

Submission

Response to the draft National Plan to End Violence against Women and Children 2022-2032

February 2022

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**PROMOTING
RESPECT & EQUITY
TOGETHER**

A Strategy to end Gendered Violence
for the Southern Metropolitan Region

Acknowledgement

Action for Gender Equality Partnership acknowledges the peoples of the Kulin Nation, the Traditional Owners of the land on which we work. We pay our respects to Elders past, present and emerging. We affirm that sovereignty was never ceded, and that colonialism and racism continue to impact on the lives of Aboriginal and Torres Strait Islander women and can contribute to the high rates of violence they experience. We recognise the strength, resilience and leadership of Aboriginal and Torres Strait Islander communities and express our commitment to reconciliation.

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Parties to this submission

This submission represents the full range and diversity of organisations who work in the prevention, early intervention, response and recovery sectors of the Family Violence network in Southern Metropolitan Melbourne (a list of these organisations is provided on the last page of this submission). Working together through the three leading partnership structures in the Southern Metropolitan Region, these agencies have collaborated to provide this response to the draft National Plan to End Violence against Women and Children 2022-2032. The partnerships are:

Promoting Respect and Equity Together

PRET is the second regional strategy for the primary prevention of gendered violence. It was developed in partnership with over 38 partner organisations in the Southern Metropolitan Region. PRET aims to continue to strengthen and align the efforts of the regional partnership to promote the social conditions where women and girls can enjoy healthy, equitable and respectful relationships and men are freed from masculine stereotypes.



Bayside Peninsula Integrated Family Violence Partnership

BPIFVP provides area-based leadership on Family Violence service integration and planning. The Partnership has been mandated to bring together the many specialist and broader sector services whose work intersects with family violence response, early intervention and prevention, into a partnership arrangement and create a more integrated 'one system' approach to dealing with family violence.



Southern Melbourne Integrated Family Violence Partnership

SMIFVP is a committee of key stakeholders, whose role is to implement the Victorian Government's family violence reform agenda in the Department of Health and Human Services' southern Melbourne area. It also holds strategic responsibility and accountability for this implementation and system integration of service delivery.



Introduction

As a group of organisations and services that work with women daily to meet their needs, we welcome the opportunity to provide feedback on the draft National Plan to End Violence against Women and Children 2022-2032. We fully support the centrality of women's and victim survivors' lived experience to shape, guide, and inform implementation of the National Plan for its duration.

Summary of Feedback

This submission will start by describing the organisations that were represented in the consultation. The feedback that was provided for each of the four pillars will be presented, and recommendations based on the feedback has been included for each pillar. The submission will end with responses to the questions that are included on the Department of Social Services Engage website.

The 69 recommendations and feedback seek to “seize” the moment of the national plan – that is, the feedback looks to strengthen and deepen the connection that the National Plan has to the family violence sector, in all its forms, and build upon the current evidence and practice across the four pillars.

While the feedback recognises the complexity of the environment and context within which the plan exists and seeks to end violence against women, it does not let this be an excuse for demanding that this plan deliver across the interconnected sectors preventing, intervening, responding, and supporting recovery from violence against women and their children. There is strong support for the model of the plan – specifically, the pillars which recognise the reality of the family violence sector, and the principles which speak to fundamental tenants of practice. A major concern is the plan's recognition of intersectional reality of family violence and the way that family violence is addressed through all areas of government policy – from housing, to emergency services, law, community wellbeing, planning and infrastructure, health and so on. It is not just a “wicked problem” on department.

The feedback is also speaking to the strength of a national plan, and the opportunity to achieve outcomes through a well thought through implementation strategy and action plan. Recommendations and feedback include consideration of the alignment of the federation to achieve outcomes and balance the different accountabilities of State and Commonwealth to fund and achieve goals. The feedback is also mindful that implementation will depend upon a well-skilled and resourced sector who can lift and respond to the national plan and its promise.

Acknowledgement and Support of Other Submissions

PRET and its partners note and support the submission provided by Respect Victoria to the draft national plan consultations. We also note that Women's Health Victoria and Gender Equity Victoria have endorsed the Rainbow Health Victoria submission and ask that consideration be given to the recommendations for improved representation and responses to the realities of LGBTIQ+ experiences of gender-based violence.

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Summary of Recommendations on the National Plan to end violence against women & Children

The following recommendations for the national plan, are drawn from the feedback detailed further in this submission.

Principle - Intersectionality

1. Better explanation throughout the draft plan to describe intersectionality principles properly as systems and structures that perpetuate discrimination and disadvantage; and recognise how these intersect to impact on experiences of violence, response to it and accessibility of support.
2. Despite the Plan “acknowledging that people with diverse sexuality and gender are impacted by gender-based violence, often in complex and intersecting ways”, the terminology is not inclusive throughout. The use of “women and children” and “girls and boys” is blind to the gendered violence experienced by those in the LGBTIQ+ communities. Those in the LGBTIQ+ communities should be further consulted to ensure the National Plan is inclusive of all those that face gendered violence.
3. Aside from several high-level comments about the experience of victim/survivors experiences and needs, their voices are almost silent throughout the document, in particular those in diverse communities. The National Plan should clearly outline the concerns of victim-survivors with the current system and services in place, their past lived experiences and what they would like to see changed.

Pillar One: Primary Prevention

4. Clarify and explicitly link the focus on reducing community attitudes that are sexist or tolerate gendered violence to Australia’s national identity and culture – one that does not victim blame but strives to create greater gender equitable outcomes across all spheres of the ecological model.
5. Ensure targets and measures for primary prevention programs are reasonable and achievable, with understanding of how their outcomes contribute to the overall reduction of the perpetration of gendered violence.
6. Share learning and agree on collective goals across state and territory plans for primary prevention.
7. Improve means of early identification of attitudes and behaviours that may contribute to an increased risk of perpetration of gendered violence – no more tolerating attitudes that ‘boys will be boys’ with regards to the negative impact of their behaviours on girls and gender diverse or trans children.
8. Governments develop means to collaborate with small and grassroots organisations to catalyse work with diverse communities and provide immediate dynamic feedback to government about what is and is not working in primary prevention efforts nationally.

Children and young people

9. Ensure work with young people is central to primary prevention efforts nationally.
10. Engage with adolescents to have young people’s needs and ideas represented in the National Plan.

Culturally, linguistic and religious specific strategies

11. Co-produce and implement targeted and culturally informed primary prevention activities to work with migrant and refugee communities.

12. Development of specific strategies that acknowledge the role that religion can play in perpetuating traditional gender roles and stereotypes which increase the risk of gendered violence being perpetrated and victims' inability to seek help due to stigma, and family, social and community expectations/ostracization.
13. Work with religious groups to increase community attitudes supportive of gender equality and improved implementation of Respectful Relationships curriculum.

Elder abuse and violence against older women

14. Include a gendered analysis and focus on elder abuse, in family and aged care settings.

Engaging boys and men

15. Provide new funding at federal and state/territory levels to increase work engaging boys and men in primary prevention activities (this should not be funding directed away from activities focused on women and children).
16. Target and engage male leaders in workplaces and communities to understand and address their own attitudes about gender equality, expectations of gender roles, and how they may have benefited from existing gender relations to work through the challenges of being agents of change (as there is growing community expectation and demand for them to do).
17. Develop tools that shift the burden off victims to address sexism and gendered violence.

LGBTIQ+ people

18. Use more inclusive language and understanding of diverse gender identities and sexualities throughout the plan to avoid repeating patterns of heteronormativity and reinforcing the gender binary.

Parenting

19. Increase focus and role of parenting in primary prevention, recognising that parents' experience of trauma and intergenerational family violence must be addressed to break cycles of violence.

Women with disabilities

20. Build the capacity of the primary prevention sector to address ableism and focus on the needs of women and children with disabilities (see [Changing the Landscape](#)).
21. Implement specific strategies which address digital literacy among women and children with a disability - both targeting pornography and predatory behaviours.

Pillar Two: Early Intervention

22. Develop evidence base and indicators to measure the effectiveness of early interventions at diverting people at the point of identifying problematic attitudes to stop escalating to abuse and violence.
23. Reframe civil action regarding domestic, family, and sexual violence from being seen as an 'early intervention' as opposed to criminal justice as both are responses after harm has been done.

Children and young people

24. Ensure the National Plan understands and articulates the differences between perpetration by adolescents and adults, recognising the specific needs and responses required.

Engaging Boys and Men

25. Increase supply and access to programs that assist boys and men to understand their emotional wellbeing and how to self-identify to ask for help for potentially harmful behaviours towards others, both outside of and within youth and criminal justice systems.
26. Develop values-based messaging and programs for boys and men who demonstrate sexist, homophobic, biphobic and/or transphobic attitudes or behaviours.
27. Develop a national strengths-based approach framework for early interventions with men based on what has worked in case management practice with men.

Parenting

28. Address current gendered parenting inequalities (which impact on women's financial independence throughout their lifetime) through ensuring that parenting programs, such as [Baby Makes 3](#), are funded and utilised by new parents to change expectations and gendered stereotypes regarding division of domestic labour.
 - a. This could be encouraged through workplaces, as well as the promotion and tracking of fathers' uptake of paid parental leave.

Pillar Three: Response

Culturally, linguistic and religious specific strategies

29. Fund local and community run services to do ongoing family violence support as these are often at the coal face of helping the immediate safety and recovery of victims as they have trusted relationships that provide better means to support victims, especially culturally and community specific services (including LGBTIQ+ run services).
30. Improve access to domestic and family violence specialist services for refugee and migrant women, including advice in language and outreach to community organisations and settlement services who are supporting women who are vulnerable to family violence due to their visa or migration status.
31. Translate all the e-safety and digital literacy materials/seminars into multiple languages for migrant and refugee women and ensure these are distributed to the appropriate on-the-ground-services working with these communities (including settlement services).

Engaging boys and men

32. Undertake a scoping study for existing and future demand on men's behaviour change program services and invest in the sector to ensure supply meets demand.

Finance and housing

33. Improved assistance and access for women experiencing abuse and violence to sustain their family home including property settlements, home loan schemes, and superannuation as part of response and recovery.

Online and technology facilitated abuse

34. Fund technical information technology and digital data specialist roles within domestic and family violence services to directly assist and protect the online safety of victims - including access and use of services online, preventing tracking and disrupting stalking, reporting fake accounts and harassment etc.

Structural Reform

35. Systematically review and remove legislative, regulatory and organisational practices that limit information sharing which creates risks to the safety of victims by leaving gaps in knowledge and can retraumatise victims through retelling to multiple services, such as history of abuse, risk assessments and perpetrator profiles/contact details.
36. Improve interoperability between domestic and family violence specialist services and community organisations supporting victims.
37. Increase capacity of housing, income, and employment services to support and prioritise the needs of victim survivors.
38. Provide and ensure all criminal, civil and family court workers and officials complete competency-based training in domestic, family and sexual abuse and trauma informed ways of working.
39. Review Victorian amendments to privacy and information sharing in favour of victim safety (see MARAM) and undertake analysis for possible national consistency and implementation.
40. Increase requirement for warm hand over policies and information sharing between services across the sector to lessen the administrative burden on victims, and minimise the likelihood of disengagement and impact of re-traumatisation from having to retell their experiences each time to another service.
41. Develop a national workforce strategy to meet demand on services and ensure supply of skilled and suitable professionals, with rewarding long term career prospects.

Federal Government Portfolios

Pillar One: Primary Prevention

Health

42. Increase funding for women's health regional services to increase capability and reach of workforce across primary prevention, early intervention, response, and recovery.

Office for Women (and Finance)

43. Review all Commonwealth fiscal and workplace policies to identify and remove settings that create or perpetuate women's financial dependence on men in heterosexual relationships, especially family policies such as access to, and rate of, paid parental leave, and superannuation contributions continuing for all forms of maternity and parental leave including unpaid leave.

Education

44. Support and resource primary prevention programs in school-based settings (Respectful Relationships) to create lasting social and cultural change.

Pillar Three: Response

Attorney-General's Department

45. Embed specialist domestic and family violence legal system responses nationally - take learnings from current specialist family violence courts and ensure all Magistrates courts have this system to improve consistency and availability of specialist professionals.

46. Review powers that allow family court to set aside or overrule state and territory-based child protection or family violence orders, and where this is currently occurring suspend until legislation and powers review completed.
47. Undertake an intersectional feminist review of awards for social services, domestic, family and sexual violence sector (including primary prevention through to recovery) to ensure it recognizes the skilled and specialist expertise required to do this incredibly valuable and important work for Australian society.
48. Increase minimum provision for domestic and family violence leave to 10 days paid leave for workers in the sector (health, domestic and family violence specialist sector etc.) and people in the justice system (police, courts, child protection, corrections etc.).

Home Affairs

49. Review and remove practices within migration law and visa system that provide perpetrators the means to use migration or visa status as a lever of abuse, including but not limited to the deportation or removal of mothers whose children are Australian born.
50. Provide all visa categories the means to access family violence provisions and provide victims social supports, childcare, and work rights, reflecting the reality that many women on temporary visas, such as tourist or student visas, are subject to criminal and exploitative abuse by Australian citizens. The burden should not be on the abused person or victim to leave the country to find safety or be limited in their ability to establish a financially independent and secure life. Systems must hold perpetrators accountable not to abuse people in Australia and the Australian migration system.
51. Review potential areas of overlapping or conflicting policies across migration and family law, align and remove practices that are retraumatising or disadvantaging victims of family, domestic and sexual abuse regardless of migration or visa status.

Action Plans

Pillar One: Primary Prevention

52. Include men and boys in the design and delivery of programs that address and promote healthy masculinities and what it means for men and boys to model respectful, fair, ethical, safe, supportive, gender equitable behaviours within relationships.
53. Ensure targets and measures for primary prevention programs are reasonable and achievable, with understanding of how their outcomes contribute to the overall reduction of the perpetration of gendered violence.

State and Territory Governments

Pillar One: Primary Prevention

54. Increase funding for women's health regional services.
55. Support and resource primary prevention programs in school-based settings (Respectful Relationships) to create lasting social and cultural change.
56. Share learning and agree on collective goals across state and territory plans for primary prevention.
57. Governments to develop means to collaborate small and grassroots organisations to catalyse work with diverse communities and provide immediate dynamic feedback to government about what is and is not working in primary prevention efforts nationally.

Pillar Three: Response

58. Systematically review and remove legislative, regulatory and organisational practices that limit information sharing which creates risks to the safety of victims leaving gaps in knowledge and can retraumatise victims through retelling to multiple services, such as history of abuse, risk assessments and perpetrator profiles/contact details.
59. Provide and ensure all criminal, civil and family court workers and officials complete competency-based training in domestic, family and sexual abuse and trauma informed ways of working.
60. Provide funding to grass roots and community-based services and organisations that are directly helping victims for domestic, family, and sexual abuse support.
61. Improve interoperability between domestic and family violence specialist services and community organisations supporting victims.

Children and young people

62. Provide and ensure all child protection workers complete competency-based training in domestic, family and sexual abuse and trauma informed ways of working.
63. Review all child protection legislation and policies with an intersectional feminist lens to identify and remove practices that perpetuates discrimination against and traumatisation of women and children for men's perpetration of family, domestic and sexual abuse.

Culturally, linguistic and religious specific strategies

64. Fund local and community run services to deliver ongoing family violence support as these are often at the coal face of helping victims' immediate safety and recovery as they have trusted relationships that provide better means to support victims, especially culturally and community specific services (including LGBTIQ+ run services).
65. Improve access to domestic and family violence specialist services for refugee and migrant women, including advice in language and outreach to community organisations and settlement services who are supporting women vulnerable to family violence due to their visa or migration status.
66. Translate all the eSafety Commission and digital literacy materials/seminars into multiple languages for migrant and refugee women and ensure these are distributed to the appropriate on the ground services working with these communities (including settlement services).

Online and technology facilitated abuse

67. Fund technical information technology and digital data specialist roles within domestic and family violence services to directly assist and protect victims' online safety - including access and use of services online, preventing tracking and disrupting stalking, reporting fake accounts and harassment etc.

Local Governments and Communities

Pillar One: Primary Prevention

68. Increase funding for women's health regional services to increase capacity building and reach of primary prevention efforts directly into communities.
69. Governments to develop means to collaborate with small and grassroots organisations to catalyse work with diverse communities and provide immediate dynamic feedback to government about what is and is not working in primary prevention efforts nationally.

About the organisations and people who contributed to this submission

Forty-seven people attended the consultation and approximately 90% either worked at an organisation that provides family, domestic, and sexual violence services or worked within the family, domestic, and sexual violence sector. Figures 1 to 4 display what services the organisations provide, where the organisations provide face-to-face services, and what client groups the organisations target.

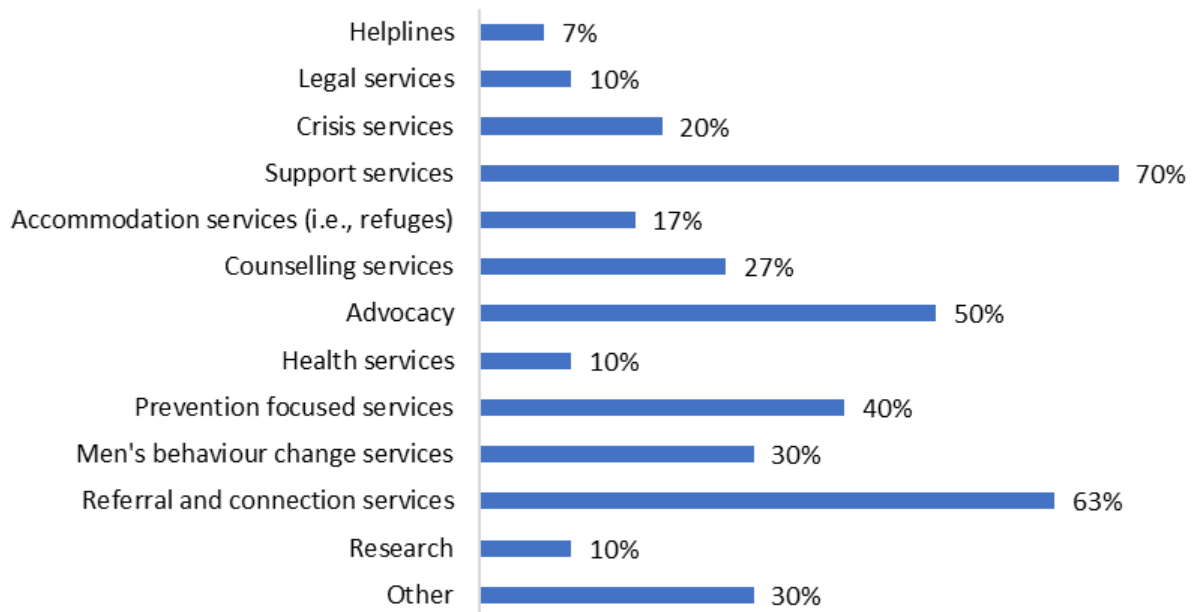


Figure 1. What family, domestic, and sexual violence services does your organisation provide

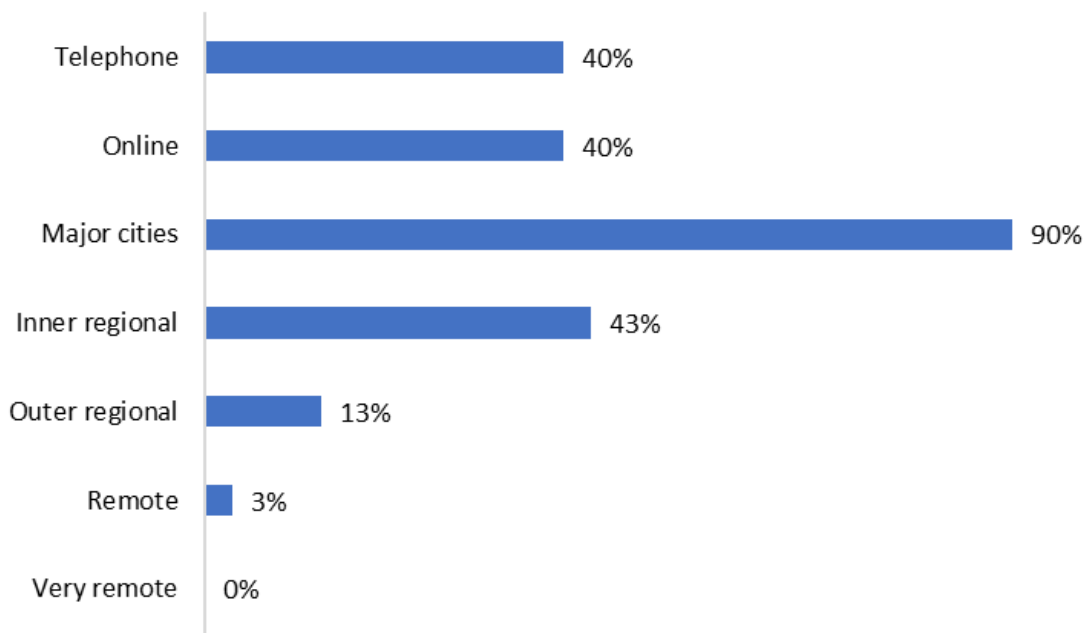


Figure 2. Where are your organisation's face-to-face services available?

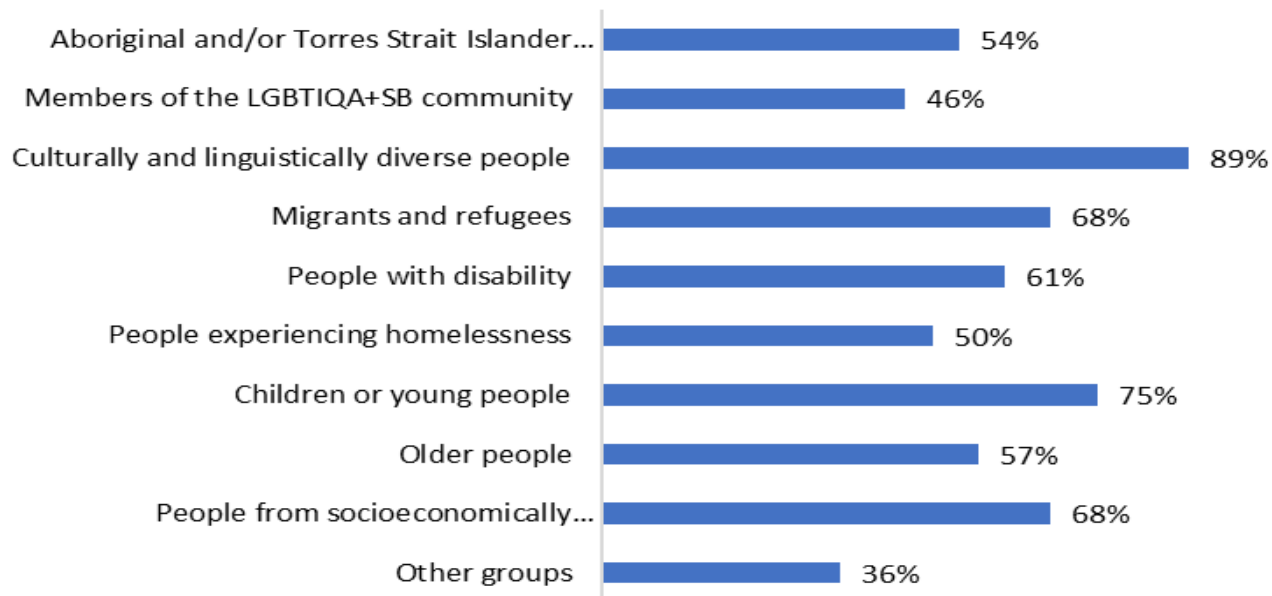


Figure 3. Does your organisation target services to the following client groups?

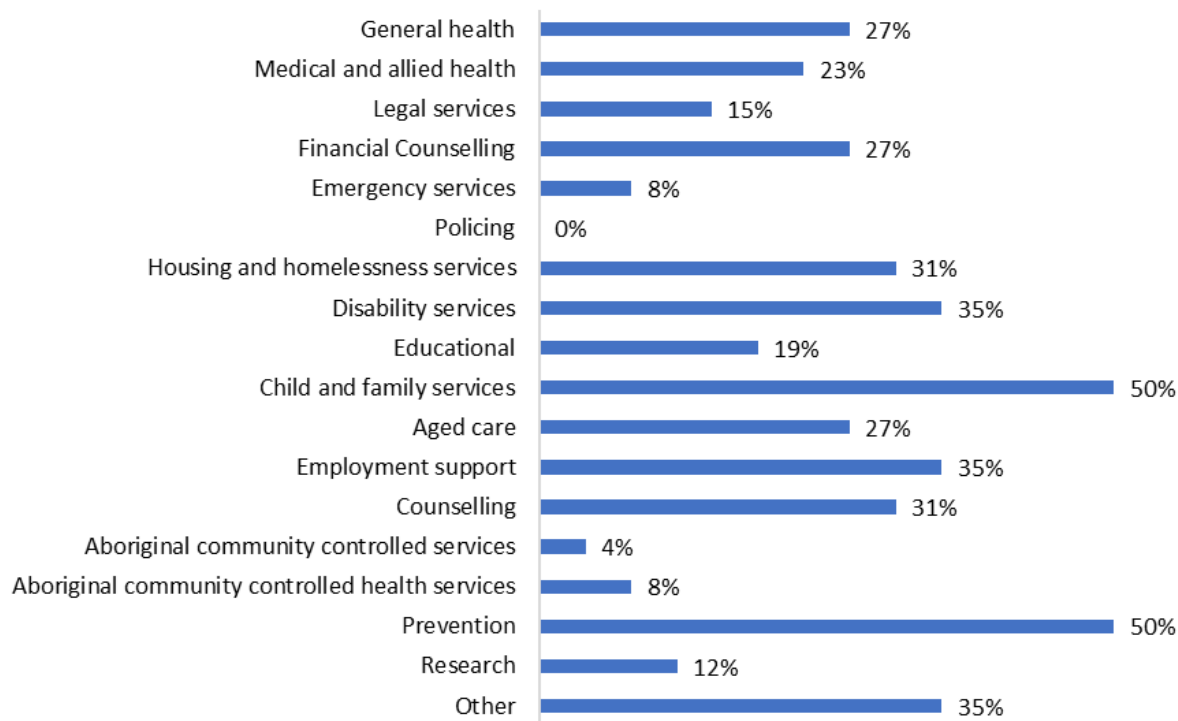


Figure 4. In regard to people working in organisations who provide services to people experiencing gendered violence, but are not a specialised family, domestic, and sexual violence service, what services do you offer?

Feedback on the four pillars of the National Plan

For each pillar, attendees of the consultation were asked to write down the strengths and weaknesses of each pillar, the opportunities, and threats to success.

Context of our Feedback

As skilled and experienced practitioners and agencies who have worked in Family Violence for many decades, we recognise the dynamics and role of aggregated coordinating documents like the draft National Plan. Further, we acknowledge the complexities inherent in delivering an overarching framework and vision, and then implementing it through the Australian Federation through multiple diverse communities experiencing different and intersecting forms of discrimination and disadvantage across Australia's vast geography.

Please note that we recognise that some of the criticisms and suggestions discussed below may be more appropriately addressed by state and territory governments and/or resolved during the action planning phase. Where possible we have sought to provide guidance of where the feedback and recommendations for action may be best directed under Australia's federated national architecture and in alignment with the four pillars to address and reduce violence against women and children, and all forms of gendered violence.

We also recognise the considerable amount of lived experience, time, and work that has gone into the development of the draft National Plan. We hope that some of the feedback below will serve to support the draft National Plan or inform the next steps.

Pillar one: Primary Prevention

What are its strengths?

Primary prevention practitioners and agencies know first-hand the positive impact of well-developed plans on setting the foundation for community wellbeing, particularly for women. We understand that national plans set the tone for the actions of states and territories and that systemic change relies on them. We are therefore **pleased to see primary prevention as one of the four pillars and that a strong intersectional lens has been applied** which recognises the unique experiences and needs of women Aboriginal and Torres Strait Islander women, migrant and refugee women, women with disability, older women, LGBTIQ+ people, children, and adolescents.

Another strength is that this pillar is **connected to the evidence-base** in that the approach is founded on various guides produced by Our Watch (i.e., Change the Story, Changing the Picture, Counting on Change).

The inclusion of two specific focus areas were cited as strengths:

1. Focusing on building capacity and the role of women and girls with disability in prevention; and
2. Educating and working with young people.

The **settings approach was cited as a strength** as it acknowledges the influence and impact of different contexts on behaviour and attitudes.

What are its weaknesses?

While Focus Area 1, point 5 from the draft National Plan discusses developing, implementing, and evaluating **targeted primary prevention activities designed by, and tailored for, migrant and refugee women**, it was requested that there should be an increased **focus on the role of CALD/ethno-specific/minority faith organisations and community leaders**. However, it was noted that religious leaders tend to be male and therefore, a female support worker should perhaps attend such discussions to ensure the application of a gender lens.

It was felt by some that CALD and migrant women were an afterthought. Perhaps these communities could be addressed throughout the Focus Areas, for example, **the role of influential organisations and community leaders in supporting men and boys to have respectful and equal relationships** could be outlined in Focus Area 4. Or perhaps, there could be a Focus Area specifically for migrant and refugee communities as they experience greater barriers to accessing support services and programs that are culturally tailored and appropriate. This is often extra challenging in the prevention context when **family, social, and religious pressures are so huge**. Therefore, a greater focus is needed on providing support for these communities.

While Focus Area 2, point 5 from the draft National Plan discusses addressing the role of pornography, an attendee asked for **specific strategies which address digital literacy among women and children with a disability - both targeting pornography and predatory behaviours**.

The lack of acknowledgement of the role of **parenting in respectful relationships** was also seen as a weakness by some of the attendees. There was a call for the **inclusion of new parents and parenting and this is an important opportunity for prevention**.

Engaging men and boys was seen as a strength, however, a stronger focus on men and boys and funding for agencies that represent them was requested. Caution was raised against resourcing and prioritising services for men versus services for women. One person said they are “not keen on wording, room for improvements.”

It was also requested that **men in leadership positions be specifically engaged** to articulate the need for change and help them to become **agents of change**.

Furthermore, this pillar should articulate the **engagement of traditionally male workforce settings**. One person spoke about the importance of working with the **whole of community** as well as engagement from boys and men, while maintaining a gender lens in alignment with the **recognition that gender inequality is driver of violence against women** and hence is one of the principles of the draft National Plan.

It was noted that **religious schools are reluctant to have these conversations with students around gender equality and family violence** and in some cases, specifically request that specific content that should really be shared with students is not covered. A huge cohort of students are therefore missing out on respectful relationships training. This is particularly concerning given the link between religious conservatism and an increased likelihood of using violence against women.¹ **If religious schools opt out**

¹ The Men’s Project & Flood, M (2020), *Unpacking the Man Box: What is the impact of the Man Box attitudes on young Australian men’s behaviours and wellbeing?* Jesuit Social Services: Melbourne.

of these conversations, they continue to be a site of increased risk to women and girls experiencing violence. Thus, respectful relationships education in religious schools should be encouraged in this pillar.

Prevention should also **target women's financial independence so they are not reliant on men** and can afford to leave an abusive situation. For women on temporary visas, it was suggested that there should be improved access to government support or paid work.

It was also requested that the **role of intergenerational family violence** be addressed in this pillar. Furthermore, the definition and description of this pillar should outline how prevention work integrates with response/recovery.

What are the opportunities?

The following opportunities were suggested:

- Link “change community attitudes” in Focus Area 1, point 1 from the draft National Plan to **national identity and national culture**.
- Collaboration of government and non-government agencies.
- Strengthen focus on the **needs/opportunities/role for migrant, refugee, CALD, minority faith communities**.
- **Elder abuse** and respect for older people is not strong enough in the draft plan. There is an opportunity for a gendered focus on elder abuse.
- Confidence - **tools to challenge sexism** - victims having to take action.
- Respectful relationships between women, men. The **language** is binary and excludes people who are gender diverse.
- More **targeted work with community**.
- Funding - authorising document.
- Four pillars - can refer to this as a guiding document.
- More engagement with **adolescents** as there is a lot of knowledge there.

What are the threats to success?

The threats or barriers to success were discussed. The greatest perceived barrier that was cited by several attendees was the **under-resourcing of prevention work**. Specific requests were made to 1) increase funding for women's health regional services; and 2) support and resource primary prevention programs in school-based settings (Respectful Relationships) to create lasting social and cultural change.

Several attendees stressed again the importance of engaging men and boys in prevention efforts with targeted prevention programs for newly arrived men and men from migrant and refugee backgrounds. Programs that are respectful and trauma informed recognising the complexities associated with men's experience of geographic and cultural dislocation, and loss of identity. However, a barrier to this being successful is **not involving men and boys in the process** of developing these programs. It is critical that men and boys are included in conversations about healthy masculinities and what it means for men and boys to model respectful, fair, ethical, safe, supportive, equitable behaviours within relationships.

It was discussed that prevention efforts can be **harder to measure** which may contribute to the smaller amounts of funding allocated to such programs. Thus, it was suggested that realistic expectations of outcomes and aims should be held so that programs and initiatives are not unfairly judged.

Poor planning and timing were raised by a few attendees. Thus, it was suggested that 1) prevention efforts should be coordinated with state plans with strong leadership from the states and territories²; 2) programs should be available early to challenge behaviours and attitudes before they escalate; and 3) smaller agencies and grassroots organisations must be included.

Pillar two: Early intervention

What are its strengths?

Several attendees felt that the **focus on men and boys was a strength of this pillar**. They particularly liked the attention on their **emotional health and wellbeing**, and inclusion of **self-identification pathways to seek help** for harmful behaviours.

Other strengths that were listed include:

- Acknowledgement of the role that **trauma** plays in family violence.
- The negative impacts of **rigid gender roles** (i.e., toxic masculinity) on both men and women.
- Recognition that people move forwards, backwards and sideways through the **cycle of intergenerational violence**.
- The focus on **collaboration** and elevating this way of working.
- Building **prevention capacity**.

What are its weaknesses?

A handful of weaknesses were discussed. A couple of people felt there was a **lack of parenting specific initiatives** included (i.e., [‘Baby Makes 3’](#)) that address and reduce the likelihood of **parental inequality**. Other comments included:

- Existing workforce challenges make it almost **impossible now to get people in men’s behaviour change programs and support positions**. It is recommended that the government undertake a scoping study for existing and future demand on men’s behaviour change program services and invest in the sector to ensure supply meets the growth in demand.
- There's no differentiator between an adult perpetrator and young person perpetrating.
- Lack of motivators for young people to stop using violence in the home (prior to criminal justice involvement).

What are the opportunities?

- **Measurable deliverables** that link to outcomes specifically for early intervention.
- Opportunity to address and define the **difference between youth perpetrators and adult perpetrators**.
- Opportunity to focus on **positive masculinity** and what it means to be a ‘modern day man’.
- Opportunity to develop positive **values-based messaging program for men** before they are referred to men’s behaviour change programs.
- Diversion programs for young offenders like [BackTrack](#).

² Note the submission from [Respect Victoria](#) also recommends coordination of prevention efforts across state and territories to provide a meaningful national picture, the scale and consistency of which is currently unknown.

- Parenting specific initiatives.
- Consideration of early intervention strategies and initiatives in **specific settings such as cultural and faith diverse settings**.
- Use learning from men’s case management to adopt a **strengths-based approach** at a national level.
- Inadequate resourcing (funding and human resourcing).

What are the threats to success?

Three threats to success were discussed. First, more **flexible magistrates are needed to successfully move between the criminal justice and civil spaces**.

Second, the **proposition that the civil space is considered early intervention** and criminal justice is considered an acute intervention, was seen as a **threat to the success of this pillar**.

Third, adequate resourcing (funding and human) is needed for Men and Boys services otherwise ‘blockages’ and long wait times (that already exist service-delivery wise) will increase.

Pillar Three: Response

What are its strengths?

There was discussion that this pillar’s strength is that it **establishes a minimum service level to ensure a consistent delivery of services**. For example, Focus Area 1, point 1 in the draft National Plan states it will “Ensure a resourced service system with an appropriately skilled and qualified workforce is available to support all victim-survivors, including victims of sexual assault, and **address perpetrator behaviour** no matter where they are located or their individual characteristics, through frontline services provided by states and territories.” Emphasis is also placed on **understanding the unique intersectional experiences of diverse communities**. Ensuring **services are appropriate for all victims** is therefore a strength worth noting.

What are its weaknesses?

Several comments related to the integration of specialist services. These were:

- Lack of service integration - **addressing organisational barriers to sharing information**, sharing risk assessments, sharing perpetrator details etc.
- Agree a lack of integration of specialist services and local community services is a huge problem and we see a **need for local and community services to be funded to provide ongoing family violence support** as often they have the **trusted relationship with victim survivor** and in complex cases with CALD clients, they have sometimes been **let down or not seen as high risk enough**.
- In relation to systems integration, a **lack of recognition of the vital role of practitioners in community organisations** who are required to hold the victim survivors and sometimes provide the critical support due to a lack of resources within specialist system or specialist system’s assessment of risk of victim survivors. A **greater respect and dialogue between specialist services and community organisations** who are trying their best to provide support to victim survivors.

- Acknowledge and **embed specialist practitioners in community organisations and generalist services** to provide victim survivors with **holistic support**, rather than have a segmented and siloed system of dependency upon referring to specialist service and re-traumatising victim survivors (post crisis).
- Strengthening understanding around **housing, income, and employment services (mutual obligation)** – it's vague.

A few comments discussed migrants and refugees as well as issues relating to visas. One person discussed a concern with **using visa status for abuse**— e.g., partner removing sponsorship and victims having to leave the country even when children remain in the country. **Women on temporary visas** (i.e., tourist, students, seasonal workers etc) are not protected/supported at all. Other comments discussed barriers that are faced when accessing support:

- Importance of recognising that there are **still significant barriers for migrant, asylum seeker and refugee women for engaging with family violence specialist services** and organisational policies add to the barriers. Often when they call, their situation doesn't meet the threshold for urgent crisis support.
- **Structural issues** creating barriers for migrant and refugee women on temporary visas. For example, social supports, such as Centrelink, childcare and work rights, are not accessible and thus create **barriers to leaving, living independently, and commencing the recovery process**.
- **Lack of culturally appropriate refuges for migrant and refugee women seeking to leave**. Often, they are more traumatised in a refuge and go back to abusive relationships
- **A culturally appropriate and rights-based approach that ensures every woman requiring support is provided with support, safety and a pathway for living free from violence** and at the moment we don't see this happening for women on temporary visas and women who are not financially dependent; they often stay or return to the perpetrator due to experiences of leaving and lack of stability, safety and security for children and victim survivors.
- System-level improvements to ensure protection of victim-survivors, for example, **protecting confidentiality of visa applicants when corresponding with perpetrators**.
- **Elder abuse that occurs for those on parent visa sponsorships** – Minimal support exist for people facing this situation. This may be missed/not understood by domestic and family violence services and authorities alike.
- The draft National Plan does not address the **dangerous role that certain visa conditions have in facilitating abuse, such as limited work authorisations, limited right of residence, dependence on a third party for the right of residence, and limited access to services and social security**. When combined with distance from family support and a lack of familiarity with Australian laws, women on temporary visas are vulnerable. So long as our migration system remains in its current form, we will not be able to comprehensively address family violence in Australia.

There were two comments that discussed policing strategies. First, that **police forces across all states should be on the same page regarding the seriousness of family violence as a number one issue**. Second, that there **needs to be a policing strategy to improve police response and victim experiences of engagement with police, including police perpetration of domestic and family violence**.

Two comments also discussed recognising that **workers in the system (health, domestic and family violence sector etc) and people in the justice system need strong family violence leave provisions**.

Also, there is a lack of recognition for the **support provided by agencies to women experiencing family violence, or coercive control who stay in the relationship.**

There were concerns about the role of technology and e-safety. It was suggested that e-safety should be broad enough to include online health records, for example, my health record, patient portals etc which can be misused/abused by perpetrators and significantly increase risk of harm to victim survivors. Also, **e-safety and digital literacy materials/seminars should be translated for migrant and refugee women.** Relatedly, there should be **clear reporting and support pathways for abuse via social networking sites in other languages** due to domestic and family violence.

Other comments related to the **child protection system, the divide in the court systems, information sharing across states and territories, technology and online safety, the importance of trauma informed practice, and intersectionality.**

- **Child protection system creates risks by not applying family violence lens to their work.**
- Streamlined process between the State Magistrates Court and the Federal Family Court system.
- Implications of the **overlap of Migration Law and Family Law for victim survivors on temporary visas experiencing domestic and family violence.**
- National agreement and support for **consistency across all states and territories for the application of information sharing.** A national response to sharing information amongst services would be a significant risk management strategy.
- Lack of focus on in depth understanding of trauma sensitive practice - **building capability of response systems to do this work in a trauma informed way - particularly police, child protection, courts.**
- The plan refers to intersectionality like it means diversity - **the plan overall needs to describe intersectionality principles properly and recognise how these intersect to impact on experiences of violence, response to it and accessibility of support.** Intersectionality does not equal diversity. This needs better articulation in the plan.
- The increase in cases of **mis-identification of victims of family violence as perpetrators within CALD communities** is a real concern as perpetrators have become quite clued on how to use the system (judicial and child protection) to their advantage. Closer look at and reviews of cases of mis-identification should take place as a matter of urgency.

There was concern about the ongoing impact of COVID-19 on remote service delivery. That is, the impact on isolated victim-survivor women/individuals and children and their access to supports.

There was also a comment about including an emphasis on Gender Equality and Climate Change – storms, floods, fires and pandemics, and the role of Local Government to prepare for, respond to and support disclosures of family violence and violence against women and children.

What are the opportunities?

The opportunities that were discussed include:

- Increased opportunities to **assist women to sustain their family home including property settlements, home loan schemes, and superannuation.**
- **Funding technical support/expertise within domestic and family violence services** to do tech security/protection and online safety. This is an opportunity for private/public partnerships.
- Opportunity to **embed specialist legal system responses at a national level** - take learnings from current specialist family violence courts and ensure all Magistrates courts have this system to improve consistency and availability of specialist professionals.

- **Improved sector collaboration and integration resulting in less trauma and greater support for victim survivors** who shouldn't have to wait for weeks to be supported once they have disclosed or be ping ponged across the sector for support.

What are the threats to success?

Workforce constraints were discussed as a potential threat to success. There needs to be a workforce strategy that (1) is forward looking rather than reactive, and (2) focuses on continuity of service standards and knowledge.

Due to **lack of funding, grass roots, community-based organisations** are at risk of being overlooked in their role of responding which will diminish the success of this pillar.

Finally, the **systems, processes, and policies within organisations may limit opportunities for collaboration between services**. For example, the requirements for accreditation under the DFFH Human Services Standards is a barrier for funding community based, ethno-specific, multicultural services to carry out DV case management.

Pillar four: Recovery

What are its strengths?

The trauma informed approach and the **long-term need to heal beyond initial safety** were seen as strengths. Furthermore, **linking recovery to prevention was seen as a strength** as it ensures that violence does not recur.

What are its weaknesses?

A few people had concerns relating to a **lack of focus on housing** and how it will be addressed. One person highlighted that there are currently limited options for women to move out of transitional housing. It is a complex issue as **private rental is often not suitable and paying a mortgage is impossible for many women**. The issue of **housing was described by one person as “the pinnacle” as without it, victim survivors are not able to move into a recovery space**. We note that Focus Area 2, point 1 from the draft National Plan addresses safe and affordable long-term housing for older people. Perhaps this issue should also be discussed in relation to all female victim survivors and children, and other diverse populations and individuals.

We note that Focus Area 2, point 3 from the draft National Plan discusses supporting migrant and refugee women to **access culturally appropriate services in their language**. One attendee underlined the fact that the recovery process differs for **migrant and refugee women who rely on reconnecting with their communities, restoring reputation, and rebuilding trust**.

There was a sense that services and funding are time defined which was of concern to a few attendees. Providing an end point is problematic as women are unable to re-enter the system and currently, long-term recovery systems do not exist. Rather, **recovery should be approached as an ongoing process with timing defined by the client rather than the system**. Indeed, it was discussed that you cannot put a timeline on recovery, particularly for children.

The need for more **emphasis on employment and financial independence** was discussed. One attendee commented, “Financial independence - having a job will enable rebuilding.” Financial independence is

important as a **lack of income and independent finances often sees women returning to their abusive partner**. We note that Focus Area 1, point 2 from the draft National Plan does outline the aim to support women and children to participate in society economically. Perhaps this can be expanded on.

Other areas that people would like to see included or given more focus include:

- The issue of **children being denied access to services as both parties not consenting to the support services**.
- The draft National Plan refers to recovery in terms of clinical services, but **a more holistic view of recovery is needed for individuals, children and communities**.
- Community capacity to understand the importance of recovery from impacts of family violence.
- There is only one reference to **whole-of-family healing** and it is in relation to Aboriginal and Torres Strait Islander peoples, however, this is relevant to all people.
- Legal issues - **legal costs of repeated legal issues** - family court

What are the opportunities?

Systemic and practical issues were discussed relating to **banks, utilities like phone providers, and services like MyGov and Medicare cards**. These services often present huge barriers and prevent women from moving on because **male perpetrators have control over passwords and thus limit or prevent access**. There is no recognition from these services that these are barriers to women moving on and getting on with their lives and thus should be targeted in the draft National Plan.

The ways in which recovery can be part of communities was discussed as an opportunity. Victim survivors need to **self-identify their community so they are not removed from it or separated from it**. Being part of that community is very important and there needs to be diversity in providers and responses depending on which community or communities people are part of.

Other comments relating to opportunities include:

- The definition of the **evidence-base is limited and could be expanded**.
- **References to older Australians could be changed to older people**.

What are the threats to success?

The main threat to success is that there is **very limited focus on shared family violence education across systems** to understand the roles or limitations and points of connection that support a continuous net of safety and communication across services where needed. For example, justice, health, mental health, family violence services, and child protection.

Recommendations

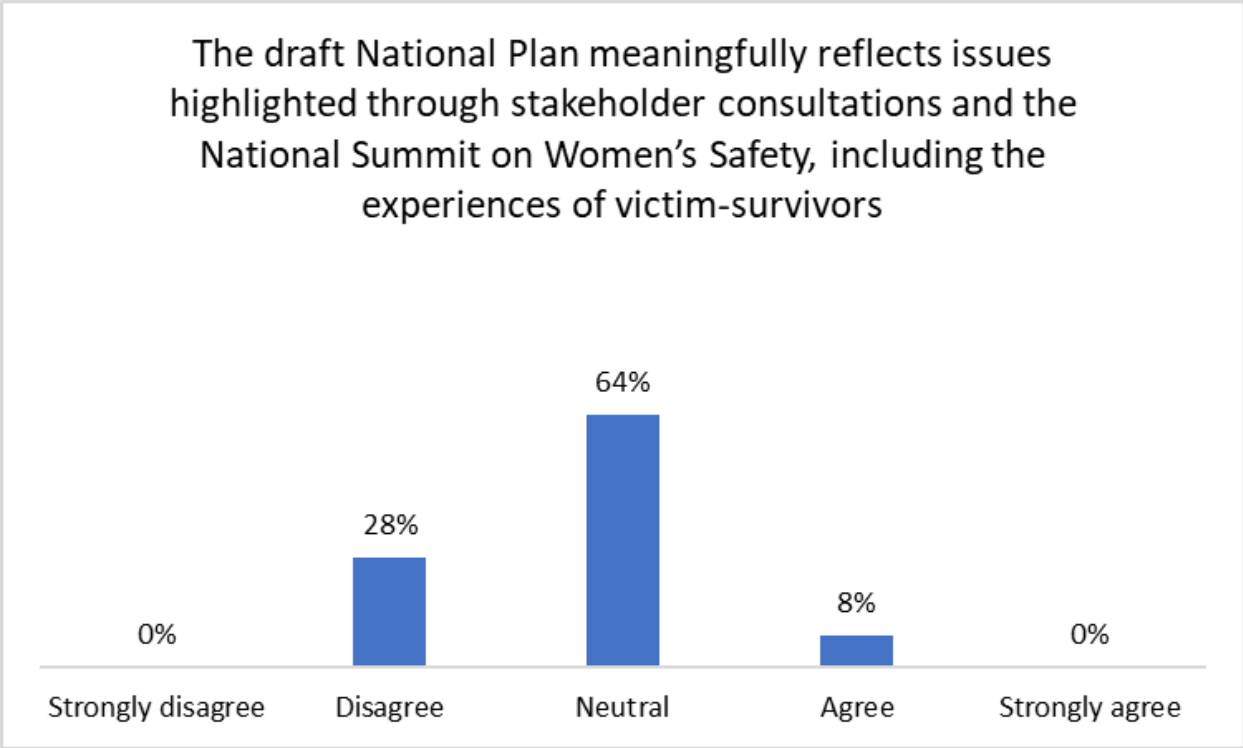
- Undertake systematic review of evidence of what works for long term trauma recovery from experiences of gendered violence
- Clarify and demonstrate the linkages between recovery and primary prevention such as:
 - Structural changes related to housing availability, access and ownership, women's financial independence and wealth creation for single mothers.
 - Culturally specific engagement to create and rebuild community support for victims' recovery so they are not isolated from their communities, including religious groups.

- Identify and address systematic and technological weaknesses that allow perpetrators to lever tools of abuse post separation/break up across banking, Centrelink, NDIS, and other services.
- Fund trauma recovery programs and services that address women’s and children’s need holistically, including whole of family healing.
 - Prioritise recovery therapies and support for children who experience domestic and family violence (recognising children as victims in their own rights of all abuse occurring in the home and between parents) to help establish emotional wellbeing and reduce likelihood of intergenerational violence.
- Reduce costs of family court and legal fees that detrimentally impact on single parents’ finances (especially mothers who have often experience financial abuse or have limited assets) and are used by perpetrators as yet another lever to control and disrupt victims’ lives as a continuation of abuse post separation.
- Provide mandatory competency-based training in domestic, family, and sexual abuse to all service providers/workforces that deal with victims and perpetrators that relate to recovery, including, but not limited to, health (i.e., psychologists/psychiatrists, occupational and speech therapists, paediatricians, GPs, nurses, counsellors), government services (i.e., Centrelink, NDIS and related providers such as Medicare, Home Affairs regarding migration and visas), justice systems (i.e., police, lawyers, courts – criminal, civil, and family, corrections and parole officers, child protection and children’s advocates), and social and youth workers.

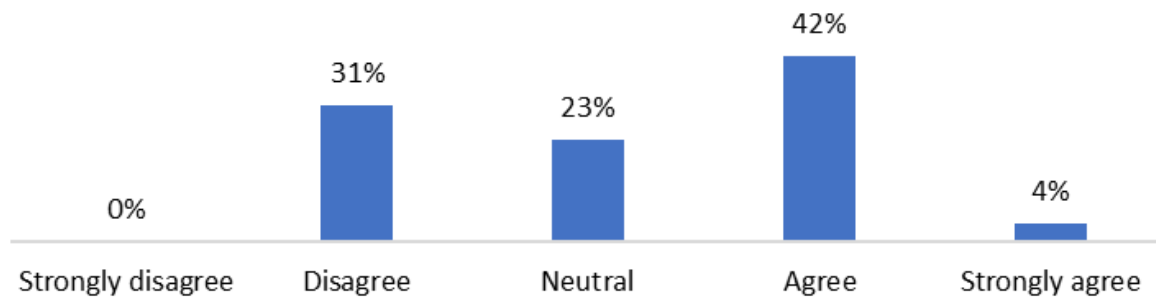
Responses to the questions included in the consultation survey

The questions included on the Department of Social Services Engage website were presented to the consultation attendees. Note that while many of the questions originally asked for short-answer responses, we presented the questions with a 5-point Likert scale response option: strongly disagree, disagree, neutral, agree, or strongly agree.

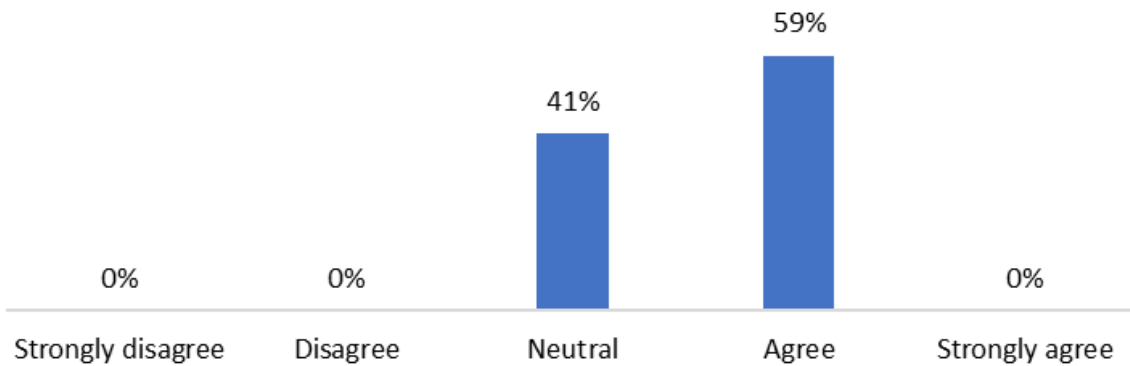
Also note that for the question asking, “The draft National Plan reflects the needs and experiences of diverse communities and individuals”, attendees were invited to rate their agreement from 1 to 5 for each of the diverse communities with 1 indicating a low level of agreement and 5 indicating a high level of agreement. Responses to these questions are summarised below.



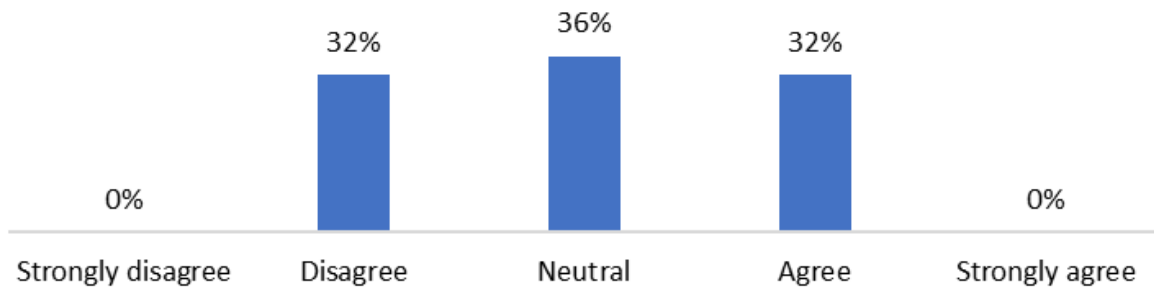
The four National Pillars in the draft National Plan provide a holistic approach to identifying and responding to gender-based violence



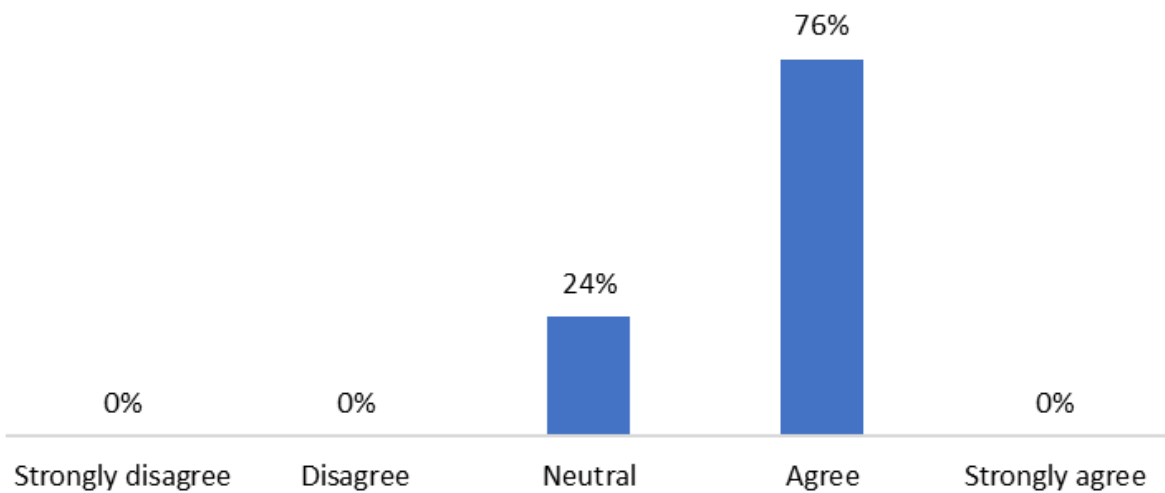
The draft National Plan includes a clear explanation of the prevalence, drivers, and different forms of gender-based violence in Australia



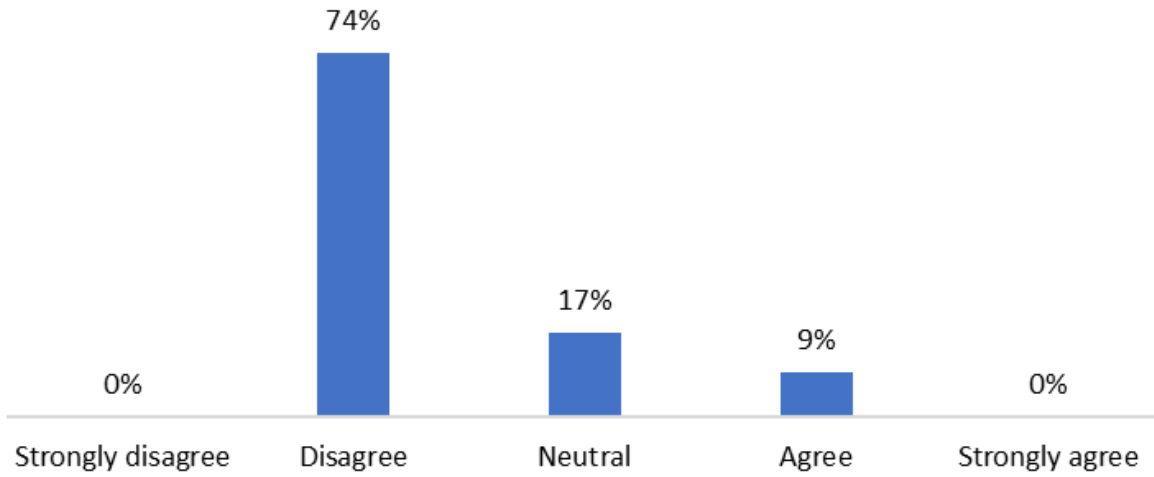
The four National Pillars in the draft National Plan reflect the family, domestic and sexual violence service system



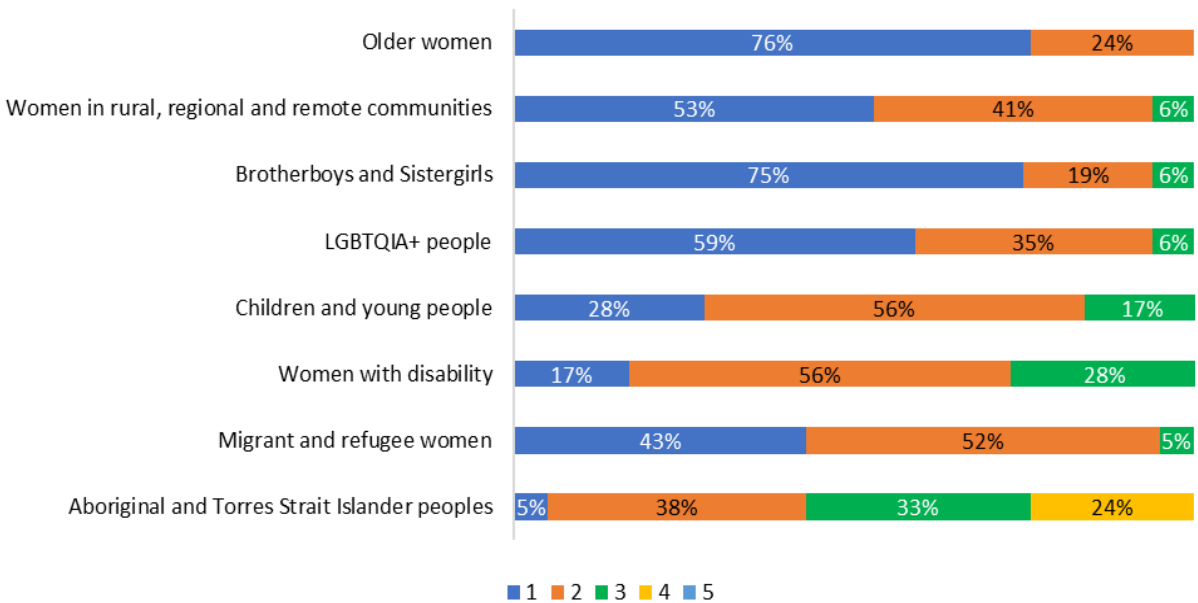
The four Foundation Principles appropriately underpin the National Pillars and actions within the National Plan



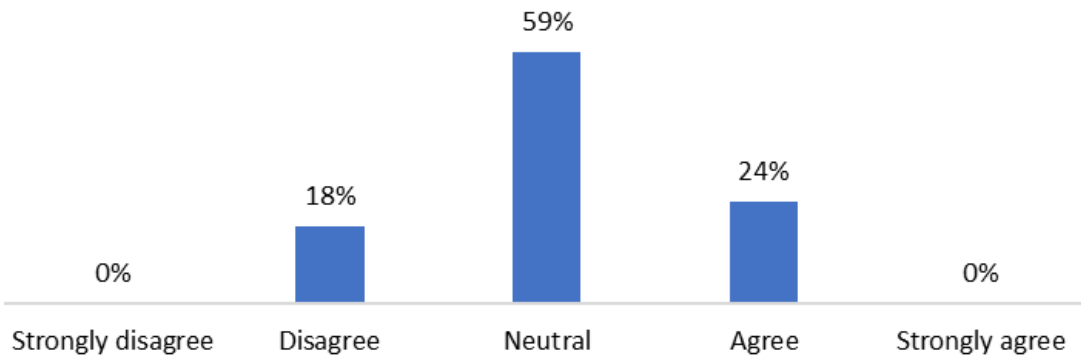
The draft National Plan reflects the needs and experiences of women and children



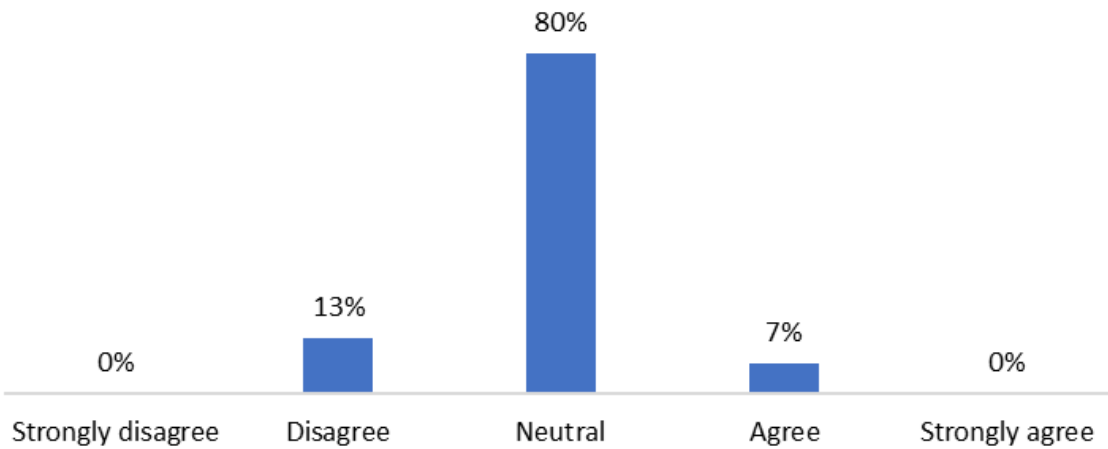
The draft National Plan reflects the needs and experiences of diverse communities and individuals.



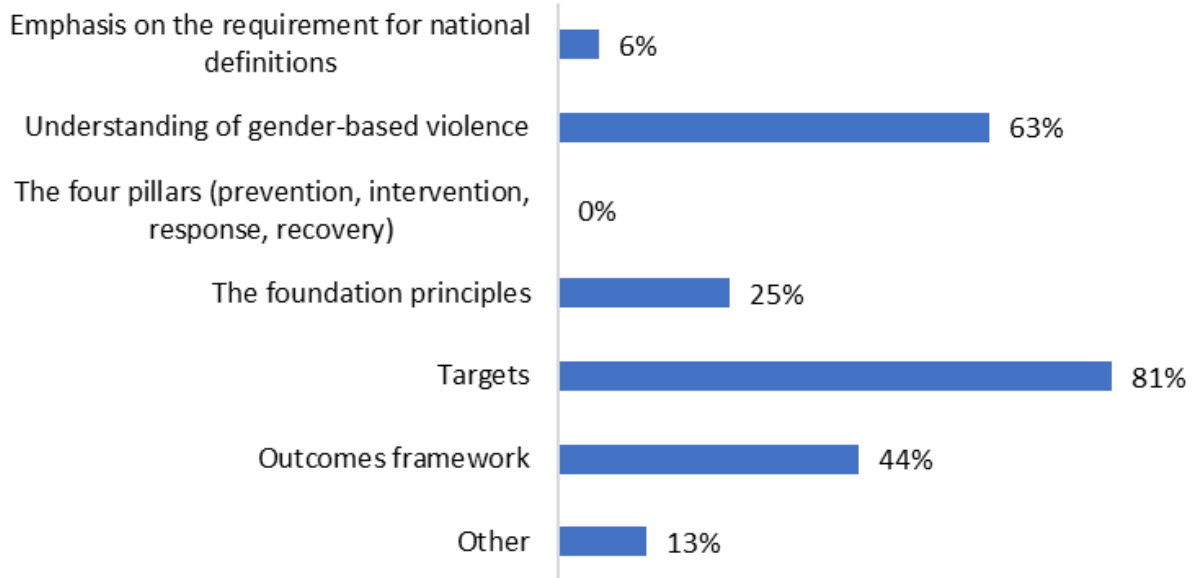
The draft National Plan supports building further evidence on what works for gender based violence prevention, early intervention, response and recovery



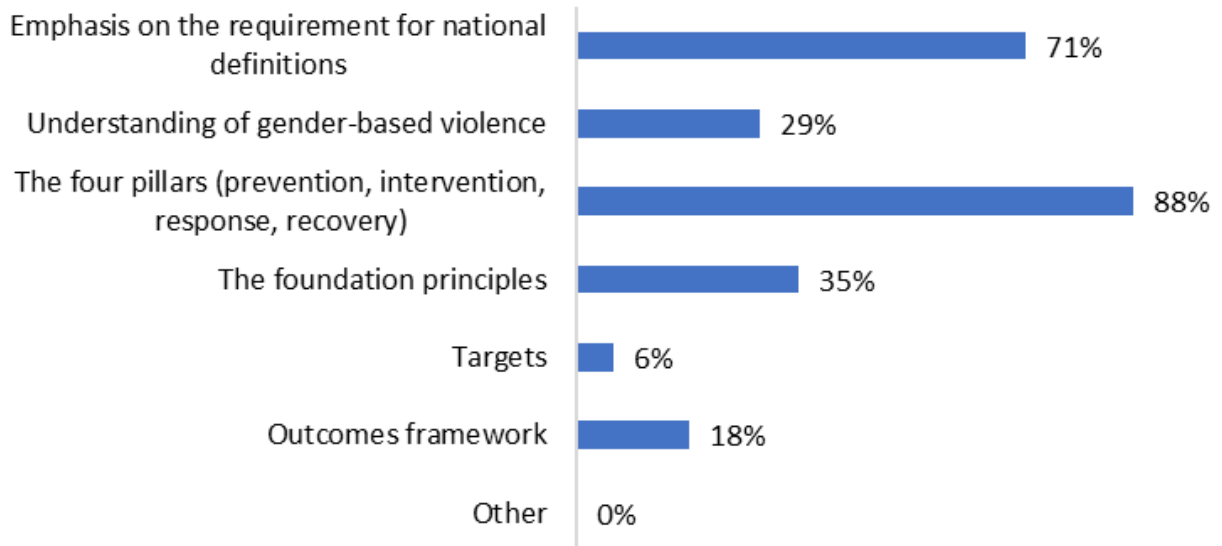
The draft indicators and outcome measures provide a strong framework for measuring progress towards the next National Plan goals



What would you change about the draft National Plan?



What would you not change about the draft National Plan?



Attendees were asked if they would like to provide any comments or explain their response to the previous question which asked, “What would change about the draft National Plan?” Their responses are below:

- NCAS needs to add new values-based questions and move away from questions with problematic attitudes, which can reinforce them.
- **Increased resources to sector.**
- This Action Plan assumes that the first Action Plan has worked 100%. That is an oversight and should have considered a **gradual progression of this work across all of the sector.**
- **Increased housing plan** and options for women, recovery continues for many, many years, not just 6 sessions.
- **Targets set based on appropriate resources.**
- **Outcomes and targets should be inclusive of multiple forms of evidence, including recognition and integration of lived experience perspectives and First Nations wisdom.**
- A principle of the strategy needs to be a Stratocaster **focus on masculinity.**
- More emphasis on **women and children on temporary visas experiencing family violence.**
- **Ensuring language is inclusive of LGBTIQ+ communities** to align with the newly formed Safe and Equal.
- Ensuring funding for men/people who use violence programs provides **distinct funding for supporting victim survivors.**
- **Acknowledging case management and counselling services for victim survivors are at capacity with lengthy wait lists.**
- Development of streamlined and consistent responses to victim survivors and men/people who use violence with the Orange Door to ensure best practice.
- Implementing **individual and tailored responses to men/people who use violence** to keep them visible to ensure the sustained safety of victim survivors and their children.

Agencies represented through this submission

This submission was compiled through the feedback from three partnerships who undertake work and activities across Southern Metropolitan Region on family violence. While some of the organisations listed below appear in two or more partnerships, the context, personnel and experience that the agency brings to the partnership work is unique to that partnership.

Promoting Respect and Equity Together

City of Casey	Kooweerup Regional Health Service
The Orange Door SMA	Koorie Pride Victoria
Legal Aid Vic	Carrington Health
Wellsprings for Women	City of Port Phillip Council
VACC	Bayside City Council
Department of Education & Training	Headspace Frankston
Youth Support and Advocacy Service (YSAS)	Monash Health
RAV	Connect Health & Community
Uniting Vic/Tas	Enliven
Alfred health	Windermere
Peninsula Health	Cardinia Youth Services
Family Life	Victoria Police- Sexual Offences and Child Abuse Team
Star health	Kingston City Council
Corrections	Women with Disabilities Victoria
Good Shepherd	Centre for Multicultural Youth
The Salvation Army	Victoria Police
Anglicare	Edithvale Primary School
JewishCare	City of Stonnington
The Orange Door - Frankston	Multicultural Centre for Women's Health
Olives' Place – Vincent care	Cardinia Shire Council
Emerge	AfriAus_iLEAC
Taskforce	SMRC - Southern Migrant and Refugee Centre
DFFH	Fire Rescue Victoria
Peninsula Community Legal Service	Connect Health & Community
Central Bayside Community Health Services	Frankston City Council
Mornington Peninsula Shire	City of Greater Dandenong
Glen Eira City Council	South East Community Links

Southern Melbourne Integrated Family Violence Partnership

SECTOR	ORGANISATION/ROLE
Specialist Women's family violence services (including Specialist CALD Women's family violence services)	WAYSS Windermere Uniting Vic/Tas Wellsprings for Women (CALD Women's FV service) InTouch Multicultural Centre Against Family Violence (CALD Women's FV service)
Specialist Men's family violence services	Anglicare Relationships Australia Victoria
Specialist Youth Family Violence Services	Berry Street
Specialist Aboriginal Family Violence Services	Victorian Aboriginal Child Care Agency (VACCA)
Local Government	City of Casey City of Greater Dandenong
Child Protection	Department of Families, Fairness and Housing (DFFH)
Department of Education and Training (DET)	Respectful Relationships, Project Lead and Liaison Officer
Department of Justice and Community Safety (DJCS)	Manager, Court Practice, Dandenong Community Correctional Services
Department of Families, Fairness and Housing (DFFH)	Agency Performance and System Support, Southern Melbourne Area, Team Leader and Manager
The Orange Door - Southern Melbourne	Family Safety Victoria (FSV)
Mental Health and Disability	ERMHA365
Hospital/Health Service (State)	Monash Health
Community Health Promotion	Enliven
Primary Health Network (Federal)	South Eastern Primary Health Network (SEMPHN)
Sexual Assault and Violence	South Eastern Centre Against Sexual Assault (SECASA)
Community Legal Service	Springvale Monash Legal Service (SMLS)
Auspice Agency and Principal Strategic Advisor	Uniting Vic/Tas
Child and Family Services	Southern Melbourne Individual, Child & Family Services (ICFS) Alliance
Alcohol and Other Drugs (AOD)	EACH South Eastern Alcohol and Drug Service (SECADA) Uniting ReGen
Victoria Legal Aid	Managing Lawyer, Westernport Region Specialist Family Violence Information and Referral Officer, Westernport Region
Victoria Police	A/Inspector, Capability and Support, Division 3, South Metro Region
Dhelk Dja Regional Coordinator (Southern Metro)	Department of Families, Fairness and Housing (DFFH)
Primary Prevention	Women's Health in the South East (WHISE)
Youth Advocacy and Support Service	YSAS

Bayside Peninsula Integrated Family Violence Partnership

SECTOR	ORGANISATION/ROLE
Auspice	Uniting Vic/Tas
Specialist Women’s family violence services	The Salvation Army Australia Good Shepherd Australia New Zealand
Specialist Women’s family violence services-refuge	Olive’s Place – VincentCare Victoria Emerge Women and Children’s Support Network Inc.
Specialist men’s family violence services	Peninsula Health Family Life Victoria Inc. Star Health Anglicare Victoria
Family Safety Victoria –	The Orange Door Bayside Peninsula Area
Victoria Police	Area Commander and FVIU – Div 1,2,4
Bayside Peninsula Child & Family Services Alliance	Partnership Manager
Bayside Peninsula Area South Division Department of Families Fairness and Housing	Agency Performance and system support APPS Area Director
South Metro Dhelk Dja Regional Coordinator Aboriginal Engagement Unit	DFFH
Community Legal Service	Peninsula Community Legal Centre
Magistrate’s Court of Victoria	Moorabbin Justice Centre Frankston Magistrate’s Court
Health Services Primary Health Network	Alfred Health – SHRFV Peninsula Health SEMPHN
Elder Abuse	Peninsula Health
Mental Health	Peninsula Health Alfred Health Monash Health
Child Protection	Department of Families, Fairness and Housing DFFH
Bayside Peninsula RAMP Coordinator	Good Shepherd Australia New Zealand
AOD	Taskforce
Cultural Diversity Family Violence	JewishCare
Primary Prevention	Women’s Health in the South East (WHISE)
Sexual Assault	South Eastern Centre Against Sexual Assault (SECASA)
Aboriginal FV Services	Victorian Aboriginal Child Care Agency VACCA
LGBTIQ+	Thorne Harbour Health
MARAM Training Coordinator	Uniting Vic/Tas