

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

Prepared by

Sisters Inside

National Network of Incarcerated and Formerly Incarcerated Women and Girls

Executive Summary

Sisters Inside and the National Network of Incarcerated and Formerly Incarcerated Women and Girls welcome the opportunity to contribute to the development of the Second Action Plan under the National Plan to End Violence against Women and Children 2022–2032.

For decades, our organisations have worked alongside women and girls who have experienced domestic, family and sexual violence, criminalisation, imprisonment, child removal, homelessness and profound social exclusion. Our submission is informed by the lived expertise of criminalised and formerly incarcerated women and girls, decades of frontline practice, advocacy, policy development and international human rights engagement.

We welcome the consultation paper's recognition that violence against women and girls is shaped by gender inequality, intersecting forms of disadvantage and structural barriers to safety¹. We also welcome its commitment to improving prevention, strengthening responses for victim-survivors and building more integrated systems. However, we are concerned that the proposed priorities overlook one of the populations most profoundly affected by violence: criminalised and formerly incarcerated women and girls.

Women and girls in prison are overwhelmingly survivors of violence². Many have experienced childhood abuse, sexual violence, coercive control, homelessness, poverty, racism and child removal long before entering prison³. Rather than interrupting these experiences, state intervention frequently compounds them. Strip searching, imprisonment, separation from children, housing exclusion after release and discrimination associated with criminal records are not disconnected policy issues. They are part of a continuum of violence that shapes many women and girl's lives.

¹ <https://engage.dss.gov.au/wp-content/uploads/2026/05/second-action-plan-consultation-paper.pdf>

² <https://nit.com.au/10-07-2026/25308/another-woman-has-died-in-a-queensland-prison-there-is-nothing-routine-about-that>

³ https://humanrights.gov.au/_data/assets/file/0024/56724/Sisters_inside_attachment3_redacted.pdf





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Throughout the consultation paper, government institutions are primarily positioned as mechanisms for responding to violence. Comparatively little attention is given to the ways in which women and girls may also experience violence through interactions with racial gendered violence of policing, prisons, family policing systems, immigration detention, or other coercive institutions. A National Plan that seeks to end violence against women should acknowledge these experiences and ensure they are addressed within national policy.

The Second Action Plan presents an opportunity to strengthen Australia's response by recognising criminalised women as a priority population, addressing institutional violence alongside interpersonal violence, investing in community-led and lived experience-led responses, and ensuring recovery extends beyond crisis intervention to include housing, family reunification, economic security and long-term social inclusion.

Violence does not end when the state intervenes. For many women and girls, it simply changes form. A national strategy that aims to end violence against women and girls must be capable of recognising that reality

1. Introduction

Sisters Inside and the National Network of Incarcerated and Formerly Incarcerated Women and Girls welcome the opportunity to provide this joint submission to inform the Second Action Plan under the National Plan to End Violence against Women and Children 2022–2032.

For more than three decades, Sisters Inside has worked alongside women and girls impacted by domestic, family and sexual violence, criminalisation and imprisonment. Through direct service delivery, individual advocacy, systemic reform, research, law reform and international human rights advocacy, we have supported thousands of women and girls across Australia during imprisonment and as they rebuild their lives in the community.

The National Network of Incarcerated and Formerly Incarcerated Women and Girls brings together criminalised and formerly incarcerated women and girls from across Australia to advocate for systemic change. The Network exists because women and girls who have experienced imprisonment possess expertise that is too often overlooked in the development of public policy, despite being directly affected by the systems governments seek to reform.



Our organisations strongly support the National Plan's ambition to end violence against women and children within a generation. We welcome its recognition that violence is shaped by gender inequality, intersecting disadvantage and structural barriers, and that responses must extend beyond crisis intervention to encompass prevention, recovery and healing.

Ending violence against women is not solely a matter of improving service systems. It is also a matter of ensuring that women and girls are able to fully realise their human rights, including the rights to safety, housing, health, family life, equality before the law and self-determination. Violence both causes and results from the denial of these rights. The Second Action Plan should therefore be understood not only as a strategy to improve responses to violence, but as part of Australia's broader human rights obligations.

However, our experience tells us that one group remains largely absent from the conversation: criminalised and formerly incarcerated women and girls.

This absence matters because criminalised women and girls are not a separate population from women and girls experiencing violence. They are among those most profoundly affected by it. Many of the women and girls we work alongside have experienced violence across multiple stages of their lives and through multiple systems. Their experiences challenge conventional policy boundaries that separate domestic and family violence, homelessness, family policing, policing and imprisonment into discrete issues requiring separate responses.

For many women and girls, these experiences are interconnected. Violence does not occur as a series of isolated events but accumulates across the life course, shaped by interpersonal abuse, institutional responses and structural inequality. Policies that address only one part of this continuum risk overlooking the conditions that continue to place women and girls in harm's way.

This submission therefore offers a perspective that is largely absent from the consultation paper: that ending violence against women requires recognising not only the violence perpetrated by individuals, but also the ways institutions, laws and public policy can perpetuate, intensify or entrench women and girl's experiences of violence. It is from this perspective that we offer the following comments on the proposed Second Action Plan.



2. Criminalised Women & Girls: The Missing Population

The consultation paper rightly recognises that violence is not experienced equally. It identifies Aboriginal women and girls and Torres Strait Islander women and girls, women with disability, migrant and refugee communities, LGBTIQ+ people, children and young people, and people living in rural and remote communities as populations who experience heightened vulnerability and face additional barriers to safety and support. This recognition is essential and should remain central to the Second Action Plan.

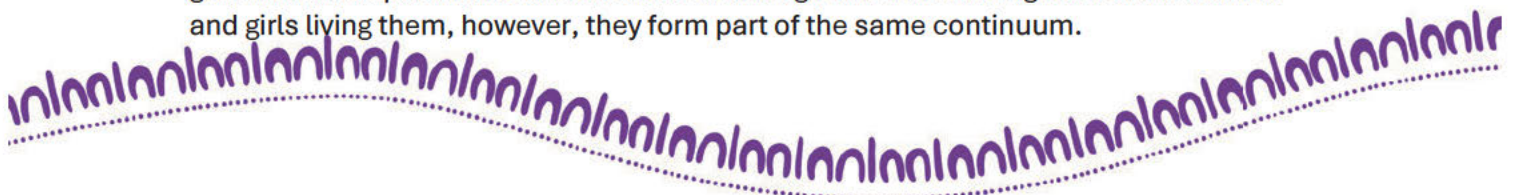
However, one population remains largely invisible throughout the proposed priorities: criminalised and formerly incarcerated women and girls.

This omission is significant because criminalised women and girls are not a distinct group separate from women and girls affected by domestic, family and sexual violence. Rather, they are among those most profoundly impacted by it. Their experiences expose the cumulative effects of violence across the life course and demonstrate how racial gendered violence, poverty, racism, child removal, homelessness, mental distress and criminalisation frequently intersect rather than occur in isolation.

For many women and girls, imprisonment is not the beginning of their contact with violence. It follows years of abuse, coercion, exploitation and systemic disadvantage. Many have survived childhood abuse, sexual violence, intimate partner violence, homelessness and repeated interactions with statutory systems before ever entering a prison. These experiences are well documented and are reflected daily in the lives of the women and girls our organisations work alongside.

Yet the significance of criminalisation extends beyond what happened before imprisonment. The consultation paper largely assumes that violence is something governments respond to through policing, courts and other institutions. Our experience is that state intervention can itself become part of women and girl's experience of violence.

Women and girls may leave an abusive relationship only to become homeless. They may lose custody of their children while trying to escape violence. They may be criminalised for actions directly connected to their victimisation. They may experience degrading practices in custody, barriers to healthcare, prolonged separation from family, and significant discrimination after release because of a criminal record. These experiences are often treated as separate policy issues, managed by different government departments and addressed through different strategies. For the women and girls living them, however, they form part of the same continuum.



This continuum of violence is also a continuum of rights deprivation. As women and girls move through these systems, they often experience the progressive erosion of fundamental rights. The right to adequate housing is undermined by homelessness and housing exclusion. The right to health is compromised through barriers to healthcare, including in custodial settings. The right to family life is disrupted through child removal and prolonged separation from children and kin. Equality before the law is weakened where women and girls encounter the racial gendered violence of policing or systemic bias, while criminal records continue to restrict access to employment, education and community participation long after a sentence has ended. These are not simply failures of service coordination. They are denials of the conditions necessary for women and girls to live free from violence and with dignity.

We encourage the Australian Government to broaden its understanding of violence accordingly. Violence cannot always be neatly divided into interpersonal violence, institutional violence and structural disadvantage. For many criminalised women and girls, these forms of harm reinforce one another over time. Interpersonal violence frequently contributes to criminalisation, while institutional responses can deepen trauma, increase economic insecurity, disrupt family relationships and create new barriers to safety and recovery.

Recognising this continuum is not about diminishing the responsibility of individuals who use violence. Rather, it acknowledges that a National Plan committed to ending violence against women must also consider whether the systems intended to provide safety are themselves producing further harm. This is particularly important for women and girls whose lives are shaped by repeated contact with policing, courts, prisons, family policing and other coercive institutions.

The absence of criminalised women and girls from the proposed priorities is therefore more than an omission of one population group. It reflects a gap in how violence itself is conceptualised. When women and girls whose experiences sit at the intersection of interpersonal violence and state intervention are left outside the frame, opportunities for meaningful prevention, recovery and long-term safety are also lost.

Recognising criminalised and formerly incarcerated women and girls as a priority population would not require the creation of an entirely new stream of work. Rather, it would strengthen each of the existing priorities by ensuring that prevention, early intervention, recovery, accountability and system reform are informed by the experiences of women and girls who encounter some of the most complex and overlapping forms of violence in Australia.



3. Comments on the Proposed Priority Areas

Priority One: Victim-survivors

We support the proposed emphasis on improving safety, recovery and healing for victim-survivors. However, the Second Action Plan should more clearly recognise that victim-survivors do not stop being victim-survivors because they become criminalised.

Many women and girls who enter prison have sought help before. They have disclosed violence to police, hospitals, schools, housing services, family policing agencies or the courts. Too often, these systems respond to the immediate crisis while overlooking the broader conditions that continue to place women and girls at risk. The result is that many women move between violence, homelessness, criminalisation and imprisonment without ever experiencing genuine safety.

For criminalised women and girls, recovery cannot be understood simply as access to crisis services or justice responses. Recovery requires stable housing, secure income, access to healthcare, meaningful employment opportunities, family reunification where appropriate, and freedom from the lifelong consequences that frequently accompany criminal records.

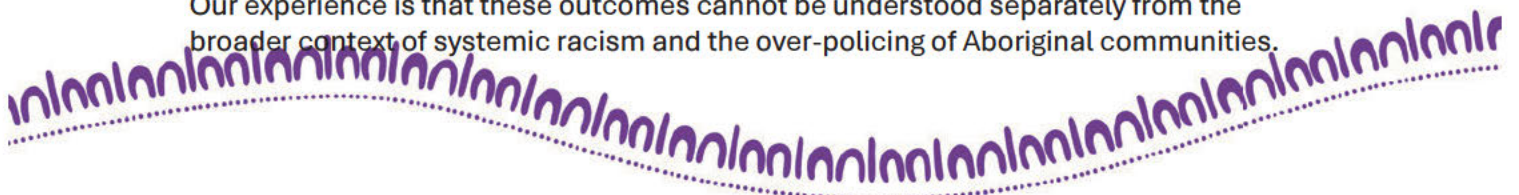
The consultation paper identifies the importance of a "no wrong door" approach to service delivery. That principle should explicitly extend to women and girls with criminal records. Too often, criminalised women and girls encounter closed doors rather than open ones. Histories of imprisonment continue to create barriers to housing, employment, parenting, education and community participation, even where those women are actively rebuilding their lives.

The Second Action Plan should recognise that recovery is a long-term process. Without addressing the structural barriers women and girls face after criminalisation, many remain vulnerable to further violence and exploitation.

The consultation paper should also take greater care in how it understands the criminalisation of Aboriginal women and girls experiencing violence.

Across Australia, there is increasing recognition that Aboriginal women and girls are sometimes racially targeted and identified by police as the person using violence. While this is commonly described as "misidentification", that language risks suggesting an isolated mistake or administrative error.

Our experience is that these outcomes cannot be understood separately from the broader context of systemic racism and the over-policing of Aboriginal communities.



Decisions about who is believed, who is viewed as threatening and who is ultimately criminalised are shaped by institutional practices and racialised assumptions that extend beyond individual incidents.

The focus should therefore move beyond improving police identification processes alone. The Second Action Plan should recognise that the criminalisation of Aboriginal women and girls experiencing violence raises broader questions about the racial gendered violence of policing, institutional accountability and structural racism within justice responses.

Priority Two: Prevention and Early Intervention

The consultation paper appropriately identifies prevention as a central priority. We strongly support this direction. However, prevention must extend beyond changing individual attitudes and behaviours.

The strongest protection against violence is often not a criminal justice intervention after harm has occurred, but the social and economic conditions that enable women and girls to exercise real choices before violence escalates.

Women cannot safely leave violent relationships if there is nowhere affordable to live. They cannot rebuild their lives without adequate income, accessible healthcare, culturally safe support and confidence that seeking help will not automatically result in losing their children or becoming homeless.

Similarly, preventing violence requires reducing the pathways through which victim-survivors themselves become criminalised. Women and girls are frequently prosecuted for offences directly connected to their experiences of violence, poverty, coercion or survival. Prevention strategies should therefore include reducing unnecessary criminalisation and expanding community-based supports that address the underlying drivers of harm.

Investment in community-controlled and lived experience-led organisations should also be recognised as violence prevention. These organisations often engage women and girls long before statutory services become involved and are trusted by women and girls who have experienced significant institutional harm.

Prevention should not be understood solely as preventing interpersonal violence. It should also encompass preventing the institutional conditions that entrench women and girls' vulnerability to violence throughout their lives.



Priority Three: Children and Young People

We welcome the stronger recognition of children and young people as victim-survivors in their own right.

However, the experiences of children whose mothers are criminalised receive little attention.

For many women, violence does not affect only them. It shapes the lives of their children through housing instability, poverty, repeated statutory intervention, parental imprisonment and family separation. These experiences often intersect, with children moving between domestic violence, family policing involvement and parental incarceration in ways that existing policy frameworks tend to address separately.

Supporting children therefore requires supporting their mothers wherever it is safe and appropriate to do so.

The Second Action Plan should place greater emphasis on maintaining family relationships, preventing unnecessary family separation, supporting mothers leaving prison, and ensuring services work with families as a whole rather than responding only after crises have escalated.

Breaking intergenerational cycles of violence requires recognising that children's wellbeing cannot be separated from the wellbeing of their primary caregivers.

Priority Four: People Who Use Violence

We support efforts to strengthen accountability for people who use violence and to expand opportunities for early intervention.

However, accountability should be understood more broadly than individual behaviour alone.

Institutions also exercise power over women. Decisions made by police, corrections, family policing authorities and other government agencies can profoundly affect women's safety, dignity and recovery. Where institutional practices cause unnecessary harm, there should also be mechanisms for accountability, transparency and continuous improvement.



Recognising institutional accountability does not diminish the responsibility of individuals who use violence. Rather, it acknowledges that governments also have responsibilities to ensure their own systems do not reproduce trauma or create additional barriers to safety.

The Second Action Plan should therefore consider accountability at both the individual and institutional level.

Priority Five: System Integration and Workforce

We strongly support improving coordination across systems.

Many women and girls interact with housing services, hospitals, mental health services, family policing, police, courts, prisons and specialist domestic and family violence organisations simultaneously. Poor coordination between these systems often results in women and girls repeatedly telling traumatic stories, navigating inconsistent responses and falling through service gaps.

However, integration alone is not sufficient.

Integrated systems that continue to criminalise, exclude or stigmatise women and girls cannot achieve the objectives of the National Plan. Integration must therefore be accompanied by a commitment to trauma-informed, culturally safe and rights-based practice across all parts of the service system.

The workforce also needs to extend beyond traditional professional disciplines. Women and girls with lived experience of violence and criminalisation possess forms of expertise that cannot be replicated through professional training alone. Their leadership should be recognised not simply through consultation, but through sustained investment in peer-led organisations, governance and service delivery.

Ultimately, the strength of Australia's response to violence will depend not only on how well systems work together, but on whether women and girls experience those systems as places of safety, dignity and respect.

4. Structural Gaps in the Second Action Plan

Poverty is fundamental to preventing violence

The Second Action Plan identifies a range of factors that contribute to violence, including harmful gender norms, substance use, gambling and adverse childhood experiences. These are important considerations. However, the consultation gives



comparatively little attention to poverty and economic inequality as structural conditions that shape women and girls exposure to violence and their capacity to escape it.

For many women and girls, leaving violence is not simply a question of recognising abuse or accessing a service. It is a question of whether they can afford somewhere to live, feed their children, replace essential belongings, pay a bond, access transport or survive financially after leaving a violent relationship.

Poverty does not cause men to use violence. Responsibility for violence always rests with those who choose to use it. However, poverty profoundly shapes women and girls' options. It limits the choices available to victim-survivors, increases dependence on abusive partners and creates barriers to long-term recovery.

This is particularly true for women and girls who have experienced criminalisation. Criminal records, discrimination in employment and housing, limited access to income, and ongoing economic exclusion frequently leave women and girls with few realistic alternatives after leaving prison or violence.

Violence prevention therefore requires more than changing attitudes or expanding crisis responses. It requires sustained investment in the material conditions that enable women and girls to exercise genuine choice, including safe housing, adequate income, secure employment and social supports. Economic justice should be recognised as a core component of Australia's violence prevention strategy.

Institutional violence must be recognised within the National Plan

The consultation paper acknowledges that women can experience violence in institutional settings, yet institutional violence is not meaningfully reflected in the proposed priorities. While considerable attention is given to improving justice responses to violence, comparatively little consideration is given to the ways justice systems themselves can become sites of violence for women and girls.

For many criminalised women and girls, interactions with state institutions are not experienced solely as pathways to safety. Women and girls may encounter degrading practices in custody, barriers to healthcare, prolonged separation from their children, coercive interventions, or environments that compound existing trauma. These experiences can undermine trust in public institutions and discourage future help-seeking.



Recognising institutional violence does not require the National Plan to duplicate the work of corrections, policing or child protection strategies. Rather, it requires acknowledging that women and girls' experiences of violence do not cease when responsibility shifts from an individual perpetrator to a government institution. The Second Action Plan should encourage all government systems that interact with victim-survivors to examine how their own policies and practices may either reduce or contribute to harm.

Recovery must include life after prison

The National Plan rightly places significant emphasis on recovery and healing. However, recovery cannot end when a woman leaves a crisis service, nor can it begin only after she leaves prison.

Women and girls leaving prison frequently return to communities facing extraordinary barriers to rebuilding their lives. Safe housing, employment, healthcare, identification, family reunification and financial security are often difficult to secure in the weeks immediately following release. At the same time, the stigma associated with criminalisation continues to limit access to opportunities that support long-term safety and independence.

Without addressing these barriers, women and girls remain vulnerable to homelessness, poverty, further victimisation and continued contact with the criminal legal system.

The Second Action Plan should therefore recognise successful re-entry as an important component of recovery from violence. Supporting women and girls to establish stable lives after imprisonment is not separate from violence prevention; it is one of the ways violence can be prevented from recurring across generations.

Lived experience must be recognised as leadership

The consultation paper appropriately acknowledges the importance of lived expertise in informing policy development. We welcome this commitment.

However, women and girls with lived experience of criminalisation continue to be underrepresented in national policy discussions about violence against women and girls, despite possessing unique expertise about the intersection of violence, state intervention and recovery.



Too often, lived experience is sought through one-off consultations rather than embedded within governance, implementation and evaluation. This limits the ability of governments to benefit from the knowledge of women who understand how policies operate in practice.

The Second Action Plan should strengthen mechanisms for shared decision-making with lived experience-led organisations, including organisations led by criminalised and formerly incarcerated women and girls. Long-term investment in these organisations is not simply an investment in service delivery. It is an investment in policy that is more responsive, more accountable and better informed by the realities of women and girls' lives.

Conclusion

Sisters Inside and the National Network support the ambition of the National Plan to end violence against women and girls within a generation. The Second Action Plan provides an important opportunity to build on the progress that has already been made while addressing areas where current approaches remain incomplete.

Our central message is straightforward: criminalised and formerly incarcerated women and girls cannot remain on the margins of Australia's national response to violence against women and girls.

The women and girls our organisations work alongside have often experienced violence across multiple settings and throughout different stages of their lives. Their experiences demonstrate that interpersonal violence, institutional practices and structural disadvantage are frequently interconnected. A National Plan that seeks to end violence against women and girls should reflect this reality.

Recognising criminalised women and girls as a priority population, acknowledging the role of institutional violence, strengthening community-led responses and investing in long-term recovery would not alter the objectives of the National Plan. Rather, these changes would strengthen its capacity to reach women who continue to experience some of the highest levels of violence and exclusion in Australia.

The Second Action Plan presents an opportunity to ensure that no woman or girl is excluded from Australia's vision of safety because she has been criminalised or imprisoned. We encourage the Australian Government to seize that opportunity by





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adopting a more inclusive understanding of violence, recovery and prevention, one that recognises the full complexity of women and girls' lives and places those with lived expertise at the centre of lasting reform.

Yours sincerely

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31 July 2026

