

**Consultation on the Second Action Plan (National Plan to End
Violence against Women and Children 2022–2032)**

Project Respect Submission

11 August 2026

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Project Respect appreciate the opportunity to make a submission to this consultation on the Second Action Plan (National Plan to End Violence against Women and Children 2022-2032).

We make this contribution in the context of our experience as a service provider where the voices of lived experience are elevated. We note that as a small and precariously funded service our ability to provide a thorough response to the consultation is constrained by resources and staffing. Given the importance of this consultation, we have however endeavoured to direct our resourcing to a meaningful and impactful response. We make the offer to further expand on our submission through discussions where this may be helpful.

About Project Respect

Project Respect are a Victorian based (but with some Nationwide footprint) support and referral organisation, uniquely providing services to women and gender diverse people with experience in the sex industry, and to women and gender diverse people who have experienced sexual exploitation (including trafficking). Some of our service users identify as sex workers who have not experienced exploitation, and conversely, some of our service users have experienced sexual exploitation in circumstances that did not involve sex work. A proportion of our service users have experiences of both consensual sex work and of exploitation, and we are very clear about the difference between these experiences.

A majority of our service users are from migrant and multicultural backgrounds, including persons experiencing visa insecurity. A high proportion of our service users are members of the LGBTIQ+ communities, including people who identify as gender diverse and/or who identify as transgender, and a significant number also have a lived experience of disability. We have been operating in Victoria for more than 25 years, providing services and engaging in important sector advocacy, education and capacity building.

We have held a seat on the National Roundtable on Human Trafficking and Slavery since its inception in 2008 and maintain meaningful links with emerging survivor groups.

Project Respect is an important and unique service provider and despite our small size are a deliverer of one of the present actions under the Australian Government's National Plan to End Violence Against Women and Children. We deliver a range of support and activities including specialist sexual violence counselling, case

coordination, and community events. We engage in sector capacity building to support safe service delivery to our service user communities, provide secondary consultation, and engage in research, outreach to brothels and to community service organisations, and broader advocacy.

Our organisation supports the decriminalisation of sex work, and the continuous improvement of mechanisms that support sex workers' ability and right to engage safely, autonomously and consensually in sex work. Part of our advocacy work is engaging in the destigmatising of sex work and lobbying for sex worker safety and autonomy.

Consultation Response

Our consultation response paper is provided in the format suggested by "*Evidence to action: informing direction for the Second Action Plan Consultation Paper in support of the National Plan to End Violence against Women and Children 2022-2032*", May 2026.

Our responses focus on improving responses to sexual violence, in particular for women and gender diverse people with experience in the sex industry, and women and gender diverse people who have experienced sexual exploitation (including trafficking). Our services user communities are often not considered with sufficient nuance in sexual violence policy, service design and justice responses, and without a sufficient specialist lens, and we hope to contribute to an improvement in this regard.

Recommendations

Our recommendations are included at the end of each discussion section after we have presented evidence supporting these recommendations. For ease of accessibility, we also present the recommendations as follows:

1. Victim-survivors of violence against women and children and other forms of gender-based violence

Recommendation 1.1: Name sexual violence explicitly in the Second Action Plan. Name *sexual exploitation* explicitly in the Second Action Plan, ensuring clarity that sexual exploitation extends beyond online sexual exploitation. Support and fund specialist services that exist for people with experience in the sex industry, and, for people who have experienced sexual exploitation, which also tailor and differentiate responses for sexual exploitation distinctly from responses to sexual assault or sexual abuse.

Recommendation 1.2: Recognise and support targeted specialist services that provide individualised services to priority cohorts, and that understand the communities being serviced, including intersections. Targeted specialist services should also be supported to provide capacity building education across sectors, including to law enforcement, to ensure knowledgeable, non-stigmatising support is provided at all system entry points, including to people with experience in the sex industry and to people with experience of sexual exploitation. Recognise that explicit government funding support for services to

marginalised communities is required, especially for those communities where philanthropy is unlikely to accept responsibility to fund service responses.

Recommendation 1.3: Utilise existing evidence and research, particularly those that have included consultation with lived experience voices, in system and program design. Prioritise implementation support where sufficient evidence bases exist, rather than channelling funding into replicating already existing research and other evidence.

Recommendation 1.4: Expressly fund organisations to incorporate lived experience leadership in program design and advocacy, particularly for marginalised communities where expertise and knowledge is particularly valuable, including for mentorship and ensuring representation in wider sectors.

2. Prevention and early intervention

Recommendation 2.1: Invest in early intervention pathways that are explicitly safe for women and gender diverse people with experience in the sex industry, and people experiencing or at risk of sexual exploitation. This needs to consider intersections with LGBTIQ+ identities (including transgender identity), migrant status, and disability. Capability of targeted specialist services with reach to communities and accessible, integrated pathways such as community events, group work, peer support and outreach should be valued and prioritised.

Recommendation 2.2: Build frontline capability to identify sexual violence, coercion and sexual exploitation without relying on stereotypes about victimhood, sex work, migration status or gender identity. Support capacity building education delivered by organisations with frontline service provision experience and lived experience involvement.

Recommendation 2.3: Consider full lifecycle intervention and education, that includes collaboration between multiple service types such as drug and alcohol services and youth services. Fund and value assertive outreach work and programs that are not solely law enforcement based, and which encourage open, brave conversations that combat the influence of predatory exploitation methods.

Recommendation 2.4: Fund prevention work that addresses sexual entitlement, technology-facilitated sexual violence, power imbalances in relationships, compromised consent and business models that profit from harm. Prevention education should distinguish between perpetrators seeking to exploit and intimate partners exerting control in other contexts, including how those differences (including financial gain motivations and use of deceit) affect victim-survivor presentations, experiences, and pathways to recovery.

Recommendation 2.5: Invest meaningfully in breaking down structural barriers such as lack of income support and housing, and barriers such as visa classes that prevent work rights of people recovering from and trying to avoid exploitation.

Recommendation 2.6: Invest in measures that enable economic empowerment of victim survivors of modern slavery, including consistent and sufficient compensation schemes, and ensuring repatriation costs of people experiencing trafficking are met – including meeting costs of repatriating exit trafficked women back to Australia.

3. Children and young people in their own right

Recommendation 3.1: Create earlier intervention pathways for young people at risk of sexual exploitation, including those in residential care, unstable housing, unsafe relationships or in consideration of online exploitation contexts, and ensure these pathways are practical and

connected with modern slavery response systems. Articulate these in the Second Action Plans for both the National Plan to End Violence Against Women and Children, and the National Strategy to Prevent and Respond to Child Sexual Abuse (2021–2030), including a clear and accessible definition of what child sexual exploitation is, referencing elements of deceit and perpetrator gain or profit.

Recommendation 3.2: Support articulated program design that ensures service responses do not misread sexual exploitation of children and young people as “choice” or “risk-taking” where coercion, grooming, violence or survival needs are present. Expand the prevention work of programs such as Project Paradigm to improve services and community education on these topics.

Recommendation 3.3: Design systems that incorporate understanding of intersectional risk across the lifespan. This should include national policy, implementation and service integration of the intersecting social, structural and systemic conditions that shape safety, risk, recognition and access to supports. Ensure system responses are age and developmentally appropriate, recognising young people as a specific population distinct from children. Support relevant recommendations advanced by innovative youth specialist services, such as YSAS, and from drug and alcohol support services and peaks such as the Victorian Alcohol and Drug Association (VAADA).

Recommendation 3.4: Recognise in the Second Action Plan that lifelong impacts of experiences of sexual abuse and sexual exploitation in childhood can affect life as an adult. Support and fund programs for specialised sexual violence counselling, such as that provided by Project Respect, which include context specific understanding and nonjudgemental approaches that can address historical experiences where this is sought by the victim-survivor.

4. People who use violence

Recommendation 4.1: Invest in research and data on people who use violence against sex workers and the intersection with perpetrators of intimate partner violence, potentially through current perpetration studies underway or planned. Use these findings in development of responses, including consideration in the development of national standards for Men’s Behaviour Change Group programs.

Recommendation 4.2: Ensure the development of national standards for Men’s Behaviour Change include consideration of violence perpetrated *against* priority communities, recognising the distinction from identifying the communities to which persons using violence themselves belong. Include targeted specialist services and community grassroots organisations in the development of these standards and require those services delivering MBCP programs to engage in professional development to understand the experiences of violence of victim survivors from diverse priority communities.

Recommendation 4.3: Invest in research and data on perpetrators of sexual exploitation and their methods, putting a face to these perpetrators and using this information in response programs and in prevention education. Consider commissioning research with the Australian Institute of Criminology in particular, who have a strong understanding of both modern slavery and of family, domestic and sexual violence.

Recommendation 4.4: Consider the perpetration of sexual exploitation explicitly in assessment and intake procedures for mainstream MBCP programs, ensuring risks of non-engagement in programs are managed, and that potential recruitment of other participants into exploitation schemes is considered. Develop targeted behaviour change programs for

men, and for boys, who are engaging in, and who are at risk of engaging in perpetration of sexual exploitation (including those who have been groomed to do so).

Recommendation 4.5: Ensure all accountability responses designed to detect violence against and exploitation of sex workers do not increase unnecessary surveillance, criminalisation or service exclusion for the very groups they are intended to protect.

5. System integration and workforce

Recommendation 5.1: Acknowledge in the Second Action Plan that Commonwealth modern slavery programs rely on state based sexual violence, housing, health, migration and community support systems, and that this reliance must be planned for and funded rather than assumed. Ensure that access to safe crisis accommodation is funded and available to victim survivors of modern slavery and not restricted only to where perpetration is by intimate partners.

Recommendation 5.2: Redesign the system of response to Human Trafficking and Slavery to be from a victim survivor perspective and to align with the continuum of care as understood and evidenced by the family violence system. Utilise opportunities to undertake redesign that is survivor led.

Recommendation 5.3: Fund specialist organisations to provide long term recovery for victim survivors of modern slavery, supporting the Commonwealth modern slavery response. This should include specialist sexual violence counselling.

Recommendation 5.4: Build workforce capability across state-funded systems so services can recognise sexual exploitation, respond without judgement to sex industry experience, and distinguish between consensual sex work, sexual violence and exploitation without conflation.

Recommendation 5.5: Monitoring of both the Second Action Plan and the responses to Human Trafficking and Slavery should be designed to complement one another in order to understand if the interfaces are effective. Monitoring of the plan should be visible and based on clear outcomes. Evaluation of effectiveness should be at the systems level and not unduly burden individual, small organisations that are not in control of system inputs.

Recommendation 5.6: Fund systems and services from a lens that truly prioritises the ending of violence against women and children as a fundamentally necessary outcome. Ensure the system does not perpetuate patriarchal structures from within, does not rely on the unpaid labour of women, and recognise the real risks of vicarious trauma and burnout that have an individual cost and act as a barrier to meaningful outcomes.

Recommendation 5.7: Include actions in the Second Action Plan that involve government ministers at the highest levels both in Commonwealth and State governments, including responsibilities for delivering meaningful community messaging and for transparency of data regarding violence against women and children.

1. Victim-survivors of violence against women and children and other forms of gender-based violence

Sexual violence must be visible as a distinct and central form of gender-based violence, not treated as secondary to domestic and family violence or absorbed into broader safety language.

For women and gender diverse people with experience in the sex industry, and for women and gender diverse people who have experienced sexual exploitation, barriers to disclosure and support include stigma, fear of judgement, criminalisation or policing concerns, visa insecurity, housing and income insecurity, fear of losing autonomy, and previous experiences of services misunderstanding their needs¹.

While these populations have some intersecting experiences, experiences differ in relation to people who have experienced sexual exploitation. The key to understanding the difference between sex work and sexual exploitation is **consent** in undertaking sex work. Exploitation and consensual sex work are clearly delineated when consent is understood. Sexual exploitation can also happen entirely outside of the sex industry, and in relation to the mix of people accessing our service, we see as increasingly being experienced by women and gender diverse people through intimate partner relationships, including sham intimate partner relationships where coercive control is a significant factor.

To be effective, a strong system response must start from belief, and consider choice, confidentiality, cultural safety, gender diversity inclusion and non-judgmental practice.

Specialist services that are familiar with and have expertise in the understanding of the needs of these communities, can provide safer, more tailored responses and build capability of services across the broader system to also more safely respond. To an extent, Victoria is the only state that has progressed this framing. These lessons should inform systems across other states as well as bolstering what we have in Victoria.

Reflection: Use of evidence, including survivor consultation

There is a significant amount of evidence currently available regarding the experiences of survivors of sexual violence (including sexual exploitation). Evidence exists in the form of research studies and community consultations that survivors have participated in, and in some cases, led. It is important that this evidence is used in the design of the response system proactively and practically. Survivors have expressed that consultations are numerous, and that testimony is given by survivors in good faith that this will result in meaningful change – so it is important that this is honoured.

¹ Hirsch R., [The extent, nature and impact of family, domestic, and sexual violence \(FDSV\) against women in the Australian sex industry](#) (2022)

In a recently completed community consultation relating to the role of economic empowerment in preventing exploitation, one survivor participant stated:

*"{Contributing to the community consultation} has had a positive impact on me. It gave me a sense of purpose and reminded me that my experiences can contribute to something bigger than myself."*²

In relation to our support communities, the following studies are available for reference, all of which were funded in whole or in part by the Commonwealth or Victorian State Government or were carried out directly by the Australian Institute of Criminology. **We request that the important findings of these studies be considered in the current consultation process.**

[Strengthening Australia's criminal justice response to modern slavery: A rapid assessment](#) (2026);

[Learning From Experience: The Role of Economic Empowerment in Preventing Exploitation](#) (2025);

[Improving service pathways: The COVID-19 pandemic and the experiences of women and gender diverse people in the Victorian sex industry](#) (2024); and

[Sexual exploitation in Australia: Victim-survivor support needs and barriers to support provision](#) (2023).

We will quote critical data from some of these studies within our consultation paper.

Project Respect has strong relationships with survivors of sexual exploitation in Australia. We have been asked by them to clearly state in our submission that there are significant differences in the experiences between sexual exploitation and sexual assault or sexual abuse. These differences are critical to policy, program and service design and must be recognised in the action plan. The impacts on survivors differ in relation to sexual exploitation, and response and long-term recovery approaches must take this into consideration. **Responses that are developed and designed for sexual assault or sexual abuse cannot be considered fit for purpose as a response to sexual exploitation.**

There is no one definitive definition for sexual exploitation enshrined in legislation. However, the term is practically understood in Australia to refer to situations in which a perpetrator uses coercion, threat or deception to force a victim-survivor to provide sexual services, or prevents them from leaving the place where sexual services are being provided, whether in a commercial or private setting³.

²Survivor Connections, Fair Futures, and Project Respect; [Learning From Experience: The Role of Economic Empowerment in Preventing Exploitation](#), (2025)

³ Boxall H, Lyneham S, Black C & Gannoni A 2023. [Sexual exploitation in Australia: Victim-survivor support needs and barriers to support provision](#). Research Report no. 29. Canberra: Australian Institute of Criminology.

The **distinction from sexual abuse** is clearly outlined by Survivor Connections and available on their website, defined as follows:

“Sexual Abuse

People can experience **sexual violence** in many ways. You might experience sexual **harassment**, be sexually **assaulted**, or experience ongoing sexual **abuse**. Sexual abuse is **any form of violence** that **breaches your sexual consent**.

Sexual Exploitation

Exploitation is a form of sexual abuse that **adds an element of profit** or benefit **for the perpetrator**. An example of this could be someone **profiting** from sharing explicit images/videos of you **without your consent**.”⁴

Tailoring Support for Needs of Priority Communities

The Victorian Government released the Everybody Matters: Inclusion and Equity Statement, as a 10-year vision to make Victoria’s family violence system safe, inclusive, responsive, and accountable for all people, regardless of their background, identity, or unique support needs. The framework aims to remove barriers for people who face discrimination or compounding challenges when seeking help⁵. The Victorian Royal Commission into Family Violence had identified several key diverse communities that are considered within the Everybody Matters statement, including people working in the sex industry. Project Respect is funded by the Victorian Government, through the Department of Families, Fairness and Housing, to provide tailored specialist support to women and gender diverse people with experience in the sex industry, in alignment with the objectives of the Everybody Matters statement.

Targeted specialist support also recognises the diversity within priority communities and that individualised support is central to positive outcomes. This was articulated by a participant in the “Learning from Experience” community consultation, centred on economic empowerment of survivors of modern slavery, who stated (in relation to support systems more generally):

“I would really, really like to see more individualised support.I think that's probably the biggest thing is being able to choose what supports that you get, so that they can be effective.” (Interview Participant)⁶

⁴ Survivor Connections (website); [Exploitation in the Sex Industry](#)

⁵ Victorian State Government; [Everybody Matters: Inclusion and Equity Statement](#) (2018)

⁶ Survivor Connections, Fair Futures, and Project Respect; [Learning From Experience: The Role of Economic Empowerment in Preventing Exploitation](#), (2025)

Project Respect's own service provision, as an example of a trauma informed, person-centred, service user-led and non-judgmental support service, can be highlighted as an example of how tailored support is developed and specialised over time, and guided by lived experience voices. The importance of continuous improvement and adaptation to the needs of service users cannot be underestimated. Being able to undertake adaptations and understanding community needs is a key strength of grassroots, community based organisations, where whole of organisation proximity to service users is integral to this understanding. This role played by grassroots organisations is often not articulated, recognised and therefore can be undervalued in the wider family, domestic and sexual violence systems.

Service improvement case study: Evidence-based adaptation

For some years, Project Respect's individually tailored support provision comprised case coordination support only. Over time, it became increasingly clear that our service users were experiencing difficulty in accessing counselling supports that understood their context, and could address embedded trauma rather than focus on recent incidents of assault.

A significant research study completed by Project Respect in 2024, [Improving service pathways: The COVID-19 pandemic and the experiences of women and gender diverse people in the Victorian sex industry](#), found evidence relating to gaps in service provision to women and gender diverse people with sex work experience. Among several relevant recommendations of this report, recommendation 16 was:

"Investing in, and enhancing access pathways to, specific mental health programs designed to provide long-term recovery care to victim survivors of sexual violence with complex trauma, including people with experience of the sex industry."

Of survey respondents who reported physical and/or sexual violence in the sex industry/workplace ($n=23$), only seven respondents sought support from specialist sexual assault services (SSAS), with an additional four wanting to access SASS but unable to. Survey respondents reported past negative experiences with services as the highest barrier to support (62.5%). This was followed by a lack of trust in services (41.6%) and not being able to meet criteria to access support (41.6%). 37.5% reported cultural barriers and 29.2% reported stigma and/or discrimination as a key barrier to accessing service support. (More than one barrier was permitted to be selected in the survey).

Interview participants described their own experiences with accessing sexual assault services, identifying issues including long wait lists, counselling being incident based (which wasn't appropriate to their situation), and not feeling like they had the capacity to explain their sex work context on top of their experience with assault.

Separately to the research, our service users who had experienced sexual exploitation expressed disappointment with counselling programs or individual mental health practitioners who did not understand the differences between sexual exploitation and sexual assault, including the level of control, significant violence, deception, and the impact of the experience of being exploited for someone else's monetary gain. Some described practitioners being underprepared to receive their disclosures resulting in unhelpful responses.

Project Respect restructured in early 2025 to accommodate a specialist sexual violence service, which commenced in June 2025. Prior to commencement, a further process of consultation was undertaken with service users regarding their recommendations for service delivery, which was utilised in the design of the service.

The specialised sexual violence counselling is provided by Project Respect with funding from the Department of Families, Fairness and Housing in Victoria, and as such, is currently only available to people living in Victoria.

Sexual violence counselling is for women and gender diverse people who have experience in the sex industry and have also experienced sexual violence. The counselling service is also for women and gender diverse people who have experienced sexual exploitation, whether or not they identify as having experience in the sex industry.

Our expertise supporting women and gender diverse people with experience in the sex industry means that we are informed about the diverse experiences people have within the sex industry. We provide non-judgemental services where the service user leads the disclosures they wish to make. Our experience supporting women and gender diverse people with experiences of sexual exploitation means we understand the complex experiences people may have had, including the impacts of deception and control. Our services are Rainbow Tick accredited, and we welcome service users from the LGBTIQ+ community. We strive to be culturally sensitive for First Nations and migrant service users and can arrange interpreters as needed. Counselling can be delivered face to face in Melbourne, or via telehealth, meaning we are able to offer the service throughout Victoria.

Users of our service have provided consistent feedback that it has been a relief to access a counsellor that understands their context. This means that goals can commence from the start, and there is no anxiety about how and when to disclose sex work experience or experiences of sexual exploitation, as it is known from the point of intake what the purpose of the counselling will be. There has been a high uptake of service users who identify as being part of the LGBTIQ+ community (approx. 47% of service users in 2025-26). Those who identify as gender diverse, including transgender identifying people were approx. 26% of service users in 2025-26.

Project Respect's program design is unique, and there is no equivalent organisation anywhere else in Australia. We receive queries from interstate regarding access to our service, but we are not currently funded to accept service users from other states. It is our goal that the need for long term recovery from sexual violence is recognised, and that we are funded to provide our specialist programs – both specialist sexual violence counselling and case coordination – to service users in states beyond Victoria.

The above-described specialised sexual counselling service has now operated for just over one year, and is at capacity, but has been able to operate without a waiting list. Feedback indicates that the specialist nature of the program, including its understanding of the context of people's experiences, enables more effective and tailored support and has helped people work on goals they had not previously been able to address. The high proportion of service users identifying as LGBTIQ+ and gender diverse (including transgender) is a further example of where safety in working with people with intersectional identities can be demonstrated. This leads to better uptake of services by hard to reach groups, which takes time and intentional effort.

Proactively utilising available evidence to launch new services, tailor service provision, and ensure accessibility to marginalised communities should be a standard response from government, and opportunities should be continually explored to ensure that the services being offered are aligned with knowledge from research as well as impact of the broader service system. The funding of **systems** needs to be modernised to be focussed on impact, with sufficient flexibility to support service programs that are matched to need, including the individual and diverse needs of marginalised communities. This needs to include where these programs have innovated beyond the design of programs currently funded. Services that are carefully tailored to meet the needs of priority communities should not be limited by funding structures that reduce the consideration of funding of these programs to that of a “procurement” task, which tends to be the case where these programs are required to fit the mould of an established system which is effectively designed for the mainstream.

Within Victoria, reforms have enabled important architecture for shared responsibility, information sharing and more consistent approaches to identifying, assessing and managing family violence risk. The five-year legislative review of the Family Violence Information Sharing Scheme (FVISS), Central Information Point (CIP) and Multi-Agency Risk Assessment and Management (MARAM) Framework recognised the significant progress achieved through these reforms. However, the review also identified substantial limitations in how the reforms operate in practice. Submissions to the review identified:

“gaps in accurate risk identification and management for some groups in the community including older victim survivors, children and culturally diverse victim survivors.”⁷

Submissions raised concerns that MARAM is not culturally safe for members of the Aboriginal community. Submissions also identified gaps in MARAM in relation to refugee, migrant and other culturally diverse communities. Consultation submissions highlighted that the MARAM risk assessment does not adequately deal with issues such as forced marriage, dowry abuse and the different extended family structures within culturally diverse communities. Concerns about the suitability of MARAM for diverse communities were also raised in stakeholder consultations, and stakeholders also expressed their views that MARAM does not support effective risk identification, assessment or management for people with a disability, members of the LGBTIQ+ community or male victim survivors.

⁷ Family Violence Reform Implementation Monitor. (2023). [Legislative review of family violence information sharing and risk management: Reviewing the effectiveness of Parts 5A and 11 of the Family Violence Protection Act 2008](#) (Vic). State of Victoria.

We would agree, across the multiple identity intersections of our support communities, that there are significant gaps in risk assessment, responses, and understanding of the circumstances of both women and gender diverse people with experience in the sex industry, and, women and gender diverse people who have experienced sexual exploitation. Explicitly, while people in the sex industry are named as a priority community in the Everybody Matters statement⁸, there are no standardised MARAM risk assessment inclusions that address the unique risks that can present for this priority community. As a service we have added additional considerations to our own risk assessments and provide capacity building training for professionals across various sectors, but this wider safe support provision is predicated on individual services and practitioners accessing this learning, rather than any standardised or mandated considerations for broad service providers in understanding risk as relates to these communities. Due to the constraints on our very small organisation, we were unable to contribute to the five-year review, which meant that this reflection could not be included in the review itself – a further example of the limitation of responses created in systems and the resultant inability to access key information helpful to the provision of safe, accessible services to priority communities.

Our responsiveness and understanding of community needs has been enhanced through engagement with lived experience, through our lived experience advisory group (LEAG), by inviting consultation from service users at various times, and through engagement with survivor groups. As a small and precariously funded organisation, we have however experienced challenges and barriers in maintaining our LEAG. We do not have access to specific funding to support lived experience engagement, and we have struck barriers with government requirements regarding onboarding of volunteers which misalign with a community with a history of criminalisation, over policing and mistreatment by authorities, and barriers with reimbursement of LEAG participation while balancing record keeping requirements against the high confidentiality requirements of this community. Having access to best practice administrative procedures, capacity building systems and professional supports for maintaining lived experience advisory and engagement would be highly beneficial to the elevation of lived experience voice and the improvement of responses to priority communities in particular.

What can family violence experiences look like for people with experience in the sex industry?

The forms of family violence specific to people with experiences in the sex industry need to be recognised in order to respond to risk, provide informed services responses, and to acknowledge and validate victim survivors as to the experience and its impact.

⁸ Victorian State Government; [Everybody Matters: Inclusion and Equity Statement](#) (2018)

While people with experience in the sex industry can experience the same type of family, domestic, sexual and intimate partner violence as any community member, there are some types that can be experienced uniquely by sex workers, or, in differing forms or proportion to other community members.

For someone with experience in the sex industry, family, domestic and sexual violence may include a perpetrator:

- taking their partner's earnings from the sex industry;
- forcing their partner into the sex industry;
- not allowing their partner to leave the sex industry;
- coercing their partner into having unwanted sex, or types of sex, by accusing her of wanting to have sex with other men, but not him;
- disclosing or threatening to disclose that their partner or ex-partner has been in the sex industry to others – including to their children, other family members, friends, children's teachers or school, employers, the police, Child Protection, the Children's Court, the Magistrates Court, the Family Court and the Australian Taxation Office – with a view to discrediting and humiliating the victim survivor;
- Verbally/emotionally abusing their partner or ex-partner in terms of their involvement in the sex industry (e.g., by calling them a 'whore' or a 'slut');
- making accusations of infidelity or being sexually jealous⁹.

Other forms of specific violence (as seen within the Project Respect support community) may also include coercion to leave the sex industry (including then becoming financially dependent on the perpetrator), stalking, harassment, and technology facilitated violence such as theft and non-consensual use of images (an issue that is likely to increase with the increased availability of 'smart' glasses).

A funded research study developed and undertaken by Project Respect examined a period during the Covid-19 lockdowns in Melbourne. The report published in August 2024 included the following findings:

- Of those who identified an intimate partner during the pandemic (n=25), 80.0% reported experiencing physical and/or sexual violence by that same partner;
- 60% reported also experiencing coercive control by that same partner;
- One in five reported sexual assault by that same partner (defined as force or threat of force of sexual activity without consent);
- 32% of survey respondents who reported an intimate partner relationship also reported experiencing pressure by that same partner to provide sexual services to other men during the pandemic period; and

⁹Hirsch R., [*The extent, nature and impact of family, domestic, and sexual violence \(FDSV\) against women in the Australian sex industry*](#) (2022)

- Despite these rates, only a single survey respondent presented to family violence services during the pandemic period¹⁰.

We note that sex workers are mentioned twice in the National Action Plan to End Violence Against Women and Children. Once to acknowledge that sex workers can experience violence from a range of perpetrators, and that barriers to reporting, accessing services and getting justice are present due to stigma. There is further acknowledgement that transgender sex workers may experience violence that is driven by gender inequality, their insecure work context and transphobia, including trans misogyny. The second mention relates to experiencing additional barriers in reporting sexual assault¹¹.

Subsequent to the publishing of the Plan, the 2024 independent Rapid Review of Prevention Approaches to help stop gender-based violence, as commissioned by the Commonwealth government, delivered findings regarding the need to increase responses to priority cohorts, including people with experience in the sex industry, stating that:

“The Review therefore recommends that greater priority and focus be given to Action 6 of the *First Action Plan (2023–2027)* of the National Plan - noting opportunities to consider the needs of particularly vulnerable cohorts. This includes women and children vulnerable to sexual exploitation, those working in the sex industry, as well as women and children from Aboriginal and Torres Strait Islander communities who are being murdered and disappeared.”¹²

We further note that in the First Action Plan 2023-2027 Activities Addendum Update 2025, there is a specific activity entitled “Specialist support for women with complex needs”, which is listed as being progressed under the National Plan to End Violence against Women and Children 2022-2032 and attributed to Project Respect. The stated objective is “Specialist support for women with complex needs, including those who have been harmed or exploited through the sex industry. This activity is part of a broader funding through the 2023–24 State Budget.”¹³ A further description, under “Implementation Progress” states that “Ongoing funding has been provided to Project Respect to support women with complex needs, including those who have been harmed or exploited through the sex industry. Project Respect delivers a range of support and activities including counselling, case management, and community

¹⁰ Hirsch R., 2024, [Improving service pathways: The COVID-19 pandemic and the experiences of women and gender diverse people in the Victorian sex industry](#).

¹¹ [National Plan to End Violence against Women and Children 2022–2032](#)

¹² [Unlocking the Prevention Potential: accelerating action to end domestic, family and sexual violence](#)

¹³ National Plan to End Violence against Women and Children; First Action Plan Progress; First Action Plan Activities Addendum; [Specialist Support for Women with Complex Needs](#) (last modified 9 December 2025).

events.”¹⁴ We note with appreciation that our specialist sexual violence counselling and case coordination work, as well as some capacity building work, are supported by the Victorian state government (although we are expressly not funded for family violence case management, or for our community events). We note however that there is **no equivalent action for states outside of Victoria**, despite similar needs existing Australia wide. Further, our work in practical terms includes support to people with experience in the sex industry whether or not harm occurred through the sex industry or in relation to it, and, we also provide supports to people with experience of sexual exploitation who have no experience with engaging in the sex industry through consensual sex work.

Where sexual exploitation intersects with family violence, what can this look like?

As noted above, sexual exploitation is a form of sexual violence where there is benefit (financial or social) derived for the perpetrator. Deception is a key factor in the perpetration of sexual exploitation.

It is important to note that within the National Plan to End Violence Against Women and Children, there is no express mention of sexual exploitation at all. There are some limited references to modern slavery inserted within the definitions of family violence (stating that family violence can also constitute forms of modern slavery, such as forced marriage and servitude) and within the definition of sexual violence (stating that forms of modern slavery, such as forced marriage, servitude or trafficking in persons may **involve** sexual violence). That sexual exploitation **is not itself defined** as a form of **gender-based violence** against women and gender diverse people or recognised as a form of violence against children is an omission in the plan that has significant repercussions. Without knowledge, which impacts risk assessments, appropriate responses cannot be activated. Prevention activities will not be adequately targeted.

We recognise that this was acknowledged in the 2024 independent Rapid Review of Prevention Approaches to help stop gender-based violence, with a specific recommendation that:

“...in recognition that sexual violence has not received adequate attention in the national policy landscape - the Review recommends that governments further expand and prioritise work on Action 6 in the *First Action Plan (2023–2027)* of the National Plan. This increased focus should....address the needs of diverse communities and recognise different experiences of sexual violence, including; violence against women with disabilities and older women, including in institutional and residential settings; sexual exploitation of women on

¹⁴ National Plan to End Violence against Women and Children; First Action Plan Progress; First Action Plan Activities Addendum; [Specialist Support for Women with Complex Needs](#) (last modified 9 December 2025).

precarious visas and the need for greater accessibility to services which provide support for trafficked persons; sexual violence experienced by those working in the sex industry; and sexual violence experienced by First Nations women and LGBTIQ+ people.”¹⁵

Despite this review being commissioned as rapid, the implementation of this recommendation has not in our opinion been adequately addressed in the two years since this review was completed. We recognise the improvements to modern slavery responses through the implementation of the Additional Referral Pathway pilot, which enhances access to the Support for Trafficked People Program, and that both programs are included under the National Plan to End Violence against Women and Children First Action Plan Activities Addendum (despite being non-gendered programs). However, specialised responses to sexual exploitation, including widespread understanding across the services landscape remains lacking, with limited understanding of the experience, immediate impacts, barriers to safety, and the long-term recovery needs of survivors.

Intersections of sexual exploitation with family violence are not well understood and we have seen services respond to intimate partner violence but fail to recognise an intersection with sexual exploitation. Experiences whereby an apparent intimate partner relationship disguises what is actually exploitation - which by its nature is based on deception, and the motivation is to derive a benefit (financially or socially) through exploitation – result in responses that may not be appropriate for either the perpetrator or the victim survivor. Lack of understanding by first line responders, including state and territory police forces, can have devastating consequences. Pathways to safety will look different for those circumstances where the exploitation is networked (for example, where there is involvement of criminal gangs). Where *income* as well as criminality is at stake, perpetrators will threaten victim survivors, and coercive tactics can be complex.

One example of a complex intersection is with drug and alcohol use. Supply of substances can be used as a coercive tactic. This includes targeting an individual who has a history of drug and alcohol use, coercing into substance use as a method of control, reducing their resistance to sexual exploitation, increasing dependence on the perpetrator, and often resulting in reduced access to services such as crisis housing and other responses such as supportive engagement by law enforcement. Targeting can also occur against individuals with no prior substance use, but when there has been prior substance use, it can have increased effectiveness in activating an individual’s shame at using substances or isolate the individual from informal support networks.

¹⁵ [Unlocking the Prevention Potential: accelerating action to end domestic, family and sexual violence](#)

We acknowledge the important work of the Victorian Alcohol and Drug Association (VAADA) and its members in their extensive understanding of the intersection between coercion and drug and alcohol use, including exploitation of substance use. We support the call for harm minimisation strategies and the understanding that where substance use is criminalised, disclosure carries legal and social consequences that can then be used as tools of abuse, triggering fears of criminalisation, child removal, housing loss, or stigma - which can be exploited as a coercive practice designed to increase compliance and prevent help-seeking.¹⁶

Lived Experience Viewpoint

As part of our submission, Project Respect was fortunate to be able to engage with a lived experience person who wished to input into this submission (anonymously) with specific details around the experience of violence against sex workers, and experiences of modern slavery. We have included the advice of the lived experience viewpoint for your consideration as **Appendix 3** of this document. This advice includes recommendations and outlines multiple contexts of violence that may be experienced by workers in the sex industry. We thank our lived experience participant for the extensive information they have so generously provided.

Recommendations – Part 1

Recommendation 1.1: Name sexual violence explicitly in the Second Action Plan. Name *sexual exploitation* explicitly in the Second Action Plan, ensuring clarity that sexual exploitation extends beyond online sexual exploitation. Support and fund specialist services that exist for people with experience in the sex industry, and, for people who have experienced sexual exploitation, which also tailor and differentiate responses for sexual exploitation distinctly from responses to sexual assault or sexual abuse.

Recommendation 1.2: Recognise and support targeted specialist services that provide individualised services to priority cohorts, and that understand the communities being serviced, including intersections. Targeted specialist services should also be supported to provide capacity building education across sectors, including to law enforcement, to ensure knowledgeable, non-stigmatising support is provided at all system entry points, including to people with experience in the sex industry and to people with experience of sexual exploitation. Recognise that explicit government funding support for services to marginalised communities is required, especially for those communities where philanthropy is unlikely to accept responsibility to fund service responses.

¹⁶ Victorian Alcohol and Drug Association. (2024). *Submission to the Inquiry into Women's Pain*. Victorian Alcohol and Drug Association.

Recommendation 1.3: Utilise existing evidence and research, particularly those that have included consultation with lived experience voices, in system and program design. Prioritise implementation support where sufficient evidence bases exist, rather than channelling funding into replicating already existing research and other evidence.

Recommendation 1.4: Expressly fund organisations to incorporate lived experience leadership in program design and advocacy, particularly for marginalised communities where expertise and knowledge is particularly valuable, including for mentorship and ensuring representation in wider sectors.

2. Prevention and early intervention

Prevention of violence against people with experience in the sex industry starts with the breakdown of stigma and discrimination, and the upholding of human rights, including decriminalisation of the sex industry. Barriers to access to services across all sectors need to be dismantled, as engagement with the service system and help seeking for experiences of violence can occur at multiple entry points including health care, justice, mental health services and education institutions. Direct service system barriers increase for people with insecure visas, people living remotely, and people who use drugs and alcohol (especially controlled and illegal substances). Layers of stigma and discrimination increase for members of the LGBTIQA+ community including people who identify as transgender, and for people who are experiencing adverse mental health, and people with a disability.

For people experiencing or at risk of sexual exploitation, effective prevention and early intervention begins with explicit understanding of what sexual exploitation is – including the knowledge and ability to understand indicators, and pathways to respond to these, before a crisis. For the people at risk, indicators may include pressure to provide sexual services in unsafe conditions; coercive control by partners, managers or third parties; threats linked to immigration or housing, debt or financial control; and exploitation that is misread as a workplace issue rather than a sexual violence risk. It needs to be understood that sexual exploitation can occur in multiple settings, including within intimate partner relationships.

Conflation of consensual sex work with exploitation is unhelpful for both sex workers and people experiencing sexual exploitation. Nuanced understanding of experiences and sharing of information can only occur in environments where bodily autonomy and consent are centred. In political environments where the loss of human rights advances is perceived as being under threat, narratives protective of particular positions will tend to push conversations towards either the denial of sexual exploitation, or over-identification of sexual exploitation, particularly human trafficking for sexual exploitation. Maintaining rights for women and gender diverse people is key to

prevention, early intervention, and effective and collaborative responses that recognise individual need.

Trusted, community-based service providers are critical within the service system because they can identify sexual exploitation and sexual violence risks early within a service intervention and offer practical support ahead of crisis.

Greater understanding of sexual exploitation throughout broader service systems also assist with better identification of sexual exploitation. For example, improvements in identification of all forms of modern slavery by health services is known to be important in the intervention for people in active situations of exploitation. A program piloted by St Vincent's Health Australia, in Melbourne in June 2025 has demonstrated an over 400 per cent increase (at St Vincent's) in identifications of patients experiencing various types of modern slavery (including sexual servitude) in the first year.¹⁷

While it is important to implement better, more consistent education about modern slavery indicators, it is also important that pathways to support are clear across service systems. The Commonwealth government currently directs all funding for the support of the survivors of modern slavery to the Support for Trafficked People program (a program active since 2004 and provided by Australian Red Cross since 2009), the newer Additional Referral Pathway pilot (commenced July 2024), and the Forced Marriage Specialist Support Program (since January 2025). Given these explicitly defined options for support, and the need for these programs to intersect with state based supports such as housing, health, mental health and family violence supports, it is critical that there is a high level of understanding of these programs across the service system, including by state and territory based police. Lack of knowledge of the programs can create barriers in community understanding, referral pathways, and justice outcomes, which impact victim survivor safety.

An Australian Institute of Criminology (AIC) report found that only one in five victims of modern slavery are identified or known to authorities, with 80% of cases remaining undetected.¹⁸ Reasons for lack of detection were reported as including the clandestine nature of the crime, mistrust in authorities, fear of deportation, self-identification issues, and lack of recognition by professionals. These barriers increase the need for greater community understanding of modern slavery. In our view, these same barriers are present regarding the identification of sexual exploitation specifically.

Barriers exist in relation to access to valuable supports. Where access to supports is delayed, greater harm can occur, resulting in more complex and longer term recovery

¹⁷ "On the Record" magazine, the Australian Nursing and Midwifery Association: [Eve Wintergreen: fighting modern slavery via healthcare](#), 1 April 2026.

¹⁸ Lyneham S, Dowling C and Bricknell S 2019. [Estimating the dark figure of human trafficking and slavery victimisation in Australia](#). Statistical Bulletin no. 16. Canberra: Australian Institute of Criminology.

needs being required. A 2023 study by the Australian Institute of Criminology focussing on the support needs of victim survivors of sexual exploitation in Australia found that the primary support needs of victim-survivors related to the following domains: financial hardship (90%), housing and accommodation (78%), employment and education (63%), mental health (90%), physical health (53%), alcohol and drug use (14%), social and community engagement (80%), safety (58%), legal (78%) and visa issues (74%), and domestic and family violence (52%).¹⁹ The study further found that:

“Caseworkers’ ability to support victim-survivors was impaired by a range of individual, interrelationship and systemic barriers. In particular, victim-survivors struggled to engage with support services if their primary needs - such as housing stability, financial and residential security, and personal safety - were not being met. However, the most significant barriers to caseworkers meeting the primary needs of victim-survivors were systemic in nature. Many victim-survivors were ineligible for government funded services, including Medicare, due to visa restrictions. This placed significant monetary strain on victim-survivors and the support services that would cover these expenses where possible.”

This statement illustrates the interrelationship between recovery and early intervention. The system-based supports as described, where they could be put in place earlier, enabled survivors to progress to other recovery needs. It is difficult for survivors to recover when their survival needs are not being met. While these system supports may appear incidental to recovery from gender-based violence, they are in fact *central* to the ability to recover and are preventative of further harm.

Consistent with the AIC findings that 90% of adult victim survivors of sexual exploitation required support for financial hardship, the community consultation project and subsequent report undertaken in partnership by Survivor Connections, Fair Futures and Project Respect, detailed an important relationship between economic empowerment, recovery from modern slavery, and *prevention* of further exploitation. In this way, this survivor led project captured survivor perspectives on how economic empowerment and participation through community engagement can shape strategies to prevent modern slavery.²⁰ Survivor perspectives stressed that prevention relies on protecting agency, choice, and control, requiring reforms to antislavery efforts that restore self-determination. They emphasised that the conditions enabling economic empowerment play a protective role against modern slavery. As one example, the report notes that

¹⁹ Boxall H, Lyneham S, Black C & Gannoni A 2023. [Sexual exploitation in Australia: Victim-survivor support needs and barriers to support provision](#). Research Report no. 29. Canberra: Australian Institute of Criminology.

²⁰ [Learning From Experience: The Role of Economic Empowerment in Preventing Exploitation](#), Survivor Connections, Fair Future, and Project Respect (2025)

when individuals have control over and access to their finances, they have more options for leaving unsafe situations, which enables individuals to make decisions that prioritise their safety and wellbeing. In the words of one participant:

“The reason we even get to exploitation is because of lack of money, lack of funds. So, having that control over your own money helps you not to be abused. Nobody can abuse or control you if you have means of making your own money and controlling your own money. You also have the power to walk away from unsafe situations, because you have the means. So that means you cannot stay in exploitative situations. It also gives you bargaining power in relationships, workplace, and life in general, reduces vulnerability.” (Interview Participant)²¹

It is important to recognise, when considering actions required to end violence against women and children, that according to an Australian Institute of Criminology report, victim-survivors of modern slavery in Australia are predominantly female, with 87% of reported cases of modern slavery in the period under review (2024-25) being women. Further, reports of modern slavery are heavily concentrated among youth and migrant populations. Data indicates that 34% of victims are under 18, 78% were born overseas, and there were a significant number of cases involving familial perpetrators and taking place in private residential settings, with 44% allegedly exploited by a family member and 30% by an intimate partner.²²

Complexity and value of early interventions

Many survivors of sexual violence (including but not limited to sexual exploitation) have complex experiences that can compound harm in their lives. The following composite case study is provided as an example of the impacts when potential earlier interventions are missed, compounding harm, and leading to the need for more extensive and longer-term recovery.

Case Study: Impacts of missed early interventions

Mai is a young woman born in Australia to Vietnamese parents. During Mai’s childhood she was sexually abused by an extended family member and was a witness to family violence. In her teenage years her parents became unable to care for her without support, and she was removed, spending two years in an out of home care setting. During this time, she experienced sexual exploitation from men, that was facilitated through being groomed by an older teen. None of her childhood experiences were disclosed or identified at the time and Mai did not receive any supports for these.

As an adult, Mai spent a short period working in the sex industry. While there were no incidents of violence during this time, Mai did experience stigma and racism, and found some

²¹ [Learning From Experience: The Role of Economic Empowerment in Preventing Exploitation](#), Survivor Connections, Fair Future, and Project Respect (2025)

²² Bricknell S & McDonald A 2025. [Modern slavery in Australia 2024–25](#). Statistical Report no. 56. Canberra: Australian Institute of Criminology.

experiences were triggering trauma from her childhood. She decided to exit the industry. In the period following, she had a short period of homelessness before being able to access a room in a house owned by a woman 15 years older than her.

Whilst in the house, Mai's roommate (and house owner) would at times coerce Mai into having sex with her, indirectly threatening that if she didn't do so, she would have to vacate the property. Six months later, the roommate started bringing men to the home to have sex with Mai in the guise of this being a way she could pay her rent. Mai was unhappy with this situation but did not want to be homeless again. She was unable to work during this time due mostly to the demands of her roommate who insisted she spend long hours doing all the housework, and the sexual services became more frequent until it was a daily occurrence.

Service interventions accessed

While living in the house Mai had internet access and did some online searches about her experiences. She began to realise that her recent experiences may have been exploitative. In her searches she found information about Project Respect being a service specific to people who had experience in the sex industry, and also people with experience of exploitation, and called them to find out if there were any supports they could provide. Mai was accepted as a case coordination service user, where she began to disclose the various aspects of her experiences.

While being retained as a service user, Mai was also referred to the Additional Referral Pathway (ARP) program who assessed her as having experienced sexual and domestic servitude, and as being eligible for the Support for Trafficked People Program (STPP). The ARP and then STPP were able to assist Mai with accommodation. A 90-day case management support period was opened with STPP, while Mai considered if she wanted to report her experiences to the Australian Federal Police. Mai ultimately chose not to report, which meant the support period closed after 90 days plus a short transition period. Mai also engaged with Project Respect for specialised sexual violence counselling, which was her first experience with counselling or any recovery therapy. The complexity of Mai's experience meant that the counselling relationship extended to almost 12 months.

Missed interventions

1. As a child, Mai did not disclose the sexual abuse due to fear, and not having a protective adult. As the abuser was not only a family member but prominent in her cultural community, she felt alone with little options. As a child, she was not aware of any services and was able to mask her experiences in other environments (such as school), as she presented as a well-cared-for child without obvious behavioural problems. ***Missed opportunities included no culturally appropriate education on sexual abuse and no available hotlines / support services that were visible and clearly available to minors. When the intimate partner family violence became visible, there were missed opportunities for child-centred services being provided to Mai that may have also revealed the sexual abuse. Removal from the home may have been prevented with greater culturally centred services and earlier intervention for the family violence experienced in the home.***
2. While in the out of home care environment there was awareness of an external 'boyfriend', but Mai did not disclose details due to threats from the men and older teens involved in the exploitation. ***Missed opportunities included insufficient exploration as to the age***

of the boyfriend and nature of the relationship. Being missing from the out of home care environment was normalised and police responses to absconding centred around immediate physical safety. Exploitation was not well understood by services and lack of obvious physical injury meant visits to sexual health clinics were focused on safe sexual practices rather than exploring if exploitation was present. Mai received little direct education about sexual exploitation.

3. When engaging with sex work, Mai had informal support from other workers but did not engage with sex work specific services. Upon deciding to exit the industry she became isolated from industry friends. *Missed opportunities included barriers to identifying and accessing safe, sex-worker affirming programs that also supported exit from the sex industry by choice, alongside some stigmatisation from within the industry that all 'exit' support is by definition anti-sex worker. Sex worker friendly counselling was not widely available and at the time required payment. Housing support was not sex worker friendly and led to non-disclosure by Mai about her sex work experience which would have been relevant to income history and Centrelink support. Wider community stigmatisation of sex work meant disclosures in all contexts were restrained. Ongoing lack of access to counselling impacted ability to engage in work, and lack of housing access primed Mai for vulnerability to coercion and exploitation.*
4. When the sexual coercion (violence) from Mai's housemate first began, Mai did not recognise this as family violence and was primarily concerned about homelessness. *Missed opportunities included the lack of community information that someone living under the same roof perpetrating violence satisfies the legislative definition of "family" violence in Victoria - and many services do not apply this definition, especially in relation to safe accommodation options. Mai did not seek services from LGBTIQ+ organisations as she did not identify as LGBTIQ+ herself. Other services such as GP clinics did not screen for modern slavery due to lack of training about indicators. Job placement agencies did not fully explore reasons for lack of capacity to work and were not trained in modern slavery indicators. Systemic barriers such as lack of affordable housing reduced Mai's choices and served to make the coercion more effective.*

Mai eventually sought interventions, but only when she was at crisis level. Assertive interventions at any of the earlier points may have disrupted the pathways to exploitation, with reduced impact on Mai's life and less embedding of trauma, which led to extensive recovery being required. In terms of service system cost, earlier services and greater emphasis on prevention and education, not only of violence and modern slavery, but also focussed on non-stigmatisation of sex work and LGBTIQ+ status, as well as anti-racism messaging, would have resulted in earlier and significantly less system intervention and cost. In relation to the counselling, as funding systems are based on 'number of intakes', much of the cost of the longer counselling period was essentially borne by the already stretched service provider.

Recommendations – Part 2

Recommendation 2.1: Invest in early intervention pathways that are explicitly safe for women and gender diverse people with experience in the sex industry, and people experiencing or at risk of sexual exploitation. This needs to consider intersections with LGBTIQ+ identities (including transgender identity), migrant status, and disability. Capability of targeted specialist services with reach to communities and accessible, integrated pathways such as community events, group work, peer support and outreach should be valued and prioritised.

Recommendation 2.2: Build frontline capability to identify sexual violence, coercion and sexual exploitation without relying on stereotypes about victimhood, sex work, migration status or gender identity. Support capacity building education delivered by organisations with frontline service provision experience and lived experience involvement.

Recommendation 2.3: Consider full lifecycle intervention and education, that includes collaboration between multiple service types such as drug and alcohol services and youth services. Fund and value assertive outreach work and programs that are not solely law enforcement based, and which encourage open, brave conversations that combat the influence of predatory exploitation methods.

Recommendation 2.4: Fund prevention work that addresses sexual entitlement, technology-facilitated sexual violence, power imbalances in relationships, compromised consent and business models that profit from harm. Prevention education should distinguish between perpetrators seeking to exploit and intimate partners exerting control in other contexts, including how those differences (including financial gain motivations and use of deceit) affect victim-survivor presentations, experiences, and pathways to recovery.

Recommendation 2.5: Invest meaningfully in breaking down structural barriers such as lack of income support and housing, and barriers such as visa classes that prevent work rights of people recovering from and trying to avoid exploitation.

Recommendation 2.6: Invest in measures that enable economic empowerment of victim survivors of modern slavery, including consistent and sufficient compensation schemes, and ensuring repatriation costs of people experiencing trafficking are met – including meeting costs of repatriating exit trafficked women back to Australia.

3. Children and young people in their own right

Recent recognition of the need to consider children and young people as victim-survivors of family, domestic and sexual violence in their own right, is welcomed and necessary. When recognising children and young people as victim-survivors in their

own right, responses must explicitly consider sexual violence, grooming, coercion and sexual exploitation that occurs before adulthood, or during the transition to adulthood.

In general terms, child sexual abuse becomes sexual exploitation when a second party benefits monetarily, through sexual activity involving a child.²³

Some young people are targeted for sexual exploitation because of increased vulnerability factors and reduced support networks due to homelessness, family violence, poverty, disability, care experience, migration insecurity, social isolation, substance use, mental health concerns, gender diversity (including identification as transgender) or lack of safe adults.

In the context of sexual exploitation, young people may experience grooming, coercion, image-based abuse, unsafe accommodation, disconnection from education and services, and harmful adult relationships that are not recognised early enough as sexual violence or exploitation.

Project Paradigm has identified that typical models of child sexual exploitation can look like inappropriate relationships, peer on peer exploitation, boyfriend/girlfriend presentation, and organised exploitation and trafficking (e.g. involving gangs).²⁴

Grooming behaviours often follow an established pattern that includes victim selection/targeting, gaining access and isolating, developing trust and keeping secrets, desensitisation to touch and discussion of sexual topics, control and reinforcement (including introduction to criminal activity), culminating in victimisation.²⁵

Sexual exploitation of children can also happen within families and is difficult to identify and difficult for children to report. Response pathways for community members who do see the indicators are often unclear, including knowing how to ensure the safety of children during a reporting process. This has been articulated by service users Project Respect has supported who experienced sexual exploitation when they were children and are now adults. Survivors have also articulated that some counselling options do not want to explore early life experiences and encourage survivors to only concentrate on the 'now' - or vice versa. Self-directed counselling goals are important to address the needs of the individual as they themselves deem appropriate.

In relation to children and young people experiencing sexual exploitation, responses must avoid blaming young people for survival strategies and instead focus on safety, trusted relationships and long-term recovery. Impacts must be considered throughout the lifecycle and context of childhood experiences considered, including during the transition to adulthood and beyond.

²³ Unicef: [Action to end child sexual abuse and exploitation: A review of the evidence](#), 2020

²⁴ Project Paradigm website; ["What is CSE?"](#)

²⁵ Project Paradigm resource; ["Grooming"](#)

In Victoria, multiple reports and follow up investigations were undertaken by the Victorian Commission for Children and Young People (CCYP) into young people in out of home care subjected to sexual exploitation. In 2015, the CCYP found 189 reports of alleged incidents of sexual abuse and sexual exploitation against 166 children living in care. Findings included that the system at the time *created opportunities* for the sexual abuse of children and young people and did not prevent sexual abuse or offer consistent responses when it occurred. Recommendations included changes to the care system and strategies to prevent sexual exploitation.²⁶

The report “Out of sight: Systemic inquiry into children and young people who are absent or missing from residential care” was tabled in the Parliament of Victoria on 24 June 2021. The inquiry was established on 4 March 2020, due to concern over the high number of young people who continued to be absent or missing from residential care. Amongst other findings, the review found that responses to criminal exploitation were limited and not well coordinated, and that effective, consistent therapeutic support was not available to most children and young people in residential care.²⁷

Progressive updates on the review were undertaken annually until 2025 with recommendations including funding for coordinated statewide approaches to address child sexual exploitation and a new approach to tackling criminal exploitation that prevents abuse and holds perpetrators accountable. The 2025 report card noted that efforts had been made to reduce child sexual exploitation, with funding in the 2023–24 State Budget allowing for improved intelligence gathering and sharing between police and Child Protection to tackle the sexual exploitation of young people in care, and support 22 Sexual Exploitation Practice Leads in Child Protection statewide. We note however that there was little to no funding in that same budget for non-government organisations outside of the out-of-home care sector to partner and collaborate with police and child protection to provide tailored, specialist support to victim survivors, nor are there responses that enable coordinated, connected therapeutic care that extend into adulthood.

The report card also acknowledged that a statewide, whole-of-government response is still critically needed to actively prevent and respond to children and young people going missing from care and being exposed to intolerable harm like sexual exploitation.²⁸ It is disappointing that after 10 years from the initial report, there has

²⁶ Commission for Children and Young People (Victoria), “[...as a good parent would...](#)”: Inquiry into the adequacy of the provision of residential care services to Victorian children and young people who have been subject to sexual abuse or sexual exploitation whilst residing in residential care; August 2015

²⁷ Commission for Children and Young People (Victoria), “[Out of sight: Systemic inquiry into children and young people who are absent or missing from residential care](#)”; June 2021

²⁸ Commission for Children and Young People (Victoria), “[Wrap up report card – progress against past enquiries](#)” 2025

been insufficient strategic planning designed specifically to curb the perpetration of sexual exploitation against children and young people in out of home care.

Sexual exploitation perpetrated against young people in out of home care is also prevalent in other states of Australia. It has been reported in Queensland that as part of Operation Kalahari, 13 people in Cairns were charged with 301 offences against children after 54 youths came forward with allegations of grooming and exploitation since 2022.²⁹

Sexual exploitation perpetrated against children and young people can happen in any setting and can also be perpetrated against adults. The grooming methods include what is known as the ‘boyfriend model’ or ‘Loverboy model’, which is to establish an intimate partner relationship, gain trust, exploit vulnerabilities, and exert control with the ultimate objective of obtaining a financial gain. These models operate in Australia, and internationally. Survivors are often not able to access appropriate support or justice. The lack of community knowledge about these perpetration methods is surprising, given recent high profile cases of sexual exploitation. Knowledge is, however, accessible. One of the participants in the Economic Empowerment community consultation stated (via survey question) that:

“I know the full end-to-end process of the lover-boy method of human sex trafficking and I have told the police about my experience in detail, but I have had no help from the police so far. The information I know would be really useful for people to know to protect themselves - I would love a platform to share it.”³⁰

We noted in section 1 that sexual exploitation is not mentioned as a form of gender-based violence within the National Plan to End Violence Against Women and Children. We also note in section 5 that sexual exploitation is not included within the definitions of family, domestic and sexual violence within the Federation Funding Agreement between the Commonwealth and States. When considering these gaps in relation to children and young people specifically, and the well documented exposure of children and young people to sexual exploitation as articulated by the Commissioners for Children and Young People in Victoria, and considering that many experiences occur when children should be safe and housed in state based care, it is disappointing that this gap in recognition of, and coordinated responses to sexual exploitation throughout the lifecycle has continued to be absent from the National plans up until this time. This next phase provides an opportunity to rectify this.

²⁹ Gillespie, E. [“Inside Queensland’s trap houses where vulnerable children are allegedly drugged and sexually abused”](#). ABC news online, 26 July 2026.

³⁰ [Learning From Experience: The Role of Economic Empowerment in Preventing Exploitation](#), Survivor Connections, Fair Future, and Project Respect (2025)

While we appreciate that there is a separate *National Strategy to Prevent and Respond to Child Sexual Abuse* (2021–2030) born directly out of the recommendations from the Royal Commission into Institutional Responses to Child Sexual Abuse, this strategy does not reference any full lifecycle strategies and concentrates heavily on on-line child sexual exploitation when referring to sexual exploitation. The strategy does not actually define child sexual exploitation nor reference the aspects of deceit or financial gain that are central to exploitation. The associated First Action Plan³¹ does, however, articulate the work of the Australian Centre to Counter Child Exploitation (ACCCE)³² in relation to online child sexual exploitation. The ACCCE has undertaken significant and innovative work in preventing and responding to online child sexual exploitation, including through collaborative projects (for example, the Wise in Paradise: First Nations Online Safety Resources)³³. However, there remains a gap in the First Action Plan regarding child sexual exploitation that occurs outside of online offences, which should be addressed in future plans, as well as ensuring continuing support for the important work of the ACCCE.

Recommendations – Part 3

Recommendation 3.1: Create earlier intervention pathways for young people at risk of sexual exploitation, including those in residential care, unstable housing, unsafe relationships or in consideration of online exploitation contexts, and ensure these pathways are practical and connected with modern slavery response systems. Articulate these in the Second Action Plans for both the National Plan to End Violence Against Women and Children, and the National Strategy to Prevent and Respond to Child Sexual Abuse (2021–2030), including a clear and accessible definition of what child sexual exploitation is, referencing elements of deceit and perpetrator gain or profit.

Recommendation 3.2: Support articulated program design that ensures service responses do not misread sexual exploitation of children and young people as “choice” or “risk-taking” where coercion, grooming, violence or survival needs are present. Expand the prevention work of programs such as Project Paradigm to improve services and community education on these topics.

Recommendation 3.3: Design systems that incorporate understanding of intersectional risk across the lifespan. This should include national policy, implementation and service integration of the intersecting social, structural and

³¹ National Office for Child Safety, National Strategy to Prevent and Respond to Child Sexual Abuse 2021–2030; [First National Action Plan](#)

³² Australian Centre to Counter Child Exploitation website; What we Do; [About us](#)

³³ Australian Centre to Counter Child Exploitation website; Resources; [Wise in Paradise: First Nations Online Safety Resources](#)

systemic conditions that shape safety, risk, recognition and access to supports. Ensure system responses are age and developmentally appropriate, recognising young people as a specific population distinct from children. Support relevant recommendations advanced by innovative youth specialist services, such as YSAS, and from drug and alcohol support services and peaks such as the Victorian Alcohol and Drug Association (VAADA).

Recommendation 3.4: Recognise in the Second Action Plan that lifelong impacts of experiences of sexual abuse and sexual exploitation in childhood can affect life as an adult. Support and fund programs for specialised sexual violence counselling, such as that provided by Project Respect, which include context specific understanding and nonjudgemental approaches that can address historical experiences where this is sought by the victim-survivor.

4. People who use violence

Responses to people who use violence need to consider sexual violence specifically, and need to consider the use of violence **against** specific intersectional communities. Often the person using violence does not identify as belonging to the *same* community as the victim survivor, and the relative community power differential will form part of the overall exercise of power and violence against a victim survivor. For example, the relatively high proportion of violence perpetrated against First Nations women by non-First Nations men has been documented.³⁴³⁵³⁶ This use of the uneven power differential can be seen in the use of sexual violence against sex workers, LGBTIQA+ identifying people (including people who identify as transgender), migrants, Aboriginal and Torres Strait Islander people, people with a disability, and older persons. Where intersections exist incorporating multiples of these identities, and include identifying as a woman, the power differential increases further.

By example, where family, domestic, sexual or community-based violence is perpetrated against people with experience in the sex industry, the perpetrators may be sex work customers, establishment owners, intimate partners or family members, and may also be persons with authority such as law enforcement or compliance officers. The power differentials create barriers for victim survivors and are also barriers to appropriately tailored responses to perpetrators.

We are not currently aware of any programs designed for men who use gender based violence that specifically address violence against sex workers, or, circumstances

³⁴ VACCHO: [Inquiry into capturing data on family violence perpetrators in Victoria- committee questions](#) 2024

³⁵ *Improving family violence legal and support services for Aboriginal and Torres Strait Islander women*, Langton M et al, ANROWS 2020

³⁶ *Changing the Picture*, Our Watch 2018

where men may be *referred* to men's behaviour change programs (MBCP) due to perpetrating violence against sex workers, as the programs are structured to address intimate partner violence (and violence against children in the family), often aimed at men who want to make positive changes in their lives and relationships³⁷. In our understanding, part of the educative process of MBCPs challenges a culture of male entitlement, the commodification of women's bodies, and coercive control. An individual facilitator might use these broad concepts to address behaviour toward sex workers, but it is not a programmed requirement.

There currently exists a data gap in understanding the perpetration of violence against sex workers – who the perpetrators are, and the extent of the intersection of violence they perpetrate against sex workers as well as their own partners. There is no evidenced understanding as to whether the perpetrators of violence against sex workers are the same people who use violence against their own intimate partners, beyond anecdotal evidence or understanding of patterns of perpetration more generally that might suggest a strong correlation. Information provided by the Australian Institute of Health and Welfare (AIHW) in understanding types of violence indicates a recognised gap in the understanding about violence perpetrated against sex workers, stating:

“There are other forms of sexual violence that may not be captured in existing measures of sexual assault, harassment or abuse. Limited data are available for these forms of violence, however, they remain a key focus in a growing body of research and are considered in scope for the *National Plan to End Violence against Women and Children 2022–2032, including:.....*

- ...forms of sexual assault experienced by sex workers.

A more general discussion about data gaps can be found in Key information gaps and development activities.”³⁸

We note however that when reviewing the “key information gaps and development activities” as reported by AIHW, there is a list of 9 key population groups, which does not include sex workers³⁹ – a concern, if sexual violence perpetrated against this priority cohort is not currently considered as a gap needing to be further understood.

While we have at various times approached peaks and services that deliver MBCP programs, we have not been successful in engaging directly on this topic. Given that there has been a recent announcement that national standards are to be developed

³⁷ Relationships Australia NSW Website; Taking Responsibility – Men's Behaviour Change Program; [Who It's For](#)

³⁸ Australian Institute of Health and Welfare website; Family, Domestic and Sexual Violence; Types of Violence; [Sexual Violence \(last updated 24 February 2026\)](#)

³⁹ Australian Institute of Health and Welfare website; Family, Domestic and Sexual Violence; Resources; [Key Information Gaps and Development Activities](#)

and implemented across MBCP programs⁴⁰, we see an opportunity for examination of core delivery materials to include consideration of violence against priority communities, linked to obtaining a greater understanding of the perpetration of violence and exertion of power against these groups. Further, there may be opportunities for development of interventions specifically aimed at people who use violence against sex workers.

We acknowledge that the high level of confidentiality afforded to sex work customers, which can be weaponised to perpetrate violence and evade consequences, is a significant factor in the lack of data about perpetration. The stigmatisation of sex work in general serves to obscure this critical understanding. In jurisdictions where sex work remains criminalised, this understanding is even further obscured.

In relation to the perpetration of sexual exploitation, there are different distinctions in the perpetration methods, and identification of perpetrators. Where sexual exploitation meets the criteria of sexual servitude or slavery, crimes articulated in Divisions 270 and 271 of the Commonwealth Criminal Code (found in the Schedule to the *Criminal Code Act 1995 (Cth)*), this is considered a form of modern slavery. Perpetration is often through the exercise of coercion and elements will have similarities to intimate partner violence, and will often include a significant level of deceit. There is an additional factor of **perpetrator gain from labour or services of the victim survivor**, including sexual services. Perpetrators can be intimate partners or family members, and can also be third parties, managers or operators of sex work businesses. Perpetrators target victims, often by identifying specific vulnerabilities which will then be utilised to reduce the level of coercion required to be effective, may introduce new vulnerabilities such as coercion to use substances⁴¹, will normalise the exploitation using deception, and are **motivated by financial or other benefit**.

In understanding and therefore responding to perpetrators, this ‘benefit’ is essential to be understood, and differentiates from power dynamics in relationship contexts. It is also important to understand that because of the benefit, there can be complex structures in perpetration involving the selling of ‘courses’ or information about how to exploit women⁴², including for financial or other gain⁴³. There can be ‘pyramid’ structures in place involving organised crime, with intersections with selling illegal drugs and gambling⁴⁴.

⁴⁰ Long, C; ABC News online; [“Men’s behaviour programs could soon face new rules under federal government push”](#) 7 August 2026

⁴¹ Draper, I. & Albalba, D. Psychiatric Times. [The Confluence of Human Trafficking, Drug Trafficking, Militias, and Substance Use](#) (2024)

⁴² O’Neill, R. (2018). *Seduction: Men, Masculinity and Mediated Intimacy*. Cambridge, UK: Polity Press.

⁴³ Vandoorne, S. et al; CNN online; [Exposing a global ‘rape academy’](#), 26 March 2026

⁴⁴ Koroleva, A. Organised Crime and Corruption Reporting Project (online); [UN Report Details Southeast Asia’s Interconnected Criminal Economy](#), 21 July 2026

The predication of exploitation also relies upon a business model involving customers, in an environment where these customers would have many more ethical and legal options to access sexual services. This means that the business model relying on exploitation needs to either be reliant on supplying low-cost services (resulting in no or little income for the victim of the exploitation), and/or supplying otherwise unavailable services that sidestep worker's safety and rights, such as non-consensual, high risk or violent acts. As we described at the outset of this paper, the difference between consensual sexual services and exploitation is always tied to consent. When it comes to detection of exploitation, for women and gender diverse people with experience in the sex industry, their exploitation may be obscured by stigma or assumptions that sexual harm is inevitable, less serious, or harder to evidence.

Currently, responses to those responsible for the perpetration of sexual exploitation sits entirely within law enforcement and the justice system. Given the low levels of identification, investigation and prosecution of modern slavery crimes⁴⁵, there will be many perpetrators undetected and undisrupted. However, there are likely to be some perpetrators of sexual exploitation who will be identified through the family violence system, including by law enforcement. It is likely that some will be directed to MBCP programs, in cases where intimate partner violence has been identified, but the nature of the exploitation is not understood. In our view, it is important that responses to perpetrators need to consider the potential that they have been perpetrating exploitation and how this changes the dynamic. We acknowledge the lack of research and evidence available in this area, but are concerned that given the motivation for financial gain, perpetrators may seek to weaponize behaviour change programs, would likely understand how to mask engagement with the program to appear to be positively engaging, and may also exercise the opportunities to recruit others into their exploitation schemes. Caution and appropriately delivered risk assessments that either exclude perpetrators of exploitation from these MBCP programs or direct them to a program tailored for people whose perpetration methods involve sexual exploitation, should be considered. As a tailored program does not currently exist, development of such programs should also be considered.

Recommendations – Part 4

Recommendation 4.1: Invest in research and data on people who use violence against sex workers and the intersection with perpetrators of intimate partner violence, potentially through current perpetration studies underway or planned. Use these findings in development of responses, including consideration in the development of national standards for Men's Behaviour Change Group programs.

⁴⁵ Doherty L & Dowling C 2026. [Strengthening Australia's criminal justice response to modern slavery: A rapid assessment](#). Special reports. Canberra: Australian Institute of Criminology.

Recommendation 4.2: Ensure the development of national standards for Men's Behaviour Change include consideration of violence perpetrated *against* priority communities, recognising the distinction from identifying the communities to which persons using violence themselves belong. Include targeted specialist services and community grassroots organisations in the development of these standards and require those services delivering MBCP programs to engage in professional development to understand the experiences of violence of victim survivors from diverse priority communities.

Recommendation 4.3: Invest in research and data on perpetrators of sexual exploitation and their methods, putting a face to these perpetrators and using this information in response programs and in prevention education. Consider commissioning research with the Australian Institute of Criminology in particular, who have a strong understanding of both modern slavery and of family, domestic and sexual violence.

Recommendation 4.4: Consider the perpetration of sexual exploitation explicitly in assessment and intake procedures for mainstream MBCP programs, ensuring risks of non-engagement in programs are managed, and that potential recruitment of other participants into exploitation schemes is considered. Develop targeted behaviour change programs for men, and for boys, who are engaging in, and who are at risk of engaging in perpetration of sexual exploitation (including those who have been groomed to do so).

Recommendation 4.5: Ensure all accountability responses designed to detect violence against and exploitation of sex workers do not increase unnecessary surveillance, criminalisation or service exclusion for the very groups they are intended to protect.

5. System integration and workforce

We have outlined in detail within our response in section 1 the needs and challenges arising regarding responding to violence against women and gender diverse people in the sex industry. We acknowledge that the FDSV system in Victoria does recognise people in the sex industry as a priority community which has provided a more targeted response to this community compared with other states and territories in Australia. Our recommendations for further improvement are largely included in our section 1 consultation response.

Regarding sexual exploitation, state based family and sexual violence systems are not set up to address the needs of people who have experienced sexual exploitation, or servitude as defined under the Criminal Code. We have provided a comprehensive overview in section 1 of what these needs are and how they are not met in state based

systems. In our view, one of the main drivers of this disparity is that there is no acknowledgement of these needs within the Federation Funding Agreement between the Commonwealth and States (which outlines FDSV funding provided to states and the broad application that is required of this funding). Without this express inclusion, there are no key performance indicators regarding these forms of gender-based violence and states will only implement specific measures if they decide to do so, without accountability to the Commonwealth for any funding being applied for this purpose.

In our view, this is connected with assumptions that the Support for Trafficked People Program (and the Additional Referral Pathway pilot) are complete solutions for these experiences, when they are not. They are reliant on state based systems for identification and referral, as the STPP and ARP themselves are not embedded in communities; they are reliant on state based systems for basic safety needs such as crisis accommodation; and they are reliant on state based systems for long term recovery, as the Support for Trafficked People Program is based on a 90 day service model, with limited opportunities for extension of support. This system design also relies on these programs being adequately culturally sensitive and possess sufficient competence in working with specific communities such as people with experience in the sex industry, migrants and people who identify as LGBTIQ+ (including people who identify as transgender). While collaborative practice can be utilised to improve the cultural sensitivity of responses, this again relies on state funded services to exist and have capacity to provide this collaboration.

In practice, there are challenges arising due to the emphasis (and sometimes sole objective) within state based systems on responding to intimate partner violence. Where sexual exploitation occurs, we have seen people unable to access state based supports, including those designed for immediate safety, because the perpetrator is not considered to be an intimate partner and the exploitation classified as ‘community violence’ *even where there is an ongoing nonconsensual sexual relationship occurring between the perpetrator and victim survivor, and/or where they are living under the same roof, simply because they are not ‘in a relationship’ beyond the exploitation experience.* This has been the case even though exploitation is perpetrated through coercive control, understanding and exploiting the vulnerabilities of the victim survivor and often involves repeated, systematic violence that goes far beyond the label of ‘community violence’.

Additionally, survivors seeking safety to exit situations of exploitation face barriers. We note that the Australian government *does not fund any safe houses for modern slavery survivors*, with the only trafficking safe house in Australia being a small facility for women, run by a non-government organisation without government funding. Improving a coordinated response to exploitation, particularly within a framing of a cost of living and housing crisis, needs serious consideration. Currently the system is excluding

people by design – limiting state based supports and creating barriers to safety, including for women and young people who are experiencing extreme violence through servitude and other forms of modern slavery where an ‘intimate partner relationship’ is not easily evidenced to satisfy the criteria imposed by state based systems. Often, access to safety is achievable only through the individual responses of particular refuge providers who have a greater understanding of exploitation and can provide the appropriate level of crisis and safe accommodation, sometimes needing to work around the current system design in order to do so.

It is important to also acknowledge that to date, the human trafficking response framework in Australia as articulated by prior National Plans⁴⁶ has been based around the United Nations Palermo Protocol agreement on addressing human trafficking, which naturally centres the responses of *countries* to a *crime type*. While responses to survivors is included as one objective, this response to survivor needs is then not further broken down as prevention, early intervention, response and recovery as generally described in FDSV response systems. This has impacted the way that support systems are designed in the modern slavery/human trafficking sector, and therefore funded, with prevention and early intervention largely framed within a justice model rather than a support and community engagement model. The response to survivors has been historically built around legislation, rather than survivor experience and support. An illustrative example of this is that until July 2024 (and only after intensive lobbying by members of the National Roundtable on Human Trafficking and Slavery over many years in order to establish the Additional Referral Pathway), referral to the Support for Trafficked People Program was a responsibility solely of the Australian Federal Police. Further, there has been very limited focus on the gendered nature of human trafficking crime types in Australia and tailoring of programs accordingly.

Systems responding to gender-based violence across Australia are disparate, varying by state, region, and type of violence. One challenge that faces service providers, particularly service providers that are established to provide specialist services to a targeted community, is evaluation of impact. A great deal of the influences of impact is beyond the control of a small service provider, and funding is very restrictive, rarely allowing for adequate evaluation to be embedded or invested in programs. A better approach would be to design larger whole of systems evaluation that *includes* targeted specialist service responses but does not overly burden small specialist organisations with this responsibility, especially where this comes with an implication that it is about proving that the organisation should exist at all, rather than an emphasis on improvement to service provision to victim survivors. Methods of evaluation should inherently encourage collaboration, rather than competition and siloing.

⁴⁶ Australian Attorney General’s Department; [National Action Plan to Combat Modern Slavery 2020–25](#)

Further, systems design needs to go well beyond ‘no wrong door’ - which should really be seen as the minimum expectation of a system. System design needs to be examined on a macro scale, incorporate lived experience viewpoints and look at whole of system improvements that are not within the control of single service providers. In doing so, consideration of the best point of contact for priority, marginalised communities needs to be specifically considered, because while there should not be any ‘wrong door’, often there will be much ‘better doors’ that involve tailored responses and provide a deeper understanding of a person’s very specific cultural identity or experience. Consideration also needs to be made of the structural barriers that serve to limit (and at times punish) individuals for experiencing challenges out of their control, or situations where the individual does not conform to a societal norm.

As outlined in our section 1 response, we reiterate that:

- Funded systems need to consider innovative and integrated service delivery approaches, and not be restricted by the design of the funding itself;
- Government funding needs to recognise the government’s responsibility to fund organisations and programs designed for marginalised communities or people with stigmatised experiences (such as addiction), and recognise the limitation that such organisations and programs have in accessing philanthropy, especially faith-based philanthropy. If responsibility to ensure the ongoing service provision to marginalised communities is transferred to philanthropy, this will mean that unelected bodies have the power to determine which members of the community are eligible to receive services and which are not. While some philanthropy is undoubtedly progressive and willing to support marginalised communities, many philanthropic bodies are less so.

We also express concern regarding the visible commitment of governments at the state and commonwealth level to prioritise and invest in systems that prevent and respond to gender-based violence. Consistent acknowledgement of the importance of this issue would provide hope for women and gender diverse people that their safety is indeed a priority. In Victoria, there have been seven different Ministers for the Prevention of Family Violence in four and a half years. In a period that spans from a year before the last election in 2022 to the present time (three months before the next election), and when the presiding government has a parliamentary majority, this has resulted in a message that the issue is not a government priority. Lack of statements from governments where significant acts of violence against women have occurred have not aided in this impression. The lack of any statement from Commonwealth ministers regarding the release of the Epstein files or a statement at the time regarding supports for people in Australia who have experienced sexual exploitation indicated a lack of understanding that when high profile cases are reported on, victim survivors look to their governments for messages of safety and support. Any action plan supporting a

framework that has the ambitious and important goal of ending violence against women and children should include clear actions for the government at all levels, and how Ministers, including the Prime Minister, should engage with this issue.

Workforce considerations

The challenges of insecure funding across the FDSV sector are well documented and spoken about frequently, and yet, they persist. It should not go unsaid that as part of this, there is an additional burden placed on a workforce of (largely) women supporting women who are victim survivors of gendered violence.

While there is celebration of the government's work on gender equity in the workplace, and consideration of gender responsive budgeting, this is not framed in the same conversation as the acknowledgement that there is a large proportion of women in the workforce who are constantly exposed to vicarious trauma directly, supporting women and gender diverse people who have experienced violence which is overwhelmingly perpetrated by men. This workforce includes a large (mostly undisclosed) proportion of women who have directly experienced gender-based violence themselves. They work in an environment of insecurity due to funding variability, and yet they contribute extensive unpaid hours. The work can be brutal, and the rate of burnout is high. In these ways, women are 'picking up the tab' of men's entitlement.

This impost on women is not measured and not considered in workplace gender equity evaluations that look at pay rates and hours alone. Gender responsive budgeting that looks at individual government projects, rather than taking a broad view that the proportion of spending on ending violence against women and children is tiny compared with other budgets, is not effective gender responsive budgeting. A recognition that funding *any* project that doesn't reduce violence against women and children is taking funding away from this activity should be built into gender responsive budgeting across the board until this violence is, in fact, ended. There can be no gender equity without it.

As an organisation, an extraordinary amount of our personal energy has had to be expended trying to continually prove our worth to advocate for funding that approaches our baseline costs. We have experienced the replication of patriarchal structures that underpin the dynamics of working within an FDSV system that, in our case, has relied on the unpaid labour of women to keep an organisation functioning, and have experienced the personal cost of this structural failure.

With sufficient funding in the FDSV sector, and the workforce adequately supported, real change is possible. The bottom line is that with insufficient funding, violence will continue, and the individuals working hard to respond to it and end it, will continue to also experience structural harm.

Recommendations – Part 5

Recommendation 5.1: Acknowledge in the Second Action Plan that Commonwealth modern slavery programs rely on state based sexual violence, housing, health, migration and community support systems, and that this reliance must be planned for and funded rather than assumed. Ensure that access to safe crisis accommodation is funded and available to victim survivors of modern slavery and not restricted only to where perpetration is by intimate partners.

Recommendation 5.2: Redesign the system of response to Human Trafficking and Slavery to be from a victim survivor perspective and to align with the continuum of care as understood and evidenced by the family violence system. Utilise opportunities to undertake redesign that is survivor led.

Recommendation 5.3: Fund specialist organisations to provide long term recovery for victim survivors of modern slavery, supporting the Commonwealth modern slavery response. This should include specialist sexual violence counselling.

Recommendation 5.4: Build workforce capability across state-funded systems so services can recognise sexual exploitation, respond without judgement to sex industry experience, and distinguish between consensual sex work, sexual violence and exploitation without conflation.

Recommendation 5.5: Monitoring of both the Second Action Plan and the responses to Human Trafficking and Slavery should be designed to complement one another in order to understand if the interfaces are effective. Monitoring of the plan should be visible and based on clear outcomes. Evaluation of effectiveness should be at the systems level and not unduly burden individual, small organisations that are not in control of system inputs.

Recommendation 5.6: Fund systems and services from a lens that truly prioritises the ending of violence against women and children as a fundamentally necessary outcome. Ensure the system does not perpetuate patriarchal structures from within, does not rely on the unpaid labour of women, and recognises the real risks of vicarious trauma and burnout that have an individual cost and act as a barrier to meaningful outcomes.

Recommendation 5.7: Include actions in the Second Action Plan that involve government ministers at the highest levels both in Commonwealth and State governments, including responsibilities for delivering meaningful community messaging and for transparency of data regarding violence against women and children.

Learning From Experience: The Role of Economic Empowerment in Preventing Exploitation (2025)

Community consultation undertaken in partnership between Project Respect, Survivor Connections and Fair Futures, funded by the Australian Government under the Community Crime Prevention Program: National Action Plan to Combat Modern Slavery 2020-25 Grant Program Round 2. Survivor led process (by Survivor Connections). Interview with 18 survivors of modern slavery.

Improving service pathways: The COVID-19 pandemic and the experiences of women and gender diverse people in the Victorian sex industry (2024)

Research undertaken by Project Respect with funding from Family Safety Victoria. Concentrates on the example of Covid-19 as a disruptor, and what this meant for people in the sex industry in Melbourne during the Covid-19 lockdowns, examining impacts on work, life, experiences of violence and access to services. Mixed methodology study.

Sexual exploitation in Australia: Victim-survivor support needs and barriers to support provision (2023)

Research undertaken by the Australian Institute of Criminology with support from the Australian Red Cross and Project Respect. Examines the support needs of victim-survivors of sexual exploitation, and where unmet need exists.

1. Funding models that recognise the specific needs of marginalised groups, such as women and gender diverse people with experience in the sex industry. This funding needs to allow for safe integration of, and codesign with, lived expertise.
2. Prioritising training around the support needs of people in the sex industry for practitioners in mainstream and specialist service support in order that specialist knowledge can be effectively transferred.
3. Prioritising and making supports related to crisis and safety available to temporary visa holders in line with that of the general population, to reduce vulnerability to violence and exploitation of temporary migrants.
4. Targeted focus and plan for early intervention and prevention of violence against people in the sex industry that does not rely on generalist approaches. This plan should include human rights-based worker protections and capitalise on the positive aspects of decriminalisation of the Victorian sex industry – not enable men’s use of violence with impunity. An environment encouraging whole of community engagement in the safety of women and gender diverse people in the sex industry will need to be developed.
5. Developing methods of reporting workplace violence and exploitative workplace conditions for people in the sex industry in ways that are accessible, culturally considered, can be anonymous, and are responsive, without the threat of punitive workplace outcomes. This will require workplace regulatory authorities, such as WorkSafe, to engage with proactive enforcement of workplace rights, while understanding that making guidance available does not equate to either access or compliance by those with power in workplaces.
6. Ensuring responses to perpetrators of violence against people in the sex industry include effective measures for accountability and prevention.
7. Recognising the distinct and interconnected forms of violence and abuse that can be experienced by women and gender diverse people in the sex industry, and the impact of this violence on their safety and wellbeing.
8. Including lived experience in codesigned responses at the micro level, and in designed responses at the macro/ systems level. Responses need to consider violence by known or unknown perpetrators beyond a narrowly interpreted family violence context.
9. Centring perpetrator accountability for violence against women and gender diverse people in the sex industry.

10. Recognising the diverse backgrounds and experiences of women and gender diverse people in the sex industry and the barriers to support they experience, including and beyond stigma and discrimination.
11. Investing in responses tailored to the support needs of women and gender diverse people in the sex industry who have experienced violence. This includes funding for targeted specialist services, such as sexual assault services, that include evaluation of the effectiveness of their support for priority communities, and time to embed change to counter decades of inadequate responses.
12. Investing in improvements to cultural competency for frontline workers in mainstream and specialist support services that encompasses understanding of the experiences of people in the sex industry, including migrant and multicultural populations.
13. Investing in improved mechanisms for feedback and consultation with lived experience to improve the responses of specialist sexual assault services and alignment with the complex needs of people with experience of sexual violence. These consultation models require funding to pay lived experience panels for their expertise.
14. Invest in resourcing for, and accessibility of, trauma-informed, longer-term recovery and healing from violence for women and gender diverse people with experience of the sex industry.
15. Invest in improvements to collaborative models of care that encompass secondary consultations and joint case management with targeted specialist organisations, including integrated waitlist management strategies.
16. Investing in, and enhancing access pathways to, specific mental health programs designed to provide long-term recovery care to victim survivors of sexual violence with complex trauma, including people with experience of the sex industry.
17. Invest in specific training and resourcing to health care professionals to ensure competence and confidence in proactively advising referral pathways to people with experience of the sex industry who have also experienced violence.

The following is material provided to Project Respect from a person with lived experience both of working in the sex industry, and of modern slavery. The contribution was made with a request for anonymity. The information below has been included with consent of the provider and is attributed to them as work they have undertaken to compile this information, based on their own experiences.

There is a deep-seated need to strengthen understanding of the lived experiences of sex workers and of victim-survivors of sexual exploitation. Sex workers can experience distinct and ongoing forms of violence and exploitation that require targeted recognition within the second action plan. There is an urgent need to acknowledge the realities of sex work, including violence that can be perpetrated by clients, third parties, intimate partners, family members, and others who seek to exploit vulnerability.

While sex workers attempt to consistently exercise agency by refusing bookings they do not want, it remains far too common for them to experience violence within their workplaces. This violence can be subtle or overt, coercive or manipulative, yet it is often normalised as part of daily work. Too frequently, sex workers endure repeated abuse, are expected to continue working, and feel compelled to remain silent in order to survive.

In relation to exploitation, a survivor-centred approach requires recognition that exploitation does not always occur through physical force. It often occurs through manipulation, financial control, deception, fraud, coercion, abuse of unequal power and racketeering. This abuse can also be facilitated through technology, digital infrastructures including the use of Artificial Intelligence (AI), and other forms of technological facilitated abuse.

1. Sexual Exploitation

Sexual exploitation should be recognised as any situation where a person obtains access to sexual labour involving financial benefit to the perpetrator. Control may be obtained through coercion, deception, abuse of vulnerability, manipulation, intimidation, threat or exertion of unequal power. Grooming may occur leading up to this control.

The experience of sexual exploitation may include rape and sexual assault, coercive sexual activity, trafficking, servitude or slavery, forced sexual activity, psychological exploitation, emotional abuse and financial exploitation. Exploitation may occur

through deliberate non-payment for sexual services. Sexual exploitation is not defined only by physical violence.

It is possible for exploitation to occur from any of the following parties: clients in the sex industry; third parties in the sex industry (including business owners, agents and others); intimate partners, or family members.

Where exploitation does occur within the sex industry, exploitation may occur before, during or after a sexual service.

2. Recognition of Client-Perpetrated Violence Against Sex Workers

The second action plan should explicitly recognise violence perpetrated by clients against sex workers. Clients may exploit workers experiencing vulnerability as part of this perpetration of violence.

Client-perpetrated violence includes:

- deliberately obtaining sexual services without intending to pay
- refusing payment after services have been provided
- using deception to obtain services
- coercing workers into services outside negotiated agreements
- ignoring or violating agreed boundaries
- threats of violence
- intimidation
- stalking
- harassment
- threats to expose a worker's identity
- recording without consent
- technological surveillance
- use of AI-enabled devices or cameras without consent

Where a client intentionally refuses payment after receiving a service, this should not be viewed only as a civil or contractual matter.

3. Financial Exploitation

Financial exploitation should be recognised as a form of gender-based violence. There are forms of this violence that are specific to the sex industry. Financial abuse frequently occurs alongside psychological abuse and coercive control. The second

action plan should recognise that economic harm can have long-term consequences for safety, independence and wellbeing.

Within the sex industry, financial exploitation includes:

- clients refusing payment
- agencies or third parties withholding earnings
- excessive deductions from income by employers/business owners
- controlling access to earnings
- creating financial dependency
- debt manipulation
- requiring unpaid labour
- threatening workers financially
- exploiting workers because of economic hardship
- forcing workers to accept unsafe conditions due to financial pressure.

4. Third-Party Exploitation Within the Sex Industry

The second action plan should recognise the role of third parties in facilitating exploitation of sex workers. These actions may be direct, or may be implemented to protect their own interests above that of the worker. Third parties who benefit from workers' labour should have responsibilities that extend to preventing exploitation, and responding appropriately if harm occurs.

Third parties may include:

- agencies
- brothel owners and venue operators
- managers
- reception staff
- recruiters
- advertisers
- drivers and/or security personnel
- intimate partners or other family members
- mentors or other sex workers.

Exploitative practices may include:

- withholding payment or making excessive financial deductions
- controlling earnings

- facilitating unsafe working conditions
- failing to respond to reports of violence
- allowing known violent clients continued access (prioritising monetary gain)
- preventing workers from seeking support and discouraging reporting
- exploiting dependency

5. Grooming

Grooming should be recognised as a process of building trust, dependency or influence for the purpose of exploitation. Grooming can occur against children and adults. Recognition of grooming is essential because exploitation often develops gradually rather than through immediate violence. Within the sex industry, grooming may be perpetrated by:

- clients
- partners, former partners or family members
- agencies, recruiters or managers
- mentors or other sex workers.

Grooming behaviours may include:

- offering gifts
- promising opportunities
- offering financial support
- providing accommodation
- presenting as a protector or mentor
- creating emotional dependency
- isolating a person from support networks
- normalising exploitative behaviour
- gradually increasing control.

6. Vulnerability and Intersecting Experiences

The second action plan should recognise that vulnerability is complex and often cumulative. A person's vulnerability should never be interpreted as consent to exploitation. Services and systems should recognise that previous trauma may increase the risk of further victimisation. Sex workers may face increased vulnerability due to:

- previous sexual violence
- childhood abuse
- domestic and family violence
- trauma histories
- neurodivergence
- substance dependence
- homelessness
- financial hardship
- migration status
- social isolation and lack of support networks
- young age

7. Neurodivergence and Exploitation

The second action plan should specifically recognise neurodivergent people as a group that may face increased risk of exploitation within the sex industry. Service system responses should ensure that neurodivergent people should be provided accessible information, and be provided appropriate communication. There should be specialised training for professionals and system recognition of neurodivergent experiences. Neurodivergent sex workers may experience:

- difficulty identifying unsafe behaviour
- increased trust in others
- communication barriers
- vulnerability to manipulation
- challenges accessing services.

8. Substance Dependence and Exploitation

Substance dependence should be recognised as a factor that may increase vulnerability to exploitation. Responses should be trauma-informed and avoid approaches that increase harm or discourage disclosure. People experiencing substance dependence may face:

- increased financial vulnerability
- coercion by others
- dependency on exploitative relationships
- barriers to reporting violence
- stigma within service systems.

9. Modern Slavery and Trafficking

Modern slavery should be expressly recognised within the second action plan, and within gender based violence frameworks. Modern slavery includes situations where a person is controlled through coercion, threats, debt, deception, psychological abuse, financial control, exploitation of vulnerability, restrictions on freedom and monitoring and surveillance.

10. Evidence Collection and Reporting

Victims often face significant barriers to reporting exploitation. Technology should support victim safety while protecting privacy. The second action plan should support:

- safe digital tools to record evidence
- accessible reporting options
- trauma-informed investigations
- improved referral pathways
- collaboration between police and specialist services.

11. Accountability and Justice Responses

Victim-survivors often experience significant delays and barriers within justice systems. Improvements should include:

- faster responses to reports of violence
- survivor-centred investigations
- improved accountability systems
- stronger coordination between services
- recognition of non-physical forms of harm
- Where children engage in harmful sexual behaviours, responses should include accountability alongside therapeutic intervention, family support and prevention.

12. Workplace Accountability and Prevention

Sex workers should be recognised as workers entitled to safety, dignity and protection from violence. The importance of safe workplaces should be considered in the second action plan.

To strengthen workplace accountability and prevent exploitation, the following actions are recommended. These are based on gaps in current practice:

- Align sex work workplaces with Environmental, Social, and Governance (ESG) standards and frameworks to ensure ethical, transparent, and socially responsible operations
- Conduct regular workplace safety audits and routine inspections to identify and address risks of exploitation
- Review business models and pricing structures regularly to detect hidden opportunities for exploitation or coercion
- Prohibit exploitative business models where third parties take 50/50 or higher profit shares, or impose additional costs on sex workers including charges for drivers, security, transport, administrative fees, banking, or EFTPOS-facilitated transactions that result in unequal profit margins
- Investigate exploitation risks within workplaces and supply chains, ensuring accountability for all parties involved
- Establish clear reporting pathways for workers to safely disclose abuse, coercion, or exploitation
- Provide education about workplace rights, including fair pay, safety, and anti-discrimination protections
- Ensure accessible information for migrant workers regarding visa rights, workplace protections, and support services
- Define clear responsibilities for businesses and third parties to actively prevent exploitation and uphold human rights

Brothels and agencies must operate under clear and ethical guidelines that prioritise worker autonomy and prevent coercion. This approach ensures that all service promotion respects worker autonomy, prevents coercion, and upholds informed consent within the workplace. These guidelines should include:

- Standard services may be promoted by the business only when they reflect the basic service structure for example, sex, oral services, and massage
- Additional or specialised services (such as “deluxe” or “premium” offerings) must not be promoted or defined by the business. These services should be determined and administered solely by the sex worker
- Sex workers must retain full control over the list of services offered and associated costs, communicating these directly to clients without interference or pressure from management or third parties
- Regulatory bodies should monitor compliance through licensing, workplace audits, and transparent reporting mechanisms to ensure that promotional activities align with ethical and human-rights standards

13. Education and Awareness

Prevention of violence and exploitation requires education across communities and services. Such education should include education around coercive control, grooming, psychological abuse, financial abuse, sexual exploitation, modern slavery, neurodivergence and trauma.

Approaches to education should include active learning, role-playing, case scenarios and practical examples. Education should occur (as appropriate) across schools, health services, police, legal services, workplaces and community organisations.

14. Technology, Surveillance and Consent

The second action plan should consider emerging technologies that may increase risk. These include AI-enabled glasses, hidden recording devices, digital surveillance and non-consensual image recording. Workers should be provided clear rights regarding consent, privacy, recording and surveillance.

Conclusion

The second action plan provides an opportunity to ensure that gender-based violence frameworks reflect the full experiences of women and children, and be inclusive of sex workers. Sexual exploitation must be understood as extending beyond physical violence to include psychological, financial and coercive forms of abuse.

Sex workers and organisations representing survivors of modern slavery should be meaningfully included in policy development to ensure responses are practical, evidence-based and reflective of lived experience.

A stronger focus on prevention, education, accountability and survivor-centred responses will improve Australia's ability to prevent exploitation and support those affected by violence.