



Submission to the Second Action Plan consultation
In response to *Evidence to action: informing direction for the
Second Action Plan*, Consultation Paper, May 2026,
in support of the National Plan to End Violence against
Women and Children 2022–2032
29 July 2026

INTRODUCTION

The Affiliation of Australian Women's Advocacy Alliances (AAWAA) is a national peak women's advocacy body for our own member groups in all states and territories of Australia. We advocate for the protection, advancement, and human rights of women and girls, particularly where we are vulnerable on the basis of our sex. Our work is evidence-based and independent. We have an established record of engagement at the international, federal, and state levels in relation to violence against women, sex discrimination and related human rights frameworks.¹ Given this standing, and our expertise in the sex-based drivers and impacts of family, domestic and sexual violence, we would welcome the opportunity to participate in any roundtables or targeted stakeholder sessions convened as part of this consultation, in addition to this written submission.

This submission responds to the five priority areas set out in the Second Action Plan consultation paper forming the direction for the National Plan to End Violence against Women and Children. The paper's decision to distinguish family and domestic violence from sexual violence is sound, as prevalence, drivers and service responses differ between them. This lucidity must be carried through into the Second Action Plan itself, including in its data collection, funding conditions and service design.

The central point of AAWAA's submission, therefore, is that the Second Action Plan will only succeed if it keeps sex clearly in view. Violence against women and girls is sex-based violence, committed overwhelmingly by men against women and children, and it follows recognisable patterns in who is harmed, how, and by whom. For that reason, sex-neutral formulations such as 'people who use violence', and the unqualified use of terms such as 'gender-based violence' and 'gendered drivers', obscure the pattern the policy is meant to address.

¹ [Engagements](#), AAWAA.

This bears directly on Australia's obligations under CEDAW.² Article 1 of the Convention defines discrimination against women as "any distinction, exclusion or restriction made on the basis of sex" that impairs their enjoyment of rights on a basis of equality with men. General Recommendation No. 19 (1992)³ confirms that this definition includes violence against women, stating that discrimination against women "includes gender-based violence, that is, violence which is directed against a woman because she is a woman or that affects women disproportionately," and that such violence is a violation of women's human rights. General Recommendation No. 35 (2017)⁴ builds on this by setting out the due diligence standard: states are responsible not only for acts and omissions by their own agents, but also for failing to act with due diligence to prevent, investigate, punish and provide reparations in relation to violence by private individuals and companies. GR35 further requires states to repeal laws and policies that directly or indirectly excuse, condone or facilitate violence, and to review apparently gender-neutral laws and policies to ensure they do not create or perpetuate existing inequalities between women and men.

It will be essential that the Second Action Plan be assessed against CEDAW throughout, and for its drafting to reflect the CEDAW Committee's warning that neutral-sounding frameworks can obscure and entrench sex-based inequality when they fail to name male violence against women explicitly.

PRIORITY AREA 1: VICTIM-SURVIVORS

We support the consultation paper's recognition that victim-survivors continue to face significant barriers to safety, support and recovery, particularly those experiencing intersecting forms of disadvantage or living in rural and remote areas; however, additional considerations also arise.

Data integrity. Outcomes for women and girls risk being absorbed into aggregate 'gender-based violence' statistics that no longer allow the sex-based pattern of harm to be seen. Sex-disaggregated data collection should be a condition of funding across specialist services, consistent with CEDAW Article 2(f), which requires states to modify or abolish laws, regulations, customs, and practices that discriminate against women, and General Recommendation No. 9,⁵ which requires the collection of sex-disaggregated statistical data. This concern is already evident in practice: sex self-identification laws, now in force in six of eight Australian jurisdictions, are affecting the reliability of sex-based administrative data. In New South Wales, official figures confirm that more than 1,000 men have changed their legal sex marker to female since self-identification commenced on 1 July 2025 – roughly three men a day.⁶ It is also, to our knowledge, the only jurisdiction for which the volume of sex self-ID changes has been made public. Nationally consistent publication of sex-marker change data would assist in understanding and accounting for its effect on crime, health and service datasets in policy.

² [Convention on the Elimination of All Forms of Discrimination against Women New York, 18 December 1979](#), OHCR.

³ [CEDAW General Recommendation No. 19: Violence against women](#).

⁴ [General recommendation No. 35 on gender-based violence against women, updating general recommendation No. 19](#).

⁵ [CEDAW General Recommendation No. 9: Statistical data concerning the situation of women](#).

⁶ [Three men a day pay \\$73 to legally change gender to female under new NSW law](#), *The Daily Telegraph*, 18 July 2026.

Female-only spaces and services. For the Plan to be meaningful, it must explicitly support the right of refuges, shelters, crisis accommodation, rape crisis centres and recovery services to remain female-only in staffing and delivery. This is foundational to the safety and psychological recovery of women fleeing male violence. There is presently unresolved legal uncertainty in Australia around the basis on which such female-only provision can be maintained,⁷ and clear support in the Second Action Plan, in policy and funding terms, for female-only service delivery as a legitimate and necessary feature of trauma-informed practice is therefore crucial, consistent with CEDAW Article 4(1) on special measures aimed at accelerating de facto equality between women and men.

Women in custody. We note ongoing concern about the housing of women in custodial settings alongside male-born prisoners,⁸ including where this has occurred despite prior government assurances to the CEDAW Committee that prisoners are housed by sex.⁹ Given that most women in custody are themselves survivors of male violence, this raises serious questions under Article 9 of the ICCPR¹⁰ (the right to security of person) as well as CEDAW, and an affirmation in the Second Action Plan that sex-based placement is the starting principle for the safety of women in custody should be prioritised.

Coercive control and reproductive coercion. The paper's recognition of coercive control and technology-facilitated abuse as areas requiring stronger response is welcome; however, this must be extended to reproductive coercion as a distinct, named form of abuse, that is, control over whether, when, or under what conditions a woman becomes or remains pregnant, and control over medical decisions during pregnancy. This is properly understood as both a criminal justice matter and a health and bodily autonomy matter under CEDAW Article 12, read with CEDAW General Recommendation 24,¹¹ which requires access to appropriate services in connection with pregnancy free of coercion. Consideration of legislative reform so that, where coercive control is established, sexual activity and reproductive decisions occurring during that period are treated as presumptively non-consensual unless genuinely free agreement is shown would be worthwhile.¹² Coercive control must also be understood as extending to financial and administrative systems, including superannuation, which perpetrators continue to use to control victim-survivors after separation.¹³ Superannuation death benefits currently may be paid to a male who has perpetrated domestic violence against a deceased female because eligibility turns on dependency rather than conduct; government and the opposition have each indicated

⁷ See AAWAA, [No more excuses: The SDA must be reformed](#), and [A timeline of women's rights: CEDAW, the 2013 amendments, and the loss of sex-based protections](#).

⁸ See [Protecting women in custody: Why all must follow the NT's lead on sex-based prison laws](#), AAWAA; [Stop housing male offenders in women's prisons](#), Women's Forum Australia; [Women inmates demand removal of trans prisoner guilty of attacking females while a man](#), The Mercury; [Prisoners at Victorian women's jail launch petition over transgender inmate](#), Herald Sun; [Prisoners fight to remove transgender inmate with history of sex offences](#), Herald Sun.

⁹ [List of issues and questions in relation to the eighth periodic report of Australia, Replies of Australia to CEDAW](#), Australian Government, March 2018. List of issues and questions in relation to the eighth periodic report of Australia, para 138.

¹⁰ [International Covenant on Civil and Political Rights](#).

¹¹ [CEDAW General Recommendation No. 24: Article 12 of the Convention](#).

¹² See AAWAA, [Why NSW's sexual consent review must confront the limits of 'consent' itself and NSW consent law: Still asking why sex 'shouldn't have happened' – The Women's Advocate](#).

¹³ [Protecting women's super from violent male partners and sons: Treasury consults on reforms](#), AAWAA.

in-principle support for reform, but none has yet been legislated. A clear timetable in the Second Action Plan for that reform is imperative.

Older women. Older women are identified in the National Plan itself as the fastest-growing group at risk of homelessness, yet remain without a dedicated funding stream or housing strategy. The Second Action Plan needs to name older women as a distinct priority cohort, support sex-disaggregated data across age pension administration, aged care quality monitoring and elder abuse reporting, consistent with CEDAW General Recommendation No. 27.¹⁴ A right for older women in aged care and home care to receive intimate personal care from female staff where this is their preference should be implemented as a matter of urgency.¹⁵

PRIORITY AREA 2: PREVENTION AND EARLY INTERVENTION

The paper's ambition to embed prevention where people live, work, learn and connect is welcome. This work should be grounded, consistently, in naming male violence against women directly. Young people already hold a sophisticated understanding of domestic violence and abuse, and any respectful relationships education should meet that understanding with direct, sex-specific language, consistent with CEDAW Article 5(a), which requires states to modify social and cultural patterns based on stereotyped roles for women and men, rather than gender-neutral framing that risks under-informing the audience it is meant to reach.

Particular attention should be paid to the role of online misogyny, 'manosphere' content and pornography in shaping the attitudes of boys and young men. These are drivers of harm and, in our view, warrant dedicated funding, including for platform accountability, rather than being subsumed into broader digital safety work.

We also have concerns that prevention remains underpowered while frontline, specialist services are already stretched, with the risk that an expanded policy agenda is not matched by sustained investment in the measures most likely to reduce violence at its source. That concern is consistent with the due diligence standard in CEDAW GR35, which requires states to adopt and adequately resource measures for prevention, not merely to commit to them in principle.

A further point concerns perpetrator-absent language in official communications. An ANROWS study of over 4,500 Australian media items found that around 60 per cent of incident-based reporting on violence against women contained no information about the perpetrator – the pattern in which 'a man killed a woman' becomes 'a woman died.' This pattern is not confined to media: the Department of the Prime Minister and Cabinet's own August 2024 guidance document on gender-based violence contains no language addressed to perpetrators.¹⁶ Government communications should name male perpetrators

¹⁴ [General recommendation No. 27 on older women and protection of their human rights](#).

¹⁵ See AAWAA, [Older women: the forgotten cohort in Australia's male violence response](#) and [Older women: Present in the data, absent from the response](#).

¹⁶ [Media representations of violence against women and their children: Final report](#), ANROWS (2016); [Naming the "invisible perpetrator": a big step forward for media coverage of violence against women](#), The Conversation (2016); [Sector Speak Part 2: The history and future of the language of violence](#),

as the acting subject where the evidence supports this, and existing media reporting guidelines should be actively monitored.

PRIORITY AREA 3: CHILDREN AND YOUNG PEOPLE IN THEIR OWN RIGHT

We welcome the paper's recognition that children and young people are victim-survivors in their own right. This recognition should be sharpened by naming girls' and young women's experience specifically within data and program design, rather than folding it into an undifferentiated 'children and young people' category that can obscure the sex-based pattern of harm.

A significant and currently under-recognised harm within this priority area is violence by sons against mothers. Australia's first comprehensive national study found that one in five young people report using violence against family members, with mothers the most frequent target, experiencing violence in 51 per cent of cases.¹⁷ Australian and international research consistently identifies this as a gendered phenomenon: UK research found 87 per cent of adolescent perpetrators were male, with 66 per cent of cases involving mother-son violence, and Australian programs report that nearly two-thirds of referrals involve mothers experiencing violence from sons.¹⁸ This violence has early onset – 60 per cent of perpetrators had begun using violence by age ten or younger – and 89 per cent of young people using family violence had themselves experienced childhood abuse, frequently involving exposure to their fathers' violence against their mothers.¹⁹ This intergenerational transmission of male violence is not currently named in the National Plan. Naming adolescent male violence against mothers as a distinct manifestation of family violence, and supporting further independent research into it, is essential if the Second Action Plan is to address the problem at its base.

Girls and young women should also retain access to female-only recovery and support pathways within child and youth services, for the same reasons that apply to adult female-only spaces, and should be consulted specifically rather than only as part of a broader, mixed-sex 'young people' cohort.

PRIORITY AREA 4: PEOPLE WHO USE VIOLENCE

The sex-neutral framing implied by 'people who use violence' in this priority area must be reconsidered. This phrasing implies a symmetry between male and female perpetration that the evidence does not support, and its use in government and sector communications

Jane Gilmore, Substack (2025); [Gender-based violence in Australia at a glance](#), Department of the Prime Minister and Cabinet (2024); [Summarising the evidence – Elder abuse](#), Respect Victoria (2021); [Ending gender-based violence: do not overlook older women and women with disability](#), Australian Human Rights Commission (2024); ["Calling for gender neutral language to be used in relation to domestic violence and abuse is not progressive ..."](#) (LinkedIn post), Emma Katz (2025).

¹⁷ [Adolescent family violence in Australia: A national study of prevalence, history of childhood victimisation and impacts](#), ANROWS.

¹⁸ [Adolescent to parent violence: Framing and mapping a hidden problem](#), British Society of Criminology, but also see [Adolescent family violence: What is the role for legal responses?](#) Sydney Law Review and [Family violence services warn teenage boys learn from fathers who inflict violence against women](#), ABC News.

¹⁹ All in the ANROWS report: [Adolescent family violence in Australia: A national study of prevalence, history of childhood victimisation and impacts](#), ANROWS.

obscures accountability. Where the evidence supports it, this priority area should be framed around male perpetration specifically.

Current arrangements too often require female victim-survivors, rather than male perpetrators, to leave the family home to secure safety, compounding women's vulnerability by removing us from housing, economic security and social support, the very conditions that help protect us and our children. It would be useful for the Second Action Plan to require, as a legislative principle, that where domestic violence is substantiated, the male perpetrator is removed from the home as a default principle and the victim-survivor and her children are supported to remain, unless the victim-survivor chooses otherwise and outside of conditions of coercion. This principle should extend to male perpetrators of all ages, including adolescent males, consistent with the evidence on mother-son violence set out above. Men's behaviour change programs remain a valuable secondary intervention and should continue to be funded, but their evaluation should centre female victim-survivor safety as the primary measure of success rather than simple program participation or completion, and they should not substitute for removal and accountability of males where their violence has been established. Article 9 of the ICCPR, the right to security of person, is a useful lens through which to consider this principle.

Consistent national standards for correctly identifying the person most in need of protection in family violence matters would also be valuable. Misidentification continues to cause harm, including instances of police declining to pursue matters involving mothers because of custody concerns, or discouraging women from reporting because of a perceived risk to their own custody position. An independent audit of police responses in this area should be conducted.

PRIORITY AREA 5: SYSTEM INTEGRATION AND WORKFORCE

We see as critical the paper's recognition that victim-survivors are too often required to navigate multiple, poorly coordinated systems at once. Sex-disaggregated data collection should be considered as a condition of Commonwealth funding across specialist and universal services engaged under the National Plan, so that outcomes for women and girls can be measured in their own right and not only in aggregate, consistent with CEDAW Article 2(f) and Article 26 of the ICCPR on equality before the law.

We also wish to raise a practical concern that broader system integration is being pursued while specialist domestic and family violence services remain chronically underfunded and workforce capacity remains strained. Integration, coordination and cross-system reform are all necessary, but they are unlikely to improve safety if the specialist women's services at the centre of crisis response remain at or beyond capacity. The Second Action Plan must therefore pair any new integration expectations with dedicated, long-term investment in specialist services, workforce retention, training and supervision, consistent with the Rapid Review's recommendations on funding uplift and workforce development.

The Plan should explicitly support the right of specialist women's services to remain female-only in staffing and delivery, consistent with Article 17 of the ICCPR (protection from arbitrary interference with privacy, family and home) as well as CEDAW's special measures provisions, treating this as a core element of safe, trauma-informed practice. Improved

coordination between domestic violence services and aged care, superannuation and financial systems would also help close gaps that currently allow perpetrators to exploit administrative processes largely unchecked. Workforce training on coercive control, reproductive coercion and technology-facilitated abuse should be built around the documented sex-based pattern of these harms.

Finally, consultation processes for the development of this and future action plans should include meaningful, timely participation from women's advocacy organisations, with advance notice as well as sufficient time and genuine opportunity for input, consistent with Article 7 of CEDAW, which requires states to ensure women's meaningful participation in the formulation of government policy on equal terms with men.

CLOSING STATEMENT

The overarching goals of the Second Action Plan are welcome, as is the consultation paper's willingness to differentiate family, domestic and sexual violence rather than treating them as a single, undifferentiated category; however, it is necessary for the final Plan to go further still: to centre the sex-based protections and rights of women and girls, to support female-only spaces and services as a matter of safety, to name male perpetrators directly where the evidence supports this, and to commit to measuring outcomes for women and girls specifically, rather than allowing those outcomes to disappear into broader, sex-neutral reporting. These points are central to Australia's compliance with its obligations under CEDAW and the ICCPR.