which now exist in the United Kingdom and New Zealand. One such model was suggested by the Australian Law Reform Commission in its 1994 Report on Equality in the Law when it suggested the passage of a federal Equality Act which would ensure protection for women in a broader range of areas than the limited scope of the *SDA*.

In the context of employment, serious attention must be paid to the effects on women of the de-regulatory drive in the workplace relations system. The deterioration of working conditions in the name of flexibility and productivity makes equality of opportunity for women more remote. In a workforce founded on casual and insecure work, and pressure to work long and unpaid hours, it is almost impossible to obtain the sort of flexibility which is necessary to really reconcile work with an authentic parental role. To achieve this we need to work on two fronts, first for equality of opportunity with men and secondly for improvements in working conditions for everyone so that equality can be achieved in practice. The ACTU is making efforts through its work and family test case, and by seeking improved conditions for casuals. Instead of allowing women to bear the costs of economic reform, the government must act to analyse and remedy the discriminatory gender effects of workplace deregulation. The fact that the *SDA* cannot help with this illustrates its limitations against systemic practices.

Australia also needs to acknowledge that sex discrimination laws are not the complete answer to women's disadvantage in the workforce. Achieving genuine workforce equality requires more than merely the elimination of discrimination. Our government has a long way to go to deliver on its obligations under the ILO Convention 156 on the Rights of Workers with Family Responsibilities, to

> make it an aim of national policy to enable persons with family responsibilities who are engaged or wish to engage in employment to exercise their right to do so without being subject to discrimination and, to the extent possible, without conflict between their employment and family responsibilities.[18]

The United Kingdom is leading in this area at present under the influence of European Union directives, having set up a right for parents of young children to request flexible work and be given a serious response by their employers, as well as improved provision for maternity and paternity leave, and regulations facilitating equal pay claims through access to comparative pay information. Its most recent proposal is for a Women and Work Commission to identify the causes of women's disadvantage at work and make recommendations to change it.[19]

In conclusion, my assessment of the *SDA* is that I wouldn't be without it. But after 20 years, it has aged. It has fundamentally changed our legal and social environment, but other changes have also occurred which have undermined some of the gains. It needs revitalising to continue to move the case for women's equality along in the modern context. Its limitations must be acknowledged, and efforts put into remedying them as well as developing other measures to end women's disadvantage.

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17. Productivity Commission, 'Productivity Commission Report on the Review of The Disability Discrimination Act 1992', 14 July 2004, <www.pc.gov.au/inquiry/dda/index.html> at 31 January 2005. Links to this report are available from the HREOC website <www.hreoc.gov.au>.

18. Art 3, para 1. This Convention is at Schedule 12 to the *Workplace Relations Act 1996*.

19. See the announcements 'New Commission to champion women in work' <www.govnet.co.uk/newsfeed.php?ID=3248> and 'Women & work commission'<www.workingbalance.co.uk/sections/print_version.php?id=1501> both at 31 January 2005.


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