



VICTORIAN
WOMEN
LAWYERS

**SUBMISSION TO THE DEPARTMENT OF PRIME MINISTER AND
CABINET REVIEW OF THE MEMBERS OF PARLIAMENT STAFF
(MOPS) ACT 1984**

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Submission

About VWL

1. Victorian Women Lawyers (**VWL**) is a voluntary association that promotes and protects the interests of women in the legal profession. Formed in 1996, VWL now has over 800 members. VWL provides a network for information exchange, social interaction and continuing education and reform within the legal profession and broader community for women lawyers.
2. Since 1996, VWL has advocated for the equal representation of women at all levels of the legal profession and promoted the understanding and support of women's legal and human rights by identifying, highlighting and eradicating gender-based and sex-based discrimination, to achieve justice and equality for all women.
3. Details of our publications and submissions are available at www.vwl.asn.au.

Overview of Submission

4. Victorian Women Lawyers appreciates the opportunity to make a submission to the Department of Prime Minister and Cabinet (**DPMC**) regarding the review of the *Members of Parliament Staff (MOPS) Act 1984 (Cth) (MOP(S) Act)*. As an organisation of women lawyers, VWL's submission focus is the inclusion and equality of women. Further, drawing on our expertise, VWL's submission about ways to improve the MOP(S) Act are informed by legislation and case law from Victoria and Australia.
5. Considering new and innovative ways for the DPMC to facilitate gender equality through the reform of the MOP(S) Act is essential. Since the 2021 report by Kate Jenkins, Australia's Sex Discrimination Commissioner, on the nature of commonwealth parliamentary workplaces (the **Jenkins Report**), we know that recruitment and retention of women is an issue within Commonwealth parliamentary workplaces (**CPWs**). According to the Jenkins Report women form 38% of the CPW. Further, the Jenkins Report makes clear that the CPW is not a safe environment, with 51% of respondents having experienced some form of bullying, sexual harassment, or actual or attempted sexual assault in CPWs. The alarming behaviour occurring in CPWs must be tackled on multiple fronts. Reforming the MOP(S) Act to force change is a critical step towards progress within CPWs.

6. The law is an important tool to both minimise risks created by the current CPW structure and create a more inclusive, safe environment for women and diverse MOP(S) Act employees. Currently, as structured and managed, the CPWs are workplace environments capable of bullying harassment and inequality. The CPWs are described in the Jenkins Report as ‘an ecosystem made up of multiple workplaces, each with its own culture’. The CPWs are geographically dispersed, with no centralised reporting agency or leadership team. VWL supports thoughtful reform of the MOP(S) Act to assist in minimising risk of unlawful and discriminatory practices and cultures and assist in creating a safer environment for women and minority-group workers, which ultimately will assist in enhancing career progression opportunities for these women.
7. The submission addresses the four questions posed by the DPMC. In relation to question 1, VWL encourages merit-based recruitment accompanied by policies facilitating an inclusive process. Additionally, VWL advocates for greater transparency regarding inequalities between MOP(S) Act staff, and improved benefits under the MOP(S) Act to be more inclusive and facilitate flexible working arrangements.

The Recruitment of MOP(S) Act Staff, including the Transparency of Arrangements, the use of Merit-based Recruitment, and Pre-engagement Checks.

8. VWL supports reform with respect to the recruitment under the MOP(s) Act to assist in minimising legal risk and facilitating significant cultural reform.

Merit-based Recruitment with a Focus on Improving Diversity

9. The MOP(S) Act does not provide for a formalised recruitment process, and there is currently no requirement for merit-based recruitment.¹ VWL supports the use of merit-based recruitment, subject to measures for the promotion of an inclusive process. This is a recommendation from the Jenkins Report.²
10. Merit-based recruitment generally involves an assessment of the appropriateness of the candidate, taking into account the duties and outcomes required of the position. The aim is to recruit the most suitable candidate. The benefits of merit-based recruitment include preventing recruitment based on social or political connections or status, preventing corruption, and promoting greater professionalism and productivity of staff.

¹ See Sex Discrimination Commissioner Kate Jenkins, *Set the Standard: Report on the Independent Review into Commonwealth Parliamentary Workplaces* (November 2021) Australian Human Rights Commission 132 (Jenkins Report).

² Jenkins Report.

11. However, VWL recognises that merit-based recruitment, if not done inclusively, can be associated with direct or indirect discrimination and may breach the *Sex Discrimination Act 1984* (Cth), *Racial Discrimination Act 1975* (Cth), *Age Discrimination Act 1992* (Cth) and *Disability Discrimination Act 2004* (Cth). Therefore, VWL submits that merit-based recruitment must be guided by the implementation of a diversity and inclusion policy that promotes open and equal access throughout the recruitment process for widely diverse individuals, including diverse genders, cultures, disabilities and abilities, responsibilities outside work, ages, and more. VWL supports a holistic approach to merit-based recruitment, whereby proper regard is given to applicants' unique lived experience (outside the "square boxes" of competency) alongside the merit-based recruitment process.
12. VWL submits that the value of diversity in the workplace is immensely important for the DPMC. It will assist to foster diversity of thought, ideas and innovation, and the proper representation of Australia's multicultural and diverse society within Australia's highest democratic institution.³ Diversity is known to lead to more a sophisticated and holistic approach to policy-making.
13. A focus on improving diversity and inclusion within CPWs involves proactively considering and including women and minority group candidates and maintaining vigilance about identifying and preventing bias towards non-inclusive recruitment processes.
14. VWL submits that the criteria adopted for merit-based recruitment must be carefully considered so as to avoid the inadvertent elimination of particular groups of people.⁴ For example, VWL encourages DPMC to consider:
 - a. Whether the recruitment process adequately accommodates varying ages, ethnicities and disabilities of applicants (for example accommodating cultural observances and providing upfront adjustments to people with one or more disabilities during the recruitment process);
 - b. Whether the recruitment process favours applicants from particular universities (which may contribute to a pool of candidates from a privileged socio-economic demographic or class);
 - c. Whether the role provides sufficient flexibility to accommodate applicants with parental or caring responsibilities and whether the people involved in the recruitment process are trained; and
 - d. Crucially, whether these people are competent to facilitate an inclusive and respectful recruitment environment for women and diverse applicants.

³ McKinsey & Company, *Delivering through diversity*, January 2018.

⁴ Jennifer Nielsen, 'Whiteness at work' (2013) 26 *Australian Journal of Labour Law* 300, see eg, the statement that 'despite being facially neutral, these procedures may disproportionately affect Aboriginal peoples and, in turn, reinforce the disadvantage they more commonly face in education and mainstream employment — irrespective of whether they have the skills to do the job.'

15. To support an inclusive recruitment process, VWL encourages the DPMC to audit and report annually on the status of recruitment, retention and diversity within CPWs. If the auditing identifies disproportionately low applicants and/or disproportionately low staff that are women or are from minority groups, VWL encourages the DPMC to identify barriers for diverse individuals throughout the relevant stage of the recruitment process. For example, there may be hidden barriers within the DPMC's job advertisement process which result in the exclusion or self-exclusion of diverse applicants. Further, there may be conscious and unconscious bias during the recruitment process that could be addressed through improved training and/or improved diversity within the recruitment team.
16. VWL recommends safeguard measures to protect the integrity of the recruitment process. At a minimum the DPMC should establish a process for candidates who feel they have been unfairly treated to complaint and receive feedback. VWL encourages the DPMC to establish an independent team or body with investigative powers to respond to these complaints.

Beyond Recruitment

17. VWL submits that the efforts to establish an inclusive recruitment process must be sustained throughout employment. This will improve retention of diverse staff and promote their ability to positively contribute to workplace culture and output. VWL considers flexible working arrangements, reasonable adjustments, opportunities for career progression, mentoring and childcare, are tools available to the DPMC to foster an inclusive workplace culture. Use of these tools will positively impact the spectrum of candidates applying for a position and staff retention.
18. VWL supports the development of a legislative framework which entitles staff to flexible working arrangements for issues preventing their full participation at work on the basis of sex, gender, culture, and other issues – such as chronic health conditions that do not meet the categorisation of 'disability' – that are not presently accommodated in the National Employment Standards under the *Fair Work Act 2009* (Cth). For example, allowing flexible working arrangements for debilitating menopause and menstrual symptoms which may promote the workplace inclusion of women, non-binary and gender diverse people who menstruate, and attract candidates with merit.

Pre-Engagement Checks

19. VWL broadly supports the use of appropriate pre-engagement checks to promote the safety and well-being of all staff. This may include asking for references from subordinates of a management-level applicant. This may assist the DPMC to identify managers with appropriate skills to manage diverse staff in an inclusive, empathetic and appropriate manner.

20. VWL acknowledges that pre-engagement checks may be misused, and result in discrimination against otherwise suitable applicants. For example, VWL does not support eliminating a candidate with a criminal record, irrespective of the seriousness or type of offence, or time passed since the offending.⁵ The appropriate exercise of discretion, informed by a combination of factors including the candidate's capacity to undertake the role, the nature of the offending, evidence of rehabilitation and the risk to others is critical to the inclusive and non-discriminatory implementation of pre-engagement checks.
21. If pre-engagement checks are implemented – either as a statutory provision of the MOP(S) Act or within a guiding policy – VWL recommends ensuring the individual or team responsible for recruitment must consider the wider circumstances of any issue identified, must allow the applicant an opportunity to respond, and exercise discretion to consider all the information without a pre-determined outcome.

Transparency of Arrangements

22. VWL agrees with the Workplace Gender and Equality Agency (**WGEA**) Report that 'transparency is "a vital first step" towards addressing the discrimination that contributes to pay gaps and other workplace inequalities'.⁶ VWL considers transparency regarding organisational equality (or inequality) and individual employment agreements encourages organisational action, and allows informed employment decisions by individuals.⁷
23. For example, data collected by the WGEA shows that all Australian industries have a pay gap in favour of men.⁸ Accessible information about whether employment under the MOP(S) Act will allow pay equity for women compared to men is an empowering tool to inform choices about where to seek employment and whether they can sustain employment under the MOP(S) Act. Conversely, the DPMC will have information about what the barriers are for facilitating a diverse and inclusive workplace.
24. An example of successfully legislated transparency is in the *Workplace Gender Equality Act 2012* (Cth) (**WGE Act**). When compared to previous legislation, the improved transparency requirements under the WGE Act significantly strengthens the identification of workplace inequality.⁹ Importantly, the legislation requires employers to now report data on gender representation and gender pay gaps.
25. VWL submits that the MOP(S) Act should mandate regular reporting on gender equality and pay gaps. The disclosure of this information should go further than requiring reporting on the programs and policies in place to address the issues, but should require an accurate data-supported description of the state of affairs.

⁵ Wells and McDermott, 'Taking a fresh look at Criminal Record Discrimination' (2021) 33 *Australian Journal of Labour Law* 270.

⁶ Workplace Gender Equality Agency, 'WGEA Review Report: Review of the *Workplace Gender Equality Act 2012*' (December 2021) Department of Prime Minister and Cabinet (**WGEA Report**).

⁷ Smith and Hayes, 'Using data to drive gender equality in employment: More power to the people?' (2015) 28 *Australian Journal of Labour Law* 191.

⁸ WGEA Report.

⁹ For a thorough analysis of the *Workplace Gender Equality Act 2012* (Cth) see Smith and Hayes, 'Using data to drive gender equality in employment: More power to the people?' (2015) 28 *Australian Journal of Labour Law* 191.

26. A useful example of auditing the workplace and collecting meaningful indicators of gender inequality comes from the requirements under the Gender Equality Act (Vic) 2021. VWL encourages adoption of a similar legislated approach in the MOP(S) Act, including the development of, and reporting against a Gender Equality Action Plan, based on the results from the Gender Equality audit.

Procedural Fairness for the Terms, Conditions and Termination of Employees and Employers under the MOP(S) Act

27. Having a centralised function and guiding policies and procedures, training and access to support services are critical steps towards creating transparency and procedural fairness for MOP(S) Act employees. The terms, conditions and procedures in relation to termination must be standardised, known, and consistently applied. This framework could also expand to consultants and/or contractors who have interactions with MOP(S) Act employees.

Recommendations in the Jenkins Report

28. As an important first stage, VWL encourages speedy implementation of recommendations 11 to 17 of the Jenkins Report. These include:
- a. Recommendation 11: Establish an office for parliamentary staffing and culture;
 - b. Recommendation 12: Professionalising management practices for MOP(S) Act employees;
 - c. Recommendation 14: Best practice training;
 - d. Recommendation 15: Guidance material in relation to termination of employment for MOP(S) Act employees;
 - e. Recommendation 16: Fair termination of employment process for MOP(S) Act employees; and
 - f. Recommendation 17: Legislative amendments to the MOP(S) Act.

Integrity or Misconduct Framework

29. VWL strongly recommends the DPMC implement a misconduct framework to facilitate independent and timely responses to alleged misconduct by employees under the MOP(S) Act, including allegations against parliamentarians.
30. Victoria's Councillor Conduct Framework (**CCF**) is a useful example in the context of elected representatives. This framework is legislated in the *Local Government Act 2020* (Vic) and provides for a three-tier hierarchy of responses depending on the nature and seriousness of the alleged misconduct. Under the CCF:
- a. Complaints of misconduct by a councillor are heard and determined under the council's internal arbitration process by an independent arbiter;
 - b. Complaints of serious misconduct by a councillor are heard and determined by councillor conduct panels; and

- c. Allegations of gross misconduct are dealt with by the Victorian Civil and Administrative Tribunal (**VCAT**).
31. Misconduct, serious misconduct, and gross misconduct are also defined in the *Local Government Act 2020* (Vic). Importantly, the determinations of the Councillor Conduct Panel are published online and publicly available. This transparent approach encourages consistent and fair decision-making by the panel. However, VWL suggests that any panel investigating allegations of misconduct under the MOP(S) Act should have the ability to redact names of relevant elected officials and employees under the MOP(S) Act if appropriate in the circumstances.
32. The CCF is an integrity-based framework. VWL supports the introduction of a framework into the MOP(S) Act that is based on principles of integrity and is victim-centred. This is particularly important for CPWs, given the alarmingly high prevalence of bullying, sexual harassment and sexual assault, as outlined in the Jenkins Report. The barriers to reporting misconduct were also identified in the Jenkins Report, with only half the MOP(S) Act employees knowing *how* to formally report bullying, sexual harassment or sexual assault.
33. In the United Kingdom (**UK**), a range of independent inquiries and reviews conducted from 2017 onwards, describe widespread sexual harassment and sexual misconduct in the UK Parliament¹⁰. These problems were described endemic and serious in nature, noting that ‘attention must be paid to the root causes of the sexual harassment problem, namely a persistent gender power gap and the inherent patriarchal attitudes that sustain it.’¹¹
34. A recent article in LSE British Politics and Policy by Christina Julios highlights the gender power gap within the institution;¹² victims reported the impact of factors such as fear of not being believed, fear of being fired, fear of reputational damage, fear of jeopardising their career, and a lack of access to effective organisational and legal support mechanisms.
35. In 2018, in response to the findings from independent inquiries, and as a response to mitigate the cultural issues arising from a male-dominated UK Parliament – an Independent Complaints and Grievance Scheme (**ICGS**) was established. The ICGS publishes information, and its reports, policies and procedures on its website.¹³ It purports to be the world’s inaugural integrity oversight body for any parliament.

¹⁰ For a summary of the reports see Christina Julios, April 6th, 2022 *LSE British Politics and Policy* 'Despite #MeToo, tackling sexual harassment of women in Parliament remains a challenge' available at <https://blogs.lse.ac.uk/politicsandpolicy/metoo-parliament/>.

¹¹ Ibid.

¹² Ibid.

¹³ At <https://www.parliament.uk/about/independent-complaints-and-grievance-scheme/>.

36. The ICGS was established as a cross-party, bicameral initiative, by Resolution of the House of Commons. The House of Commons (including MPs, MPs' staff and staff from the House Administration), the Parliamentary Digital Services (**PDS**) and third-party passholders were covered by the ICGS for incidents that happened from June 2017 onwards. Over time, more employees have been included within the ICGS; in November 2018, House of Lords' administration staff were included and in May 2019, Members of the House of Lords and their staff were included. In October 2019, the ICGS was further extended to complaints made before June 2017 and to former parliamentary employees, including those who left parliament after June 2017.¹⁴
37. The ICGS consists of:
- a. A Behaviour Code, which clearly sets out the behaviour expected of all members of the parliamentary community;
 - b. An independent bullying, harassment and sexual misconduct Helpline and an independent sexual misconduct advisory (ISMA) service, provided by Victim Support;
 - c. The Bullying and Harassment policy and procedure;
 - d. The Sexual Misconduct policy and procedure;
 - e. Independent investigators provided by three investigation service providers, and independent investigators (recruited to investigate non-recent and current complex cases);
 - f. A Parliament-wide training programme, "Valuing Everyone", delivered by Challenge consultancy; and
 - g. Provisions in the Codes of Conduct for Lords Members and their staff, which mean that bullying, harassment and sexual misconduct constitute a breach of the Codes.
38. The 2020-21 ICGS Annual Report states 388 people contacted its helpline, either by phone or by email, which was an increase from the previous two years. The ICGS conducted 48 investigations with 46% of upheld, and an additional 45 cases were initiated.
39. An independent 18-month review of the ICGS, carried out by Alison Stanley CBE, made 36 recommendations. The key recommendations included simplifying and improving the operation of the ICGS cases, setting up governance of the ICGS, restructuring the team and improving the ICGS policies and procedures.
40. VWL calls for the DPMC to develop a legislative framework stemming from the MOP(S) Act that explicitly considers the nature of, and mitigates gender discrimination, power imbalances, and the fear of insecure employment that women experience when contemplating reporting misconduct.
41. Using evidence from the UK ICGS, VWL urges those developing an Australian complaints scheme to draw on the experiences of the ICGS to fast-track effective implementation. Any Australian scheme should also be reviewed after 18 months and its operations publicly available, to at least the extent of the UK's ICGS.

¹⁴ ICGS 2020-21 Annual Report, available at <https://www.parliament.uk/globalassets/documents/conduct-in-parliament/behaviour-code/icgs-annual-report-july-2020-to-june-2021.pdf>.

The Responsibilities, Expectation, and Accountability of MOP(S) Act Staff

Employment of Staff by MPs under the MOP(s) Act

42. The Jenkins Reports sets out that within the CPW:
- a. *“Gender inequality is ...a key driver of bullying, sexual harassment and sexual assault. The Commission heard that institutional structures, processes and practices across CPWs devalue women and consequently foster gendered misconduct”*; and
 - b. *“...Women are underrepresented in decision-making roles and that there is a lack of broader diversity across CPWs. This lack of diversity contributes to a ‘boys club’ culture and bullying, sexual harassment and sexual assault. It also means that CPWs are not representative of the community that they aim to serve.”*
43. The Jenkins report also identifies that *“one of the most common themes raised was the critical role of leaders in creating and maintaining a safe, respectful and inclusive workplace. As one participant observed, ‘it comes from the top’. While examples of good leadership which set the tone for safety and respect were described by some participants, many discussed the way in which leaders themselves were responsible for bullying, sexual harassment and sexual assault, and also their inadequate responses to the misconduct of others.”*
44. VWL supports implementation of the following recommendations of the Jenkins Report:
- a. Recommendation 5 - Diversity among parliamentarians.
 - b. Recommendation 6 - Diversity among Members of Parliament (Staff) Act employees.
 - c. Recommendation 8 - Diversity and inclusion in the parliamentary departments.
 - d. Recommendation 10 - Everyday respect in the parliamentary chambers.
45. VWL is confident that the greater representation of women including more diverse women Members of Parliament (**MPs**) in impactful portfolio positions and cabinet will have a positive flow on impact for MOP(S) Act staff provided there is better leadership and a top-down approach aimed at empowering staff.
46. There have been a range of different employment arrangements for CPW staff, with the convention that ministerial staff are accountable to their Minister and, through their Minister, to the Parliament. The MOP(S) Act formalises this chain of responsibility through the employment process. Firstly, this will occur by the hiring process of MOP(S) Act staff as section 4(1) states that a Minister may, with the approval of the Prime Minister, engage a consultant. This puts the onus on a Minister to hire staff that meet their expectations and accountability. Secondly, section 4(2) states that an agreement that a consultant is engaged to perform is under the supervision of the Minister. These are essential elements that place the onus on MPs to set their expectations of MOP(S) Act staff and maintain accountability of the staff who work under MPs supervision.

47. VWL also considers that there is a responsibility for managers to provide clear role descriptions and position responsibilities which are reasonable and appropriate to the role. The Jenkins report identifies cases where staffers were required to complete personal errands and tasks for MPs, and this is linked to claims of bullying and harassment. People managers in CPWs must be required to attend training and be provided with support services to fulfil their responsibilities.
48. The timing of this submission has coincided with a critical moment in time being the recent federal election in May 2022. It was widely reported that the federal election results have resulted in a record number of women who will take their seats in the House of Representatives following the May 2022 Federal Election. Women will comprise 38 percent of the chamber in the new parliament, which is the highest ever proportion on record after 58 women were elected to the lower house, including 19 first-term MPs.
49. The appointment of MOP(S) Act staff by MPs and a system of employment and importantly “supervision” establishes a notion of reporting to a member of Parliament. Therefore, it appears that responsibilities, expectations and accountability of parliamentary staff follows a hierarchy that involves the particular MP. The framework set out in the MOP(s) Act is reflective of the ordinary framework of many workplaces in order to create a system of reporting and accountability to a senior member of staff. In this case, to the MP.
50. VWL expects that a greater representation of women (and in particular women from diverse backgrounds) as MPs in parliament results in greater responsibilities, expectation, and accountability of MOP(S) Act Staff by a *top-down effect*. This will optimise the framework of accountability for members of parliamentary staff in the workplace to Members of Parliament as set out in the MOP(S) Act.

Accountability and Reporting

51. VWL considers accountability must be tied to a system of available reporting within the parliamentary workplace. VWL calls for the establishment of workplace policies and structures to support a physically and psychologically well, safe and supported CPWs as a matter of urgency.
52. The Jenkins Report notes that *“Australian law prohibits workplace bullying, sexual harassment and sexual assault. External accountability mechanisms support the enforcement of these laws in the context of most workplaces. The reflection of these standards within CPWs, however, is inconsistent at best.”*
53. In ordinary Australian workplaces, there are usually Human Resources (**HR**) departments, policies and structures to create a system of accountability for staff. This structure of accountability within the workplace may also be a deterrent to staff from acting in a way that may harm the physical and mental health of others. For example, engaging in workplace bullying or harassment given that there are HR departments in place to address the issue.

54. VWL supports the implementation of all recommendations of the Jenkins Report that would create accountability and reporting for MOP(S) Act staff, in particular Recommendation 20 of the Jenkins Report for the expansion of the Parliamentary Workplace Support Service. Part of their role is to establish a clear pathway for anonymous reporting, including through a digital platform; publish additional information on what happens with anonymous and bystander disclosures.
55. As for reporting, VWL also endorses Recommendation 26 of the Jenkins report to protect the safety and wellbeing of MOP(S) Act parliamentary staff by the establishment of a new Parliamentary Health and Wellbeing Service (**PHWS**) at Parliament House. VWL considers that the PHWS service is an integral part of ensuring accountability of MOP(s) staff as it provides a framework for reporting to reduce barriers to staff working across the parliamentary workplace to understand that their physical and mental health is valued, and encourage them to access services to support their physical and mental health.

Appropriate Public Reporting and Accountability of the Administration of the MOP(S) Act

56. VWL considers that effective implementation of best practice within the CPWs also requires public accountability, given that members of parliament are elected by the public. Parliamentary workplaces are not immune from the issues faced by all workplaces. However, parliamentary workplaces face greater community expectations and public scrutiny. Arguably, the parliamentary workplace should be an exemplary example of a well workplace as a model for other Australian workplaces. Reports regarding the allegations of Brittany Higgins impacts public confidence in the parliament and Commonwealth public service as a safe and fair environment.
57. VWL supports appropriate public reporting of the administration of the MOP(S) Act as an essential means of enforcing responsibility and accountability for MOP(S) Act employees. This provides a source of transparency and open government. Such public reporting should be trauma informed and should be victim/survivor lead.
58. To achieve this, VWL supports implementation Recommendation 22 of an Independent Parliamentary Standards Commission (**IPSC**) as recommended in the Jenkins Report. The IPSC is to, among other things, operate a fair, independent, confidential and transparent system to receive disclosures, handle informal and formal complaints.
59. VWL supports the public reporting of the work undertaken by the IPSC to ensure accountability to the public. For example, a report of the use of the IPSC annual report of complaints made, investigations, and outcomes.
60. VWL also supports the implementation of Recommendation 23 of the Jenkins Report, which involves the extension of public interest disclosure protections to MOP(S) Act employees. The impact of this legislation is partly to encourage and facilitate the disclosure of suspected wrongdoing in the public sector, to ensure that those who make public interest disclosures are supported and protected from adverse consequences, and to ensure that these disclosures are properly investigated and appropriately handled.

61. VWL submits that these elements if applied to MOP(S) Act staff would greatly assist addressing issues that have arisen in the parliament and identified in the Jenkins Report.