



Submission on the draft National Plan to End Violence Against Women and Children 2022 - 2032

February 2022

Introduction

Women's Health Victoria (WHV) welcomes the opportunity to provide a submission on the draft *National Plan to End Violence Against Women and Children 2022-2032* (the draft National Plan). WHV is a state-wide feminist health promotion, advocacy and support service with a proud history of over 25 years. We advocate and build system capacity for a gendered approach to health that reduces inequalities and improves health outcomes for Victorian women. We collaborate with health professionals, researchers, policy makers, service providers and community organisations to influence and inform health policy and service delivery for women.

Three key priorities for WHV are the prevention of violence against women, women's mental health, and sexual and reproductive health. We bring more than a decade's experience in leading primary prevention policy, practice and workforce development, including [training delivery](#) and implementation of the national [Gender Equality in Advertising](#) project, which applies an evidence-based approach to the prevention of violence against women within the advertising and communications setting. WHV also leads the Women's Mental Health Alliance (the Alliance), a coalition of around 40 organisations and individuals who provide expert advice to policy makers and health services on the mental health of women and girls and undertake advocacy to ensure all women have access to evidence-based, gender-sensitive and trauma-informed mental health support. WHV also brings expertise in sexual and reproductive health, including through the operation of *1800 My Options*, a state-wide information and referral service for contraception, pregnancy options, abortion and sexual health. We are well-placed to provide advice on issues that arise at the intersection of the violence against women, mental health and sexual and reproductive health sectors.

This submission outlines WHV's significant concerns with the draft National Plan and associated recommendations. In line with our priorities and expertise, we focus on the primary prevention of men's violence against women and children and women's and children's recovery from violence-induced trauma and mental ill-health.

Summary of Recommendations

The revised version of the draft National Plan needs to:

1. Include an undertaking from the Australian Government to develop a national gender equality strategy to create the policy framework to guide structural change across Australia and boost efforts to prevent violence against women and children.
2. Clearly and consistently acknowledge that gender inequality is not 'an underlying determinant' of violence against women and children but the primary underlying driver.
3. Embed intersectionality throughout the Plan by consistently referencing the structural barriers that contribute to the marginalisation of priority populations, identifying concrete actions to address these, and investing in organisations led by Aboriginal and Torres Strait Islander women, women with disabilities, migrant and refugee women, and members of the LGBTQI+ community.

4. Include a commitment under the Prevention Pillar Focus Areas to scaling up WHV's [Gender Equality in Advertising](#) project to increase its scale and impact, in partnership with the Victorian Government.
5. Include a commitment under the Prevention Pillar Focus Areas to investing in and scaling up primary prevention training and capacity-building initiatives. Examples include the suite of online and interactive training courses WHV offers on [Gender Equity](#) and [Prevention of Violence Against Women](#).
6. Revise the Focus Areas under the Prevention Pillar so that they:
 - specify how each commitment addresses one or more gendered drivers of violence against women and children (ensuring all drivers are included),
 - specify how each commitment will be carried out (linking to existing initiatives as appropriate), and
 - represent a balance between activities aimed at each of the four-tiered outcome levels (individual, service, system and community).
7. Include a commitment under the Recovery Pillar Focus Areas to ensuring services and workforce in the (i) mental health and (ii) sexual violence, domestic and family violence sectors understand and are equipped to respond to the mental health and trauma impacts of violence against women and children.
8. Include a commitment under the Recovery Pillar Focus Areas to investing in the Women's Trauma Recovery Centre, an evidence-based model of care for victim-survivors of family and sexual violence which has been co-designed with women with lived experience, developed by the Illawarra Women's Health Centre in NSW and underpinned by research conducted at UNSW.
9. Commit the Domestic, Family and Sexual Violence Commission to reporting on progress towards gender equality indicators alongside attitudinal, prevalence and service use data as part of their monitoring and evaluation responsibilities, drawing on existing public datasets where these exist (e.g., data collected by the Workplace Gender Equality Agency).
10. As part of the evidence development program:
 - develop methods for collecting data on effectiveness of interventions and services to inform decisions about which interventions to scale up.
 - commit to expanding existing and new data collection instruments to include questions specific to women with disabilities, migrant and refugee women, and members of the LGBTQI+ community.
11. Include reference in the outcomes framework to efforts to strengthen the legislative and policy environment to address violence against women and children in relation to desired system-level outcomes.

Definitions and consultation

This submission uses the term violence against women. This definition is inclusive of family violence, sexual violence, sexual harassment, intimate partner violence and domestic violence. Our use of this term acknowledges that most of the violence in these contexts is perpetrated by men against women and that there is a specific evidence base for the prevention of men's violence against women. WHV's use of the term women is inclusive of all people who identify as women, and we acknowledge that gendered violence also impacts gender diverse and transgender people and occurs in LGBTQIA+ relationships.

In preparing this submission WHV has consulted with a range of organisations with expertise in both prevention and response to violence against women including:

- Specialist and peak bodies including Safe and Equal and VCOS; and
- The Victorian Women's Health Services network, including the Multicultural Centre for Women's Health, Women's Health East, Women's Health in the North, Gippsland Women's Health, and Women's Health Goulburn North East.

Overview

Addressing violence against women and children – progress since the first National Plan

Some initial progress in the **prevention** of violence against women and children has occurred following the first National Plan, however **recovery** from violence was not a key feature and little work in this area has occurred on a national level to date. In relation to prevention, as the draft National Plan reports, important pieces of infrastructure have been established (establishment of the national primary prevention agency Our Watch and the Australian National Research Office of Women's Safety (ANROWS)), promising practice has emerged across a range of priority settings, prevention has been increasingly recognised as a policy priority for States and Territories, and a skilled prevention workforce is emerging (though requires significant expansion). There is also some improvement in *gendered attitudes, norms and practices that drive violence against women* (reduction in attitudes condoning and accepting violence against women, increase in attitudes supporting women's engagement in public life, and modest gains, albeit from a low base, in representation of women in management and in male-dominated industries¹).

However, overall changes in relation to the gendered drivers of violence against women and children have been minimal. Women continue to experience economic inequality, inequality in decision-making power, gender stereotyped or sexualised representation in media and

¹ Our Watch (2020) [Tracking progress in prevention: a national monitoring report on progress towards the primary prevention of violence against women and their children in Australia](#), Our Watch. Melbourne.

advertising, and intersecting forms of discrimination.^{2,3} These continuing manifestations of gender inequality help explain the trends observed in the prevalence of violence against women since the start of the first National Plan – no reduction in rates of intimate partner violence, and increased rates of sexual violence – and the increase in the prevalence and severity of intimate partner violence documented since the start of the COVID-19 pandemic^{4,5}.

Given the enormous social, economic, community and individual costs of violence against women and children and the fact that experience of and exposure to violence is a reinforcing driver of violence⁶, persistent or increasing rates of intimate partner and sexual violence underline the urgency of ensuring the draft National Plan is robust, comprehensive, evidence-based and well-resourced. However, the current version of the draft National Plan falls far short of fulfilling these criteria.

Our submission therefore identifies critical areas of weakness across the draft Plan and sets out key recommendations to address these, so that all levels of Australian society can work towards the draft Plan's vision of *'a country where all women and children live free from fear and violence, thrive and reach their full potential, and where women and children and LGBTQIA+ people of all genders are safe at home, at work, at school, in the community and online'*.

Finally, we note that in addition to our recommendations regarding the content of the draft National Plan, the revised version needs to:

- be endorsed by all key stakeholder groups,
- include a governance structure enabling all parts of the sector (including victim-survivors) to have oversight and direct input to government, and
- be accompanied by detailed action plans with the necessary investment to effect and embed real and sustainable change.

² McKenzie M, Bugden M, Webster A, Barr M (2018) [Advertising \(in\)equality: the impacts of sexist advertising on women's health and wellbeing](#). Women's Health Victoria. Melbourne. (Women's Health Issues Paper; 14)

³ Our Watch (2020) [Tracking progress in prevention: a national monitoring report on progress towards the primary prevention of violence against women and their children in Australia](#), Our Watch. Melbourne.

⁴ Commonwealth of Australia (2022) [Draft National Plan to End Violence Against Women and Children 2022-2032](#). Canberra, Australia. P20.

⁵ Boxall H, Morgan A, Brown R (2020) [The prevalence of domestic violence among women during the COVID-19 pandemic](#). Australian Institute of Criminology. Canberra. (*Statistical Bulletin*; no. 28).

⁶ Our Watch. (2021) [Change the story: A shared framework for the primary prevention of violence against women in Australia \(2nd ed.\)](#). Melbourne, Australia: Our Watch.

Recommendations to strengthen the draft National Plan

The draft National Plan as a whole

Stronger focus on structural contributors to gender inequality needed

As noted in our previous submission⁷, for primary prevention to be effective, structural inequalities must be addressed and efforts made to **increase gender equality across every part of society**. Our Watch's *Tracking Progress in Prevention* report highlights that a key next step for prevention in Australia is to increase the focus on actions to drive structural change and strengthen the 'gender policy machinery of governments'.⁸ While the draft National Plan acknowledges the importance of gender inequality as the underlying cause of violence against women and children and recognizes that it is expressed through norms, practices and structures, the Focus Areas under the pillars, the indicators chosen for measuring success, and the outcomes focus on norms rather than practices and structures. As outlined in *Intersectionality Matters: A guide to engaging immigrant and refugee communities to prevent violence against women*, discussions about preventing violence against women often focus on shifting the gendered norms and behaviours that reinforce gender inequality. Challenging prejudice and stereotypes is essential, however structural forms of gendered inequality must be addressed concurrently, including economic inequality and the unequal distribution of power, opportunities, and the control of resources for prevention efforts to lead to long-term, sustainable change.

Recommendations:

- 1. Include an undertaking from the Australian Government to develop a national gender equality strategy to create the policy framework to guide structural change across Australia and boost efforts to prevent violence against women.**

This would align with Recommendation 58 from the 2021 report from the *House Standing Committee on Social Policy and Legal Affairs Inquiry into Family, Domestic and Sexual Violence*⁹ that, 'recognising that the principal drivers of family, domestic and sexual violence are gender inequality and stereotypical attitudes towards gender roles, characteristics and behaviour the Committee recommends that the Australian Government consider establishing a gender equality strategy'. Victoria's Gender Equality Strategy, [Safe and Strong](#), provides an excellent template.

⁷ Women's Health Victoria (2021) [Submission to inform the Second National Plan to End Violence Against Women and Children](#). Women's Health Victoria. Melbourne. P17.

⁸ Our Watch (2020) [Tracking progress in prevention: a national monitoring report on progress towards the primary prevention of violence against women and their children in Australia](#), Our Watch. Melbourne. P5.

⁹ Australia. House of Representatives Standing Committee on Social Policy and Legal Affairs (2021) [Inquiry into family, domestic and sexual violence](#). Parliament of Australia. Canberra.

2. **Clearly and consistently acknowledge that gender inequality is not ‘an underlying determinant’¹⁰ of violence against women and children but the primary underlying driver.**

Intersectional approach needs to be embedded throughout the draft National Plan

As detailed in our previous submission¹¹, an intersectional approach to understanding violence against women and children recognises that gender inequality ‘intersects’ with other forms of inequality and oppression, including colonisation, racism, ageism, ableism, homophobia and transphobia, socio-economic disadvantage and faith-based discrimination. The draft National Plan includes intersectionality as one of its four principles, however throughout the rest of the document there is little evidence of this principle being embedded across all components of the Plan, whether as part of universal initiatives, or in the form of commitments to specific initiatives led by populations likely to experience higher rates of violence (for example, the lack of a standalone, First Nations-drafted National Plan, contrary to requests from Aboriginal and Torres Strait Islander advocacy groups). Instead, the deployment of intersectionality as a concept throughout most of the draft National Plan approximates a ‘laundry list’. Different priority populations are framed as needing special attention without an accompanying discussion of how to address the structural and systemic factors that contribute to the multiple and overlapping forms of discrimination, oppression, and inequality they face.

This failure to comprehensively embed intersectionality throughout the draft Plan matters. Our Watch’s *Tracking Progress in Prevention* report highlights that there has been little reduction in the other forms of oppression and inequality that women experience that intersect with gender inequality¹². Given the Commonwealth’s responsibility for policy and legislation in a wide range of areas such as social welfare (including the NDIS), taxation, superannuation, childcare funding, migration law, education curriculum, industrial relations policy, and social housing, there are myriad opportunities for reforms that would contribute to reducing multiple forms of inequality. The *Tracking Progress in Prevention* report also provides examples of both progressive and regressive legislative reforms that impact on the drivers of violence against women and children and other forms of discrimination, and identifies policy domains where further contributions could be made, including:

- *justice (for example, implementing recommendations from the Royal Commission into Aboriginal Deaths in Custody report and the Human Rights Law Centre and Change the Record joint report into Aboriginal and Torres Strait Islander Women’s over-imprisonment¹³), and*

¹⁰ Commonwealth of Australia (2022) [Draft National Plan to End Violence Against Women and Children 2022-2032](#). Canberra, Australia. P10.

¹¹ Women’s Health Victoria (2021) [Submission to inform the Second National Plan to End Violence Against Women and Children](#). Women’s Health Victoria. Melbourne. P6.

¹² Our Watch (2020) [Tracking progress in prevention: a national monitoring report on progress towards the primary prevention of violence against women and their children in Australia](#), Our Watch. Melbourne. P6.

¹³ Human Rights Law Centre and Change the Record Coalition (2017) [Over-represented and overlooked: the crisis of Aboriginal and Torres Strait Islander women’s growing over-imprisonment](#). Human Rights Law Centre and Change the Record Coalition.

- *housing (because the risk of homelessness and insecure housing increases the likelihood that women will be subjected to violence).*¹⁴

Recommendation:

3. Embed intersectionality throughout the draft National Plan by:

- consistently referencing the systemic or structural barriers mentioned in the principles that contribute to lack of power, decision-making and control of resources as well as oppression and discrimination experienced by priority populations,
- identifying concrete actions to address these, focusing on Commonwealth areas of responsibility and aligning with State/Territory and local initiatives as needed, and
- committing to investing in organisations led by Aboriginal and Torres Strait Islander women, women with disabilities, migrant and refugee women, and members of the LGBTIQ+ community.

Further guidance is available in:

- [*Changing the Picture: a national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children*](#) (Our Watch 2018),
- [*Intersectionality matters, a guide to engaging immigrant and refugee communities to prevent violence against women*](#) (Multicultural Centre for Women's Health, 2017),
- [*Pride in Prevention: a guide to primary prevention of family violence experienced by LGBTIQ communities*](#) (Rainbow Health Victoria, 2020), and
- [*Inclusive planning guidelines for the prevention of violence against women with disabilities*](#) and other specific guides for applying a disability lens to evidence-based prevention work (Women with Disabilities Victoria, 2017-2021).

Pillars

Prevention pillar needs stronger systemic lens and more detail

The inclusion of a dedicated Prevention pillar in the draft National Plan is important. However, the Focus Areas under this pillar predominantly target individuals, community groups or the corporate sector as agents of change in relation to gendered norms and behaviours that contribute to violence against women and children. Concerningly, there is no mention of initiatives to address structural drivers of gendered violence such as women's economic inequality and persistent under-representation in leadership and management roles. Shifting these drivers is critical to sustainable, meaningful and long-term change and requires substantial investment. In addition to a national gender equality strategy (Recommendation 1 above), key priorities include expansion of the primary prevention workforce, stronger leadership and governance structures to drive organisations to meet gender equality targets and prevent sexual harassment, and initiatives to challenge pervasive gender stereotypes and

¹⁴ Our Watch (2020) [*Tracking progress in prevention: a national monitoring report on progress towards the primary prevention of violence against women and their children in Australia*](#), Our Watch. Melbourne. P32.

inequality in the media such as the [Gender Equality in Advertising](#) project.

As with all four pillars in the draft National Plan, there are also no references under the Focus Areas to specific interventions known to be effective or that have been recommended for expansion or further refinement. For example, respectful relationships education is mentioned, however the wording is general and an explicit commitment to a national roll-out and a whole-of-school approach rather than stand-alone classes is absent¹⁵.

Recommendations:

4. **Include a commitment under the Prevention Pillar Focus Areas to scaling up WHV's [Gender Equality in Advertising](#) project to increase its scale and impact, in partnership with the Victorian Government.**

This would align with Recommendation 57 from the 2021 report from the *House Standing Committee on Social Policy and Legal Affairs Inquiry into Family, Domestic and Sexual Violence*¹⁶ that the Australian Government increase investment in “national research and awareness raising campaigns into sexist advertising and the negative effects of unequal gender representation”.

5. **Include a commitment under the Prevention Pillar Focus Areas to investing in and scaling up primary prevention training and capacity-building initiatives. Examples include the suite of online and interactive training courses on [Gender Equity](#) and [Prevention of Violence Against Women](#) run by WHV.**
6. **Revise the Focus Areas under the Prevention Pillar so that they:**
 - specify how each commitment addresses one or more gendered drivers of violence against women and children (ensuring all drivers are included)
 - specify how each commitment will be carried out (linking to existing initiatives as appropriate), and
 - represent a balance between activities aimed at each of the four-tiered outcome levels (individual, service, system and community).

Recovery pillar needs stronger focus on mental health and trauma

As acknowledged in the draft National Plan¹⁷, recovery and prevention are intertwined. Experience of and exposure to violence is a reinforcing driver of violence against women and children¹⁸. However, if victim-survivors can access appropriate recovery support services, the likelihood of re-victimisation decreases, as does the likelihood of long-term mental ill-health or PTSD and the flow-on impacts on physical health, relationships, employment and financial security. The Recovery pillar acknowledges the significant and long-term mental health

¹⁵ Consent education will be added to the national curriculum from 2023 in a decision announced by federal and state education ministers on 17 February 2022. While a positive development, extensive further work is needed to ensure relationships and sexuality education contributes to prevention of violence against women and children.

¹⁶ Australia. House of Representatives Standing Committee on Social Policy and Legal Affairs (2021) [Inquiry into family, domestic and sexual violence](#). Parliament of Australia. Canberra.

¹⁷ Commonwealth of Australia (2022) [Draft National Plan to End Violence Against Women and Children 2022-2032](#). Canberra, Australia. P38.

¹⁸ Our Watch (2021) [Change the story: A shared framework for the primary prevention of violence against women in Australia \(2nd ed.\)](#). Our Watch. Melbourne.

impacts of violence against women and children, the potential for services to contribute to added trauma, and the importance of trauma-informed recovery services. However, there is no evidence of a commitment to investing in mental health support for women and children who have experienced violence, nor acknowledgement of the need for a whole of system response. Significant investment is required to support trauma-informed care across the service system, supported by specialist practitioners and services (e.g., the Women's Trauma Recovery Centre in NSW), as well as capacity building across general health, mental health and other social services. Capacity-building includes training for the sexual violence and family and domestic violence workforces in trauma and mental health and for the mental health workforce in violence against women and children and trauma. Again, as with all Pillars, there is a lack of detail about how each Focus Area will be achieved.

Recommendations:

- 7. Include a commitment under the Recovery Pillar Focus Areas to ensuring services and workforce in the (i) mental health and (ii) sexual violence, domestic and family violence sectors understand and are equipped to respond to the mental health and trauma impacts of violence against women and children.**
- 8. Include a commitment under the Recovery Pillar Focus Areas to investing in the Women's Trauma Recovery Centre, an evidence-based model of care for victim-survivors of family and sexual violence which has been co-designed with women with lived experience, developed by the Illawarra Women's Health Centre in NSW and underpinned by research conducted at UNSW.**

This would align with Recommendation 77 of the *House Standing Committee on Social Policy and Legal Affairs Inquiry into Family, Domestic and Sexual Violence* that '...the Australian Government, in partnership with the NSW Government, fund a trial program of the Illawarra Women's Health Centre's Women's Trauma Recovery Centre. This funding could be part of a pilot program over a five-year period with a view, subject to positive evaluation, to rolling out similar services around the country.'

Measuring success, Targets and Outcomes Framework

Measuring success: Data collection needs to go beyond prevalence and service demand and support the principle of intersectionality

WHV welcomes the establishment of an independent Domestic, Family and Sexual Violence Commission to monitor and report on accountability and evaluation frameworks against the draft National Plan across all levels of government. We also commend the evidence development initiatives described in Measuring Success such as establishing consistent data collection approaches across jurisdictions (including in relation to service use) and a new survey on Aboriginal and Torres Strait Islander on experiences of violence to build on existing surveys. However, there remains an over-emphasis on the individual as the data point – the surveys described focus on attitudes and prevalence of violence – and little on either service/program effectiveness or the structural drivers of gender inequality (some of which exists and could be cross-referenced). There is also no indication of any effort to acquire data

relating to priority populations other than Aboriginal and Torres Strait Islander people. After 12 years of the first National Plan, Australia now needs more sophisticated and comprehensive data to inform both prevention efforts and the development of intervention, response and recovery services.

Recommendations:

- 9. Commit the Domestic, Family and Sexual Violence Commission to reporting on progress towards gender equality indicators alongside attitudinal, prevalence and service use data as part of their monitoring and evaluation responsibilities, drawing on existing public datasets where these exist (e.g., data collected by the Workplace Gender Equality Agency).**
- 10. As part of the evidence development program:**
 - **develop methods for collecting data on effectiveness of interventions and services to inform decisions about which interventions to scale up.**
 - **commit to expanding existing and new data collection instruments to include questions specific to women with disabilities, migrant and refugee women, and members of the LGBTQI+ community.**

Targets and Outcomes Framework: System-level outcomes need strengthening

WHV recognises that the targets and outcomes framework in the current draft National Plan are provisional and will be significantly developed in future. A four-tiered system for the outcomes framework is useful, however there is a disconnect between the description of the system level outcomes – ‘focused on the legislative and policy environment in which violence occurs’ and referring to ‘government levers that can be used including legislation, policy, governance and funding’ – and those presented in the table. Outcome 3.1 appears to be missing, outcome 3.2 is more closely related to service delivery and hence the Service-level outcomes, and outcome 3.3, while important, relates to the evidence base. There are no outcomes related to legislative and policy initiatives aimed at improving prevention, early intervention, response and recovery from violence.

Recommendation:

- 11. Include reference in the outcomes framework to efforts to strengthen the legislative and policy environment to address violence against women and children in relation to desired system-level outcomes.**