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FEMINIST LAW BULLETIN

NEW ZEALAND AOTEAROA

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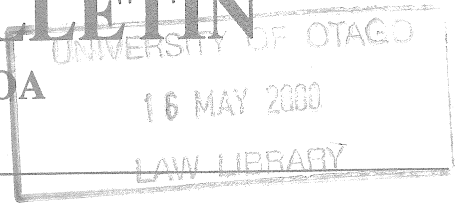

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Why a Feminist Law Bulletin?
The Feminist Law Bulletin:
- Identifies when feminist issues arise in policy, legislative proposals, and the practice of law;
- Provides an opportunity for exploration and discussion of some of these issues;
- Enables a general readership to gain an introduction to feminist analysis of the law.

Editor:
This issue of the Feminist Law Bulletin was written and edited by Claire Baylis. The views expressed are those of the editor and not necessarily those of the producers and publishers of the Feminist Law Bulletin.

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CASE AND COMMENT: REFUGEE LAW: Gender-based Persecution

by **Sarah Murphy**, Office of Treaty Settlements, formerly Legal Consultant to the United Nations High Commissioner for Refugees (UNHCR).

Under the 1951 Convention and the 1967 Protocol Relating to the Status of Refugees, a person is a refugee if they are outside their country and have a "well founded fear of being persecuted [in their Country] for reasons of *race, religion, nationality, membership of a particular social group or political opinion.*"

In spite of the fact that two thirds of the world's refugees are women and girls, persecution on the basis of gender is not included in the refugee definition. With the rising awareness of discrimination against women, the absence of gender as a specific ground for discrimination has become the subject of debate. In 1990, the UNHCR urged Governments to use the "membership of a particular social group" category to recognise gender based persecution.

New Zealand Case Law

Most of New Zealand's case law on refugee status stems from the Refugee Status Appeal Authority (the Authority), which hears appeals against decisions by the New Zealand Immigration Service to decline refugee status. The following are two examples of how the Authority deals with gender-based persecution cases.

Refugee Appeal No 2039/93 Re MN 1996

In this case an Iranian woman (MN) feared the persecution of violence and discrimination against her, from both the State and her male family members. The case discusses MN's circumstances and values as well as the "system of domination in Iranian-Arab society [which] uses not only tribal social values, but also Islamic ideology as tools to control women." The Authority granted her refugee status.

MN was not a virgin, and feared that if she married, this would be discovered and she would be killed. Her sister had been killed by her brother in the same circumstances and two other female relatives had been killed by male family members. MN reluctantly had an abortion in New Zealand because she feared that if her refugee application was

rejected and she had to return to Iran she would suffer severe consequences if she had given birth out of wedlock.

MN "spoke passionately of her opposition both to the patriarchal society comprising her extended Arab family, and to the male domination of women in Iranian society at large."

The Authority rejected the concept of "cultural relativity", that is the notion that human rights must be judged in the cultural or religious context of the particular country to which they are being applied. In doing so it impliedly criticised a 1994 Judgment of the Authority, which stated:*"There can be no doubt at all that women constitute a social group....However that simple fact does not mean that gender based discrimination, which is pervasive throughout the world, should be permitted by western liberal democracies to constitute a valid basis for refugee claims on the grounds of membership of a social group....In many countries these unenlightened attitudes have some form of religious sanction."* (Refugee Appeal No.915/92 Re SY)

In Re MN, then, the Authority has rejected a case which implicitly sanctioned discriminatory actions which could be argued to be in accordance with cultural norms.

In Re MN, the claim for asylum was accepted on the basis that she had a fear of persecution on religious and political grounds as covered in the International Convention on Civil and Political Rights (ICCPR). The Authority noted that the denial of the right of Iranian women to function as autonomous and independent individuals has enormous implications at both the political and family levels.

The Authority did discuss the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) (see Feminist law Bulletin, Issue 2, 1997) in relation to what constituted persecution. However by relying on the ICCPR, the Authority left open the status of CEDAW in New Zealand refugee law.

The Authority said it could be considered that the woman belonged to a "particular social group" for the purposes of the Refugee Convention definition, but it did not base its decision on this. The Authority did not define the social group as "women" per se, but rather as: *"women who, as a result of their deeply held values, beliefs, and convictions, reject or oppose the way in which they are treated in Iran, and the attendant power structure which perpetuates and reinforces the so-called 'Islamist' justification for this state of affairs."*

While the result here was favourable for MN, there are problems with the Authority's "social group" definition. In Iran there is likely to be a Convention ground other than "social group" which could be relied on for most women fearing persecution. However, if the reasoning were applied to another country it could prove too restrictive, potentially favouring educated women who have analysed the political situation, rather than a woman who flees on an instinctive fear.

Refugee Appeal No. 2124/94 Re LYB 1996

LYB was a Chinese woman applying for refugee status because she claimed she had escaped from China after the State tried to capture her to perform a forced abortion on her. Since coming to New Zealand she had given birth, so she no longer feared an abortion, but rather that she would be imprisoned for three years if she returned, for resisting the abortion.

The Authority referred to China's one child policy, which allows only married couples to have babies, and even then, only if they obtain permission from their work unit. Those who are pregnant out of wedlock are required to have an abortion.

The Authority rejected the applicant's account of circumstances leading to her

departure on credibility grounds. However it went on to discuss the issue of whether she fell within a "social group" which could validly be granted refugee status.

Here the Authority defined the particular "social group" very narrowly. It stated that there is no evidence that "unmarried or expectant mothers who have refused to undergo an abortion" constitute a particular "social group" in China. Further, it stated that the consequences LYB feared were not because of her membership of a particular social group, but because she had broken the family planning law.

In refugee law, a prosecution under a country's law which constitutes a violation of basic human rights, can amount to persecution, if it falls within one of the convention grounds. Arguably Chinese women fleeing forced abortions, fear "gender" related persecution. While the immediate purpose of the family planning laws is not to persecute women because of their gender, forced abortions relate directly to gender. They can only be performed on women, and they relate to a woman's reproductive choice, which is fundamental to women's identity.

Both these cases illustrate only a limited acceptance of gender as a social group. However the narrow construction favoured by the Authority is likely to be tested in future cases.

THE FUTURE OF THE EMPLOYMENT COURT:

The Minister of Labour, Hon Max Bradford, recently announced a review of aspects of the Employment Contracts Act 1991 (ECA), including a review of the operation of the Employment Court.

The Minister's Justification:

"... [D]evelopments have occurred in the employment and industrial relations area since 1991, and it may well be timely to review the Court's role in this new arrangement...it is entirely appropriate for this Parliament ... to look at the judgments of the Court to see whether they are consistent with the will of Parliament." Hansard 19/3/97

Bradford believes that Employment Court decisions are "creating uncertainty for a lot of businesses....they don't know what the Court will do next." The Listener May 3-9 p24-26.

The motivation for the review is driven partly by criticisms that the Court is biased towards protecting worker's rights, and partly because of the new right view that employment contracts should be seen as merely one type of contract, dealt with by ordinary judges rather than a specialised court. (Eg see R Epstein *Employment Law*, Business Roundtable 1996 and J Kelsey "Mad Max and the Future of the ECA" March 1997 *Labour Notes*, 6-7.)

Laila Harre's (Alliance) View

"The fact is that the Employment Court is just doing its job. If the Minister does not like what the court's decisions are, then instead of attacking the court, he should have the guts to front up in this House with legislation that we can all debate. If he thinks that temporary workers should be sacked at will,...[i]f he thinks that no workers should get redundancy pay unless they have the industrial muscle to bargain for it,...[i]f he thinks that employers should be able to follow any dodgy process they want in order to sack a worker, then put a Bill to that effect Mr Bradford. It is on those things that he is challenging the Employment Court for protecting workers against. He knows he could not get the numbers in the House to change that law. His attacks on the Employment Court are a back door way of getting that result. Underlying his criticism of the court and the widespread criticism of the court from the Business Roundtable and others in that community is the totally false assertion that employment is just like any other contractual relationship. That is nonsense. Employment is as much a social relationship as a commercial one. It is offensive in the extreme to suggest that the trade in potatoes or second-hand cars is the same as the relationship established when someone gets a job. The Employment Court, like the Family Court, is one of the last bastions against the redefinition of every important human interaction as a contract." Hansard 19/3/97

Employment Court Decisions:
The Court has protected workers' rights in some areas by decisions which go beyond the black letter of the statute. This is a common practice where legislation does not cover a point, or leaves it open to judicial discretion. For example, in *Brighouse* the Employment Court held that if a contract made no mention of redundancy payments, then simple fairness meant that based on the employee's length of service, redundancy must be paid. The Court of Appeal upheld this decision.

The Relevance to Women
The maintenance of the Employment Court as a specialist institution applying protective legislation in an area where there is an obvious power imbalance, is crucial to women. When the market place was governed by the 'freedom of contract' principle, the 1890 Royal Commission on Sweated Labour found that this had resulted in the exploitation of many workers, especially women.
On the whole women workers tend to be in particularly vulnerable positions, and the ECA has only worsened this. There has been a massive de-unionisation of women in the private sector, women are over-represented as casual and part-time workers and the gender pay gap has increased. Women now earn 73.4% of men's average weekly earnings compared to 74.7% in 1991 (Statistics NZ 1997).
There is an irony in the fact that the National Party election manifesto claimed that employment equity for women would be achieved by their legislative proposals. What makes this worse is that the proposed review of the Court and the Legislation, does not cover any review of the ECA in terms of its achievements in these equity areas. (See also M Coleman "Pay Equity: Hard Work Down Under" forthcoming in J Gregory, A Hegewisch, R Sales *Women, Work and Inequality: The Challenge of Equal Pay in a Deregulated Labour Market* (Mac Millan))

Has the Employment Court Helped Women?
While there are Employment Court cases that have been problematic for workers and especially for women (see Judge for Yourself) the equity and good conscience jurisdiction of the Court has helped women's position. Decisions have shown an understanding of the power imbalance in employment relations and of gender issues, for example by holding that discrimination includes indirect discrimination and that a grievant's evidence need not be corroborated in cases of sexual harassment or sex discrimination to be credible.

- There are a number of specialist courts in this country, for example the Family Court, and the Environment Court etc. Do you think employment issues are distinct enough from other contract issues to justify such a Court?
- If there are still some problems with Judges' understanding of gender issues in employment, are we more likely to overcome these problems quickly when dealing with specialised Judges rather than general Judges?

JUDGE FOR YOURSELF: *Lenart* v *Massey University* WEC15/97
This was an appeal from an Employment Tribunal decision which held that Mr Lenart had been unjustifiably dismissed by Massey University due to complaints of sexual harassment. The University appealed to the Employment Court arguing that Lenart should not be reinstated, while Lenart asked for compensation for stress and humiliation.

The Facts:
The incident which resulted in the dismissal happened to Ms X in 1995. Prior to this another sexual harassment complaint had been brought against Lenart. In 1993 he had phoned a female student at home at 10pm, called her

"darling" and said "How about coming around and making love then?" The Court found that this student had made a complaint to the University and that Lenart had admitted making "offensive sexual suggestions" and was given a formal warning. Lenart also agreed not to repeat "such incidents" with that person or anyone else.

In 1995 Lenart was attending a University function where Ms X was also present as a University employee. Ms X had formerly been a student of Lenart's and he had been her mentor. She had not seen him for 3 years prior to that evening.

Ms X was on her way to the toilet and due to a mobility disability was concentrating on her balance, when Lenart approached her. Before she could identify him he was "in close physical contact with her entire body, including pressing his face against her," saying "Oh darling." She finally realised it was Lenart, he then asked what she was doing. She answered him and may have smiled. He fondled her hair, told her that she was beautiful and that her boyfriend was so lucky. Ms X was shocked and distressed by the encounter and asked a colleague to walk her to her car.

She was approached the next day by the Head of the Harassment Advisory Committee who had interviewed the previous complainant and who had heard about the incident. She took Ms X to a support person and told her that Lenart was a "toxic zone" and that he had harassed other women. Ms X, later, laid a complaint against Lenart.

Sexual Harassment

The Court considered the elements of sexual harassment under section 29 of the Employment Contracts Act 1991. It found that Lenart's behaviour was unwelcome or offensive to Ms X and that it was of such a significant nature that it had a detrimental effect on her employment. Although a counsellor's evidence was that Ms X's reaction was "typical of mild forms of post-traumatic stress syndrome" normal in victims of sexual abuse, the Judge held *"It is difficult to escape the conclusion that Ms X suffered the serious detrimental effects from Mr Lenart's behaviour largely because of her physical disability which prevented her from moving away after he caught her completely by surprise."*

- Does this comment of the Judge show a lack of understanding of the nature and effects of sexual harassment?
- While Ms X had stated that the incident "raised the whole of her disability and brought home to her that she could not protect herself in an ordinary way", does the Judge's focus on her disability underplay the fact that she felt the need to protect herself from Lenart?

The Judge then found it "difficult" to objectively decide whether the words and behaviour used were "of a sexual nature". His test was whether Lenart "would have used the same behaviour towards a male", Lenart being heterosexual. He determined that while Lenart *"frequently hugged men, was likely to have called them "mate" and may well have enquired into their activities[, i]t is highly unlikely however that he would have touched a male's hair while standing up so close to that person as to be able to breathe on their face, or to have described a man's personal appearance, using an appropriate synonym for 'beautiful' or to have said that the man's girlfriend was 'so lucky'."*

Even having come to this conclusion, the Judge still believed this was a "borderline *case...where the sexual nature is not immediately manifested".* He did finally conclude though that the behaviour was "capable objectively of being viewed as being sexual in nature."

• Do you agree that the behaviour in this case was borderline as to whether it was of a sexual nature?
• Do you agree with the test used by the Judge? What happens if the harasser is bi-sexual?
• Is calling a man "mate" analogous with calling a woman "darling"?

Serious Misconduct:
The Court held that the University was right that sexual harassment had occurred, and that as an employer it did have a legal duty to take steps to avoid any repetition of the behaviour. Yet the Court still maintained that the University was not justified in dismissing Lenart. The Judge agreed with the Tribunal that "because *the sexual nature of the behaviour was not manifestly plain, it was open to Mr Lenart to advance an 'innocent' (to use the Tribunal's word) explanation for his behaviour."*
The Judge identified the following factors as making Lenart's motives a real issue:
- that the behaviour took place in a public place;
- that Ms X smiled at Lenart and responded to his questions;
- that they may have previously hugged in greeting, although Ms X was sure that if so, those hugs were not of the same nature;
- that Lenart's cultural background as a Hungarian made him effusive and "incurably demonstrative";
- that he often hugged friends of both sexes in a non-sexual way, and used the term "darling".
The Judge concluded that had the University had an open mind, these factors could have shown that Lenart's "actual *intentions were innocent and attributable to an effusive nature ..."*
The Judge said the University had completely rejected this explanation as not being credible and he disagreed with the University taking into account the 1993 incident, stating that *"was insufficient to rebut the plea of innocence in relation to the 1995 incident...[as the former] was far more serious and not susceptible to an innocent explanation unlike [the 1995 incident]."* The Judge decided this on the basis that *"it is difficult to see the similarity between the two incidents. ..[in] the 1993 incident there was an express request for sexual favours over the telephone late at night and the 1995 incident involved hugging in a public place."*
• Do the factors identified by the Judge make Lenart's behaviour innocent?
• Why does the Judge raise the fact that Ms X answered Lenart's questions and may have smiled?
• From these factors, do you think the Judge understands the power imbalance inherent in sexual harassment cases, especially one of this nature?
• Do you agree that there is no real similarity between the two incidents? Even if this is so, does the fact that this was the second finding of sexual harassment mean the University was justified in viewing it as serious misconduct?

The University's Process:
Lenart argued that the process followed by the University was unfair for three other reasons:
- the decision-maker at the University was influenced by the powerful persona of the Head of the Harassment Committee who Lenart claimed, was clearly biased. She had approached Ms X, she viewed Lenart as a "toxic zone", and she had been part of the 1993 investigation;
- Lenart was not informed clearly enough that termination was possible;
- Lenart did not get the chance to make contributions to the method of ensuring that there was no repetition.

Accepting these arguments and taking into account that Ms X said she had not intended Lenart to be dismissed, the Court held that Lenart should be reinstated, but that he was not entitled to compensation. The Judge did not make it clear how the University was to ensure no repetition of the behaviour.

- Do you agree that the process was biased? If the police heard that a rapist had raped again is it inappropriate for them to approach that victim and suggest they lay a complaint?
- How do the allegations of bias fit with the University's legal duty to avoid repetition of the harassment?
- Should Lenart suggest how to ensure there is no repetition, considering his previous undertaking?
- How much weight should Ms X's view of Lenart's dismissal be given?

LAW COMMISSION'S WOMEN'S ACCESS TO JUSTICE PROJECT:

Lawyers' Costs in Family Law Disputes

The Women's Access to Justice project has just released its latest consultation paper which concerns lawyers' costs in family disputes.

The Commission found that one of the main issues facing women in family law disputes was the high cost of pursuing their claims. These costs often seem to escalate because of the tactics of the other party and their lawyer. Many of the women the Commission consulted with described instances of their former partner "deliberately delaying matters, stonewalling progress and bringing issues before the courts time and time again." This may be due to a wish to continue controlling the woman, and it becomes all the more problematic when the man's lawyer is actively involved. There were also concerns that the Family Court did not adequately deal with these problems and were very reluctant to award costs even where appropriate.

Women also discussed the problems with their own lawyer's handling of fees, for example, their hourly rate, the lack of information about fees and about the cost revision process. Ineligibility for civil legal aid was also a problem for many women: *"Lawyers cost, what, $150 per hour? Even if I find a job that pays $15 an hour it would take me 10 hours to earn what I pay for one hour from a lawyer. That's ridiculous."* (From Report on Consultation with Lesbian Women).

The Paper raises areas for debate including:

- the examination of the Professional rules relating to lawyers' responsibilities in the context of the position of women in society generally and in family law disputes particularly;
- consideration of the ways that "costs are discussed, charged, contained, supervised and recovered..."
- review of the skills that lawyers could develop to reduce costs including training and specialisation.

The Paper raises many fundamental and interesting questions on women's access to justice in family law disputes. The Commission would welcome responses by 25 July 1997. Contact: Michelle Vaughan, freephone 0800 88 3453 or Freepost 56452, law Commission, PO Box 2590, Wellington.

THE INTERNET:

News/Views from the Net:

Some interesting news from the US based Legislative Update site at http://www.now.org/issues/legislat/legislat.html

Consumer Affairs in the US

The Republicans are trying to pass a Product Liability Bill which President Clinton had previously vetoed. It now appears he may be dropping his opposition to it, and has set up an inter-agency task force to come up with a "compromise solution". However, the task force does not include any agencies which are responsible for health and safety matters. The Bill if passed would limit the ability of consumers to bring

successful lawsuits, for example, by making the loser pay the winner's costs which deters low income plaintiffs and by restricting non-economic damages which especially hurts women eg loss of fertility.

National Domestic Violence Hotline:
This is a Nationwide hotline in the US for toll-free crisis intervention, information and referrals. It has operated for 14 months and recently received its 100,000th call. Of those calling 61% identify themselves as domestic violence survivors, 18% as friends or family members of survivors and 5% as batterers. The hotline is now being advertised in a new stamp booklet introduced by the US postal service. A similar hotline for rape and sexual assault information and referral is also being proposed.

Quote from Andrea Dworkin, feminist activist, from an interview with Michael Moorcock, British Novelist at: http://www.igc.org/Womensnet/dworkin/MoorcockInterview.html -
On Right Politics:
"The victory of the right also expresses the rage of white men against women and people of colour who are seen to be eroding the white man's authority. The pain of destroying male rule won't be worse than the pain of living with it."

Shopping on the Internet
There are over 30 million users of the internet and New Zealand use is proportionally very high. It is possible now to purchase goods and services over the internet and pay by credit card or cheque. Some of these purchases are New Zealand based sites such as Whitcoulls, but others are based overseas, for example in the United States. But for those who do buy over the internet there are some dangers of which buyers should be aware.

Purchasing from New Zealand Suppliers:
In the Feminist Law Bulletin, Issue 5, 1996 we outlined some of the protections that consumers have under the Consumer Guarantees Act 1993. When purchasing on the net from New Zealand suppliers, these laws apply although there are still some legal issues which need to be dealt with before purchasers will be as well protected as they are ordinarily. For example, there may be an issue about the point at which the contract was formed, which is relevant if the goods never turned up.

Purchasing from Overseas Suppliers:
However, purchasing from net sites based overseas is where the greatest risks lie. If something goes wrong with goods bought in this way, it may be very difficult for the consumer to enforce their rights. It is difficult to control suppliers in other countries, it can even be difficult legally to determine which country's laws should apply - New Zealand's Laws because the purchaser is here, or the United States' laws because that is where the supplier is based. Even if you manage to get a judgment by default, because the overseas supplier has not filed a statement of defence in a New Zealand court, it may be very difficult to enforce it if the supplier has no assets here.

Reducing the Risks:
If you do purchase goods on the net from overseas suppliers there are some steps you can take to reduce the risks:
- Try to stick to reputable sites - even better if they state their repair and refund policies;
- Look for agencies which can help. Eg: the Internet Consumer Protection Agency at: http://www.glen-net.ca/icpa

It tests suppliers who want to join it to ensure they are reputable businesses. If suppliers pass the test, the agency seal of approval will appear on their home

page. If you have a problem with such a supplier the agency will try to help you resolve it;

- Check out sites which inform surfers of problem suppliers, Eg:
  www.ftc.gov
  www.bbb.org
  www.fraud.org
- Make sure you know what currency prices are given in.

For further information see Consumer Magazine June 1997, p31 and K Tokeley "Shopping on the Net: Legal Protection for Consumers" forthcoming Otago LR.

MEDIATION PROCESSES IN STATUTES: Are they Good or Bad for Women?

In the Feminist Law Bulletin Issue 5, 1994 we discussed the nature of Alternative Dispute Resolution. In this issue we will look more closely at the mediation processes which are set up by statute as the first step in proceedings under an Act. In New Zealand, over the last twenty years, it has been very popular to introduce mediation into legislation. There are currently over thirty statutes which refer to mediation or conciliation.

The terms mediation and conciliation under these statutes are almost interchangeable, as each statute sets up a slightly different model and there is no consistent differentiation. I will therefore refer to the processes as mediation.

The areas covered by mediation are so broad that many people will come into contact with them during their lifetime. Mediation is used in areas such as: tenancy, resource management, family, health, children and young persons, and employment, as well as at the Disputes Tribunals, the Human Rights Commission, and the Waitangi Tribunal.

Feminists have different views about whether mediation processes are helpful to women and to what extent.

Adversarial Processes - are processes where the two parties (who are usually legally represented) fight against each other to have their view of the facts and law accepted by a third party decision-maker. This is the process in Courts in New Zealand.

Consensus Processes - are processes like mediation where the disputing parties are helped by the mediator to find common ground and to build this into their own settlement which may involve compromise from both sides, and which ideally creates new win-win options.

Advantages for Women in Mediation:

Some feminists believe that mediation is a beneficial process for women particularly in comparison to the Court system, for the following types of reasons:

- Compared to the traditional adversarial court process, mediation may be less disturbing for women complainants, for example, in sexual harassment cases.
- If women view the world differently to men and naturally use a more consensual type of dialogue, mediation may be better suited to women's nature than adversarial processes based on conflict;
- If mediation produces better outcomes, in that they are fairer and more likely to be outcomes in which both parties win to some extent, rather than the win-lose outcome of Court cases, women are advantaged;
- Mediation may help women to feel empowered as they get a chance to speak for themselves rather than through a lawyer, and they can raise issues of concern to them rather than being limited to strictly legal issues;
- Mediation may be able to improve the long term on-going relationship of the parties, as they learn to communicate better;

• As mediation is usually cheaper than court, women, who generally have lower incomes than men, are particularly advantaged;
• As mediation usually takes less time than Court, difficult situations can be dealt with more quickly.

Dangers for Women in Mediation:
Other feminists believe that there are dangers involved in mediation. Some of these feminists believe that as a result, mediation should not be used in particular areas, while others believe that women must simply be aware of these dangers. The types of problems for women include:
• That the mediator may be able to influence the parties decision and that this can create problems if mediators are not aware of gender inequities;
• That where informal mediation processes are used, rather than the formal Court processes, the risk of prejudice may be increased. This can be particularly problematic for Maori or Pacific Islands women when the mediator is a pakeha male;
• That it is a male myth that women are more consensual than men - that this myth protects men from conflict initiated by women;
• That the way women speak which may be more hesitant and seeking agreement from the mediator or the other party, can disadvantage them in a mediation, as they may be seen by the mediator to be less certain of the facts or to be lying;
• That mediation may not be able to redress power imbalances, especially systemic societal power imbalances between genders or different races, or where the type of dispute arises from an inherent power imbalance eg employment disputes. In these cases the agreement reached may reflect such imbalances;
• That mediation has been used as a way of keeping some issues out of Court where more public resources would be used up, and that often these issues are ones that are of relevance to the disempowered in society, for example discrimination issues rather than commercial issues;
• That because mediation settlements are usually private, public standards are not being set in important areas like sexual harassment, which means the public are not being effectively educated on these issues.

UPCOMING EVENTS:
• The 1997 Family Violence Symposium: Violence, Abuse and Control. August 29-31, Palmerston North.
For information contact Palmerston North Convention Centre, PO box 474. Ph 06-351 4469. Fax 06-356 9841.

• The Future of Mental Health in New Zealand: Ethics, Law and Policy for the Decade Ahead. National Conference. October 2-3, Auckland. For information contact Jane Kilgour, Legal Research Foundation. Ph (09) 3099540 or fax (09) 3737473.

• The Victoria University of Wellington Law Review invites submissions for it's special issue on "Gender Issues and the Law". Contributions due 1 September for publication in late 1997. For information contact Kate Tokeley or Susy Frankel, VUW ph: (04)495 3290 or fax (04) 495 3295.

Judge's Gender Equity Seminar
The seminar has taken place and appears to have been successful, but at the time of going to print for this issue of the Bulletin, detailed information was not yet available.

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