



Care Incorporated
ABN 45 037 269 595

19-23 Moore Street
TURNER ACT 2612

GPO Box 2951
Canberra ACT 2601

E: admin@carefcs.org
P: 02 6257 1788
www.carefcs.org

31 July 2026

Dear Minister for Social Services

RE: Action to prevent economic abuse and alleviate the economic impact of gender-based violence

Thank you for the opportunity for Care to provide a submission to inform the second action plan under Australia's National Plan to End Violence against Women and Children 2022–2032 (the National Plan).

Care welcomes the Australian Government's continued unprecedented investment in initiatives to end violence against women and children and other gender-based violence. Care seeks to highlight the essential need for the second action plan to centre on economic safety and recovery for victim-survivors of gender-based violence. We think it is time to turn the National Plan into high impact solutions that:

- prevent economic abuse
- alleviate the economic impact of gender-based violence

Care has worked collaboratively with a range of community-based organisations in the development of this submission. Care specifically acknowledges the contribution of Each and the Centre for Women's Economic Safety and would like to acknowledge our support for their submissions to inform the second action plan.

We also broadly support the recommendations made in the reports [*Financial abuse: an insidious form of domestic violence*](#) and the [Women's Economic Equality Taskforce Final Report](#) which called for immediate and long term actions to change social support, tax and legal systems to address their weaponisation for economic abuse.

Yours sincerely,

A black rectangular box redacting the signature of the CEO of Care.

CEO, Care.

ABOUT CARE

Care Inc has been supporting the Canberra community since 1983 and we believe in financial fairness for all. We are a charitable organisation that provides assistance to people experiencing financial difficulty. Our work spans across four programs: financial counselling and capability; consumer law; community loans; and community education. Care also operates the National Debt Helpline for Canberra and the surrounding areas.

WHAT WE ARE SEEING

Care has been supporting victim-survivors of gender-based violence for over 40 years. A high proportion of the women we support have been affected by economic abuse or are struggling with the economic consequences related to their experience of domestic and family violence.

Over the last six months alone (from 1 January to 30 June 2026):

- 27% of women calling the National Debt Helpline in our region disclosed experience of domestic and family violence
- Of the 379 women referred to Care for financial counselling or capability support, 35% disclosed experience of domestic and family violence with around one in three referred by specialist domestic and family violence services
- Almost 70% of women that disclosed experience of domestic and family violence had dependent children
- 30% identified as being Aboriginal or Torres Strait Islander

Presenting issues recorded for women that disclosed experience of domestic and family violence included:

- Financial abuse, financial safety and recovery
- Essential service stress
- Rental stress and risk of homelessness
- Mortgage stress and rates
- Struggling to afford everyday essentials
- Tax debt
- Fines and infringements
- Cost of family law process
- Centrelink debt

In addition to the financial counselling services outlined above, Care receives funding from the ACT Government under the Commonwealth National Partnership Agreement on Family, Domestic and Sexual Violence Responses 2021-27 Program. Under this program Care provides financial counselling support for women detained at the Alexander Maconochie Centre (AMC) with their financial recovery after experiencing economic abuse.

Over the last year (1 July 2025 to 18 June 2026) Care provided 47 women with financial counselling support while detained at AMC with some women continuing to engage with support after being released. Over half disclosed experiencing domestic and family violence. We note that detainees often don't recognise and disclose economic abuse as a distinct form of domestic and family violence. In light of this, we estimate that the number with experience of economic abuse is closer to 100%.

Of the women supported at AMC:

- 34% identified as being Aboriginal or Torres Strait Islander
- 26% identified as being from culturally and linguistically diverse backgrounds
- 26% disclosed that they live with a disability
- 21% reported experiencing addiction to gambling, alcohol or other drugs
- 15% reported identifying as being part of LGBTQIA+ communities
- 15% reported having children in their care prior to detention

The top 5 financial issues were:

- Financial safety and economic abuse
- Essential service debt (telcos and energy)
- Fines and other debts relating to economic abuse including tax and Centrelink debt
- Experiencing or at risk of homelessness
- Harm from gambling, alcohol and other drugs

For this group in particular, debt is often intrinsically linked to the violence and economic abuse they have experienced. Engaging in systems to try to deal with those debts is re-traumatising. We find that debt related to economic abuse and other forms of gender-based violence is a barrier to economic safety and recovery on release and increases the risk of coming into contact with police in the future.

Women sometimes tell us that they feel they are set up to fail and often report that they feel let down by the very systems that are meant to support them.

KEY MESSAGES

Addressing economic abuse is key to ending violence against women and children and other forms of gender-based violence.

Reform is needed to address known systemic issues that are used to perpetrate economic abuse.

Reform is needed to address known economic barriers to safety, wellbeing, recovery and healing.

All victim-survivors should have access to specialist economic abuse services.

RECOMMENDATIONS

Care recommends four priority actions be included in the next action plan. We believe these actions will have the greatest impact in reducing the prevalence and impact of financial and economic abuse and other forms of gender-based violence:

Recommendation 1: Recognise economic abuse as a distinct category of domestic and family violence that needs targeted action.

Recommendation 2: Address known systemic issues within the Australian, state and territory public service systems that are used to perpetrate economic abuse.

Recommendation 3: Prioritise the development and implementation of policy and law reform that address economic barriers that prevent victim-survivors from moving forward with their lives.

Recommendation 4: Invest in the expansion of specialist economic abuse financial counselling and financial rights services so that all victim-survivors can access the support they need and recognise that this is crucial to safety, wellbeing, recovery and healing.

The following part of our submission provides an explanation for each of our recommendations.

RECOMMENDATION 1: TARGETED ACTION TO ADDRESS ECONOMIC ABUSE

The next action plan should recognise economic abuse as a distinct category of domestic and family violence that needs targeted action across all pillars: prevention, early intervention, response and recovery and healing.

Economic abuse is experienced by the vast majority of survivors (78%–99% of survivors¹) and has a direct cost to victim-survivors of \$5.7 billion per year and \$5.2 billion per year on the Australian economy². Violence has traumatic and pervasive immediate and long-term impacts on victim-survivors and their families.

Care would like to see a commitment from the Australian, state and territory governments to develop a Domestic and Family Violence (Financial and Economic Abuse) Policy developed through collaboration with the community sector and victim-survivors. Each Policy should:

- Apply to all relevant public services that the Australian, state or territory government deliver or regulate
- Provide a consistent definition of economic abuse and evidentiary requirements (see below note)
- Provide a consistent framework and approach to address economic abuse including policy principles that must be applied in decision making
- Be supported by guidance to ensure the policy principles are interpreted and applied through a gender and cultural lens
- Detail options that are available to support victim-survivors' economic recovery after experiencing domestic and family violence
- Formalise ongoing collaboration with the community sector and victim-survivors to monitor, review and improve the effectiveness of the Policy

To support fair outcomes for victim-survivors, we call on all levels of government to adopt a standard approach to how a victim-survivor can evidence economic abuse and other forms of gender-based violence across all relevant systems – similar to the approach in Scotland. The guidance to the *Domestic Abuse (Scotland) Act 2018* states that victim-survivors need written evidence from a person acting in an official capacity showing that:

¹ Kutin, J., Russell, R., & Reid, M. (2017). Economic abuse between intimate partners in Australia: Prevalence, health status, disability and financial stress. *Australian and New Zealand Journal of Public Health*, 41(3), 269-274. <https://doi.org/10.1111/1753-6405.12651>

² Deloitte Access Economics. (2022). *The Cost of Financial Abuse in Australia*. Deloitte and Commonwealth Bank of Australia.

- Their circumstances are consistent with those of a person who has had domestic violence or abuse inflicted, or threatened, upon them, during the 6 months before you notified the Department for Work and Pensions
- They have made contact with the person acting in an official capacity to tell them about any incidents that have occurred in the past 6 months

A person 'acting in an official capacity' means a health care professional, police officer, registered social worker, your employer or a representative of your trade union, any public, voluntary or charitable body which has had direct contact with you about the domestic violence or abuse.

We note that Care is an active member of the Economic Abuse Reference Group (EARG) and is currently on the EARG working groups for the National Economic Abuse Scorecard and Business and Tax. EARG is an informal group of over 70 community organisations across Australia that work collectively with government and industry to reduce the financial impact of family violence. State sub-groups have formed in Victoria, New South Wales and Western Australia to work on local issues.

As far as we know, Care is the only organisation in the ACT involved in policy advocacy specifically aimed at addressing economic abuse and the financial impacts of domestic and family violence. The importance of this work should be formally recognised and resourced by the ACT Government. This could be achieved by establishing an economic abuse community advisory panel under a new Economic Abuse Policy (ACT) as outlined above. Care would be well placed to lead and coordinate this work.

RECOMMENDATION 2: ADDRESS SYSTEMIC ISSUES USED TO PERPETRATE ECONOMIC ABUSE

At Care we are frustrated at the lack of action to prevent and respond early to economic abuse, gender inequality and unfairness across Australia's public service systems. Improved administrative practice is not enough to overcome the weaponisation of systems to perpetrate economic abuse. Policy, law reform and cultural change is needed underpinned by an examination of the underlying evidence base and policy principles upon which they operate.

Victim-survivors repeatedly tell us that they do not have trust or confidence in public service systems and often find interactions re-traumatising. The cost of these system failures primarily falls on victim-survivors but also has flow on impacts for acute services including child safety, out of home care,

crisis housing and homelessness services, criminal justice system and preventable hospitalisations.

Consistent with Recommendation 1, Care would like to see a commitment in the next action plan from all levels of government to address systemic issues used to perpetrate economic abuse for all relevant public services that they deliver or regulate. We have provided some examples for Australian Government consideration below.

Child Support System³

The experience of our clients corroborates findings by researchers at Swinburn University⁴ who describe how separated mothers endure lasting impacts to their financial security, emotional and mental wellbeing, food security, and housing safety through child support-facilitated financial abuse, long after separation.

Economic abuse issues we see include:

- The system relies on the person using violence being honest cooperative and compliant
- Creates ongoing relationship of financial dependence
- Exposes victim-survivor to re-traumatisation and ongoing economic abuse
- Can result in under or overpayment (and debt)
- Can cause victim-survivors to fail other eligibility tests that are assessed based on child support income they never actually received

Reform option:

While there are excellent reports and research papers which recommend changes to the existing child support system to address the issues our clients experience, Care believes a seismic shift is needed to break the ongoing financial nexus which ties victim-survivors to the person using violence. Care believes that the Australian Government needs to consider moving towards a cleaner separation between Australia's tax-transfer system.⁵ A complex and inefficient tax-transfer system imposes costs on society and those more vulnerable in society will bear a disproportionate share of these costs.⁶

³ See report by the Commonwealth Ombudsman. "Weaponising Child Support: when the system fails families. An investigation into how Services Australia is responding to financial abuse through the Child Support program"

⁴ Cook, K et al, Financial Abuse: The weaponisation of Child Support in Australia, Swinbourne University of Technology and the National Council of Single Mothers and their Children, 2023

⁵ Taxation means the compulsory imposition of charges on individuals and entities by governments. Transfers mean amounts paid by governments in cash or in kind, mainly to individuals who meet a set of criteria.

⁶ For further information about Australia's tax and transfer system see https://treasury.gov.au/sites/default/files/2019-10/afts_architecture_of_australias_tax_and_transfer_system_revised.pdf

In the context of child support a reform option could include:

- Introduce an income based levy for all people with children aged 0 to 18 years (or even 25) administered through the tax system similar to the Medicare Levy AND
- Expand eligibility and entitlement to income support payments for families AND
- Expand access to government provided services that support families with the cost of raising children including Medicare, disability services, childcare, education and training

Taxation

The [Australia's future tax system report](#) (2009) (the Henry Review) presents a "vision of a future tax and transfer system that would position Australia to deal with the demographic, social, economic and environmental challenges of the 21st century and would enhance community wellbeing". While there are many great recommendations for reform in the report, there is no mention of economic abuse or the impacts of domestic and family violence. Gender is only referenced in the context of workforce participation.

Economic abuse issues we see include:

- The current tax-transfer systems create complexity and unfair outcomes for victim-survivors: For example, delivering concessions through the tax system and using household income to means test family payments and concessions relies on the person using violence being honest, cooperative and compliant; incorrectly assumes that economic resources and obligations are shared fairly within families and creates an ongoing relationship of financial dependence.
- The taxation system turns a blind eye to economic abuse: For example, the use of family trusts and forced directorships exposes victim-survivors to compliance and enforcement activity that is based on the behaviour and actions of the person using economic abuse (and other related parties) rather than actual financial benefit to the victim-survivor and can create a significant miscarriage of justice.

Reform option:

- Move towards a cleaner separation between Australia's tax-transfer systems to remove opportunities for economic abuse.
- Like other parts of the tax system, attribution of income and responsibility for compliance in the context of economic abuse should be based on the substance of the arrangement such as consideration of who is really in control, who is actively participating in the business and who really benefits from the arrangement.

- Provide legal recognition of economic abuse within the taxation system and provide legal and administrative remedies that aim to undo the harm for victim-survivors and redirect compliance and enforcement activity to the person(s) behind the economic abuse.
- Invest in systems that support small business compliance and reduce opportunities for economic abuse similar to features like pay as you go withholding, third party reporting and pre-fill in the personal tax space.

Social security system

Our social security system is a complex and administratively costly system which consistently fails to provide a fair financial safety net to those the system is meant to support. The Henry Review stated that “A 21st century tax and transfer system should reflect the commitment to Australian values of fairness and support for those who are disadvantaged, but do so in a way that is efficient, sustainable, simple and transparent, and internally consistent.” The Choice: Violence or poverty report (2022)⁷ says that it is domestic violence that breaks up families and leaves women to raise their children alone. But it is the state that forces them into poverty.

Economic abuse issues we see include:

- System relies on person using violence being honest, cooperative and compliant.
- Assumption that the cost of raising children and economic resources are shared fairly within families.
- Creates ongoing relationship of financial dependence on person using violence, including for young people.
- System is complex, compliance driven and harmful rather than trauma-informed and culturally safe.

Reform option:

Financial safety and independence is crucial to ending gender-based violence. The Social Security system could be reformed to ensure eligibility and entitlement for family payments, income support and other concessions is based only on an assessment of the person who needs support. The system should also ensure young people can access income support based on their own circumstances rather than an assessment of family income. For example, the Australian Government could consider:

- using information shared by other government agencies to identify and verify eligibility and entitlement to income support payments and

⁷ Summers, A. (2022). The Choice: Violence or Poverty. University of Technology Sydney. <https://doi.org/10.26195/3s1r-4977>

automate payments rather than to identify and punish (perceived) non-compliance

- introducing free childcare rather than the current childcare rebate
- changing Commonwealth Rent Assistance to be more reflective of actual rental stress (broadly consistent with recommendations in the Henry Review, F5 – Housing assistance)
- expanding access to Rent Assistance for victim-survivors that are not eligible for other income support payments
- ensuring all income support is back paid to the date the applicant was eligible (with a cap) rather than the application date
- providing flexibility in relation to mutual obligations for victim-survivors including exemptions, and again use third party reporting to help people comply
- expanding access to Special Benefit Payments and access to Medicare for victim-survivors that are not Australian citizens

Family law

The family law system is toxic. It is painfully slow and complex. It causes significant economic harm to victim-survivors and trauma to children and young people. It is costly for the government. It is an enabler of private profit. Public Interest services such as Aboriginal and Torres Strait Islander Legal Service and Legal Aid are grossly underfunded to litigate family law matters and to provide independent children's lawyers. Funding alone cannot overcome the issues with the Family Law System.

Economic abuse issues we see include:

Women who experience domestic and family violence are more vulnerable to poor outcomes under the family law system and this comes at a devastating cost to them and their children including overwhelming legal costs, reduced economic participation and housing insecurity. Care's clients report experiences with the family law system which are indicative of a system that rewards vexatious litigants and perpetrators of gender-based violence:

- system allows controlling behaviours towards victim-survivors to continue through parenting, property and financial arrangements
- vexatious litigants can delay family law outcomes for years and force victim-survivors to agree to unfair settlements
- lack of fast, practical solutions to separate finances (including debt) and obtain access to a fair share of income and assets that women and children need for everyday essentials
- does not adequately consider economic abuse and other gender-based violence in decision-making
- orders can be very difficult to enforce in practice

Reform option:

In our view, lawyers and judges are not the right people to be driving and deciding outcomes for families, and family law courts are not the right place for this process to play out. To address this, the Australian Government could consider introducing a new independent government body that administers family law and provides a platform for couples to separate and move forward with their lives. The new body should aim to provide people with trust and confidence that the system works, that it is fair, inclusive and designed around the wellbeing of individuals, families, children and young people. Family law matters could be assessed and decided through an independent administrative process that provides binding decisions on all matters relating to separating couples and their children, similar to voluntary bankruptcy. The new administrative body could be supported by the following features:

- extensive access to information and enforcement powers
- the ability to make default assessments if a person refuses to engage
- principally a self-assessment model where no risk indicators present
- level and degree of oversight by the administrator is proportional to the domestic and family violence risk indicators
- formal cooperation and coordination with state and territory child safety, police, health, child advocate and community services
- established referral pathways for victim-survivors including specialist domestic and family violence services, housing, financial counsellors, and child, youth and family services
- allow for quick interim decisions about urgent safety and economic matters
- provide clear guidance about how domestic and family violence and economic abuse is considered in decision making
- introduce an external dispute resolution process for family law decisions similar to the Australian Financial Complaints Authority
- a cost contribution model based on capacity to pay (something like income contributions during bankruptcy)

RECOMMENDATION 3: ADDRESS ECONOMIC BARRIERS THAT PREVENT RECOVERY AND HEALING

At Care we want people impacted by economic abuse and other forms of gender-based violence to be able to move forward with their lives, regain their financial independence, and feel positive about their financial future. We recognise that family violence and poverty are interwoven and that socio-economic disadvantage can persist throughout the lives of victim-survivors (including children and young people).

The [Choice: violence or poverty report](#) (2022)⁸ explains that an estimated 275,000 Australian women suffered physical or sexual violence from their current partner in 2016. Almost 90,000 of them wanted to separate but were unable to do so, with an estimated 22,600 saying that lack of money and financial support was the main reason they were unable to leave their violent partner. Only 85,800 of these women were employed full-time, with almost 110,000 of them either unemployed or not in the labour force, and therefore having no income of their own. The report found that government policy, through payments policy and other welfare measures, ensures that as many as half the women who choose to leave will end up in poverty. Money problems reported include:

- could not pay electricity, gas or telephone bills on time (42 per cent)
- were unable to heat or cool home (11 per cent)
- could not pay their car registration or insurance on time (20 per cent)
- pawned or sold something to raise cash (13 per cent)
- could not pay mortgage or rent on time (13 per cent)
- went without meals (9 per cent)
- could not pay credit card minimum balance (9 per cent)
- sought financial help from family or friends (37 per cent)
- sought assistance from welfare or community organizations (15 per cent)

Options to overcome these barriers include:

- Recognise economic abuse and other forms of gender-based violence as a distinct category of financial vulnerability separate from financial hardship.
- Direct financial support: Provide more flexible and responsive grant options for victim-survivors administered by the local community services that support them such as domestic and family violence crisis housing and financial counselling services.
- Increase income support payments: ensure victim-survivors that are unable to work can achieve an adequate standard of living including access to safe, secure and affordable housing and ensure that family payments more accurately reflect the true costs of raising children.
- Broaden access to Centrelink crisis support payments for people that have experienced domestic and family violence: The current eligibility criteria is too restrictive and should be made more flexible and responsive to the needs of victim-survivors. See Economic Justice Australia's submission for more information.

⁸ Summers, A. (2022). The Choice: Violence or Poverty. University of Technology Sydney. <https://doi.org/10.26195/3s1r-4977>

- **Public Debt Relief:** Introduce an economic abuse debt relief scheme for all relevant public services delivered or regulated by Australian, state, territory or local governments similar to the Scottish Coerced Debt Relief Scheme proposal in the [Scottish Parliament, Social Justice and Social Security Committee report](#) (July 2025)⁹. The scheme could be adapted for the Australian context to provide options to reduce, pause, or write off public debt (like fines, rates and public housing arrears) resulting from economic abuse or other forms of gender-based violence.
- **Financial Recovery Periods:** Similar to the above and again adapted from the Scottish proposal, develop guidelines for financial and essential services to suspend aggressive debt collection practices and provide a 12 to 24 month recovery pause on debt for survivors and expanded options to reduce, pause, or write off debt resulting from economic abuse or other forms of gender-based violence. Should also include options to extend if related issues are not yet resolved eg. ongoing family law property settlement.

RECOMMENDATION 4: ACCESS TO FINANCIAL COUNSELLING SERVICES

Specialist economic abuse financial counselling services should be an integrated part of the local domestic and family violence community service ecosystem.

Care recognises that to the extent possible, specialist economic abuse financial counselling services need to be designed and delivered with victim-survivors and should be part of more coordinated and connected services for people affected by gender-based violence. We don't believe employing one or two financial counsellors within other services is an effective model as they are isolated from supports and more at risk of burn-out and vicarious trauma. Financial counsellors within financial counselling agencies like Care receive the support, professional development and supervision they need. A more coordinated and connected service model may include financial counsellors working alongside specialist domestic and family violence services, peer support workers, service navigators, housing, mental health and legal services. Care would welcome the opportunity to be involved in the development and implementation of an economic abuse financial counselling service for the ACT.

Care supports the recommendations by the Centre for Women's Economic Safety to fund specialist economic abuse financial counsellors and to

⁹ Scottish Parliament, Social Justice and Social Security Committee (July 2025) "Inquiry Into Financial Considerations When Leaving an Abusive Relationship".

provide a new accredited course to ensure specialist financial counsellors can recognise and respond appropriately to economic abuse.

Care estimates that we need 4-5 additional financial counsellors to address the unmet need for specialist economic abuse financial counselling and capability services in Canberra and the surrounding region including:

- Prevention: policy advocacy for financial fairness for all and financial literacy education programs for groups at higher risk of experiencing economic abuse and other forms of gender-based violence (for example, Care is currently piloting a financial literacy education for young parents in alternative education)
- Early intervention: building economic safety and independence through our financial capability and financial counselling services
- Response: connecting victim-survivors with financial supports, bill and debt relief, consumer law advice and other specialist support services through our financial capability and financial counselling services (for example, our work with women detained at the AMC)
- Recovery and healing: rebuilding economic safety, independence and wellbeing through our financial capability and financial counselling services and our assistance beyond crisis loan program

We note that workforce recruitment and retention in the ACT is particularly challenging as the community sector “competes” against two markets of Public Service employment. Also, Commonwealth funding approaches that are proportional to population do not adequately consider the lack of alternative funding sources in the ACT, leaving the ACT further behind.

We also note that business-related economic abuse is an incredibly complicated area requiring specialist financial counselling skills and expertise and access to specialist legal advice. In practice the burden to support these complex cases of economic abuse falls on a small cohort of financial counsellors and can leave victim-survivors having to navigate these complex situations on their own. Care does not think we have the specialist expertise to safely support victim-survivors of complex forms of business-related economic abuse, and recommend the Australian Government establish and fund a dedicated national specialist service for referral.

Contact

Please feel free to contact [REDACTED], Policy Advocacy and Business Development Director on [REDACTED] if you would like to discuss anything in relation to this submission.