



Australian
Multicultural
Women's
Alliance

Submission to the Consultation on the Second Action Plan: National Plan to End Violence against Women and Children 2022–2032

Australian Multicultural Women's Alliance (AMWA)

July 2026



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Background

Who Are We

The Australian Multicultural Women's Alliance (AMWA) is the national voice for migrant, refugee, and culturally and linguistically diverse (CALD) women. It is led by the Federation of Ethnic Communities' Councils of Australia (FECCA), the national peak body representing Australians from culturally and linguistically diverse (CALD) backgrounds. With a long-standing commitment to advocating for multicultural communities, FECCA provides strategic guidance and operational support to the Alliance, ensuring that the voices of migrant and refugee women are elevated in national policy discussions. Through this partnership, the Alliance leverages FECCA's extensive networks, research expertise, and advocacy experience to drive meaningful change for women from diverse backgrounds. FECCA as lead, is also supported by partners Settlement Services International (SSI) and Media Diversity Australia (MDA).

What We Do

The Australian Multicultural Women's Alliance (AMWA) advocates for gender equity, representation, and inclusion across all facets of Australian society. Our work is informed by lived experiences, community insights, and evidence-based research to ensure that systemic barriers are addressed, and opportunities for women are unlocked.

As an intersectional alliance with over 1,000 members, we aim to empower women from all cultural and linguistic backgrounds to thrive and contribute fully to Australia's prosperity. Our vision is for a thriving, equitable Australia where multicultural women are empowered to shape their own futures, fully participate in all aspects of society, and be celebrated as valued leaders and contributors to an inclusive community. Our mission is to advance the rights, amplify the voices, and improve the well-being of multicultural women through innovative advocacy, intersectional collaboration, and leadership development. We strive to leverage best practice domestically and internationally, build the Alliance's profile and influence, and ensure that lived experiences and formal expertise drive transformative social change.

About This Consultation

This submission draws on a comprehensive national consultation program (2025–2026) including:

- AMWA's Thematic Working Group on Gender-Based Violence, comprising cross-sector experts and multicultural family violence specialist organisations, convened specifically to inform the Second Action Plan.
- State-based community consultations in South Australia, Tasmania and Western Australia (ECCWA).
- A joint consultation with the Settlement Council of Australia (SCOA) and Minister Plibersek.

- Targeted meetings with the NSW Women's Safety Commissioner, the Federal Circuit and Family Court of Australia (FCFCOA) and discussions with key stakeholders including Domestic Family and Sexual Violence Commissioner, National Women's Alliances, InTouch and Women's Legal Services Australia.
- A national consultation on *Multicultural Women and the Second Action Plan*, facilitated by Commissioner Micaela Cronin, Domestic, Family and Sexual Violence Commission (24 July 2026).
- Cumulative insights from AMWA and SSI's national Train, Engage, Connect and Support (TECS) project to increase capability of community leaders to address family violence, which included national consultation across all states with victim survivors, community and faith leaders, and ethno-specific specialist organisations.
- Discussions with the National Advocacy Group (NAG) on Women on Temporary Visas Experiencing Violence, whose Blueprint for Reform (June 2026) AMWA endorses in full.
- One on one consultations with multicultural women with lived experience, single mothers and victim survivors over the course of 2025 and 2026.

Executive Summary

Multicultural women are not peripheral to Australia's national response to gender-based violence. They are among those most disproportionately impacted and consistently least served by existing systems. The intersecting factors of migration status, race, language, visa insecurity and economic dependence do not increase their propensity to experience violence - they determine whether safety is accessible at all. A Second Action Plan that does not structurally embed these realities in its design, funding and accountability mechanisms will reproduce the same inequitable outcomes as what has come before.

AMWA's submission is organised around the five priority areas of the Second Action Plan. Our ten core recommendations across the priority areas are set out below.

Priority Area	Core Recommendation(s)
1 - Victim-Survivors	1. <i>Recognise temporary migration status as a structural determinant of vulnerability to gender-based violence and integrate this consideration across prevention, response and recovery initiatives.</i>
2 - Prevention & Early Intervention	2. <i>Recognise and fund settlement and community infrastructure as essential components of Australia's prevention and early intervention architecture.</i> 3. <i>Strengthen Australia's prevention framework by addressing the structural and socioeconomic conditions that increase multicultural women's vulnerability to gender-based violence, including barriers to employment, skills recognition and economic participation.</i>
3 - Children & Young People	4. <i>Strengthen protective environments for multicultural children by investing in culturally responsive family, community and faith-based supports that promote safety, belonging, positive role models and long-term wellbeing, while recognising the impacts of intergenerational trauma and family violence.</i>
4 - People Who Use Violence	5. <i>Strengthen culturally responsive approaches to accountability and behaviour change by recognising the diverse forms of coercive control experienced by multicultural women and investing in community-informed interventions including early intervention.</i> 6. <i>Adopt a more comprehensive and culturally responsive approach to preventing sexual violence and engaging men and boys by</i>

	<i>strengthening policy alignment, community leadership and early education across multicultural communities.</i>
5 - System Integration & Workforce	7. <i>Recognise structural racism as a cross-cutting driver of inequitable outcomes, implement the National Anti-Racism Framework, and establish nationally consistent Cultural Safety Standards underpinned by cultural humility, institutional accountability and genuine partnership with multicultural communities.</i> 8. <i>Invest in workforce capability across formal, informal and adjacent sectors - building DFSV capability in settlement, community and adjacent sector workers, and cultural and migration capability in specialist DFSV workers - in both directions.</i> 9. <i>Invest in community navigation as an essential workforce capability through trusted multicultural organisations and specialist navigators to strengthen culturally responsive pathways into support.</i> 10. <i>Strengthen evidence, accountability and long-term system reform by improving disaggregated data, embedding multicultural women's leadership in governance, and adopting sustainable funding and commissioning models that support integrated, community-led responses.</i>

AMWA calls on the Australian Government to embed multicultural women's leadership and lived experience across the design, implementation and evaluation of the Second Action Plan. The expertise, relationships and infrastructure that keep multicultural women safe are already present in communities across Australia. The Second Action Plan must move from acknowledging this to resourcing it.

Introduction

The Australian Multicultural Women's Alliance (AMWA) welcomes the opportunity to contribute to the development of the Second Action Plan under the *National Plan to End Violence against Women and Children 2022–2032*.¹

As the national alliance representing multicultural women, AMWA recognises that ending gender-based violence requires more than strengthening specialist responses. It requires addressing the broader systems that shape women's lives before, during and after experiences of violence.

While gender inequality remains the primary driver of violence against women, multicultural women often experience additional structural barriers associated with migration status, race, language, culture, faith, disability, caring responsibilities and socioeconomic disadvantage. These intersecting factors do not increase women's propensity to experience violence; rather, they influence how women encounter institutions, access support, exercise their rights and achieve long-term safety and recovery.

AMWA therefore calls for intersectionality as a systems approach that examines how multiple institutions, including migration, settlement, employment, housing, health, policing, family law and the broader gender-based violence service system, interact to shape outcomes for multicultural women and their children.²

An intersectional response must extend beyond crisis services to address the structural and institutional conditions that enable equitable access to safety, justice and recovery. It requires recognising the limits of Australia's current evidence base. As highlighted throughout AMWA's consultations, *"the system cannot see what it is not designed to measure."* Current national data collections do not consistently capture family- and community-based coercive control, migration-related vulnerabilities, or the intersecting social and structural factors that shape multicultural women's experiences of violence.

Multicultural women are also not a homogeneous group. The experience of a woman who has arrived as a refugee, navigating trauma, displacement and an unfamiliar system, is fundamentally different from that of a long-term established migrant managing the accumulated effects of racism and underemployment, which is again distinct from that of a temporary visa holder whose safety options are constrained by her immigration status, or a woman on a partner visa who has never accessed settlement services. Additionally, transgender and gender diverse people from multicultural backgrounds face compounding layers of discrimination, including transphobia,

¹ The National Plan to End Violence against Women and Children 2022–2032 | Department of Social Services

² Kimberle Crenshaw, (1989). *Demarginalizing the intersection of race and sex: A Black feminist critique of antidiscrimination doctrine, feminist theory and antiracist politics*. University of Chicago Legal Forum, 1989(1), 139–167; Kimberle Crenshaw, *Mapping the margins: Intersectionality, identity politics, and violence against women of color*. Stanford Law Review, 43(6), (1991), 1241–1299

racism and in many cases migration-related vulnerabilities that significantly increase their exposure to gender-based violence and reduce their access to culturally safe support.

The Second Action Plan must reflect the diversity of experiences in its data frameworks, its service design, workforce training, its funding models and its accountability mechanisms. It should ensure meaningful partnership with multicultural women, beyond consultation, as a structural feature of implementation. Finally, it should recognise that solutions designed for one cohort may not reach another, making it all the more imperative to attend to Australia's rich diversity as well as heterogeneity of experience within multicultural communities.

Foregrounding intersectionality, AMWA identifies the following cross-cutting priorities that must be embedded in the Second Action Plan:

- Recognise multicultural organisations as essential infrastructure within Australia's gender-based violence system.
- Recognise settlement infrastructure as prevention.
- Embed migration policy as a determinant of safety within the National Plan implementation, with attention to temporary visa holders as a specific cohort within multicultural communities.
- Strengthen community navigation through trusted multicultural organisations and integrated service hubs.
- Introduce nationally consistent standards for anti-racism, cultural safety and interpreter access and involving grass roots organisations in co-design.
- Introduce culturally responsive approaches to prevention, behaviour change, accountability and mitigation of sexual violence.
- Improve disaggregated data collection by ethnicity, visa status, migration pathway and language.
- Invest in community-led leadership pathways, bicultural workforces and meaningful paid co-design with multicultural women, including women with lived experience.
- Address the fragmentation of Australia's gender-based violence response across federal and state systems, portfolios and jurisdictions, and establishing a genuine whole-of-government approach that ensures multicultural women are not trapped between disconnected systems,
- Establish a formal whole-of-government governance mechanism, bringing together Home Affairs, DSS, Attorney-General's Department, Health, Education, Housing Australia and state and territory representatives, to reduce jurisdictional fragmentation, ensure federal and state responses operate as a coordinated whole, and eliminate the need for victim-survivors to repeat their stories across disconnected systems.
- Recognise economic participation, recognition of overseas qualifications, affordable childcare and equitable access to information as foundational elements of primary

prevention that strengthen women's independence, reduce vulnerability and support long-term safety.

- Embed multicultural women as genuine governance partners, in recognition of their lived experience and leadership, across the design, commissioning, implementation and evaluation of the Second Action Plan and as a structural requirement, with appropriate protocols, remuneration and cultural safety.

Together, these priorities provide a framework for AMWA's submission and a roadmap for a coordinated, whole-of-government response that embeds cultural safety, anti-racism, community partnership and systems integration across prevention, early intervention, response and recovery.

Priority Area 1 (Victim-Survivors)

1.1 Address Migration Related Barriers to Safety for Victim Survivors

Core Recommendation:

1. *Recognise temporary migration status as a structural determinant of vulnerability to gender-based violence and integrate this consideration across prevention, response and recovery initiatives*

AMWA considers the exclusion experienced by temporary visa holders as a significant structural barrier that prevents equitable access to safety under Australia's response to gender-based violence. While the National Plan is founded on the principle that all women should be able to live free from violence, current policy settings continue to produce markedly different outcomes depending on a woman's migration status. Migration status should be recognised as a structural determinant that shapes women's exposure to violence, access to protection and long-term recovery.

AMWA's national consultations and the NAG Blueprint for Reform (June 2026) identified the following distinct and compounding barriers:

- **Family Violence Provision gaps:** Existing Family Violence Provisions do not extend across most temporary visa subclasses, creating substantial gaps in protection for international students, temporary skilled migrants and other temporary residents. Women whose partner visa applications are pending, or whose relationships break down before a permanent partner visa is granted, occupy a grey area, facing uncertainty regarding their immigration status, compelled to prove the genuineness of their relationship while simultaneously experiencing violence and coercive control.³ Women who have not yet lodged a valid application, whose applications have not progressed sufficiently, or whose circumstances fall outside the legislative framework remain without protection. The complexity of these arrangements reinforces perpetrators' ability to use migration status as a mechanism of abuse and underscores the need for clearer, trauma-informed pathways to protection.⁴
- **The immigration process as re-traumatisation:** Processes that require women to produce detailed written accounts of abuse while experiencing acute trauma - often in a second language and while managing experiences of displacement or persecution - risk

³ Migrant DFV victim-survivors made to prove genuineness of relationship - ABC News

⁴ National Advocacy Group (NAG). Blueprint for reform: Strengthening protections and pathways to safety for migrant and refugee women experiencing family violence. 2026. NAG.

compounding rather than alleviating harm. The NAG Blueprint for Reform (June 2026) describes the immigration system as operating as 'a form of abuse itself.'⁵

- **The migration system as a perpetrator of violence:** The immigration system itself operates as a site of harm for many victim-survivors. Arbitrary administrative timelines — such as the 28-day window to respond to sponsorship withdrawal — are unworkable for women in acute crisis who are simultaneously managing legal proceedings, intervention orders, case management and trauma. These processes are not neutral; they actively compound vulnerability and must be understood as a form of institutional harm. The current systems abuse framework needs to recognise the migration system as a site of systems abuse, as there is clear evidence that it functions as one.
- **Power imbalance and perpetrator manipulation of the migration system:** Perpetrators who hold immigration power over their partners, through sponsorship, visa dependency and control of migration documentation, are able to weaponise administrative processes as a mechanism of ongoing coercive control. The current framework does not adequately name or address this power imbalance. The language of 'trauma and violence informed' better captures this dynamic than 'trauma-informed' alone, which risks pathologising women's responses rather than naming the power and control that underlies them.
- **Visitor visas and the cost of partner visas:** A significant and growing cohort of victim survivors, such as those who have entered on visitor visas and those priced out of the partner visa pathway by the significant increase in partner visa application costs, currently have no pathway to protection whatsoever under the Family Violence Provisions. This gap is not marginal; it represents a structural exclusion of women whose circumstances do not fit the legislative framework, but whose safety needs are no less urgent.

Consultation Voices: Migration Status as a Barrier

"We still see migration status as a huge barrier, especially for certain subclasses that are not eligible for domestic violence provision. It's really a systemic abuse where women have to choose between securing their future, everything they've invested into coming to Australia, and safety."

"For student visa holders, there's a huge barrier for disclosure and help-seeking, especially when there are very few services they can access in terms of eligibility, no financial support in terms of housing, and these women need to pay huge amounts of application fees to the Department of Immigration, application fees, agents, school fees on top of all of this."

Gender Based Violence Thematic Working Group Member

⁵ Ibid

Recommendations:

The Second Action Plan presents an important opportunity to recognise migration status as a structural determinant of vulnerability and to strengthen responses that ensure protection is not contingent on visa category. AMWA recommends:

- **Align the Second Action Plan with the NAG Blueprint for Reform (June 2026):** introduce a new 3-year substantive visa for victim-survivors ineligible for existing family violence provisions (no application fee, no work or study restrictions, access to Medicare and social security, pathway to permanent residency); broaden the definition of family violence in migration legislation to cover child sexual abuse, elder abuse, multi-perpetrator conduct and family and close personal relationships beyond intimate partner relationships consistent with approaches in New Zealand and Canada; lower evidentiary requirements for establishing family violence in response to growing evidence about the impacts of coercive control on victim-survivors in precarious circumstances; fast-track a low-cost permanent visa for parents of Australian citizen children where removal would result in forced separation or harm to the child; and formalise an Intergovernmental Committee on temporary visas and DFSV.⁶
- **Ensure that misidentification of victim-survivors as perpetrators is explicitly named, prevented and remedied:** where the Department of Home Affairs has been notified of domestic, family or sexual violence, any counter-allegations or actions by the person using violence must be assessed by a delegate with specialist family violence expertise, or in direct consultation with specialist family violence services, before any decision affecting the victim-survivor's visa status is made. Misidentification, which disproportionately affects multicultural women due to language barriers, cultural factors and power imbalances, must be recognised as a systemic risk, not an individual error, and remediation pathways must be available where it has occurred.
- **Recognise the migration system within the systems abuse framework and ensure granular visa-by-visa analysis:** recommend that the Office for Women's work on systems abuse explicitly include the migration system and the Department of Home Affairs as a site of systems abuse, developed in partnership with specialist immigration and family violence services. The ways in which perpetrators exploit the migration system differ significantly across visa subclasses, and the risks and mechanisms of abuse for a student visa holder are distinct from those for a partner visa applicant, a visitor visa holder, a humanitarian entrant or a temporary skilled migrant. Any review, therefore, must not take a one-size-fits-all approach. The review must examine and address each pathway distinctly, with findings disaggregated by visa type.⁷

⁶ AMWA's discussions with Women's Legal Services Australia, 17th July 2026.

⁷ Ibid.

Enabling Recommendations

- **Strengthen pathways to protection for all temporary visa subclasses.** This includes addressing gaps in Family Violence Provisions for pending partner visa applicants, those priced out of their partner visa costs, international students and temporary skilled migrants; and improving access to specialist supports regardless of visa category; address protection gaps affecting older women who are dependent on adult children through sponsorship arrangements; recognise the distinct experiences of temporary migrant cohorts including PALM scheme workers.⁸
- **Develop trauma and violence informed immigration processes** that reduce unnecessary evidentiary burdens on victim-survivors and review and extend the 28-day response window for women in crisis; mandate interpreter access at every stage of immigration processes; and develop a Home Affairs protocol for cases where shared ImmiAccount access has been compromised.
- **Guarantee access to economic and social supports during visa processing:** ensure victim-survivors have access to social security, Medicare, education, subsidised childcare and work rights while family violence provisions or family violence-related visa applications are being processed.

⁸ Note: women on visitor visas and those priced out of partner visa costs currently have no pathway to protection at all.

Priority Area 2 (Prevention and Early Intervention)

2.1 Settlement and Community Infrastructure as Prevention

Core Recommendation:

2. *Recognise and fund settlement and community infrastructure as essential components of Australia's prevention and early intervention architecture by embedding settlement, orientation and multicultural community organisations within the design and implementation of the Second Action Plan.*

For multicultural women, effective prevention begins well before violence occurs. It requires sustained investment in the social and community infrastructure that enables women and families to understand their rights, build trusted connections, navigate Australian systems and access support before violence escalates. Settlement should therefore be recognised as a critical component of Australia's prevention infrastructure, rather than solely a mechanism for facilitating social and economic integration.⁹

Evidence increasingly demonstrates that settlement, multicultural and migrant organisations already perform a critical early intervention role within Australia's gender-based violence system. The recent SSI *Scoping the Gap* report found that these organisations routinely provide language assistance, safety planning, documentation support, referrals, community engagement and low-intensity casework that enable migrant and refugee women to access specialist domestic, family and sexual violence services.¹⁰ Much of this work occurs outside funded program parameters, creating a structural reliance on unfunded early intervention activities that facilitate women's access to safety.

Consultations held by AMWA and SCOA consistently identified that prevention is most effective when information about Australian laws, family violence protections and support services is delivered early through trusted community organisations. While this work is frequently described as collaboration, in practice it often consists of substantial unfunded responsibilities, including trust-building, system navigation, case coordination and culturally responsive engagement, that extend well beyond contracted service delivery.

International evidence similarly demonstrates that specialist organisations operating "by and for" Black and minoritised communities improve trust, safety and engagement by providing culturally

⁹ Gender Lens on the 2026 Budget | AMWA and NFAW

¹⁰ Settlement Services International. (2025). *Scoping the Gap: The unmet needs of migrant and refugee women experiencing domestic and family violence*. SSI; Settlement Services International & Australian Multicultural Women's Alliance. (2025–2026). Train, Engage, Connect and Support (TECS) Project: National consultation insights on building the capability of community and faith leaders to address gender-based violence. Unpublished consultation synthesis.

specific support grounded in community knowledge. This reinforces AMWA's recommendation that multicultural organisations be recognised as essential infrastructure within Australia's gender-based violence system, rather than supplementary service providers.¹¹

Several specific failure points were consistently identified across consultations:

- **Exclusion of temporary migrants:** Vulnerability is not confined to humanitarian entrants or newly arrived migrants. Excluding cohorts of temporary migrants from settlement and prevention initiatives leaves significant gaps in Australia's early intervention system and overlooks valuable opportunities to reduce vulnerability before violence occurs.
- **The disclosure-to-support gap:** When women disclose violence to a trusted community contact, referrals frequently default to generic services such as 1800RESPECT rather than to a specialist navigator with cultural and language capability. Programs such as Safe to Speak (Full Stop Australia) demonstrate the value of strengthening social responders in community settings. Education and rights information, delivered through trusted community settings including English classes, TAFE, faith organisations and community events, represents one of the most effective early intervention mechanisms available. Without a trusted bridge across that gap, many women disengage before receiving support. AMWA and SSI's Train, Engage, Connect and Support (TECS) program, which equips community and faith leaders to recognise family violence and become trusted first responders, demonstrates what a proven and scalable model looks like. The TECS model should be enhanced to include systems navigation and scaled rather than replaced with new pilots.
- **Parenting approaches and legal context:** Many families arriving in Australia experience significant conflict around parenting approaches, discipline and family roles in a new cultural and legal context with tensions that, when unaddressed, can escalate into family violence. The cost of seeking legal recourse is a further structural barrier. For many women in crisis, the inability to access affordable legal advice particularly immigration legal advice, is the point at which the circle of support breaks down entirely. Strengthening partnerships between specialist DFSV services and grassroots multicultural organisations, with community-led models at the centre, is essential to a coordinated, culturally responsive early intervention system.

¹¹ Domestic Abuse Commissioner. *A Patchwork of Provision: Mapping report*. 2022; Domestic Abuse Commissioner. *By and For Funding Pot Briefing Paper*. 2024.

Case Study – Community organisations as cultural intermediaries: ARISE Women Supporting Association

ARISE WSA demonstrates how grassroots organisations strengthen cultural safety by bridging mainstream systems and community realities. Working alongside South Sudanese women and families, ARISE WSA translates mainstream parenting and family support programs into culturally meaningful conversations that build understanding rather than compliance. As founder explains, "Mainstream organisations don't know the challenges of a particular community." Reflecting on parenting education and family violence, she observed, "In Australia you're not supposed to smack your child. But what are you supposed to do? It is not indicated."

Rather than expecting families to adapt to one-size-fits-all service models, ARISE WSA works alongside communities to interpret Australian laws with respect to family violence in culturally relevant ways, demonstrating how trusted grassroots organisations provide the cultural context, trust and relationships that generic service models cannot replicate.

Consultation Voices - Settlement as Prevention

"We're constantly asked to collaborate because we're trusted by communities, but collaboration has become an expectation rather than a partnership. Multicultural organisations are doing significant amounts of unfunded work- building trust, explaining systems, supporting referrals and helping women navigate services - yet this contribution is rarely recognised or resourced."

"The system assumes settlement organisations will bridge the gap between communities and specialist services, but this work sits outside funded contracts. We're filling gaps because communities trust us, not because the system has designed it that way."

ECCWA consultations and GBV Thematic Working Group

Recommendations

The Second Action Plan provides an opportunity to strengthen prevention by recognising settlement and community infrastructure as foundational components of Australia's prevention framework, and funding migrant and settlement organisations as key partners in the prevention architecture. More specifically, AMWA recommends that the Australian Government:

- **Review funding and commissioning arrangements to recognise and sustainably resource specialist multicultural organisations** as culturally specific providers, enabling them to deliver community-led prevention, early intervention and support for multicultural women.

- **Fund at least one specialist multicultural DFSV service** in each state and territory, with capacity for culturally responsive casework, legal navigation, language support and community connection, accompanied by a national best-practice network.
- **Fund accessible legal support** including immigration legal advice at no cost to the victim-survivor, recognising that legal costs are frequently the point at which the circle of support breaks down.
- **Reform funding and commissioning arrangements:** commit to multi-year, flexible investment models that recognise the prevention, early intervention, navigation and culturally responsive services delivered by multicultural organisations.
- **Require larger funded organisations to allocate a defined percentage of funding and capacity-building support** to smaller ethno-specific and grassroots organisations, ensuring that scale does not crowd out community trust.

Enabling Recommendations:

- **Broaden access to settlement-based prevention initiatives** to include temporary migrants, international students, graduate visa holders and temporary skilled workers, recognising that vulnerability extends beyond humanitarian migration pathways.
- **Invest in rights education and coercive control awareness through community settings:** delivered through trusted community groups and ethno-specific organisations so families understand entitlements and that controlling behaviours are unacceptable, recognising these concepts may not exist in many community languages.
- **Invest in culturally responsive parenting programs as a prevention measure:** and funding culturally responsive parenting programs that support families including fathers and extended family members to navigate changes in parenting norms, child safety laws and family expectations in Australia, as part of both early intervention and settlement support in critical. *(See also Priority Area 3 — Children and Young People, where parenting programs are also referenced as a protective factor for children.)*

2.2 Strengthening Protective Factors through Economic and Social Inclusion

Core Recommendation:

3. *Strengthen Australia's prevention framework by addressing the structural and socioeconomic conditions that increase multicultural women's vulnerability to gender-based violence, including barriers to employment, skills recognition and economic participation.*

For multicultural women, prevention extends beyond specialist family violence responses to addressing the structural conditions that shape vulnerability before violence occurs. Economic security, meaningful employment, recognition of overseas qualifications, culturally responsive

childcare, leadership opportunities and community participation are protective factors that strengthen women's independence, reduce financial dependence on perpetrators and increase opportunities to seek safety. Integrating these factors into Australia's primary prevention framework is essential to reducing both the risk and impact of gender-based violence.

AMWA's consultations and research identified the following distinct barriers:

- **Skills recognition investment is missing its target:** AMWA welcomes the Australian Government's \$85.2 million investment in skills recognition as an important step. However, the current investment is largely targeted towards trade and construction occupations, limiting its benefit for multicultural women, who are more likely to hold qualifications in regulated and female-dominated professions such as health, education, social services and accounting.¹²
- **Underemployment despite qualifications:** The Activate Her Skills report (AMWA and SSI, 2026) demonstrates that Australia's skills recognition and employment systems leave many highly qualified migrant and refugee women significantly underemployed despite possessing substantial professional expertise.¹³ Over 341,000 qualified migrant women are locked out of jobs or significantly underemployed in the Australian workforce. The report further details the experience of a victim-survivor of family violence who navigated lengthy, costly and complex recognition processes from a domestic violence shelter. Such case studies illustrate the prolonged economic insecurities of victim survivors navigating these processes and the high stakes of not fixing the skill recognition process through a gendered impact lens.¹⁴
- **Employer bias compounds the problem:** AMWA's consultations have found that even after formal skills recognition, women's credentials are frequently discounted. Consultations identified employer bias against overseas qualifications and experience as a significant and under-addressed barrier, compounding economic insecurity beyond the recognition process itself.
- **Barriers to maintaining employment while experiencing domestic and family violence:** Multicultural women surviving domestic and family violence face compounding barriers to maintaining employment — including court appearances, trauma impacts, safety planning demands and perpetrator interference — that are largely invisible in both DFSV policy and employment policy. This gap leaves women without adequate financial, legal or psychosocial support during what is often the most critical period of their recovery. Legal, financial and psychosocial supports must be available alongside employment pathways.
- **Economic abuse as a distinct form of violence:** Financial control, restriction of spending, sabotage of employment and weaponisation of visa-linked restrictions, including Centrelink

¹² AMWA Federal Budget Response.

¹³ Activate Australia's Skills Campaign, Australian Multicultural Women's Alliance (AMWA), Settlement Services International (SSI), & Media Diversity Australia. (2026). Activate Her Skills: Harnessing the economic potential of migrant women through better skills recognition.

¹⁴ Gender Lens on the 2026 Budget | AMWA and NFAW

ineligibility and limited work rights, are forms of coercive control. The NAG Blueprint (Pillar Two) recommends expanding Special Benefit eligibility to all temporary visa holders who have experienced DFSV and supporting long-term recovery program to include a cash option for migrant women.¹⁵

- **Recovery as the least developed and least resourced pillars of Australia's response to gender-based violence.** Without sustained investment in long-term recovery, including housing stability, employment, economic participation and psychosocial support, many women transition from crisis into prolonged insecurity, undermining long-term safety and independence.

Case Study – ARISE Foundation Australia: Economic Participation as Prevention

ARISE Foundation Australia demonstrates how community-led organisations strengthen prevention by addressing one of the key structural drivers of vulnerability which is economic dependence. Through culturally responsive employment pathways, trauma-informed coaching and employer partnerships, the Foundation supports victim-survivors of domestic and family violence to achieve sustainable economic independence alongside recovery. As ARISE notes, employment is not simply a recovery outcome but a protective factor that strengthens long-term safety by reducing financial dependence and increasing women's confidence and autonomy.

Significantly, **none of the participants who secured employment through the program have returned to perpetrators**, illustrating the critical role that economic participation can play in preventing

Consultation Voice – Prevention through Economic Inclusion

"Economic participation, leadership opportunities and culturally responsive education are not separate from violence prevention-they are among the strongest protective factors that enable multicultural women to exercise choice, build independence and seek support before violence escalates."

AMWA Gender-Based Violence Thematic Working Group

¹⁵ National Advocacy Group (NAG). Blueprint for reform: Strengthening protections and pathways to safety for migrant and refugee women experiencing family violence. 2026. NAG.

Recommendations

The Second Action Plan presents an important opportunity to strengthen prevention by investing in the social and economic conditions that enable multicultural women to live free from violence.

AMWA recommends that the Australian Government:

- **Extend the \$85.2 million skills recognition investment to feminised professions:** the current investment is largely targeted at trade and construction occupations. Extending it to health, education, social work and accounting where multicultural women are significantly underrepresented despite holding qualifications would simultaneously address workforce shortages, gender equity and economic security as a violence prevention lever.
- **Pilot employer paid placement support/subsidy programs for hiring skilled migrant women** without 'local experience', modelled on prior disability employment schemes and explicitly tied to safety and economic security outcomes. Participating employers must demonstrate cultural inclusion and safety not just access.
- **Commission Jobs and Skills Australia to include disaggregated analysis** of migrant women's skills utilisation and employment outcomes with specific attention to feminised professions (health, education, social work, accounting) as part of the Lifelong Learning Project; and incorporate findings into a violence prevention and economic security policy framework.

Enabling Recommendations

- **Introduce targeted financial assistance and subsidies for overseas skills recognition of migrant women and particularly those who experience domestic violence**, recognising that financial barriers to workforce participation are also barriers to women's safety, economic security and recovery from violence.
- **Improve access to culturally responsive and flexible childcare** as a foundational enabler of workforce participation, economic independence and social inclusion for multicultural women. Strengthening pathways to meaningful employment more broadly, through culturally responsive employment services, career navigation and leadership opportunities, complements the skills recognition investment and ensures that recognition translates into genuine workforce participation.
- **Ensure legal, financial and psychosocial supports** are available alongside employment pathways, addressing the specific barriers multicultural women face in maintaining employment while experiencing domestic and family violence including court appearances, trauma impacts and perpetrator interference.
- **Invest in integrated recovery pathways** that combine housing, employment, legal, health and psychosocial supports, recognising that recovery is essential to long-term economic security, independence and violence prevention.

Priority Area 3 (Children and Young People)

3.1 Strengthening Protective Environments for Multicultural Children and Young People

Core Recommendation:

4. *Strengthen protective environments for multicultural children by investing in culturally responsive family, community and faith-based supports that promote safety, belonging, positive role models and long-term wellbeing, while recognising the impacts of intergenerational trauma and family violence.*

Children's safety cannot be separated from the wellbeing of their families and communities. For multicultural children, protective environments are shaped not only by freedom from violence but also by access to culturally responsive childcare, stable housing, economic security, community connection and opportunities to maintain their cultural, linguistic and faith identities. The Second Action Plan should therefore adopt a holistic approach that recognises children's wellbeing as intrinsically connected to broader family, settlement and community support systems.

AMWA's consultations identified the following distinct and compounding issues:

- **Gap in community-based supports:** Consultations identified a significant gap in culturally safe mentoring programs, positive male role models and inclusive community activities for children from single-parent families following domestic and family violence. Many multicultural and faith-based organisations are trusted spaces but lack resources to establish sustainable programs. Participants emphasised these initiatives should not be framed as domestic violence programs. Doing so reinforces stigma and discourages participation. Governments should invest in inclusive community activities that strengthen children's wellbeing, social connection and cultural identity while remaining accessible to all families.
- **Children as victim-survivors in their own right:** A multidisciplinary investigative model enabling children to disclose safely in a trauma-informed environment with cultural and language support was identified by the FCFCOA as a priority reform. Children currently have little direct access to information about their own family law matters; their engagement is mediated and often filtered until a crisis point is reached. This issue is compounded for multicultural children with language and other systemic barriers of access. Therapeutic support requires both parents' agreement which is a significant barrier where the protective parent is the victim-survivor. Children of modern slavery and forced marriage victim-survivors must also be explicitly recognised as victim-survivors in their own right, with access to independent support and culturally safe trauma services. Feedback from AMWA's Thematic Working Group proposed that national alignment between the Second Action Plan and the

National Strategy to Prevent and Respond to Child Sexual Abuse and that it must address child sexual abuse in multicultural community contexts through culturally responsive disclosure pathways, recognising that for many multicultural families, shame, community surveillance and fear of child protection systems compound under-disclosure.

- **Intergenerational trauma:** Intergenerational prevention requires dedicated investment in youth-specific, culturally safe approaches distinct from adult men's behaviour change programs. For many multicultural families, family violence intersects with displacement, conflict, forced migration and settlement to create cumulative trauma across generations.¹⁶ These experiences should be understood as important developmental and trauma-related risk factors, requiring early, culturally responsive intervention to break cycles of violence without stigmatising victim-survivors. Intergenerational trauma also presents very differently for a family who arrived in the last two years than for a family that has been in Australia for a generation, where the accumulated impacts of racism, discrimination and socioeconomic disadvantage may be more salient. Programs and responses designed without this distinction risk being irrelevant to both groups.
- **Child sexual abuse:** Discussions with the FCFCOA noted that victim-survivors are sometimes advised against raising child sexual abuse in family court proceedings due to the risk of children being removed from the protective parent which is a perverse systemic outcome requiring structural reform. For multicultural families, shame, community surveillance, language barriers and fear of child protection systems also compound under-disclosure. Research on primary prevention of harmful sexual behaviours confirms that prevention programs are most effective when facilitated by trusted community figures in familiar settings.¹⁷ This underscores the importance of community-based, culturally responsive prevention, in addition to institutional and school-based responses, in multicultural communities where trust in formal settings may be limited.
- **Whole-of-family responses:** Australia's current response architecture is largely built around the separation model, i.e. removing the person using violence or supporting the victim-survivor to leave which may not align with community values or be feasible given visa dependencies. Siloed, individually focused responses can reduce engagement with support services and, in some cases, increase conflict when remain in the household. In many multicultural communities, significant cultural pressure exists to remain together as a family, and families themselves may want whole-of-family support rather than responses that separate or individualise.
- **The child protection system and its disproportionate impact on multicultural mothers:** The child protection system is operating in ways that are disproportionately punitive for multicultural mothers, who are making decisions about family, housing, visas and safety

¹⁶K Fitz-Gibbon, S Meyer, H Boxall, J Maher, & S Roberts. *Adolescent family violence in Australia: A national study of prevalence, history of childhood victimisation and impacts* (Research report, 15/2022). ANROWS.

¹⁷ DH Russell, S Trew, R Smith, DJ Higgins, & K Walsh, Primary prevention of harmful sexual behaviors by children and young people: A systematic review and narrative synthesis. *Aggression and Violent Behavior*, 81, 2025, 102022. <https://doi.org/10.1016/j.avb.2024.102022>

within contexts of multiple overlapping pressures that the system does not consistently recognise. Mothers can be effectively penalised for decisions made under duress — including remaining in violent relationships for visa or housing reasons — in ways that fail to account for the structural constraints they face. Both statutory and non-statutory child protection interventions can operate to further harm mothers and children from multicultural communities where practitioners lack cultural competence and contextual understanding.

- **Children exposed to ongoing violence through family court contact arrangements:** Children from multicultural families are routinely exposed to ongoing violence through contact arrangements made in the family law system that do not adequately account for cultural context, visa situation or ongoing safety risks. The family law system and the domestic and family violence response system do not consistently communicate or coordinate, leaving children particularly those whose parents have insecure migration status without the independent, specialised support they need.

Consultation Voice – Building Safe Community Connections for Children

A consultation participant with lived experience described the difficulty of finding culturally safe community supports for her children following domestic and family violence. While searching for mentoring opportunities, she found that mainstream programs rarely reflected her children's cultural and faith identities, while community organisations lacked the resources to establish dedicated initiatives. Rather than programs explicitly associated with domestic violence, she advocated for inclusive community activities that enable children to develop positive relationships, build confidence and remain connected to their culture and faith in safe, welcoming environments.

"It is important to be around people who look like you and eat like you... I didn't want my children to attend something wrapped around domestic violence. I wanted somewhere they could have fun, feel safe and have positive role models while staying connected to their faith and community."

"Community centres and faith organisations are not equipped to support single mothers and their children in this way. Government asks communities to do this work, but these networks need proper investment if they are going to provide safe spaces for children."

Consultation participant with lived experience

Recommendations:

The Second Action Plan should:

- **Invest in early intervention initiatives that address the intergenerational impacts of family violence and displacement**, supporting children to build resilience, positive relationships and long-term wellbeing through culturally safe community settings, whilst

recognising that newly arrived families face distinct challenges than other cohorts of multicultural communities.¹⁸

- **Call for a national review of child protection practices with a cultural lens across all jurisdictions**, cognisant of the challenges of multicultural mothers who make decisions within contexts of visa dependency, cultural pressure and overlapping systemic demands.
- **Strengthen children's participation in family law proceedings**: ensure child-friendly, culturally responsive information and independent support so that children from diverse cultural and linguistic backgrounds can meaningfully participate in decisions affecting them.

Enabling Recommendations

- **Fund multicultural and faith-based organisations to deliver inclusive social connection, recreational, mentoring and family support initiatives**, recognising their role in strengthening protective factors, reducing isolation and supporting children without requiring participation through domestic violence-specific programs.
- **Ensure children's programs are designed with whole-of-family engagement and fund co-designed programs** that build on and connect with parenting support, rather than treat children's wellbeing as separable from the family context in which they live.
- **Invest specifically in adolescent family violence responses**: young people can be both victims and users of violence; intervention must be distinct from children's services and adult programs, culturally safe, co-designed with young people and involve families and communities recognising that intergenerational trauma and displacement shape how young multicultural people experience and respond to violence.¹⁹

Priority Area 4: People Who Use Violence

4.1 Culturally Responsive Accountability and Behaviour Change

Core Recommendation:

5. *Strengthen culturally responsive approaches to accountability and behaviour change by recognising the diverse forms of coercive control experienced by multicultural women and investing in community-informed interventions including early intervention that address violence without reinforcing racism or exclusion.*

¹⁸ <https://aifs.gov.au/resources/short-articles/supporting-wellbeing-african-background-refugee-children-and-families>

¹⁹ <https://aifs.gov.au/resources/short-articles/supporting-wellbeing-african-background-refugee-children-and-families>

The Second Action Plan appropriately recognises the importance of holding people who use violence accountable while supporting opportunities for behaviour change. However, AMWA considers that culturally responsive approaches to accountability require greater recognition of the diverse ways violence is experienced across multicultural communities, as well as the structural conditions that influence both prevention and intervention.

AMWA's consultations identified the following issues that current frameworks do not adequately address:

- **Non-physical and technology-facilitated violence:** AMWA's consultations surfaced forms of violence rarely captured in mainstream risk assessment frameworks: visa coercion (perpetrators threatening to withdraw sponsorship or report to Home Affairs); technology-facilitated abuse through shared ImmiAccount access, WhatsApp monitoring and GPS surveillance; transnational control by family members overseas; financial abuse and sabotage of employment or qualification recognition; spiritual and dowry-related abuse; and AI-facilitated abuse, which frontline DFSV workers are increasingly encountering.
- **Multi-perpetrator and extended family coercive control:** Multicultural women may experience forms of coercive control that extend beyond intimate partners to include extended family members, in-laws and broader community networks through community surveillance, social isolation, threats relating to family honour, transnational control and pressure from family members overseas. These forms of coercive control are not recognised within mainstream risk assessment frameworks or behaviour change responses, despite having profound implications for victim-survivor safety.
- **Cultural stereotyping and stigma:** Consultations identified that discussions about violence within multicultural communities can become framed through cultural stereotypes rather than structural drivers, increasing stigma while reducing trust in mainstream systems.
- **Structural drivers require nuanced responses:** Trauma associated with displacement, conflict, racism, colonisation and settlement may influence responses to prevention initiatives. Culturally responsive behaviour change initiatives therefore require stronger partnerships with trusted multicultural organisations. Accountability responses must therefore be accompanied by anti-racism and community education to reduce stigma and strengthen trust in mainstream services. Partnerships with trusted multicultural organisations are essential to culturally informed community engagement recognising that behaviour change initiatives are most effective when they emerge from within communities rather than being delivered to them.
- **The absence of programs in language and in culture:** Culturally responsive behaviour change programs and interventions for men from multicultural communities largely do not exist within the current funded landscape. What exists is predominantly mainstream men's behaviour change programs designed for, and by, Anglo-Australian populations. Adapting these programs through translation or surface-level cultural modifications is not the same as co-designing programs grounded in the cultural, linguistic and community realities of specific

communities. Multicultural men who wish to lead this work face significant funding and structural barriers to doing so.

Consultation Voice – Accountability and Anti-Racism

"If we only respond through criminalisation without education, communities become more fearful of engaging with services. Accountability is essential, but it must be accompanied by culturally responsive education, trusted engagement and anti-racism so that communities are not further isolated."

AMWA Gender-Based Violence Thematic Working Group

Case Study – Community-led engagement with multicultural men

African Family Services has demonstrated that culturally grounded engagement with multicultural men can strengthen participation in violence prevention initiatives. By framing engagement around strengthening families and communities, while maintaining a clear focus on accountability, the organisation has increased men's participation in prevention activities. This highlights the value of community-designed approaches developed in language, in culture and through trusted multicultural organisations.

Case Study: African Family Services

Recommendations:

The Second Action Plan should:

- **Develop and embed programs and interventions in language and in culture for men from migrant and refugee communities**, genuinely co-designed and community-led, not adaptations of existing mainstream men's behaviour change programs which are largely absent for multicultural communities.

Enabling Recommendation:

- **Improve workforce capability** to identify and respond to culturally specific manifestations of coercive control within multicultural communities, including multi-perpetrator abuse, family-based control and transnational coercion.

4.2 Strengthening Prevention of Sexual Violence and Engagement with Men and Boys

Core Recommendation:

6. Adopt a more comprehensive and culturally responsive approach to preventing sexual violence and engaging men and boys by strengthening policy alignment, community leadership and early education across multicultural communities.

AMWA welcomes the increased recognition of prevention within the Second Action Plan but notes that sexual violence remains comparatively under-discussed and under-invested relative to other forms of gender-based violence. Greater attention is needed to prevent sexual violence beyond intimate partner relationships—including child sexual abuse, workplace sexual harassment and community-based sexual violence—while ensuring responses recognise the diverse experiences of multicultural communities and there is better alignment across Australia's intersecting policy frameworks.

AMWA's consultations identified the following:

- **Address Policy fragmentation:** Current responses remain fragmented across the National Strategy to Prevent and Respond to Child Sexual Abuse, the National Plan, online safety initiatives and broader gender equality reforms. This fragmentation creates gaps in accountability and consistency of response.
- **Acknowledgement of diverse experiences - No single model for multicultural communities:** Effective approaches require locally designed, culturally responsive initiatives that acknowledge diverse migration experiences, faith contexts and community structures. As in the case of First Nations peoples, experiences of racism, discrimination and colonisation for multicultural communities also influence trust in institutions and shape how prevention initiatives are received without diminishing individual accountability for violence.
- **Prioritise culturally responsive education:** Over-reliance on punitive responses misses opportunities: Prevention efforts should prioritise culturally responsive education on respectful relationships, healthy parenting, consent and gender equality delivered through trusted community settings. Reliance on punitive responses alone risks further marginalising communities while missing opportunities for earlier intervention.
- **Lived and living experience as a governance requirement:** The lived and living experience of multicultural women who have experienced violence is currently invoked as a consultation mechanism rather than embedded as a governance requirement. Tokenistic consultation where women are asked to validate decisions already made is common and harmful. Genuine co-design requires protocols, remuneration, cultural safety frameworks and trauma-informed engagement that enable women to participate as partners rather than as service users being consulted.

Recommendations:

The Second Action Plan should:

- **Fund culturally grounded Navigator and Family Safety Officer models** for early intervention with men and families from multicultural communities, co-designed with trusted multicultural organisations, with the aim of intervening before matters enter the criminal justice system and distinguishing structural drivers including displacement, racism and intergenerational trauma from individual accountability.
- **Invest in multicultural men as leaders and co-facilitators of prevention and early intervention:** multicultural men who want to lead this work face significant funding and structural barriers. Invest in community-led engagement by supporting multicultural male change agents and community leaders as co-facilitators — recognising that culturally responsive approaches are most effective when co-designed and delivered from within communities.

Enabling Recommendations:

- **Invest in culturally responsive prevention initiatives** addressing respectful relationships, consent, healthy parenting and gender equality for men, boys and families through trusted multicultural organisations.
- **Support community-led engagement with men and boys**, recognising that culturally responsive approaches are most effective when co-designed and delivered by trusted community leaders.

Priority Area 5: System Integration and Workforce

5.1 Invest in Culturally Safe and Anti-Racism Measures as part of Workforce Capability

Core Recommendation:

7. Recognise structural racism as a cross-cutting driver of inequitable outcomes for multicultural victim-survivors, implement the National Anti-Racism Framework, and establish nationally consistent Cultural Safety Standards, underpinned by cultural humility, institutional accountability and genuine partnership with multicultural communities.

AMWA considers structural racism, alongside inadequate cultural safety protocols, as a cross-cutting systemic barrier that undermines equitable outcomes for multicultural victim-survivors across every stage of the gender-based violence response.

AMWA's cross-sector consultations identified the following intersecting barriers:

- **Uneven progress across jurisdictions:** Culturally responsive practice has improved in parts of the service system, but progress remains uneven and is often driven by individual practitioners rather than embedded through consistent standards, accountability and system-wide reform.
- **Barriers to disclosure and help-seeking:** Persistent challenges include limited multilingual information, difficulties accessing culturally appropriate interpreters, victims' concerns regarding confidentiality, fear of authorities and immigration consequences, and limited confidence that mainstream services would understand their circumstances. Some consultation participants also reported police disregarding their complaints and testimonies on occasions where the perpetrator was white, male and heterosexual. These barriers intersect to reduce women's willingness to disclose violence, delay help-seeking and undermine confidence in formal support systems.
- **Anti-racism without accountability:** Culturally and racially marginalised women continue to experience racism, dismissal and re-traumatisation when reporting violence to police. This reinforces the need for stronger institutional accountability, culturally safe policing practices and anti-racism measures across first-response systems. Anti-racism training and cultural safety frameworks, without consequences for non-compliance and without external accountability structures, produce compliance theatre rather than institutional change. Where anti-racism measures exist without enforceable standards, organisations can meet the letter of requirements without substantively changing practice.

AMWA's consultations have also identified the following opportunities for development:

- **Cultural humility as the minimum standard:** In the context of Australia's highly heterogeneous multicultural communities, where no practitioner can reasonably possess detailed knowledge of every cultural tradition or migration experience, cultural humility — which builds on principles embedded within First Nations approaches to cultural safety — offers a practical framework for genuinely culturally safe practice. Such an approach is grounded in ongoing self-reflection, recognition of power imbalances, awareness of unconscious bias and respectful partnership with communities.²⁰ Cultural humility must extend beyond specialist DFSV services to all settings where multicultural women seek safety and opportunity — including employment. Any employer wage subsidy scheme for skilled migrant women must therefore require participating employers to demonstrate cultural inclusion and safety as a condition of access, not merely a willingness to hire.
- **Expertise resides within communities:** Trusted grassroots multicultural organisations play a critical intermediary role by building trust, interpreting systems and adapting mainstream responses to the realities of individual communities. Embedding these organisations as genuine implementation partners is essential to strengthening outcomes for multicultural victim-survivors under the Second Action Plan.
- **Institutionalising Community Participation in Policing:** Research also demonstrates that institutionalising community participation within policing and justice systems strengthens trust, accountability and culturally responsive practice.²¹ Embedding multicultural communities as ongoing partners in policy development, governance and service improvement can help address structural barriers and improve institutional responses to gender-based violence.

²⁰ Melanie Tervalon and Jann Murray-García, "Cultural Humility Versus Cultural Competence: A Critical Distinction in Defining Physician Training Outcomes in Multicultural Education," *Journal of Health Care for the Poor and Underserved* 9, no. 2 (1998): 117–125; Erena Curtis, Rachel Jones, Daphne Tipene-Leach, Cath White, Suzanne Paine, Barry Loring and Papaarangi Reid, "Why Cultural Safety Rather Than Cultural Competency Is Required to Achieve Health Equity: A Literature Review and Recommended Definition," *International Journal for Equity in Health* 18, no. 174 (2019); Australian Commission on Safety and Quality in Health Care, *National Safety and Quality Health Service Standards User Guide for Aboriginal and Torres Strait Islander Health* (Sydney: ACSQHC, 2021); Australian Human Rights Commission, *National Anti-Racism Framework* (Sydney: AHRC, 2024)

²¹ Lisa Wheildon, *Towards Meaningful Engagement: Key Findings for Survivor Co-production of Public Policy on Gender-Based Violence* (ANROWS Insights No. 05/2023, Australia's National Research Organisation for Women's Safety (ANROWS), 2023); Institutionalise Transformation to Prevent Gender Based Violence, Transforming Society, Blog: Transforming Society ~ Institutionalise transformation to accelerate the prevention of gender-based violence

Consultation Voice – Structural Racism

"Structural racism should be named as the organising condition that underpins all other gaps. Inclusion as a standalone item understates its significance, as it impacts cultural capability, lived experience engagement, community-led solutions and workforce participation. The recommendations of the National Anti-Racism Framework should be actioned legislatively so that progress does not remain dependent on the priorities of governments but is embedded within enduring institutional structures."

AMWA Gender-Based Violence Thematic Working Group Member

Recommendations:

The Second Action Plan provides an important opportunity to embed anti-racism and cultural safety as foundational elements of Australia's response to gender-based violence. AMWA recommends that the Australian Government:

- **Develop and implement National Cultural Safety Standards across the gender-based violence sector:** underpinned by cultural humility, anti-racism, institutional accountability and genuine partnership with multicultural communities, drawing on established First Nations approaches. Standards must be mandatory and apply to executives, commissioners, board members and frontline practitioners across family violence, justice, policing, health, housing and settlement sectors, grounded in cultural humility and reflective practice rather than cultural competency alone.
- **Implement the recommendations of the National Anti-Racism Framework** through legislative and policy reforms that strengthen accountability for systemic racial discrimination ensuring that anti-racism measures include enforceable consequences, clear reporting mechanisms that do not place the burden of evidence on victim-survivors, and external accountability structures that monitor implementation outcomes rather than stated intention alone.

Enabling Recommendation:

- **Strengthen community participation in policing and justice systems** by embedding multicultural organisations and women with lived experience as ongoing partners in governance, policy development, workforce reform and service improvement.

5.2 Building Community Navigation, Informal, Formal and Adjacent Sector Workforce Capability

Core Recommendations:

8. Invest in workforce capability across formal, informal and adjacent sectors - building DFSV capability in settlement, community and adjacent sector workers, and cultural and migration capability in specialist DFSV workers - in both directions.

9. Invest in community and systems navigation as an essential workforce capability through trusted multicultural organisations, community leaders and specialist navigators to strengthen culturally responsive pathways into support.

AMWA's consultations consistently identified fragmentation across government systems as one of the greatest barriers facing multicultural women. Participants described a service landscape in which women frequently move between migration, family law, policing, housing, child protection, health and specialist domestic and family violence services without coordinated support, often having to repeatedly disclose traumatic experiences while navigating multiple eligibility requirements and disconnected referral pathways. For multicultural women experiencing violence, these intersecting systems and adjacent sectors frequently determine whether safety can be achieved in practice. AMWA, therefore, advocates for strengthening the critical break points in systems navigation as a means of circumventing system fragmentation and improving early intervention.

Community-led initiatives such as Settlement Services International's Train, Engage, Connect and Support (TECS) program, delivered in partnership with FECCA, demonstrate the value of equipping trusted community and faith leaders with the knowledge and confidence to recognise family violence, respond safely and facilitate referrals. Similar approaches, including Safe to Speak, further demonstrate the value of strengthening the capability of trusted social responders to identify violence and support women to seek help.

AMWA identified the following specific failure points and opportunities:

- **The disclosure-to-support gap:** While women may disclose violence within trusted community settings, referrals frequently default to generic services rather than culturally responsive navigation and specialist support. Without trusted assistance to navigate complex legal, housing, migration and family violence systems, many women disengage before receiving the support they need. Trusted entry points also sometimes lack the system literacy to navigate women into mainstream services and equally, mainstream services do

not consistently refer women back to culturally specific organisations that can provide ongoing cultural support and community connection. Strengthening this two-way referral and navigation loop is essential to creating a genuinely integrated 'no wrong door' system.

- **Jurisdictional fragmentation and the federal/state disconnect:** Multicultural women navigating domestic and family violence do not experience federal and state systems as separate they experience them simultaneously, and the gaps between them. Family violence provisions interact with federal migration law in ways that state-based services are rarely equipped to navigate. Participants in AMWA's Thematic Working Group consultation provided feedback that protections and services are inconsistent across jurisdictions for example, refuge access for temporary visa holders is free in Victoria but not in other States, and MARAM in Victoria technically includes culturally diverse services but in practice the settlement sector has no defined role in risk assessment²². The Department of Home Affairs, whose policies fundamentally determine the safety options available to temporary visa holders, remains largely absent from the architecture of the national gender-based violence response. Women are left to absorb the cost of these disconnections, repeatedly disclosing trauma while navigating eligibility requirements that do not align across borders or portfolios.
- **Strengthen culturally responsive access to and through the family law system:** The Federal Circuit and Family Court of Australia is an integral and often under-recognised component of Australia's family safety architecture. Through parenting and property decisions, specialist family safety services and multidisciplinary practice, the Courts influence women's safety, children's wellbeing, economic security and accountability for family violence. The Courts are uniquely positioned to identify patterns of coercive control, escalating risk and systems abuse during separation, often before serious harm occurs, and to facilitate earlier connections with legal and specialist support services. For multicultural women, this potential is significantly constrained by language barriers, visa insecurity, misidentification risk and limited culturally responsive navigation support.²³

The Federal Circuit and Family Court of Australia Annual Report 2024–25 confirms the Court has established a Cultural Liaison Officer (CLO) program described as the first of its kind in the federal court system operating initially in the migration jurisdiction, with seven CLOs based in Sydney, Parramatta and Melbourne. CLOs have been tasked with identifying applicants experiencing domestic and family violence, minimising interpreter booking failures, and connecting applicants to legal and social support services. The Court has itself identified the need to better support litigants with barriers to risk screening, including CALD litigants, through programs such as Lighthouse.²⁴ This confirms both the model's viability and the urgent need to extend equivalent culturally responsive support into the family law

²² [Evidence-based risk factors and the MARAM risk assessment tools | vic.gov.au](https://www.vic.gov.au/evidence-based-risk-factors-and-the-maram-risk-assessment-tools)

²³ AMWA's Consultation with Hayley Foster, Federal Circuit and Family Court of Australia, 9 July 2026 (Unpublished consultation notes).

²⁴ Federal Circuit and Family Court of Australia, Annual Reports 2024–25 p 70

jurisdiction including through circuit-based and remote access for women in regional, rural and remote communities, and with CLOs specifically trained in the intersection of family violence, visa insecurity and misidentification risk.

- **Workforce capability across formal, informal and adjacent sectors:** Australia's gender-based violence workforce is currently fragmented across three groups that rarely train together, refer to each other effectively or share a common framework for culturally responsive practice. Specialist DFSV workers need deepened cultural, migration and intersectional capability to respond effectively to multicultural women. Settlement and community workers including faith leaders, community navigators and peer supporters are already functioning as informal first responders but lack DFSV training, recognised pathways and sustainable resourcing to do this safely and consistently. Adjacent sector workers - including GPs, midwives, teachers, housing workers, pharmacists and police - are sites of heightened risk and early disclosure but are largely untrained to recognise or respond to family violence. They also lack the referral pathways to connect women to appropriate support. Building capability in both directions (DFSV capability into settlement and adjacent sectors, and cultural and migration capability into specialist DFSV services) is a structural requirement for an integrated, culturally responsive system. Informal community workers who are already performing this work without formal recognition or remuneration represent an untapped and undervalued workforce pipeline.
- **Ethno-specific and grassroots organisations as frontline infrastructure:** Ethno-specific and grassroots organisations - including community associations, faith-based groups and organisations like ARISE WSA established by and for specific cultural communities - frequently provide the most trusted, accessible and culturally resonant first point of contact for multicultural women experiencing violence. Unlike larger settlement organisations, these groups often operate with minimal or no government funding, rely on volunteer labour and have limited access to professional development, formal referral networks or workforce pathways. They are not a supplement to the formal system, for many women, they are the system. Without targeted investment in their capacity, resourcing and sustainability, the informal infrastructure that keeps multicultural women safe will continue to operate invisibly and at risk of collapse

Recommendations:

The Second Action Plan should:

- **Invest in a Community Navigator Model** that strengthens the critical break points between trusted community disclosure, mainstream services and culturally specific supports. The model should build system literacy, referral capability and coordinated two-way pathways through trusted multicultural organisations

- **Invest in a dedicated workforce development stream across formal, informal and adjacent sectors:** build capability across three distinct but connected groups
 - Formal workers in specialist DFSV, settlement and ethno-specific organisations (deepened cultural, migration and intersectional capability);
 - Informal community workers in grassroots organisations including faith leaders, navigators and peer supporters (recognised pathways, accreditation and sustainable resourcing) and create formal recognition pathways for informal community workers into paid professional roles; fund free NAATI accreditation for workers with specialist DFSV training; and explore HECS forgiveness for DFSV-related tertiary study in health, social work and community services and
 - Adjacent sectors including GPs, midwives, teachers, housing workers, pharmacists and police (DFSV training and referral pathways). Capability must be built in both directions.
- **Invest in Cultural Liaison Officer roles across the Federal Circuit and Family Court of Australia** to improve culturally responsive engagement, referrals and systems navigation; strengthen access for women in regional, rural and remote communities through circuit-based and remote CLO support; and ensure CLOs are specifically trained in the intersection of family violence, visa insecurity, misidentification risk and migration system dynamics.

5.3 Strengthening Data, Accountability and Long-Term System Reform

Core Recommendations:

10. Strengthen evidence, accountability and long-term system reform by improving disaggregated data, embedding multicultural women's leadership in governance, and adopting sustainable funding and commissioning models that support integrated, community-led responses.

An integrated gender-based violence system requires robust evidence to identify inequities, monitor outcomes and inform policy. AMWA considers that current national data collections do not adequately capture the experiences of multicultural women and children, particularly those on temporary visas, from smaller or emerging communities, or with intersecting experiences of disability, language barriers or insecure migration status.

Current national data collections also have important methodological limitations that reduce the visibility of multicultural women's experiences. Existing approaches are largely designed around the individual as the primary unit of analysis, making it more difficult to capture family- and community-based coercive control, violence perpetrated by extended family members, and migration-related forms of abuse.²⁵ As a result, significant forms of violence experienced by multicultural women

²⁵ A national consultation on *Multicultural Women and the Second Action Plan*, facilitated by Commissioner Micaela Cronin, Domestic, Family and Sexual Violence Commission (24 July 2026).

remain underrepresented in national evidence, limiting the capacity of governments to design equitable policy and service responses.

AMWA identified the following distinct gaps and priorities:

- **System-wide data gaps:** Improving data collection should be a priority across family violence, justice, housing, health and family law systems, including routine collection of ethnicity, country of birth, language, visa status, disability and migration pathway.
- **Family law system data:** Discussions with the FCFCOA highlighted specific data gaps within the court system: visa status, language needs, cultural background and patterns of misidentification are not routinely captured. A significant proportion of FCFCOA matters involve people from CALD backgrounds; 86 per cent of all FCFCOA matters involve family violence allegations. These populations must be visible in the data. In 2024–25, 93% of parenting matters had at least one risk factor alleged, and 73% had four or more risk factors alleged. In relation to migration matters before the Court, 84% of applicants are unrepresented, and 85% of those require an interpreter across more than 70 languages underscoring the scale of language access need within federal courts.²⁶
- **Information sharing:** While several states have established information-sharing provisions between courts and specialist services, equivalent mechanisms remain limited across federal systems, contributing to fragmented service pathways. Expanding culturally appropriate information-sharing arrangements, alongside earlier referrals to legal assistance, housing, migration and social supports, would support more integrated, trauma-informed responses. Many multicultural women navigate the family courts, migration services, child protection, housing, specialist family violence services, legal assistance providers and settlement agencies simultaneously often repeating their story across each. The absence of coordinated information-sharing arrangements means that risk identified in one system frequently does not reach another, delaying intervention and increasing harm.
- **Referral pathways:** the family law system is uniquely positioned to identify patterns of coercive control, escalating risk and systems abuse during separation, but this potential is constrained without stronger referral pathways and legislative frameworks that enable integrated, trauma and violence informed responses.
- **National data inconsistency:** Australia does not have a nationally consistent approach to how domestic and family violence data is collected or reported. Victoria counts L17 forms, New South Wales counts crime statistics and Queensland counts intervention orders producing data sets that cannot be meaningfully compared and that collectively fail to capture the experiences of multicultural women. The Australian Institute of Health and Welfare is currently piloting a national data set; this pilot represents a significant opportunity

²⁶ Federal Circuit and Family Court of Australia Annual Report 2024–25, Table 2.5(a).

that will be wasted if it does not include disaggregated data on ethnicity, visa status, language, country of birth and migration pathway from the outset.²⁷

Recommendations

The Second Action Plan should improve data collection as follows

- **Improve disaggregated data collection across the gender-based violence system:** routinely capture and report data disaggregated by ethnicity, visa status, country of birth, language, disability, interpreter requirements and migration pathway including within the family law system where migration status, language needs, cultural background and patterns of misidentification are not currently collected.
- **Align with AIHW national data reforms as an important opportunity to strengthen national datasets** so they better capture family- and community-based violence, migration-related vulnerabilities, and non-intimate partner forms of coercive control that are not consistently visible under current data collection methodologies. AMWA recommends the AIHW national domestic and family violence data pilot explicitly include this disaggregation from the outset.²⁸
- **Design data collection to evaluate whether reforms are improving access, safety and outcomes for multicultural women and children** by measuring inputs and longitudinal outcomes following court processes and service engagement.
- **Strengthen information-sharing arrangements, address legislative barriers and reduce fragmentation:** review barriers to information sharing across family law, migration, housing, child protection, specialist domestic and family violence services, legal assistance providers and settlement agencies and identifying where Privacy Act thresholds prevent integrated, trauma and violence informed responses and establish clear consent frameworks and appropriate safeguards that do not place the burden of disclosure on victim-survivors.
- **Strengthen referral pathways between different systems** to support earlier intervention and continuity of support. Support longitudinal research examining multicultural women's and children's experiences of the family law system, including barriers to access, outcomes following separation and the effectiveness of integrated service responses.

²⁷ Targeted meetings with the NSW Women's Safety Commissioner, the Federal Circuit and Family Court of Australia (FCFCOA) and Commissioner Micaela Cronin; A national consultation on *Multicultural Women and the Second Action Plan*, facilitated by Commissioner Micaela Cronin, Domestic, Family and Sexual Violence Commission (24 July 2026).

²⁸ Australian Institute of Health and Welfare. Specialist crisis domestic and family violence services data pilot. 2026. AIHW. <https://www.aihw.gov.au/family-violence/specialist-crisis-dfv-services>

Conclusion

AMWA's submission reflects the voices of multicultural women across Australia - frontline workers, advocates, community leaders and women with lived experience - who participated in a comprehensive national consultation program throughout 2025 and 2026. Their message is consistent: the systems meant to keep multicultural women safe are not yet designed with them in mind. The Second Action Plan provides a significant opportunity to change that.

The evidence across this submission demonstrates that migration status, racism and lack of cultural safety, language, and economic dependence are structural factors that determine whether safety is accessible at all, not peripheral complexities to be accommodated at the margins of the plan.

Several cross-cutting themes emerged with particular consistency across our consultations: the acute exclusion of temporary visa holders from family violence protections; the gap between disclosure and specialist support that community organisations are absorbing without recognition or resourcing; economic abuse and financial insecurity as distinct forms of coercive control; structural racism as the organising condition that underpins every other gap; lack of culturally responsive services; multi-perpetrator and family-based coercive control that remains invisible in current frameworks; inadequate disaggregated data that renders multicultural women invisible in the evidence base; and short-term pilot funding that prevents the community-led infrastructure already doing this work from operating sustainably.

Addressing these requires more than policy intent. AMWA calls for the following principles to be embedded across implementation: co-design with multicultural women from the outset, not consultation after the fact; disaggregated data as a non-negotiable accountability baseline; multi-year flexible funding as the minimum standard for community-led organisations; National Cultural Safety Standards with mandatory institutional accountability; and settlement formally recognised and resourced as prevention infrastructure.

AMWA commits to ongoing partnership with the Australian Government in co-design, implementation and evaluation of the Second Action Plan, and offers to contribute to the validation process. We are accountable to the multicultural women and communities whose voices have shaped this submission, and we will continue to advocate until the plan reflects the full reality of their lives.

The expertise, relationships and infrastructure that keep multicultural women safe are already present in communities across Australia. The Second Action Plan must move from acknowledging this to resourcing it.

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