

29 August 2025

Mode of delivery: submission uploaded to <https://consultations.ag.gov.au/rights-and-protections/upr/consultation/>

Australia's fourth Universal Periodic Review – draft National Report

Thank you for the opportunity to comment on Australia's draft National Report to Australia's fourth Universal Periodic Review. Relationships Australia acknowledges Australia's longstanding commitment to upholding human rights within and beyond its borders. Nevertheless, there remain opportunities for Australia to identify and address its own structural and systemic issues which continue to undermine human rights.

The work of Relationships Australia

Relationships Australia is a federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances. Relationships Australia provides a range of services, including counselling, dispute resolution, children's services, services for victims and perpetrators of family violence, services for older people, and relationship and professional education. We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others.

Relationships Australia has provided family relationships services for over 75 years. Our State and Territory organisations, along with our consortium partners, operate approximately one third of the Family Relationship Centres (FRCs) across the country. In addition, Relationships Australia Queensland operates the national Family Relationships Advice Line and the Telephone Dispute Resolution Service.

In 2023-2024, Relationships Australia member organisations:

- served more than 175,000 clients across more than 100 locations and 97 outreach locations
- employed 2,000 staff to offer more than 380 unique services/programs
- launched more than 25 new programs
- participated in over 29 research projects, and
- offered more than 27 articles and submissions, which reflected and amplified what we learn from clients and through research projects,¹ to support legislative and policy development, and continuous improvement and innovation in service delivery.

¹ Relationships Australia (2024) Annual Impact Report for Family Relationships Services Programs. Accessible at <https://www.relationships.org.au/wp-content/uploads/RA-Impact-Report-24-FINAL.pdf>

The core of our work is relationships – through our programs, we work with people to enhance not only family relationships, but also relationships with friends, colleagues, and across communities. Relationships Australia believes that violence, coercion, control and inequality are unacceptable. We respect the rights of all people to live life fully within their families and communities with dignity and safety, and to enjoy healthy relationships. These principles underpin our work.

Framing principles of this submission

Principle 1 - Commitment to human rights

Relationships Australia contextualises its services, research and advocacy within imperatives to strengthen connections between people, scaffolded by a robust commitment to human rights. Relationships Australia recognises the indivisibility and universality of human rights and the inherent and equal freedom and dignity of all.

Principle 2 – Commitment to inclusive and universally accessible services

Relationships Australia is committed to universal accessibility of services, as well as inclusive and culturally safe services. Our clients (and staff) experience stigma, marginalisation and exclusion arising from diverse circumstances and positionalities, including:

- ‘postcode injustice’ in accessing health, justice and other social services
- poverty
- status as users of care and support
- disability and longstanding health restrictions (including poor mental health)
- intimate partner violence, abuse or neglect as an older person, and/or child maltreatment
- family separation
- being an adult informal carer for a child or other adult
- being a young person caring for a child or an adult
- housing insecurity and instability
- employment precarity, unemployment and under-employment
- misuse of alcohol and other drugs, or experience of gambling harms
- people who come from culturally and linguistically marginalised backgrounds (including people who have chosen to migrate and people who have sought refuge)
- people affected by complex grief and trauma, intergenerational trauma, intersecting disadvantage and polyvictimisation
- survivors of institutional abuse
- people experiencing homelessness or housing precarity
- people who identify as members of the LGBTIQ+ communities, and
- younger and older people.

None of these circumstances, experiences and positionalities exists at the level of an individual or family. They become barriers to full enjoyment of human rights and full participation in

economic, cultural, and social life through the operation of broader systemic and structural factors including:

- legal, political and bureaucratic frameworks
- beliefs and expectations that are reflected in decision-making structures (such as legislatures, courts and tribunals)
- policy settings that inform programme administration, and
- biases or prejudices that persist across society and that are reflected in arts, culture, media and entertainment.

Principle 3 – An expanded understanding of diverse ways of being and knowing

Relationships Australia is committed to working with Aboriginal and Torres Strait Islander people, families and communities. Relationships Australia is also committed to enhancing the cultural responsiveness of our services to other culturally and linguistically marginalised individuals, families and communities. Our commitment to human rights necessarily includes a commitment to respecting epistemologies beyond conventional Western ways of being, thinking and doing.

Of acute importance is a commitment to respecting epistemologies and experiences of Aboriginal and Torres Strait Islander people as foundational to policy and programme development, as well as service delivery. Connection to Country, and the context-specific experiences of kinship, for example, do not countenance the hyper-individualism that pervades Western assumptions about distribution of resources and obligations between the Western nation-state and individuals, and among individuals. Centring the epistemologies and experiences of Aboriginal and Torres Strait Islander people is a necessary (although not of course sufficient) step in achieving the targets in the National Agreement on Closing the Gap, as well as preventing entry into poverty, ameliorating its effects, and hastening transitions out of poverty.

Principle 4 - Commitment to promoting social connection and addressing loneliness as a serious public health risk

Policy, regulatory and service interventions that strengthen connections and reduce isolation are the most promising and feasible avenues for reducing the risk of abuse and exploitation of people who face structural and systemic barriers to their full participation in society. For example: Social support has emerged as one of the strongest protective factors identified in elder abuse studies:

....Social support in response to social isolation and poor quality relationships has also been identified as a promising focus of intervention because, unlike some other risk factors (eg disability, cognitive impairment), there is greater potential to improve the negative effects of social isolation.²

² See Dean, CFCA 51, 20, Box 7, citing the United States of America population study described in Acierno et al, 2017; citing also Hamby et al (2016); Pillemer et al (2016).

Loneliness is a complex social problem and a public health concern. It stems from dissatisfaction with our relationships, a lack of positive and respectful relationships, or both of these, and is often caused by experiences of exclusion due to structural and systemic social realities that form obstacles to participation in social, economic, cultural and political life. As a public health concern (Heinrich & Gullone, 2006; Holt-Lunstad et al, 2015; Mance, 2018), loneliness has been linked to physical health risks such as being equivalent to smoking 15 cigarettes a day and an increased risk of heart disease (Valtorta, 2016). Loneliness is a precursor to poorer mental health outcomes, including increased suicidality (Calati et al, 2019; McClelland et al, 2020; Mushtaq, 2014).³ Relationships Australia is a foundation member of the Ending Loneliness Together network⁴ and has, since 2013, been the custodian of Neighbours Every Day,⁵ the primary purpose of which is to equip and empower individuals to build sustainable, respectful relationships with those around them. It is an evidence-based campaign aimed at reducing loneliness by raising awareness and, importantly, providing tools to combat social isolation.

Principle 5 – Intergenerational stewardship and equity

Fairness to future generations should not be viewed through a reductionist fiscal lens. Relationships Australia takes seriously obligations of stewardship for future generations, which transcend the national balance sheet and require us to invest in social infrastructure (tangible and intangible). This includes fit for purpose human rights infrastructure.

Principle 6 – Commitment to centring lived experience in policy and service design, delivery and evaluation

Centring lived experience (including through co-design) in policy and service design supports the development of policy, legislation and services that uphold human rights – especially human rights of individuals and groups who have traditionally been marginalised and excluded from policy discourse, or been the ‘objects’ of such discourse. In addition, centring lived experience can enhance the transparency and public accountability in policy and programme

³ The campaign Ending Loneliness Together has released a guide that explains how community organisations can use validated scales to measure loneliness: https://endingloneliness.com.au/wp-content/uploads/2021/08/AGuidetoMeasuring-Loneliness-for-Community-Organisations_Ending-Loneliness-Together.pdf

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⁵ Neighbours Every Day is an evidence-based campaign, evaluated by the Australian National University, aimed at reducing loneliness by raising awareness and, importantly, providing tools to combat social isolation. With adequate resourcing, we are confident that Neighbours Every Day could be scaled to reach a greater number of Australians, in all communities and at all stages of the life course. For recent international endorsement of Neighbours Every Day, see: From loneliness to social connection - charting a path to healthier societies: report of the WHO Commission on Social Connection. Geneva: World Health Organization; 2025. Licence: CC BY-NC-SA 3.0 IGO.

development, and the efficiency of government services, by supporting the delivery of outcomes that are valued by service users, not just administrators.

Other relevant submissions

This submission is informed by the various submissions which Relationships Australia has made in recent years, and which can be found at <https://relationships.org.au/what-we-do/#advocacy>. It draws heavily on our 2023 submission to the Australian Human Rights Commission on Australia's Human Rights Framework. Other submissions containing recommendations of particular relevance are:

- submission to the Commonwealth Attorney-General's Department on the draft National Plan to End Abuse and Mistreatment of Older People 2024-2034, as well as the various submissions made to the Department over the past seven years concerning harmonisation of laws relating to enduring powers of attorney and a national register
- the pre-2025/2026 Budget submission
- submissions to the Commonwealth, as well as state and territory governments, about domestic and family violence, gendered violence, sexual violence, and child maltreatment
- submissions to Parliamentary inquiries into Australia's family law system, as well as submissions responding to the issues paper and discussion paper produced as part of the Australian Law Reform Commission's inquiry into that system
- submissions to Commonwealth agencies concerning their dealings with people experiencing circumstances of vulnerability
- submissions relating to the Royal Commission into Aged Care Quality and Safety and to the Government during the development of the *Aged Care Act 2024* (Cth), as well as submissions to inquiries into the use of restrictive practices in aged care services
- submissions relating to the care and support economy and the recognition of unpaid/informal carers
- the submission to the Senate Standing Committee on Community Affairs in relation to its inquiry into the extent and nature of poverty in Australia, and
- the submission to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability and the submission responding to the NDIS Consultation Paper: Supporting you to make your own decisions.

Recommendations

Recommendation 1 A national Human Rights Act

Australia should offer a voluntary commitment to develop a national Human Rights Act that provides a positive framework for recognition of human rights in Australia, and that includes:

- an effective Parliamentary oversight mechanism to hold Government to account in recognising and protecting human rights, as well as preventing and remediating breaches

- provisions that clarify the relationships between existing Commonwealth, State and Territory thematic frameworks and strategies, and ground them explicitly in human rights
- provisions that impose duties to protect and promote human rights and to prevent discrimination on unlawful grounds
- meaningful, effective, accessible and proportionate remedies for breaches of human rights, including a standalone cause of action that can be invoked (including against the Crown) in respect of alleged breaches of human rights, proof of which can afford access to a range of remedies, including damages and restitution, as well as injunctive and declaratory relief
- modernised and consolidated anti-discrimination provisions with meaningful, effective, accessible and proportionate remedies, as well as preventive mechanisms
- provisions that apply specifically to the Australian Public Service, to embed human rights within the APS Values, so that human rights pervade policy development and implementation, and service delivery, and for which Agency Heads are accountable (in respect of APS employees and contractors/consultants)
- provisions that require the Act to be reviewed every three years, with reports to be tabled in Parliament; that review should include identification of emerging human rights issues
- modernised and consolidated anti-discrimination provisions with meaningful, effective, accessible and proportionate remedies, as well as preventive mechanisms, and
- provisions that expressly recognise:
 - the human rights impacts of poverty
 - the effect on human rights of systemic and environmental factors
 - the implications of intersectionality
 - a right to social inclusion and connection
 - the rights of older adults, and
 - a right to privacy and a 'right to be forgotten'.

Recommendation 2 Rights of women

Australia's national report should acknowledge that work remains to be done:

- recognise, across strategic plans and frameworks, legislation, and service design and delivery, that the risk to women of experiencing gender-based violence, abuse or mistreatment does not lessen with age, and that not only are older women often turned away from DFV and sexual violence services, but also that specialist services for older adults experiencing abuse, violence and mistreatment are subject to 'postcode lottery'
- prevention of gender-based violence, including through improved engagement of men and boys of all ages
- valuing paid and unpaid care, including by lowering barriers to long-term employment in the care and support economy, such as:
 - limited funding security to community sector organisations
 - competitive tendering

- funding gaps created by increasing costs of providing support services, without matching funding, and
- improved support for unpaid carers; people should not be impoverished by undertaking unpaid and informal caring roles, and the value to the economy of them doing so needs concrete recognition.

Recommendation 3.1 Rights of older adults – acknowledging rights gaps

Australia's report should expressly acknowledge that Australia's Human Rights Framework has yet to uphold the basic human rights of older adults and to effectively promote full and effective participation by and opportunities for older adults in economic, social, cultural and political life.

Recommendation 3.2 Rights of older adults – an international convention

The Australian Government should offer a voluntary commitment to:

- support and commit to working towards the adoption of a United Nations Convention on the Human Rights of Older Persons by:
 - ensuring the involvement of civil society organisations in the drafting, designing and negotiation of the instrument, particularly organisations that represent older persons and diverse communities of older persons
 - engaging with the Human Rights Council, the Open-ended Working Group and other relevant bodies to urgently move forward the agenda for drafting and adoption of a new treaty on the human rights of older persons, and
 - supporting the Australian Human Rights Commission's involvement in the discussion concerning a future convention on the rights of the older persons, both at the international and at the domestic levels.

Recommendation 3.3 Rights of older adults using aged care services – acknowledging a new rights gap

The draft report should acknowledge that the *Aged Care Act 2024* (Cth) prohibits older adults using aged care services to enforce the rights described in that Act, and should be transparent about the rationale for doing so.

Recommendation 3.4 Rights of older adults using aged care services – voluntary commitment

The Australian Government should offer a voluntary commitment to repeal subsection 24(3) of the *Aged Care Act 2024*, to more fully support the rights of older adults as described in that Act.

Recommendation 3.5 Rights of older adults – disclosing challenges

The draft should be revised to disclose the challenges faced by Australian governments in finalising and implementing important human rights protections for older adults, including:

- a comprehensive national plan to end violence, abuse, neglect, exploitation and mistreatment of older adults within a generation, supporting by funding that reflects at

least the known prevalence of these harms, including for national rollout of specialist services

- nationally consistent laws about enduring powers of attorney, and
- a national register for enduring powers of attorney.

Recommendation 4 Cultural safety should be universalised

The national report should be revised to explicitly acknowledge that the existence of ACCOs in a community or sector does not relieve other organisations (such as Relationships Australia organisations) from ensuring that its services, service outlets and workers are culturally safe, and that First Nations people should be able to choose whether to go to an ACCO service or another service.

Recommendation 5 Rights of persons with disability

The Australian Government should offer a voluntary commitment to establish systems which:

- implement the recommendations made by ALRC Report 124 (National Decision-Making Principles and supported decision-making)
- empower people with disability to express their individuality and draw on their own strengths/abilities as they see fit
- offer high quality services that support users to access their preferred providers, in place-based and culturally safe formats
- enable real choice with adequately trained workforces who are remunerated fairly and appropriately within a system that minimises employment precarity
- listen to and centre the voices of those with disability, who are the experts in their own lives, experiences and needs, and
- for those living in care facilities – offer ‘residential’, rather than ‘institutional’ facilities which accommodate freedom of movement within and outside the facility, independence, choice of activities, ability to attend activities that they enjoy, and engage with risk.

Recommendation 6 A national Human Rights Act and *doli incapax*

The Australian Government should offer a voluntary commitment to enact a national Human Rights Act that mandates greater scrutiny of proposals that are misaligned with evidence-based understanding of children’s needs and potentialities.

Recommendation 7 ‘Adult crime adult time’ in the national report

The National Report should explicitly acknowledge that ‘adult time adult crime’ legislation, enacted by some Australian governments, is not based on neuro-developmental evidence and disproportionately criminalises and incarcerates First Nations people at younger ages.

Recommendation 8 Rights of children in the family law system - the national report

The draft report should acknowledge that the *Family Law Act 1975* (Cth), the family law courts and the service ecosystem intended to support separating families do not yet fully implement the obligations under the Convention on the Rights of the Child, and be transparent about why that is the case.

Recommendation 9 Rights of children in the family law system – voluntary commitment

The Australian Government should offer a voluntary commitment to elevate and amplify children's rights in the context of family law proceedings, family separation, special medical procedures and the criminal justice system, including by:

- implementing Proposals 7-8 to 7-10 of ALRC DP86 6
- amending the Family Law Act to require child inclusive practice (CIP) (with limited exceptions), and resourcing Family Relationship Centres and Family Hubs (as proposed in the Metcalfe Review) to support CIP
- amending section 68LA of the *Family Law Act 1975* (Cth) to expressly require that Independent Children's Lawyers must be appointed for proceedings related to special medical procedures, and provide appropriate resourcing to support this
- developing nationally consistent legislation to protect the right to bodily integrity of children and young people with variations in sex characteristics, as modelled by the *Variations in Sex Characteristics (Restricted Medical Treatment) Act 2023* (ACT), and
- implementing Recommendation 50 of ALRC Report 135 by establishing a Children and Young People's Advisory Board, possibly under the aegis of the Family Law Council, to allow systemic advocacy to complement children's participation in matters affecting them.

Recommendation 10 Unpaid carers

The Australian Government should offer a voluntary commitment to support unpaid carers to experience opportunities and outcomes equal to persons who are not carers, and experience no disadvantage, relative to persons who are not carers, in relation to:

- civil, social, cultural and political participation
- education and employment participation and outcomes
- health care and health outcomes, and
- short, medium and long-term financial outcomes.

Recommendation 11 Online safety

The national report should be strengthened by discussing the imminent social media ban for users under the age of 16, and the human rights implications of this.

Recommendation 12 Government processes – co-design

The Australian Government should offer a voluntary commitment to embed authentic co-design across legislative and service development, implementation and evaluation.

Comments on the draft National Report

Guided by the framing principles for this submission, Relationships Australia makes the following observations and comments to support its recommended revisions of the Australia's report.

Human rights legislation

As canvassed in our 2023 submission to the Parliamentary Joint Committee on Human Rights,⁶ Australia's capacity to robustly uphold human rights is hampered by the absence of a comprehensive national human rights Act. Relationships Australia **recommends** that Australia offer a voluntary commitment to develop a national Human Rights Act that provides a positive framework for recognition of human rights in Australia, and that includes:

- an effective Parliamentary oversight mechanism to hold Government to account in recognising and protecting human rights, as well as preventing and remediating breaches
- provisions that clarify the relationships between existing Commonwealth, State and Territory thematic frameworks and strategies, and ground them explicitly in human rights
- provisions that impose duties to protect and promote human rights and to prevent discrimination on unlawful grounds
- meaningful, effective, accessible and proportionate remedies for breaches of human rights, including a standalone cause of action that can be invoked (including against the Crown) in respect of alleged breaches of human rights, proof of which can afford access to a range of remedies, including damages and restitution, as well as injunctive and declaratory relief
- modernised and consolidated anti-discrimination provisions with meaningful, effective, accessible and proportionate remedies, as well as preventive mechanisms
- provisions that apply specifically to the Australian Public Service, to embed human rights within the APS Values, so that human rights pervade policy development and implementation, and service delivery, and for which Agency Heads are accountable (in respect of APS employees and contractors/consultants)⁷
- provisions that require the Act to be reviewed every three years, with reports to be tabled in Parliament; that review should include identification of emerging human rights issues

⁶ See Recommendation 1 of that submission, which is available at <https://www.relationships.org.au/wp-content/uploads/PJCHRhumanrightsframework.FINAL.pdf>

⁷ Building on the foundations laid in Australia's 2010 Human Rights Framework (see, eg, p 6).

- modernised and consolidated anti-discrimination provisions with meaningful, effective, accessible and proportionate remedies, as well as preventive mechanisms, and
- provisions that expressly recognise:
 - the human rights impacts of poverty
 - the effect on human rights of systemic and environmental factors
 - the implications of intersectionality
 - a right to social inclusion and connection
 - the rights of older adults, and
 - a right to privacy and a 'right to be forgotten'. (**Recommendation 1**)

Rights of women

Relationships Australia acknowledges Australia's investments, at Commonwealth, state/territory and local levels of government, to improve gender equality. This has been particularly evident in relation to ending gender-based violence and recent initiatives to improve health outcomes among women. However, much remains to be done, including:

- recognising, across strategic plans and frameworks, legislation, and service design and delivery, that the risk to women of experiencing gender-based violence, abuse or mistreatment does not lessen with age, and that not only are older women often turned away from DFV and sexual violence services, but also that specialist services for older adults experiencing abuse, violence and mistreatment are subject to 'postcode lottery'
- prevention of gender-based violence, including through improved engagement of men and boys of all ages
- valuing paid and unpaid care, including by lowering barriers to long-term employment in the care and support economy, such as:
 - limited funding security to community sector organisations
 - competitive tendering
 - funding gaps created by increasing costs of providing support services, without matching funding, and
- improved support for unpaid carers; people should not be impoverished by undertaking unpaid and informal caring roles, and the value to the economy of them doing so needs concrete recognition.

Relationships Australia **recommends** that the draft report should be revised to indicate these gaps. (**Recommendation 2**)

Older adults

Delivering the Hugh Stretton Oration in 2023, the then Minister for Health and Ageing⁸ declared that '...age equality must become another of the great human rights issues of our time' in relation to which 'societies everywhere must act'. He further declared that 'governments must

⁸ Now Minister for Health, Disability and Ageing.

provide the leadership.’⁹ Relationships Australia notes that Australia accepted the recommendations of Israel and Argentina that Australia should address age discrimination and promote the human rights of older persons (Recommendations 98 and 99 in the status implementation report).

Ageism

In Australia, the evidence of ageism directed at older people and its deleterious impact on their status as rights-bearers is extensive and growing.¹⁰ Older adults in Australia suffer from violations to their fundamental human rights such as the right to life, the right to privacy and the right to family life, as well as the right to freedom from cruel, inhuman or degrading treatment. Yet these violations are often overlooked or minimised, evidencing a serious yet remediable normative lacuna or ‘rights gap’.

The research establishes that ageism is deeply implicated in the marginalisation of older people from general human rights inclusion and protection, and that human rights guarantees are often denied to older people, as older people.¹¹ Ageism is at the root of the glacial progress, on the political agenda, of issues of critical concern to all of us as we age. These include the notoriously long-overdue harmonisation of laws relating to enduring powers of attorney and the establishment of a national register.

Research undertaken by the Australian Human Rights Commission identified the prevalence and harms of age discrimination in employment and our social and cultural lives (eg the *Willing to Work* and the *What’s Age Go to Do with It?* Reports). The Australian Human Rights Commission reported that over a quarter of respondents experienced age discrimination in the workplace and almost a third were aware of other people experiencing age discrimination in the workplace.¹² Research by EveryAGE Counts establishes that the key settings where ageist attitudes prevail are the workplace, provision of healthcare, aged care and family and local community settings.¹³

Ageism is endemic in health care. In relation to the provision of healthcare, the Final Report of the Royal Commission into Aged Care Quality and Safety found that people receiving aged care, particularly those in residential aged care, do not consistently receive the health care they need and, that in many cases, care is substandard. Substandard care can occur in routine areas like provision of adequate food, medication management, dental and skin care, as well as in complex care, such as the management of chronic conditions, dementia or palliation. Notably, the Commission found that those who run the aged care system did not seem to know about the nature and extent of substandard care and made limited attempts to find out.¹⁴

⁹ See <https://www.health.gov.au/ministers/the-hon-mark-butler-mp/media/the-hugh-stretton-orator-with-minister-butler-university-of-adelaide-27-april-2023>

¹⁰ AHRC, 2016; AHRC, 2021.

¹¹ Van Bueren (nd).

¹² AHRC 2021, 35-44.

¹³ EveryAGE Counts, 2017, 9; EveryAGE Counts, 2021; Nemiroff, 2022.

¹⁴ Royal Commission Report 2021, 7-13, 69-73.

Recent reports and inquiries demonstrate that the absence of a human rights approach in system design and service delivery undermines the basic rights of older Australians, and causes pain, suffering and fear.¹⁵ If Australia is serious about being an inclusive society which flourishes because all individuals are accorded their human rights, a profound change to underlying social attitudes and policy settings is required.

Currently, our rights as we age are customarily viewed through reductionist medicalised, economic, and technocratic lenses. This impoverished understanding of our rights as we age has facilitated ongoing ageism and age discrimination, as well as amply-documented violence, abuse, neglect and exploitation.¹⁶ To promote transparency and accountability in the international human rights community, Relationships Australia **recommends** that Australia's report expressly acknowledge that Australia's Human Rights Framework has yet to uphold the basic human rights of older persons and to effectively promote full and effective participation by and opportunities for older adults in economic, social, cultural and political life. The Framework has maintained the well-documented 'visibility gap' in public and political recognition of the human rights concerns that engage us as we age.¹⁷ (**Recommendation 3.1**)

Certainly, Australia is not unique in its conspicuous lack of attention to our rights as we age. Across the world, older persons face entrenched ageism and age discrimination.¹⁸ As the COVID-19 pandemic shows, older persons are disproportionately vulnerable to violation of even the most fundamental rights, such as the right to life.¹⁹ Although the Universal Declaration of Human Rights states that we are all born equal and are all equally entitled to the same rights as everyone else, this does not, in reality, apply as we age.

Relationships Australia is committed to advocating for the recognition of the rights of older persons. We have joined the EveryAGE Counts Campaign and the Rights of Older Persons Australia network. We consider the absence of an international convention on the rights of older persons to be a key influence on perpetuating ageism and abuse and neglect of older people. Accordingly, Relationships Australia urges Government to take concrete steps to exercise the leadership envisaged by Minister Butler in his 2023 Stretton Oration. A Human Rights Act must address this gap in visibility in Australian settings, while Australia's active participation in developing a convention on the rights of older people will support the visibility of older people's rights in the international community, and so we **recommend** that Australia offer a voluntary commitment to develop a national Human Rights Act (see **Recommendation 1**) and to support, and commit towards the adoption of, a United Nations Convention on the Human Rights of Older Persons, by:

¹⁵ See Final Report of the Royal Commission into Aged Care Quality and Safety, 2021; North & Fiske, 2013.

¹⁶ See the Final Report of the Royal Commission into Aged Care Quality and Safety, 2021; Qu et al, 2021.

¹⁷ See, eg, Herro & Byrnes, 2021.

¹⁸ World Health Organization, 2015, 2021. See also Izenkova et al, 2015; Iversen, Larsen & Solem, 2009.

¹⁹ United Nations Department of Economic and Social Affairs, Covid-19 Pandemic and Older Persons (Web Page); InterAmerican Commission on Human Rights, Resolution No. 01/20: Pandemic and Human Rights in the Americas (adopted 10 April 2020).

- ensuring the involvement of civil society organisations in the drafting, designing and negotiation of the instrument, particularly organisations that represent older persons and diverse communities of older persons
- engaging with the Human Rights Council, the Open-ended Working Group and other relevant bodies to urgently move forward the agenda for drafting and adoption of a new treaty on the human rights of older persons, and
- supporting the Australian Human Rights Commission's involvement in the discussion concerning a future convention on the rights of the older persons, both at the international and at the domestic levels.²⁰ (**Recommendation 3.2**)

Why does the rights gap matter? Impact of COVID-19 on older persons – an illustration

Ageism, discrimination and stigma were at the core of the suffering of older persons brought about by COVID-19. In 2020, the United Nations reported that the COVID-19 pandemic was causing untold fear and suffering for older people across the world.²¹ The statistics were shocking. Over 95% of fatalities due to COVID-19 in Europe were of people 60 years or older.²² In the United States, 80% of deaths were among adults 65 and over. In China, approximately 80% of deaths occurred among adults aged 60 years or older. Fatality rates for those over 80 years of age was five times the global average.²³

The broader effects of the pandemic were equally shocking. Across the world, older persons were denied healthcare for conditions unrelated to COVID-19, were neglected and abused in institutions and care facilities, suffered hunger and poverty, loneliness and isolation, and endured the trauma of stigma and discrimination. Older persons living in precarious conditions – such as refugee camps, informal settlements and prisons – were particularly at risk, due to overcrowded conditions, limited access to health services, water and sanitation facilities, as well as potential challenges accessing humanitarian support and assistance. Older persons, often women, were among the caregivers responding to the pandemic, increasing their risk of exposure to the virus. Older persons were subjected to hate speech targeting older persons in public discourse and on social media as expressions of intergenerational resentment.²⁴

The final recommendation of the United Nations report into COVID-19 and its effect on older persons was that stronger legal frameworks are required at both national and international levels to protect the human rights of older persons, including by accelerating the efforts of the

²⁰ This recommendation reflects the call to action made by Rights of Older Persons Australia (ROPA), of which Relationships Australia is a member. ROPA is comprised of those civil society organisations, individual supporters and advocates who publicly endorse a new UN Convention on the Human Rights of Older Persons. See <http://www.rightsofoldersons.org.au/>

²¹ United Nations Report 2020.

²² UN Report, 2020, 5.

²³ UN Report, 2020, 5.

²⁴ UN Report, 2020, 2-9.

General Assembly's working group to develop proposals for an international legal instrument to promote and protect the rights and dignity of older persons.²⁵

Aged Care Act 2024 – limited recognition of rights of service users

We acknowledge that the Government has taken important steps towards upholding the rights of users of aged care services in the *Aged Care Act 2024*, following the damning findings by the Royal Commission into Aged Care Quality and Safety. The Royal Commission found pervasive and deliberate acts of harm and forms of abuse occurring in residential aged care, including physical and sexual abuse²⁶ occurring at the hands of staff members, and there are situations in which residential aged care providers do not protect residents from abuse by other residents. The Royal Commission's Final Report states: 'This is a disgrace and should be a source of national shame. Older people receiving aged care should be safe and free from abuse at all times.'²⁷

Further, ineffectual oversight and reliance on market-based regulatory mechanisms over the past three decades has enabled our society's general and shameful acquiescence in widespread institutionalisation and the use of restrictive practices on older adults, and persons with disabilities,²⁸ which arguably breach the Optional Protocol against Torture. Reliance on market-based theory (including on consumer, rather than human, rights) has consistently failed to drive innovation, quality, safety or accountability. This is partly because of factors intrinsic to institutional aged care in Australia, with its relatively small and geographically dispersed population and vulnerability to market failure, and partly due to the particular characteristics and needs of service users. The consumer's right to choose has little meaning in the context of 'transfer trauma', complaints-based mechanisms and the perfunctory 'tick a box' approach by regulators that was highlighted in evidence given to the Royal Commission.²⁹

Disappointingly, the 2024 Act – a once in a generation reform package - is ambivalent in its commitment to the rights of older adults. In particular, the Act expressly prohibits the bringing of any court or tribunal action to enforce rights, including the rights to autonomy and self-determination mentioned in paragraph 115 of the draft report (see subsection 24(3) of the *Aged Care Act*). The denial to service users of means to directly enforce the rights enumerated in the *Aged Care Act*, and to obtain remedies from a court or tribunal, is a substantial limitation on the human rights of persons living in residential aged care. In our view, therefore, the suggestion in the draft report (eg paragraphs 115 and 116) that the *Aged Care Act 2024* upholds

²⁵ UN Report, 2020, 14. See also Inter-American Commission on Human Rights, Resolution No. 01/20: Pandemic and Human Rights in the Americas (10 April 2020).

²⁶ Royal Commission Report Final Report, 2021 (n 36); Royal Commission Interim Report, 2019; Royal Commission into Aged Care Quality and Safety, 'Aged Care in Australia: A Shocking Tale of Neglect' (Media Release, 31 October 2019).

²⁷ Royal Commission Final Report, 2021, 68.

²⁸ For recent data on continued use of seclusion and restraint in acute (short care) mental health units (published 19 August 2025), see <https://www.aihw.gov.au/mental-health/topic-areas/safety-quality/seclusion-and-restraint>

²⁹ For example, the evidence of Professor R Paterson. For further discussion, see Relationships Australia's submissions to the Royal Commission and to the Department of the Prime Minister and Cabinet in relation to its draft strategy for the care and support economy.

and centres human rights, is misleading. Relationships Australia **recommends** that Australia's report should acknowledge this, and that Australia should offer a voluntary commitment to remedy this fundamental flaw of an Act publicly presented as being person-centred and rights-based. **(Recommendations 3.3 and 3.4)**

Further, not only does the Aged Care Act deprive service users of means to enforce rights and remedy breaches, but it also relies on Constitutional heads of power that entrench deficit and medicalised conceptions of older adults. A national human rights act, and identification of older persons' rights as a national priority, would provide a sound jurisprudential basis for effectively countering ageism and age discrimination in Australia.

This is another reason why Relationships Australia **recommends** that Australia should commit to passing a Human Rights Act that explicitly recognises that we maintain our status as rights-bearers at all points in the life course. A national Human Rights Act should counter the prevailing 'false binary' of having or lacking capacities with more nuanced sensibilities, articulate dignity of risk, and offer a vigorous riposte to so-called 'benevolent' ageism, which recognises older people not as rights-bearers, but as beings to be the objects of 'care' and 'protection'. **(See Recommendation 1)**

Abuse, mistreatment and neglect of older adults in family and community settings

Abuse, mistreatment and neglect of older adults also occurs in family and community settings. The National Elder Abuse Prevalence Study reports that 14.8% of older persons living in the community suffer some form of neglect or abuse - psychological, sexual, financial or physical.³⁰ However, the AIFS study was confined to people living in the community, and people with sufficient cognitive capacity to engage in consultation. The limitations on the study suggest that the figure of 14.8% significantly understates the prevalence of abuse and neglect: the study excluded people living with cognitive impairment and people living in residential aged care facilities, prisons and other institutional settings. The parameters of the study also did not accommodate specific examination of the situations of culturally and linguistically marginalised older people, and older people experiencing compounded marginalisation through intersecting disadvantage, such as homelessness or membership of LGBTIQ+ communities. Relationships Australia has welcomed the research agenda in hand under the auspices of the Attorney-General's Department to address the limitations of the nature and prevalence study.

The most common form of abuse of older adults is psychological and most commonly, perpetrators are adult children. Most victims do not seek help. The socio-demographic characteristics associated with elder abuse include financial strain, housing stress and individual-level characteristics such as social isolation, loneliness, mental illness, poor physical health and disability. The study reports that elder abuse largely remains a hidden problem, and that increasing recognition and awareness of elder abuse behaviours is essential.³¹

³⁰ ALRC, 2017; see also Dow & Brijnath, 2019, pp 143-159.

³¹ ALRC, 2017 (n 39) 78. See also Qu et al, 2021.

Telling the whole story – lack of engagement and prioritisation by Australian governments

Page 2 of the draft Report refers to Australia ‘ensuring’ that there is a national plan to support the rights of older Australians. This is misleading because it glosses over the failure by Australian governments to take any action before the expiry of the first plan to prevent an extended vacuum and loss of momentum in policy, legislation and service provision. This policy vacuum (currently standing at over two years) enabled the consistent de-prioritisation of work to uphold the rights of older adults relative to, for example, defamation reform and the introduction of a statutory tort of privacy infringement. Older adults have been harmed because of this policy vacuum.

Relationships Australia acknowledges the most recent meeting of the Standing Committee of Attorneys-General, at which a plan was approved; it is now for state and territory governments to agree and undertake their own processes to bring the plan to fruition. It is unclear how long this will take (and, indeed, whether the plan as agreed to by SCAG will drive meaningful reforms and actions by Australian governments).

The draft report as it stands seeks to obscure the flailing processes around harmonisation of laws relating to enduring powers of attorney, which continue to deprive older adults (and others) of the potential for powers of attorney to be protective against financial abuse while perpetuating opportunities for such instruments to be abused by unscrupulous attorneys. Serial consultations have taken the place of meaningful and effective reform that would uphold the rights of people who would rely on enduring instruments to exercise their autonomy and self-determination.

In the interests of transparency and genuine accountability, paragraph 118 of the draft report should honestly disclose the challenges faced by Australian governments in achieving these policy goals. **(Recommendation 3.5)**

Without honest acknowledgement that other priorities simply matter more, genuine progress will continue to be stalled with energy directed towards half-measures that do not improve the lives and uphold the rights of older adults.

Limited availability of services undermines the rights of older adults experiencing abuse and mistreatment

Relationships Australia considers that ageism underlies yawning service delivery gaps, including in the ‘postcode lottery’ of availability of services that can help older people affected by abuse or neglect, and reflected in short-term and geographically sparse funding envelopes for elder abuse services that come nowhere close to matching even the known prevalence of abuse and neglect of older people.³²

For example, older women approaching ‘mainstream’ DFV or sexual violence crisis services are often turned away, because those services are focused on younger women. However, ageing

³² Qu et al, 2021.

does not appear to reduce women's risk of being subjected to gendered violence;³³ the risk continues, from both intimate partners and adult children (see Qu et al, 2021). Services set up as 'pilots' in 2018 have been positively evaluated by evaluators appointed by Government, and adopted as ongoing funded services in the pilot locations, but there has been no additional funding and no broader rollout of these services, notwithstanding compelling evidence of prevalence of abuse of older adults across Australia. The draft report should reflect this as a gap in upholding the rights of older adults in Australia. **(see Recommendation 3.5)**

First Nations people – commitment to culturally safe services

Relationships Australia has welcomed Government's initiatives to enable provision of services to First Nations people by ACCOs; we **recommend** that the draft National Report be strengthened by discussion of these, and by explicit acknowledgement that:

- the existence of ACCOs in a community or sector does not relieve other organisations (such as Relationships Australia organisations) from ensuring that its services, service outlets and workers are culturally safe, and
- First Nations people should be able to choose whether to go to an ACCO service or another service. **(Recommendation 4)**

People with disability

The significant barriers and intersecting challenges faced by people with disability impede the full enjoyment of human rights. While the development of a Human Rights Act will, by its very nature, apply to all members of the Australian community, Relationships Australia considers that it is incumbent on governments to ensure that disability does not, in any way, diminish the entitlement of a person to enjoy all the human rights that would otherwise be available to them. Rather, impairment requires additional frameworks and structures to support the fundamental principles of dignity and integrity within the spectrum of human diversity.

Relationships Australia **recommends** that Australia offer a voluntary commitment to establish systems which:

- implement the recommendations made by ALRC Report 124 (National Decision-Making Principles and supported decision-making)³⁴
- empower users to express their individuality and draw on their own strengths/abilities as they see fit
- offer high quality services that support users to access their preferred providers, in place-based and culturally safe formats
- enable real choice with adequately trained workforces who are remunerated fairly and appropriately within a system that minimises employment precarity

³³ For implementation progress in relation to gender-based violence, see especially recommendations 128-133, 209, 211, 212-219, 220-228 and 281 of the status of implementation report.

³⁴ See also the final report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, especially volume 6.

- listen to and centre the voices of those with disability, who are the experts in their own lives, experiences and needs, and
- for those living in care facilities – offer ‘residential’, rather than ‘institutional’ facilities which accommodate freedom of movement within and outside the facility, independence, choice of activities, ability to attend activities that they enjoy, and engage with risk. **(Recommendation 5)**

Children³⁵

Relationships Australia is committed to ensuring that children’s rights are honoured and fully upheld across all domains of Australian life. This includes, but is not limited to, ensuring that children’s voices and children’s developmental needs and safety are centred in all systems and processes with which they engage. It appears, however, that in the eyes of our legal systems and public discourse, children and young people are divided into two groups: those worthy of care, protection and support and those who should be criminalised.

Doli incapax

Recent groundbreaking evidence (see Mathews et al, 2023; Higgins et al, 2023) shows the shocking prevalence, across the population, of child maltreatment, as well as revealing the ongoing and multi-faceted impacts of child maltreatment. It is important to note that one form of child maltreatment examined in the Australian Child Maltreatment Study is exposure to domestic and family violence.³⁶ All children are vulnerable to maltreatment and all children merit the protection of the law.

In submissions to the ACT government concerning raising the age of minimum responsibility, and to the Parliamentary Joint Committee on Intelligence and Community concerning amendments to the *Australian Security Intelligence Organisation Act 1979*, we have expressed concerns about expectations of children and young people that do not align with the research literature or practical experience and observation about their capacities – or with their rights under the Convention on the Rights of the Child. Australia should offer a voluntary commitment to enact a Human Rights Act which mandates greater scrutiny of proposals that are misaligned with evidence-based understanding of children’s needs and potentialities.³⁷

(Recommendation 6)

Relationships Australia further **recommends** that the draft Report be strengthened by explicit acknowledgement that ‘adult time adult crime’ legislation, enacted by some Australian

³⁵ See, especially, recommendations 50, 229, 231-235 in the status of implementation report. We note that Australia accepted Greece’s recommendation that Australia complete the incorporation of the Convention on the Rights of the Child into domestic legislation and policy including a national plan for children (recommendation 50).

³⁶ The Study took a narrower approach than is taken in the *Family Law Act 1975* (Cth) to what constitutes exposure to family violence, confining that to seeing or hearing family violence. Following amendments that commenced in 2012, the Family Law Act considers a child to have been exposed to family violence not only if they see or hear the violence, but also if they ‘otherwise experience the effects’ of it: ss 4AB(3).

³⁷ See, especially, recommendations 40, 140, 141, 143-147, 148-160, 162-169 of the status of implementation report (which Australia noted).

governments, is not based on neuro-developmental evidence and disproportionately criminalises and incarcerates First Nations people at younger ages. **(Recommendation 7)**

Children in the family law system

The family law system is one of many examples where the status of children as rights-bearers, and the protective potential of a cohesive and clear articulation of their rights, has yet to be translated into daily practice (although improvements have and continue to be made through discrete legislative and service delivery reforms, including the *Family Law Amendment Act 2023* (Cth)). The existing family law system derives from how common law civil disputes have traditionally been resolved and has been consistently and unequivocally shown to harm children. That harm is intrinsic to the nature of the system, which assigns innately combative roles to parents. Nearly half a century of ‘retrofitting’ the *Family Law Act 1975* (Cth) to centre children, and to soften the edges of win/loss litigation dynamics, has failed to mitigate this harm. Children and young people suffer from entanglement in this system, and continue to suffer in their adult lives and relationships – including the relationships that they develop with their own children. The draft report should acknowledge that the *Family Law Act 1975* (Cth), the family law courts and the service ecosystem intended to support separating families do not yet fully implement the obligations under the Convention on the Rights of the Child,³⁸ and be transparent about why that is the case. **(Recommendation 8)**

The particular harms suffered by children caught up in the adversarial family law system have long been documented.³⁹ In 1997, ALRC Report 84 found that children believed that the family law system was ‘dominated by legal strategising by competing parties to maximise their chances of winning the case...The interests of the child often get lost between the warring parties.’⁴⁰ From the binary win/loss outcomes that litigation is designed to produce flow all manner of serious and sometimes irreparable harm to children and their families. Such harms were described by researchers from the Australian Institute of Family Studies in their investigation into the experiences of children and young people in the family law system (Carson et al, 2018).

In light of our obligations under the Convention on the Rights of the Child, this cannot be allowed to continue. A national Human Rights Act would provide a solid conceptual basis for the urgently needed structural transformations to ‘give children a bigger voice, more of the time’ (Carson et al, 2018) and for the transformation of the system from a harmful adversarial and court-centric system to an approach that holistically centres children’s rights and wellbeing as something other than the outcome of a legal process.

Relationships Australia provides a range of services to children and young people who are affected by intersecting systems, including the family law, family violence and child protection systems, and the criminal justice systems. The complexities faced by children in these

³⁸ Relationships Australia has expressed this view in a range of submissions over the past seven years, including its recent response to a survey undertaken by the Family Law Council in February 2023.

³⁹ See, eg, Crockenberg & Langrock (2001).

⁴⁰ ALRC Report 84, paragraph 4.25.

circumstances are traversed in the 2015, 2016, and 2024 reports of the Family Law Council, as well as the Australian Child Maltreatment Study.⁴¹ The 2024 Family Law Council report on Term of Reference 2 includes recommendations that would support improved implementation of the Convention on the Rights of the Child in the family law system; even if fully implemented, they do not go far enough.

Relationships Australia **recommends** that the Australian Government should offer a voluntary commitment to elevate and amplify children's rights in the context of family law proceedings, family separation, special medical procedures and the criminal justice system, including by:

- implementing Proposals 7-8 to 7-10 of ALRC DP86 6
- amending the Family Law Act to require child inclusive practice (CIP) (with limited exceptions), and resourcing Family Relationship Centres and Family Hubs (as proposed in the Metcalfe Review) to support CIP
- amending section 68LA of the *Family Law Act 1975* (Cth) to expressly require that Independent Children's Lawyers (ICLs) must be appointed for proceedings related to special medical procedures,⁴² and provide appropriate resourcing to support this, noting that ICLs have never been resourced adequately to support their functions under the Family Law Act; if Australia is serious about children's rights, then there needs to be a comprehensive re-basing of ICL funding
- developing nationally consistent legislation to protect the right to bodily integrity of children and young people with variations in sex characteristics, along the lines of the *Variations in Sex Characteristics (Restricted Medical Treatment) Act 2023* (ACT),⁴³ and
- implementing Recommendation 50 of ALRC Report 135 by establishing a Children and Young People's Advisory Board, possibly under the aegis of the Family Law Council, to allow systemic advocacy to complement children's participation in matters affecting them. (**Recommendation 9**)

Carers

Relationships Australia provided comments to the Department of the Prime Minister and Cabinet on the draft care and support economy strategy and to the recent inquiry into the *Carer Recognition Act 2010* (Cth). We intend to also make a submission commenting on the Productivity Commission's interim report on the care and support sector.

In our submissions relating to paid and unpaid caregiving, Relationships Australia emphasises the critical importance of shifting public language around care and support from narratives that focus on burdens, and deficits, and that reinforce stereotypes and prejudices about those who care and those who access care. Too often, public and political discourse around the 'care and support economy' reinforces gendered, ageist and ableist assumptions, and reductive pathologising and deficit paradigms, which undermine the human rights of all those concerned.

⁴¹ See <https://www.ag.gov.au/families-and-marriage/family-law-council/family-law-council-published-reports>

⁴² See section 67ZC of the Act; see also Family Law Practice Direction – Medical Procedure Proceedings (<https://www.fcfcga.gov.au/fl/pd/fam-medical>).

⁴³ See also recommendation 101 of the status of implementation report, which Australia noted.

Further, discussions about caregiving instrumentalise and commodify care and support, viewing it through a primarily financial and economic prism. This inhibits full appreciation of the human rights and intrinsic dignity of us all, and should be a central concern of a national Human Rights Act, enacted pursuant to **Recommendation 1**. Finally, no one should be impoverished because they choose to undertake caring responsibilities; that choice is a critical enabler of productivity, through employment and education participation. Yet the costs of caring have increased inexorably, and lag far behind the cost of living and the financial support we provide to carers, both informal carers and those who work in the care and support economy.⁴⁴ We therefore **recommend** that Australia should offer a voluntary commitment to support unpaid carers to experience opportunities and outcomes equal to persons who are not carers, and experience no disadvantage, relative to persons who are not carers, in relation to:

- civil, social, cultural and political participation
- education and employment participation and outcomes
- health care and health outcomes, and
- short, medium and long-term financial outcomes. (**Recommendation 10**)⁴⁵

Online safety

Relationships Australia **recommends** that the draft Report be strengthened by discussing the imminent social media ban for users under the age of 16, and the human rights implications of this. (**Recommendation 11**)

Government processes

The aspirations of a national Human Rights Act will remain unmet in the absence of robust and meaningful mechanisms to hold governments to account in centring human rights in policy and legislation, service delivery and regulation. Mechanisms intended to ensure that the Australian Government complies with human rights obligations are too often degraded by chronic under-resourcing, inadequate or impractical enforcement options, as well as political and regulatory cultures that valorise ‘political responsiveness’, ‘light touch’ or ‘co-regulation’ approaches.⁴⁶ They are often reduced to being performative, tick a box processes. While Relationships Australia acknowledges appropriate limitations on such mechanisms to provide direct relief by way of damages or compensatory payments, accountability entities⁴⁷ should be empowered

⁴⁴ See, eg, Evaluate, 2022; Hill & Cass, 2011.

⁴⁵ See also recommendation 13 of our 2024 submission about Australia’s National Carer Strategy, available at <https://www.relationships.org.au/wp-content/uploads/Relationships-Australia-Submission-to-the-National-Carer-Strategy-consultation.011124.pdf>

⁴⁶ The deficiencies of industry co-regulation and ‘light touch’ regulation, particularly in sectors serving people who experience substantial asymmetries in relation to providers, have been highlighted in a range of Royal Commissions and other inquiries, including (for example, the HIH Royal Commission, the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry, and the Royal Commission into Aged Care Quality and Safety). The dangers of complacent regulation have also been highlighted in recent revelations about harm suffered by children in government-funded child care service provision.

⁴⁷ Whether standalone, like the Commonwealth Ombudsman, or within other agencies, such as the Office of Legal Services Coordination in the Attorney-General’s Department, which inter alia oversees the conduct by the

and resourced to ensure that human rights are not violated through, for example, policies and programmes that deny procedural fairness, that take unfair advantage of the power disparity between the Commonwealth and citizens in litigation, or that do not respond appropriately to service users' circumstances of vulnerability.

Finally, Government should ensure that its consultation processes afford sufficient time to engage in authentic co-design. This is of particular importance when those affected by government proposals have been marginalised in or traumatised by other processes and contexts or who experience circumstances that may affect their capacity to engage to the extent that they would otherwise wish to do so.⁴⁸ Relationships Australia **recommends** that Australia offer a voluntary commitment to embed authentic co-design across legislative and service development, implementation and evaluation. **(Recommendation 12)**

Conclusion

Thank you again for the opportunity to contribute to the development of Australia's fourth Universal Periodic Review.

Kind regards



Nick Tebbey
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Commonwealth of litigation and dispute resolution to ensure that the Commonwealth does not take improper advantage of its power and resources.

⁴⁸ See Butler et al, 2025; see also recommendations 263-270 of the status implementation report.

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