



Submission to the Consultation on the Second Action Plan

National Plan to End Violence against Women and Children 2022–2032

*Strengthening Digital Safety and Technology-Facilitated Gender-Based Violence Provisions:
Building on the Plan's Foundations*

Submitted by: Away from Keyboard (AFK) Inc., an ACNC-registered Australian charity (DGR endorsed) working on digital safety, child safeguarding, and prevention of technology-facilitated harm.

This submission is made on behalf of AFK Inc. and may be published.

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Executive Summary

AFK commends the Department and all governments for the ambition and structure of the National Plan to End Violence against Women and Children 2022–2032. Naming “online” alongside home, work, school and community in the Plan's overarching Goal statement is a meaningful and forward-looking choice, and it gives the Second Action Plan a strong foundation to build from. This submission is offered in that spirit: as a set of practical suggestions for strengthening the continuity between that vision and the Plan's operational architecture, its Theory of Change, Outcomes Framework, 10 Actions, 6 long-term outcomes, and 6 national measurable targets, so that the ambition already expressed in the Goal is carried through with equal clarity at every level beneath it.

Our review identified a consistent opportunity: several places where digital and technology-facilitated dimensions of gender-based violence are already implied or partially present, and where a small amount of additional language, a dedicated measure, or an explicit cross-reference would bring the same clarity and practicality that the Plan already achieves so well for its other priority areas. Technology-facilitated gender-based violence (TFGBV) is one of the fastest-growing modalities through which coercive control, sexual violence, and abuse of children are perpetrated in Australia, so strengthening this continuity now will make the Second Action Plan more resilient and future-ready.

We set out fourteen practical opportunities below, each anchored to a named section of the Outcomes Framework 2023–2032 or Theory of Change 2022–2032, together with a suggested clarification or addition for the Second Action Plan. One idea runs through several of them and is worth naming at the outset: vulnerability compounds rather than adds. A person facing more than one form of disadvantage (disability, remoteness, a culturally and linguistically diverse background, being known to child protection, being Aboriginal or Torres Strait Islander) does not face those risks separately; each additional factor multiplies the others, and the resulting risk profile is categorically higher than any single factor would predict. This principle, set out explicitly in Section 2.11, is the thesis underpinning much of AFK's advocacy and shapes how several of the enhancements below are framed. We also draw on first-hand research and consultation findings from the Women Deliver 2026 Declaration Consultation on TFGBV, which AFK convened and facilitated in Melbourne in April 2026 with 28 participants from 10 countries, as independent, contemporaneous evidence that these same continuity opportunities are being identified in parallel international processes, and that practical, workable solutions already exist. Where relevant, we also draw on AFK's own applied work, including a free-to-use pre-deployment AI ethics assessment tool we have developed and the

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frameworks underpinning it, as evidence that these suggestions are readily implementable, not merely aspirational.

1. Method: Reading for Continuity

This submission is grounded in a close reading of three source documents published to inform this consultation: the Theory of Change 2022–2032, the Outcomes Framework 2023–2032, and the “What’s been done” progress page. Our approach was to ask, for each of the Plan’s six 10-year outcomes and six national targets, whether the digital/technology dimension already present in the Goal statement is carried through with equal clarity into measurement, indicators and action. We have focused on opportunities that can be addressed through clarification, cross-referencing, or targeted addition, building on language and structures the Plan has already established, rather than proposing a parallel framework.

2. Opportunities to Strengthen Continuity

2.1 Carrying the Goal’s reference to “online” through into a measurable target

The Goal statement in both source documents commits to a country where people “live free from gender-based violence and are safe in all settings including at home, at work, at school, in the community and online.” This is a strong and welcome commitment. There is an opportunity to bring the Plan’s six agreed national targets, namely female intimate partner homicide, community knowledge (UVAWS), community attitudes across three scales (AVAWS, AGIS, SVS), and Closing the Gap Target 13, into full alignment with that commitment by ensuring at least one target speaks directly to online or technology-facilitated harm, the same way the other named settings are already reflected.

“These targets will be measured through the Performance Measurement Plan (developed in Phase 2) where they will be linked to a set of indicators and measures.” (Outcomes Framework 2023–2032, p.8)

Suggested enhancement: The Second Action Plan could establish a seventh national target (or a named sub-target under an existing outcome) specific to technology-facilitated gender-based violence, with an agreed data source and scale developed in the next Performance Measurement Plan cycle. This would give the existing Goal statement the same measurable follow-through already achieved for the Plan’s other four settings.

2.2 Bringing consistency to technology-facilitated abuse language across outcome areas

Within the Outcomes Framework, the phrase “technology-facilitated abuse” already appears within the Aboriginal and Torres Strait Islander Action Plan activity lists attached to Outcomes 1, 3 (Community attitudes, Rejecting gender inequality, and Rejecting sexual violence sections)

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and Closing the Gap Target 13, a helpful sign that the concept is recognised and valued within the Plan. The same core paragraph currently appears under each of these headings, which offers a good opportunity: tailoring that language slightly for each outcome area would let the Plan speak with the same precision and practicality it already applies elsewhere, and would make clearer how technology-facilitated abuse shows up differently in a community-attitudes context compared with a justice-accountability context.

Suggested enhancement: Build out the existing technology-facilitated abuse language into outcome-specific detail, clarifying what it looks like as a knowledge consideration (Outcome 3.1), a service-response consideration (Outcome 2), and a perpetrator-accountability consideration (Outcome 4) respectively, so each outcome area carries language tailored to its own logic.

2.3 Extending the Plan's forward-looking scope to include AI-facilitated harm

The Plan's Theory of Change is explicitly designed to be forward-looking and adaptive, which is one of its real strengths. Artificial intelligence is not yet named as a harm vector in either source document, not in the 6 long-term outcomes, the 21 National Plan objectives, the 10 Actions, or the 9 Closing the Gap Target 13 indicators, and this is a natural next area for the Second Action Plan to build into that existing forward-looking design, given the trajectory of harm: AI-generated intimate imagery and deepfake abuse, synthetic child sexual abuse material, companion-app-enabled coercive control, and algorithmic amplification of misogynistic content are documented, escalating harm categories.

This consultation's own Privacy Collection Notice states the Department “may also use AI tools to process information you submit to us.” The Department is already comfortable operationalising AI in the delivery of this consultation, which is a useful signal of readiness, and a reason for confidence that an AI and emerging technology lens can be integrated into the Plan itself without difficulty.

Suggested enhancement: Add an explicit AI and emerging technology lens threaded across all four domains (prevention, early intervention, response, recovery and healing), with a named action under the Second Action Plan. AFK's own free-to-use pre-deployment AI ethics assessment tool, which screens against 35 governance frameworks with mandatory child safety and technology-facilitated gender-based violence checks, demonstrates that pre-deployment risk screening for AI systems is already operationally achievable, and AFK would be glad to share this experience further.

2.4 Extending Closing the Gap Target 13's strong indicator set

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Target 13 commits to a 50 per cent reduction in family violence and abuse against Aboriginal and Torres Strait Islander women and children by 2031, and its nine supporting indicators, covering self-reported physical violence, child protection substantiations, out-of-home care, community awareness and attitudes, hospitalisation, and homicide, already represent a comprehensive and carefully built evidence base. Building on that strong foundation, there is an opportunity to add a measure of technology-facilitated family violence, particularly given the Theory of Change's own acknowledgement that Aboriginal and Torres Strait Islander women already face compounding barriers to reporting arising from mistrust of police and mainstream services. Technology-facilitated abuse (location tracking, image-based abuse, surveillance via shared devices) can compound those barriers further, because it is harder to name, harder to evidence, and often occurs through infrastructure victim-survivors cannot easily leave (shared family phone plans, community-only digital spaces).

Suggested enhancement: Add a tenth indicator to Target 13 specific to technology-facilitated family violence experienced by Aboriginal and Torres Strait Islander women and children, developed in partnership with Aboriginal and Torres Strait Islander-led data governance processes consistent with Priority Reform Four of the National Agreement on Closing the Gap.

AFK wishes to record a further point here in support of Target 13, not against it: a reduction target of this scale is only achievable if funding follows the evidence on what works. The broader Closing the Gap Agreement is instructive. The Productivity Commission's most recent assessment found only four of the nineteen national socio-economic targets on track, six improving but not on track, and four worsening. Priority Reform Two, which commits governments to strengthening the Aboriginal and Torres Strait Islander community-controlled sector, remains among the least progressed of the four Priority Reforms nationally. Out-of-home care, one of Target 13's own supporting indicators, sits inside this same pattern: children removed from family violence contexts are disproportionately Aboriginal and Torres Strait Islander, and the service system around them remains disproportionately mainstream rather than community-controlled. This matters for the target's viability, not only its equity. The 1991 Royal Commission into Aboriginal Deaths in Custody found that overimprisonment, not individual criminality, drove the disparity in custodial deaths, and recommended structural change; many of its recommendations, including independent mechanisms for investigating police misconduct and the abolition of mandatory sentencing, remain unimplemented more than three decades later, and imprisonment rates have worsened rather than improved since. Family violence, child removal, and youth justice contact are not separate systems for the families Target 13 is designed to protect; they are the same families moving through connected systems, and a target that measures family violence reduction without a corresponding

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commitment to fund the community-controlled services positioned to deliver it risks remaining aspirational rather than becoming achievable.

Suggested enhancement: Alongside the tenth indicator proposed above, direct a defined and growing share of Target 13 implementation funding to Aboriginal and Torres Strait Islander community-controlled organisations, consistent with Priority Reform Two of the National Agreement on Closing the Gap, and extend proven models such as justice reinvestment trials into family violence prevention specifically, rather than defaulting to mainstream services to deliver on Target 13.

2.5 Extending the community attitude scales to capture technology-facilitated abuse

The four scales underpinning the Plan's attitude and knowledge targets, UVAWS, AVAWS, AGIS and SVS, are well-established and already provide a strong measurement backbone for the Plan. "Objectification of women" within AVAWS is the closest existing construct to a digital dimension, and there is an opportunity to build a complementary construct alongside it that captures image-based abuse, stalkerware-enabled coercive control, doxxing, and deepfake harassment as distinct, measurable attitudes. This would let the Plan track community understanding of the harm types currently growing fastest and disproportionately affecting children and young people, using the same rigorous methodology already applied to the existing four scales.

Suggested enhancement: Commission development of a dedicated technology-facilitated abuse attitudes and awareness scale (or an extension module to the existing NCAS instrument) for use in the next Performance Measurement Plan cycle.

2.6 Building out children's online safety into a fully actioned outcome

Outcome 5, sub-outcome 5.1, already states that children and young people should be "supported to grow up safe and supported including at home, school, in their community, and online", a welcome and specific commitment, and the only sub-outcome across the entire 21-objective Outcomes Framework that names "online" explicitly. Building this through into a corresponding action and indicator would give it the same operational strength as the Plan's other commitments. Given that the Theory of Change itself reports 39.6 per cent of Australians up to age 18 have been exposed to domestic violence, a parallel figure, indicator or target for children's online exposure or harm would round out the evidence base nicely.

Suggested enhancement: Develop a specific action and indicator under Outcome 5 addressing children's online safety, tailored to the materially different risk profile, disclosure barriers, and protective factors relevant to children specifically, alongside the broader technology-facilitated abuse language discussed in Section 2.2.

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2.7 Naming technology-facilitated coercive control within perpetrator accountability

Outcome 4 and its three sub-outcomes set out a clear and practical approach to identifying people at risk of using violence, supporting behaviour change, and holding people accountable through police and justice systems. There is an opportunity to extend this already-strong framing to name technology-facilitated coercive control (location tracking, spyware, account takeover, image-based abuse used as a control mechanism) explicitly, given this is an established and growing modality of perpetration that benefits from specific investigative capability, evidentiary literacy, and legal response alongside the existing focus on physical violence.

This applies equally to Outcome 4.2, which commits to supporting people who use violence to change their behaviour through evidence-based interventions. Existing behaviour change program content is built around physical and interpersonal violence, and does not yet consistently address technology-facilitated modalities as a distinct behaviour requiring its own content: recognising covert monitoring as controlling behaviour, understanding why constant location tracking or account access is coercive even when framed by the person using it as care or concern, and building content specific to image-based abuse as a tool of control. Behaviour change work that does not name these patterns risks leaving a person who uses technology to control a partner without ever being asked to examine that behaviour directly.

Suggested enhancement: Extend Outcome 4's sub-outcomes to name technology-facilitated coercive control explicitly as a perpetrator behaviour, building on Action 9's existing commitment to improving police responses, and ensure funded behaviour change programs include content specific to technology-facilitated coercive control rather than treating it as an implicit extension of physical violence content.

2.8 Bringing upstream product and platform accountability into the prevention domain

The Theory of Change's 6 cross-cutting principles and 10 Actions, and the Outcomes Framework's reform areas, build a strong and well-established downstream response: attitude change, service capability, justice-system accountability, and recovery support. Building on this foundation, there is an opportunity to extend Domain 1 (Prevention) to include safety-by-design obligations and pre-deployment risk assessment for digital products and AI systems, alongside the existing community-attitudes focus, in keeping with the Theory of Change's own argument that “no single approach on its own will achieve sustained changes in the long-term” and that action is needed “across all four domains.”

Suggested enhancement: Recognise upstream, pre-deployment safety accountability for digital and AI product design as a distinct prevention mechanism within Domain 1. AFK's own

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governance frameworks and pre-deployment assessment tool are offered as an existing, operational example of what this can look like in practice, and AFK would welcome the opportunity to contribute further evidence to Phase 2 (Performance Measurement Plan) and Phase 3 (Evaluation Methodology) development.

2.9 Funding culturally and linguistically appropriate prevention for CALD and immigrant communities

This is a distinct enhancement from those proposed above, and deliberately kept separate from the Closing the Gap discussion in Section 2.4: Closing the Gap is a specific mechanism for Aboriginal and Torres Strait Islander peoples, and folding other communities into it would blur an accountability structure that exists for good reason. The underlying principle, however, is shared: prevention funding that reaches a community only through translated mainstream programs tends to under-perform programs designed by that community from the outset. AFK's own accepted research with Afghan communities in Melbourne's outer south-east has found this pattern directly: prevention programs fail to reach culturally and linguistically diverse communities not because need is absent, but because of how those programs are designed and delivered, and safety technologies trained on data that excludes these communities fail to detect harm within them. Technology-facilitated abuse compounds this further for CALD and immigrant communities specifically: language-targeted scams and harassment go largely unaddressed by safety tooling built for English speakers, and navigating school, government and safety systems in a second language is itself a barrier to disclosure.

Suggested enhancement: Name culturally and linguistically appropriate, community-designed prevention and safety programs, rather than translated mainstream programs, as a specifically funded component of the Second Action Plan's response to technology-facilitated abuse for CALD and immigrant communities.

2.10 Resourcing frontline workforce capability to understand and respond to TFGBV

Outcome 2.2 already commits to “workforces access training and information to enable the effective delivery of timely, evidence-based, culturally safe and trauma-informed services”, a strong existing hook the Second Action Plan can build on directly. What is missing is specificity: generic “training and information” is not the same as frontline family violence workers, police, health practitioners and educators having genuine technical literacy in how technology-facilitated abuse actually operates, and clear, resourced protocols for what to do when they encounter it.

This gap is not new to this submission. AFK's founder raised it directly in her UN ESCAP intervention at the CSW70 regional briefing, arguing that justice and service systems across

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the Asia-Pacific are “often not designed to respond to intersectional, fast-moving, and digitally mediated harm,” and that individual digital literacy and a repair-after-harm model both fail women and children because the systems around them, not only the individuals within them, lack the capability to respond. The central challenge named in that intervention was velocity: technology-facilitated harm now scales faster than workforce training cycles typically refresh, which means a one-off training module delivered once is already out of date by the time it reaches a caseworker. Generative AI, deepfake image-based abuse, stalkerware-enabled coercive control and AI-generated abuse material each require frontline workers to recognise a form of harm that may not have existed when they were last trained, and to know a concrete response pathway, not just a definition.

Suggested enhancement: Fund a specific, technical, and regularly refreshed TFGBV capability-building program for frontline family violence, police, health and education workforces, resourced under the existing Outcome 2.2 commitment rather than left to generic awareness training. This should be developed jointly with technical experts and people with lived experience, cover concrete response protocols (not only definitions and awareness), and be scheduled for regular refresh cycles that keep pace with the technology itself, consistent with the velocity problem raised in AFK's CSW70 intervention.

2.11 Recognising compounding vulnerability as an explicit, named cross-cutting principle

The Theory of Change already commits to an intersectional approach and names diverse population groups: Aboriginal and Torres Strait Islander women and children, women and children with disability, culturally and linguistically diverse communities, LGBTIQ+ people, older women, and people in rural, regional and remote areas, as groups the Plan must respond to. This is a genuine strength to build on. There is an opportunity to make explicit what intersectionality means operationally, because as currently framed these groups can read as parallel categories addressed one at a time, when the lived reality is compounding: each additional point of vulnerability does not simply add to a person's overall risk, it multiplies it. A woman with disability, from a culturally and linguistically diverse background, in a remote area, experiencing technology-facilitated abuse is not facing three or four separate and independent risks. She is facing a single, compounding risk profile that is categorically different, and higher, than any one factor alone would predict, and she is also the person most likely to fall through the gaps between services that are each designed around a single category of need.

This principle is the thread running through several of the enhancements proposed above, though it has not until now been named as a single, unifying idea: it is why the CALD and immigrant enhancement in Section 2.9 argues for community-designed programs rather than translated mainstream ones; why the Closing the Gap discussion in Section 2.4 argues that

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family violence, child removal, and youth justice contact are the same families moving through connected systems rather than separate cohorts; why children's online safety in Section 2.6 matters most acutely for children who are already known to child protection or already living with disability; and why frontline workforce training in Section 2.10 needs to equip workers to recognise compounding risk, not only single-category harm. Naming the principle explicitly, rather than leaving it implicit across separate enhancements, would give the Second Action Plan a single organising idea capable of holding all of them together.

Suggested enhancement: Adopt compounding, overlapping vulnerability as an explicit, named cross-cutting principle within the Second Action Plan's Theory of Change, alongside its existing intersectional approach, directing that policy design, service delivery and data collection actively identify and respond to overlapping vulnerability rather than treating diverse population groups as parallel, separately addressed categories. This should be reflected in the Phase 2 Performance Measurement Plan so that data collection is capable of identifying compounding risk profiles, not only single-category prevalence, across every indicator and target discussed in this submission.

2.12 Naming groups whose technology-facilitated harms are not yet fully represented

The Theory of Change already names the diverse population groups discussed in Section 2.11, and several already have a dedicated enhancement in this submission: Aboriginal and Torres Strait Islander women and children in Section 2.4, culturally and linguistically diverse and immigrant communities in Section 2.9, and children in Section 2.6. Four groups the Theory of Change also names do not yet have technology-facilitated harm named specifically against them in this submission, and are set out below so the gap is visible and addressable rather than left implicit.

- Women and girls with disability: technology built to support independence, including assistive technology, health monitoring devices, and communication aids, can be repurposed as a surveillance and control mechanism, and reliance on a carer for device access or account management creates a distinct barrier to disclosure that does not affect other victim-survivors in the same way. Safety planning and workforce training developed for technology-facilitated abuse should include content specific to disability, rather than assuming existing general content transfers across.
- LGBTIQ+ people, including Sistergirls and Brotherboys: outing threats, doxxing, and targeted harassment campaigns are established technology-facilitated harms against this community that are distinct from image-based abuse or coercive control as usually



described, and carry their own safety and disclosure risks, particularly where a person is not open about their identity in all areas of their life.

- Older Australians: technology-facilitated abuse by adult children, carers, or partners, including financial control through banking apps, restricted device access, and monitoring, intersects directly with elder abuse and is likely under-identified because it is not yet named as a technology-facilitated harm in either elder abuse or family violence service contexts.
- Boys and men as victims, not only as a prevention target: the Women Deliver evidence in Section 3 discusses reaching boys and young men through prevention programs aimed at reducing future perpetration, which remains important. Separately, sextortion targeting boys and young men is a documented and growing harm in its own right, and warrants recognition as a victimisation pattern distinct from the prevention framing already reflected in this submission.

Suggested enhancement: Extend the technology-facilitated abuse language proposed in Section 2.2 to name these four groups specifically, alongside the groups already addressed elsewhere in this submission, and ensure the frontline workforce training proposed in Section 2.10 includes content addressing each of them rather than a single generalised module.

2.13 Naming child-on-child technology-facilitated violence organised through networked online groups

Every enhancement proposed so far in this submission is built around a perpetrator-victim model in which an adult targets a child, or an adult targets another adult. There is a distinct and escalating harm pattern that model does not capture. The eSafety Commissioner and international law enforcement agencies, including the FBI, have identified decentralised online networks, sometimes referred to as “the Com”, in which children are coerced, groomed, or directed, by other children, by adults posing as children within the network, or by a mix of both, into self-harm, violence, and the production of abuse material. These networks operate through gaming platforms, messaging apps, and mainstream social media, using status, coercion, and peer pressure within the group to direct children toward harming themselves, harming other children, or producing content depicting that harm.

AFK's founder attended the IPPPRI26 conference in the United Kingdom as a delegate, at a workshop addressing Com groups and youth-on-youth harm directly. Two features of this harm are consistently under-recognised in current frameworks. First, the coercion very often directs the child to harm themselves rather than another person, in order to gain status, approval, or continued standing within the network: self-harm produced and shared for views. This is

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coercive violence in which the child is both the instrument and the target, sitting entirely outside any framework built around a perpetrator harming a separate victim. Second, this harm escalates into violence directed at siblings: a child coerced or pressured by the network into violence against a brother or sister in their own home. This sits between two systems built for something else. Family violence frameworks are built around adult perpetrators, and technology-facilitated abuse frameworks are built around harm delivered through a device to someone outside the household. Sibling violence coerced by an online network is captured by neither.

This submission names this pattern specifically, rather than folding it into general technology-facilitated abuse language, because its perpetrator-victim structure is genuinely different and existing frameworks are not built around it. A child directed by a network to harm another child, to harm a sibling, or to harm themselves, is very often also a victim of coercion within that same network, and child protection, criminal justice, and family violence systems built around an adult perpetrator do not map cleanly onto a case where the person causing harm is also a child being coerced. Families and services encountering this pattern currently have no framework built for it, only frameworks built for something adjacent to it.

Suggested enhancement: Name child-on-child technology-facilitated violence organised through networked online groups as a distinct harm category within the Second Action Plan, separate from adult-perpetrated technology-facilitated abuse, with its own data collection, service response design, and child protection pathway. This category should explicitly recognise coerced self-harm produced for views and network-directed sibling violence as named sub-patterns, recognise that a child within these networks may be simultaneously a victim and an instrument of harm, and resource frontline workers to recognise and respond to this dual status rather than defaulting to a single-perpetrator framework.

2.14 Establishing clear evidence and information pathways from technology providers when harm occurs

When technology-facilitated harm occurs, particularly harm that occurs through platforms and services based overseas, which children frequently engage with in secret or in private and which parents and carers may not know their child is using at all, parents, guardians, and police currently have no reliable, timely pathway to obtain evidence, account information, or a substantive explanation from the provider about what happened. This gap sits between the moment harm is discovered and the moment anyone directly affected, including police investigating it, can get an answer from the platform involved.

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This gap compounds every other harm named in this submission. A family or a police investigator who cannot get timely information from an overseas provider is left without the evidence needed to support a child, pursue an offender, or even understand the scope of what occurred. This is not a hypothetical problem: it is the practical experience of families and investigators dealing with platforms that have no Australian presence, no obligation to respond, and no consequence for silence.

Suggested enhancement: Establish a clear, mandated pathway and response timeframe for technology providers, including those based overseas, to provide evidence, account information, and a substantive response to parents, guardians, and police when a child has experienced harm through their platform, with escalation and enforcement mechanisms where a provider fails to respond, and international cooperation arrangements to support this where the provider operates outside Australian jurisdiction.

3. Evidence from the Women Deliver 2026 Declaration Consultation

In April 2026, AFK convened and facilitated a Declaration Consultation on Technology-Facilitated Gender-Based Violence at the Women Deliver 2026 global conference in Melbourne, bringing together 28 participants from 10 countries across Australia, the Asia-Pacific, Africa, Europe, the Americas, and the United Kingdom. That consultation was run entirely independently of this process, and its findings offer useful, contemporaneous corroboration for several of the enhancements suggested above.

- Participants reached strong consensus that technology, digital rights, and TFGBV are not explicitly named in the Women Deliver Declaration's six commitments, echoing the opportunity identified in Section 2.1 and 2.2 above, and confirming this is a pattern across international gender-equality frameworks, not one specific to this Plan.
- Platform and state accountability was identified as the single strongest entry point for TFGBV action internationally, including calls to strengthen regulator powers (in Australia's case, the eSafety Commissioner) and to embed safety-by-design obligations at the point of platform and AI deployment, directly supporting the enhancement suggested in Section 2.8.
- Participants raised the concept of algorithmic violence (harm caused by platform design and recommendation systems at scale, without a single identifiable perpetrator) as a critical gap in current legal and policy frameworks, reinforcing the case for an AI and emerging technology lens as suggested in Section 2.3.
- A recurring and important theme was that prevention programs are not currently reaching boys and young men effectively, and that early, unregulated exposure to graphic content

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and misogynistic online communities shapes attitudes well before adulthood. Participants connected this directly to national community-attitudes survey data, suggesting the technology-facilitated abuse attitudes and awareness scale proposed in Section 2.5 could usefully include a boys-and-young-men-specific module.

- Participants working across the Pacific, including Papua New Guinea and Vanuatu, highlighted that Australia funds significant digital infrastructure in the region without embedding safety standards or gender-responsive design requirements, a consideration that may be relevant to how Australia's international commitments interact with the domestic settings addressed by this Plan.
- Participants noted that Aboriginal and Torres Strait Islander-led research on the digital exclusion index points to serious gaps in regional and rural connectivity that compound vulnerability to technology-facilitated harm, reinforcing the case for the Closing the Gap Target 13 indicator suggested in Section 2.4.

A full copy of the Women Deliver 2026 Declaration Consultation report, including the complete set of recommended actions mapped against the Declaration's six commitments, is available on request and may assist the Department's Phase 2 and Phase 3 development work.

4. AFK's Continuing Advocacy Across Australian Policy Processes

The enhancements proposed in Section 2 are not offered in isolation. Over the preceding twelve months, AFK has raised the same continuity gaps between stated commitment and operational delivery across a series of independent Australian policy processes. We set these out below because the consistency of this pattern across separate, unrelated forums adds weight to the case: these are not observations unique to this submission, but a recurring finding wherever technology-facilitated harm is examined closely.

- Prime Minister's Taskforce request (July 2025, following an initial letter in January 2025): AFK wrote to the Prime Minister calling for the immediate establishment of a Prime Minister's Taskforce on the Sale and Sexual Exploitation of Children, in response to the UN Special Rapporteur's findings on Australia. The letter explicitly named the National Plan to End Violence Against Women and Children (2022–2032) as one of the existing national efforts such a taskforce should complement and reinforce, and set out a specific priority area on “Online Exploitation and Technological Threats,” calling for expanded regulatory and investigative capacity for the eSafety Commissioner and the Australian Centre to Counter Child Exploitation, and for legislative responses to AI-generated and peer-produced child sexual abuse material.

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- Senate submission, Logged Out, Left Out: Closing the Gaps in Online Safety Codes (Senate Environment and Communications References Committee): this submission set out detailed, evidence-based recommendations on privacy-preserving age assurance, mandatory Safety by Design at every access point (including non-logged-in and “logged-out” traffic), independent red-team testing, and a dedicated technology-facilitated gender-based violence and scam safety annex, directly paralleling the enhancements proposed in Sections 2.3, 2.5 and 2.8 above.
- Joint Standing Committee on Foreign Affairs, Defence and Trade submission, Gender Equality in the Digital Age: Technology-Facilitated Harm as a National and Economic Security Risk (co-authored with Women 4 STEM): this submission argued that technology-facilitated gender-based violence should be recognised as a national and economic security risk, not solely a social harm, reinforcing the case set out in Section 2.8 above for treating upstream, pre-deployment safety accountability as a prevention mechanism in its own right, rather than a downstream response.
- National Council of Women Australia (NCWA) Midterm Conference, Canberra, 28–29 June 2026: Resolution Six, National Framework for Technology-Facilitated Abuse, was carried at this conference, urging the Federal Government to develop and implement a coordinated national framework addressing technology-facilitated abuse across justice, child protection, online safety, education and AI governance systems; to embed Safety by Design principles; to strengthen legal responses to online grooming, image-based abuse, AI-generated abuse material and technology-facilitated coercive control; and to introduce nationally consistent data collection and accountability mechanisms. This resolution was authored by AFK's founder in her capacity as the National Council of Women Victoria's (NCWV) Human Rights and ICT Adviser, and formally moved by NCWV, of which AFK holds organisational membership, seconded by the National Council of Women South Australia.
- House of Representatives Standing Committee on Education, Inquiry into the Factors Driving Educational Attainment: this submission argued that the digital environment is now unmeasured attainment infrastructure, and cited eSafety Commissioner research finding that 27 per cent of domestic and family violence cases involved technology-facilitated abuse of children, with impacts on children's mental health identified in 67 per cent of those cases, direct evidentiary support for the technology-facilitated coercive control enhancement proposed in Section 2.7 above, and for the children's online safety enhancement proposed in Section 2.6. It also drew on AFK's own pre-deployment assessment tool, which has continued to accumulate assessment data since that submission was lodged: current figures (as at July 2026) show 73 completed



assessments, with 95 per cent identifying serious gaps before deployment and an average of 5.3 blind spots per assessment, concrete, measured evidence for the upstream safety-by-design enhancement proposed in Section 2.8.

- UN ESCAP CSW70 regional briefing intervention: AFK's founder addressed ESCAP Member States directly on the gap between legal protections and lived experience across the Asia-Pacific, arguing that justice and service systems are "often not designed to respond to intersectional, fast-moving, and digitally mediated harm," and that a repair-after-harm model fails women and children because systems, not only individuals, lack the capability to respond. This intervention is the direct basis for the frontline workforce training and resourcing enhancement proposed in Section 2.10 above.
- IPPPRI26 conference, United Kingdom: AFK's founder attended as a delegate at a workshop addressing Com groups and youth-on-youth harm directly, including coerced self-harm produced for views and network-directed sibling violence. This engagement is the direct basis for the child-on-child technology-facilitated violence enhancement proposed in Section 2.13 above.

Resolution Six matters to this submission for a specific reason: it means the recommendations set out in Sections 2.2, 2.3, 2.7 and 2.8 above now carry the formal backing of NCWA's Constituent Councils nationally, carried through NCWA's own standing orders and voting process, not only AFK's own advocacy. Taken together with the Prime Minister's Taskforce request, the Senate submission, the Joint Standing Committee submission, the House of Representatives education inquiry submission, the UN ESCAP CSW70 intervention, and the IPPPRI26 engagement, this represents a consistent pattern across seven independent forums, spanning domestic and international settings: the same continuity gap between stated commitment and operational delivery is being identified independently by a Senate committee process, a foreign affairs and security inquiry, an education attainment inquiry, two international forums, and now a national women's peak body resolution, in addition to this submission itself.

5. Summary of Suggested Enhancements

- Establish a national target specific to technology-facilitated gender-based violence, with an agreed data source developed in the Phase 2 Performance Measurement Plan.
- Build out the existing technology-facilitated abuse language into outcome-specific detail rather than a single repeated paragraph.
- Add an explicit AI and emerging technology lens across all four domains, with a named action in the Second Action Plan.

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- Add a tenth Closing the Gap Target 13 indicator on technology-facilitated family violence against Aboriginal and Torres Strait Islander women and children, developed under Indigenous-led data governance.
- Direct a defined and growing share of Target 13 implementation funding to Aboriginal and Torres Strait Islander community-controlled organisations, consistent with Priority Reform Two of the National Agreement on Closing the Gap.
- Commission a dedicated technology-facilitated abuse attitudes and awareness scale for the next Performance Measurement Plan cycle, including a module addressing boys and young men.
- Develop a specific, actioned indicator for children's online safety under Outcome 5, alongside the broader technology-facilitated abuse language.
- Name technology-facilitated coercive control explicitly within Outcome 4's perpetrator-accountability sub-outcomes, and ensure funded behaviour change programs include content specific to it rather than treating it as an implicit extension of physical violence content.
- Recognise upstream, pre-deployment safety-by-design accountability for digital and AI products as a distinct prevention mechanism within Domain 1.
- Name culturally and linguistically appropriate, community-designed prevention and safety programs as a specifically funded component of the Second Action Plan's response to technology-facilitated abuse for CALD and immigrant communities.
- Fund a specific, technical, and regularly refreshed TFGBV capability-building program for frontline family violence, police, health and education workforces, resourced under the existing Outcome 2.2 commitment, covering concrete response protocols rather than only awareness.
- Adopt compounding, overlapping vulnerability as an explicit, named cross-cutting principle within the Second Action Plan's Theory of Change, reflected in Phase 2 Performance Measurement Plan data collection.
- Name technology-facilitated harms specifically affecting women and girls with disability, LGBTIQ+ people, older Australians, and boys and men as victims, and extend frontline workforce training to cover each of them rather than a single generalised module.
- Name child-on-child technology-facilitated violence organised through networked online groups as a distinct harm category, separate from adult-perpetrated technology-

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facilitated abuse, recognising a child within these networks may be simultaneously a victim and an instrument of harm.

- Establish a clear, mandated pathway and response timeframe for technology providers, including those based overseas, to provide evidence, account information, and a substantive response to parents, guardians, and police when a child has experienced harm through their platform.

6. About AFK Inc.

Away from Keyboard (AFK) Inc. is an ACNC-registered Australian charity (DGR endorsed, backdated to 2023 inception) working on digital safety, child safeguarding, and the prevention of technology-facilitated harm. AFK's approach is deliberately upstream: rather than responding to harm after it occurs, our work is built to catch governance gaps before a product, policy or AI system reaches the people it could affect.

This work draws on a combination of grounding that is worth making explicit, because it underpins the credibility of the frameworks and recommendations set out above. AFK's founder holds practical certification in AI ethics, including applied work in machine learning pipelines, fairness evaluation, bias mitigation, and model governance, which grounds this submission's understanding of algorithmic and technology-facilitated harm in technical practice rather than principle alone. She also sits on international standards and policy bodies, including as Co Vice-Chair of IEEE Industry Connections Activity IC25-008-01 (AI and Family Violence) and as an accredited UN delegate to the Commission on the Status of Women and the World Summit on the Information Society, giving direct visibility into how governance frameworks of exactly this kind are designed and negotiated at the international level. And through AFK's organisational membership with VCOS, No to Violence, and the National Council of Women Victoria, this work is continually tested against frontline family violence and community service practice, rather than developed at a remove from it. It is this combination of technical grounding, international standing, and frontline accountability that shapes the enhancements this submission proposes.

6.1 Recent engagement in global AI governance and online safety

AFK's founder, Sarah Barnbrook, holds accredited UN delegate status to the Commission on the Status of Women (CSW) and the ITU's World Summit on the Information Society (WSIS), and serves as Co Vice-Chair of IEEE Industry Connections Activity IC25-008-01 (AI and Family Violence), an international standards initiative examining how artificial intelligence intersects with family violence risk and response.

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In July 2026, AFK represented Australian digital-safety and child-safeguarding expertise at WSIS Forum 2026 and the inaugural UN Global Dialogue on AI Governance in Geneva, alongside the AI for Good Global Summit. AFK's founder personally delivered a WSIS workshop session, delivered a masterclass for AI startups on pre-deployment risk screening, and facilitated the Women in AI High Level Roundtable. Following this, AFK's founder was named to the inaugural WSIS Women and Girls Trendsetter cohort and invited into the ITU Network of Women Ministers and Leaders in ICT.

This engagement built directly on AFK's WSIS Session 243 outcome document, published by the ITU, which set out a practical methodology for identifying compounding digital risk. We raise this global engagement here because it places AFK, and by extension this submission, inside the same live international conversation the Second Action Plan will need to keep pace with: government AI offices are now standing up in parallel around the world, including Australia's own Office of AI (announced 15 July 2026), and the same enhancements proposed in this submission are being called for, in close to identical terms, in Geneva, in New York, and in Melbourne.

6.2 Memberships and affiliations

AFK holds organisational membership with a number of Victorian and national peak bodies relevant to this submission, reflecting our position within the broader family violence, community services, and gender equality sector rather than as a standalone digital safety voice:

- VCOSS (Victorian Council of Social Service), the peak body for Victoria's community and social service organisations.
- No to Violence (NTV), the peak body for men's behaviour change and family violence prevention services.
- National Council of Women Victoria (NCWV), where AFK holds organisational membership and AFK's founder also serves as Human Rights and ICT Adviser.

AFK's founder additionally holds individual affiliations with National Council of Women Australia (NCWA), Soroptimist International (as a Melbourne club member and National Advocacy Lead for the Digital Safety Futures Project for SI Australia), Women 4 STEM (as Chief Advocacy Officer), and the Australian Gender Equality Council (as Company Secretary). Together, these affiliations connect AFK's digital safety and AI governance work directly into the established family violence prevention and gender equality sector this Second Action Plan serves.

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7. Closing

AFK would welcome the opportunity to discuss any aspect of this submission further, to share the full Women Deliver 2026 Declaration Consultation report, or to contribute directly to the Second Action Plan's Phase 2 Performance Measurement Plan and Phase 3 Evaluation Methodology development. Our tools, frameworks and international engagement exist to make exactly this kind of continuity between vision and delivery achievable in practice, and we are glad to put them at the Department's disposal.

Yours sincerely,

[Redacted signature block]

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