

Submission to the Australian Government

Consultation on the Second Action Plan

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

Submitted by:

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About the Author

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His work in relation to domestic violence advocacy focuses on the interaction between behavioural systems, institutional design, and public policy outcomes.

He is also a victim-survivor of domestic and family violence. His lived experience has informed his research into coercive control, systems abuse, and misidentification dynamics within domestic violence response systems.

His work aims to support more accurate, evidence-based, and inclusive policy frameworks that improve outcomes across the full spectrum of harm pathways.

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Re: Submission to the Second Action Plan Consultation

Dear Minister,

I 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*.

I write from two intersecting perspectives:

- as a **policy professional**, with formal training in public policy analysis and design of policy interventions (MPP Economics); and
- as a **victim-survivor of domestic and family violence**, whose experience exposed structural limitations in current frontline and institutional responses.

My professional background informs the analytical framework set out in the attached submission and the design of policy interventions. My lived experience gives me insight as to why those interventions are necessary.

In my own case, fled my house and attended a police station to report sustained domestic abuse, which was corroborated by extensive evidence including documentation, witness accounts, and contemporaneous records. Despite this, the police response did not investigate or review evidence I offered. Instead, initial gender-biased assumptions at the point of contact shaped subsequent institutional engagement, which treated me as a presumed perpetrator for 8 months before police eventually looked at the evidence I had offered to provide. It was only after they looked at the evidence that they recognised they had misidentified victim and perpetrator. My abuser was then charged and convicted.

The consequence was not only a failure of protection, but a prolonged period in which institutional processes became entangled in, and became a weaponsized part of, the dynamics of the abuse itself. False allegations, reputational harm, and engagement with police and legal systems formed part of the coercive dynamic, with significant impacts on my safety, health, and wellbeing.

Over time, the absence of early, structured investigation allowed harm to escalate and persist. Ultimately, the position taken by authorities was reversed without reliance on additional new evidence, indicating that the relevant information had been available but not systematically engaged with at the point of first response.

This experience is not presented as an isolated grievance. Rather, it highlights a broader **system design issue**: when response frameworks are optimised for direct, incident-

based harm, they are necessarily less effective in cases where coercive control is indirect, cumulative, or structured to influence institutional processes.

Clearly, we need to design a system capable of responding to multiple presentations of harm. The current system which largely ignores the risks associated with indirect coercive control leaves open pathways of escalation to physical violence in which the DFV system is complicit through poor design and inadequate response.

The submission that follows translates these observations into a structured policy framework. It proposes targeted reforms – particularly in early-stage intake, behavioural assessment, and recognition of systems abuse – to improve accuracy, reduce misidentification risk, and enable earlier intervention across a wider range of harm pathways.

I offer this submission in the spirit of constructive reform. Australia's domestic violence framework has achieved significant progress, particularly in protecting those at risk of severe physical harm caused by direct aggression. The recommendations outlined here are intended to complement and strengthen that framework by extending its reach to less visible, but equally consequential, forms of abuse.

Thank you for considering this submission.

Yours sincerely,

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Introduction

I 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.

Australia's domestic and family violence (DFV) system has achieved substantial progress over recent decades. Reforms recognising coercive control, strengthening early intervention, and improving institutional response have significantly enhanced protection for those at risk of severe physical harm flowing from direct aggression.

These gains are foundational and must be preserved.

However, there remains a critical and under-recognised gap in how the system addresses **indirect, cumulative, and institutionally mediated forms of abuse**, including systems abuse. This submission proposes targeted reforms to address that gap by improving early detection, classification, and response.

The analysis draws on a **causal behavioural systems framework** which understands domestic violence as an interaction between behaviour, response, and institutional systems over time.

The Missing Harm Pathway – Indirect Coercive Control

Domestic violence policy must distinguish between the existence of coercive control and how it is expressed and detected.

Psychological research consistently identifies two broad modes of aggression:

- **direct**, overt aggression, which is physically manifest and incident-based
- **indirect** or relational aggression, which operates through reputation, relationships, and third-party or institutional mediation

These modes are not mutually exclusive, but they are not equally visible or measurable. Direct aggression leaves physical evidence, is easier to classify, and aligns closely with existing criminal justice frameworks. Indirect aggression, by contrast, is cumulative, often deniable, and dependent on institutional uptake, making it substantially harder to detect and record.

Current domestic violence systems are overwhelmingly calibrated to detect direct, incident-based harm. They are far less capable of identifying indirect or institutionally mediated coercive control, including systems abuse, reputational harm, and third-party recruitment. This creates a structural asymmetry in detection.

The consequence is not simply under-measurement. It shapes outcomes:

- victims of indirect coercive control are less likely to be recognised
- help-seeking may be suppressed due to anticipated system response

- misidentification becomes more likely in contested or ambiguous cases
- escalation pathways may develop outside existing risk frameworks

Because policy and data systems are built around what can be readily observed and recorded, they may systematically over-represent visible forms of harm and under-represent less visible forms. This risks conflating what the system is equipped to detect with the true distribution of harm.

Addressing this requires expanding system capability to recognise and respond to both direct and indirect forms of coercive control, supported by improved measurement, behavioural assessment, and early-stage intervention pathways.

System Model: Behaviour, Response and Institutional Interaction

Domestic and family violence is best understood not as a series of isolated incidents, but as a dynamic interaction system. Outcomes emerge through the interaction between:

- coercive control behaviours (direct and indirect)
- victim response under sustained coercive pressure
- institutional interpretation and intervention

A critical implication is that institutional response is not external to this system. It is part of the causal structure. Intervention can interrupt harm, but it can also reshape behaviour, sometimes in unintended ways.

A key inflection point in this system is help-seeking. Individuals move into one of two pathways:

- **Disclosure**, enabling classification and potential early intervention
- **Victim Suppression**, where anticipated retaliation and/or system response inhibits reporting, leading to prolonged exposure and escalation

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The diagram also illustrates how perpetrator adaptation and interacting feedback loops recursively reshape behaviour and system entry over time.

- Perpetrator – primary behaviour
- Victim – behavioural response
- Institutional engagement
- Perpetrator – adaptive behaviour

Figure 1 Domestic violence interaction system showing divergent disclosure and suppression pathways and associated feedback dynamics.

System Feedback Loops

Three interacting feedback loops shape outcomes across the system:

Misidentification loop

- early classification under uncertainty becomes self-reinforcing
- institutional interpretation shapes subsequent behaviour and evidence assessment

Retaliation loop

- help-seeking and/or intervention triggers behavioural adaptation
- perpetrators may escalate physical abuse in response to help-seeking, or
- perpetrators shift to indirect, reputational, or systems-mediated forms of coercion following constraints imposed by institutions

Suppression loop

- anticipated retaliation and/or system response shapes help-seeking behaviour
- in indirect abuse contexts, this produces sustained non-disclosure rather than delayed reporting

These loops interact dynamically, creating self-reinforcing pathways of escalation, suppression, or misclassification.

Behaviour × Response Interaction Matrix

The following matrix summarises how behavioural expression and victim response interact across the system:

Behavioural Expression	Response Profile	Initial Interaction	Help-Seeking	Institutional Response	Outcome Risk
Direct / violent	Stable	Harm recognised early	Early disclosure	High-confidence classification	Lower escalation risk
Direct / violent	Accommodative	Harm minimised	Delayed disclosure	Later detection at higher severity	Escalation risk
Direct / violent	Dysregulated	Conflict visible	Crisis disclosure	Mixed or fragmented response	High conflict risk
Indirect / institutional	Stable	Low visibility	Evidence building	Gradual clarification	Detection delay
Indirect / institutional	Accommodative	Harm normalised	Suppression or partial disclosure	Misidentification likely	High escalation and prolonged exposure, and escalation to physical violence
Indirect / institutional	Dysregulated	Conflict without clear causation	Reactive disclosure	Contested narratives	System amplification

This matrix highlights a central insight: system performance is strongest in direct, visible cases and weakest in indirect, behaviourally complex cases, especially in indirect and accommodative scenarios, precisely where current frontline models are least calibrated.

Anticipation and Adaptation Matrix

Behaviour in DFV contexts is not only reactive, but anticipatory. Individuals adjust both disclosure and coercive strategies based on expected system response.

Behaviour	Response Profile	Expected System Response	Pre-Engagement Behaviour	Post-Intervention Adaptation	System Risk
Direct	Stable	Validation expected	Early help-seeking	Compliance	Low residual risk
Direct	Accommodative	Uncertain response	Delayed disclosure	Shift to indirect control	Escalation prior to help-seeking, perpetrator mode shift
Direct	Dysregulated	Adversarial response expected	Reactive engagement	Continued escalation	High conflict
Indirect	Stable	Uncertain recognition	Evidence accumulation	Narrative intensification	Delayed classification
Indirect	Accommodative	Risk of disbelief	Suppression or withdrawal	Increased institutional leverage	Misidentification and prolonged harm, or escalation to physical violence
Indirect	Dysregulated	High-conflict response	Reactive disclosure	Narrative escalation	System overload

This matrix reinforces that behaviour adapts to institutional response.

This indicates that system behaviour not only responds to abuse patterns, but actively shapes them through anticipatory adaptation.

The Core Issue: Structural Limits of a Direct-Harm System

Current DFV systems are highly effective in responding to:

- direct, incident-based violence
- immediate threats to physical safety
- clearly evidentiary events observable at first contact

This model has saved lives and must remain central to the system.

However, this creates a structural limitation: systems calibrated to detect **direct violence are less sensitive to indirect coercive control**, where harm may be:

- reputational or narrative-based
- relational and socially mediated
- enacted through third parties or institutions
- cumulative and evolving over time

In these contexts:

- harm is less visible at the point of first response
- evidence is fragmented or longitudinal
- outcomes depend on institutional interpretation

This produces a systemic detection gap.

System Effects: Misidentification, Escalation, and Suppression

The causal behavioural systems model demonstrates that outcomes in DFV contexts are not determined by perpetrator behaviour alone. They emerge through **interaction between perpetrator behaviour, victim response, and institutional processes**.

Misidentification

In indirect or high-conflict presentations:

- early classification can be uncertain
- initial assumptions may become self-reinforcing
- cross-allegation contexts amplify this risk

Escalation (including institutional amplification)

Where interventions are applied using a direct-violence model:

- perpetrators may adapt behaviour or ‘game the system’
- perpetrator behaviour often includes shifting to indirect or systems-mediated coercion once direct violence is constrained by institutional intervention

Institutional engagement may unintentionally:

- trigger formalisation of threatened false narratives
- escalate reputational harm
- convert threatened coercion into realised harm

Suppression of Help-Seeking

Where individuals anticipate:

- disbelief
- misidentification
- escalation triggered by reporting

help-seeking may be delayed or avoided. This is particularly true where each incidence of harm may appear tolerable compared to the risk of escalated harm and institutional misidentification. The dynamic becomes the ‘straw that eventually breaks the back’.

In indirect abuse contexts, suppression is often a **structural non-entry pathway**, leading to prolonged exposure and increased downstream harm, which can be seen as resulting in the creation of a “pressure cooker” relationship dynamic.

System Gap: No Safe Entry Point for Early or Indirect Harm

Entry into DFV systems is predominantly:

- police-led, or
- crisis-triggered

This creates a mismatch:

Context	System response
Direct violence	Early detection and intervention, sometimes following delayed reporting
Indirect coercive control	Suppressed disclosure – there is no safe pathway to reporting indirect abuse, because reporting leads to misidentification and amplification of harm

Early help-seeking is a critical inflection point, yet current systems provide limited safe, low-consequence pathways for early disclosure for victims of indirect coercive control.

The absence of a safe reporting pathway for victims of indirect abuse leads to the continuation of the pressure cooker relationship dynamics, resulting in an increased risk of escalation to physical violence.

Recommendations

Recommendation 1: Establish a Pre-Escalation Behavioural Triage Pathway

The Second Action Plan should prioritise a **pre-escalation, behaviourally informed intake and triage pathway tailored to the needs of victims of indirect coercive control**.

Purpose

- enable early identification of coercive dynamics
- improve classification accuracy
- reduce risks of suppression and escalation

Key Features

- multiple entry points beyond police, including psychologists / psychiatrists, GPs, referral through help lines, etc.
- structured behavioural assessment by qualified psychologists/psychiatrists
- longitudinal evidence capture – allow psychs to recommend evidence collection and preservation while investigation proceeds
- graduated institutional response thresholds – may include psych treatment, referral to counselling, evidence preservation, or referral to police.

This shifts the model from **first-contact classification** to **evidence-informed interpretation**.

Recommendation 2: Strengthen Recognition of Systems Abuse

Explicitly recognise systems abuse as a form of indirect coercive control. This is recognised in NSW coercive control legislation, but poorly understood or recognised by front line responders.

This includes:

- threats of false allegations
- narrative manipulation and reputational harm
- misuse of police, courts, or child protection systems

Recommendation 3: Improve Handling of Cross-Allegations

- develop a DVSAT – Part B for use in cross allegations and/or reports of indirect abuse. This should include risk factors associated with indirect abuse.
- assess competing claims in parallel through investigation, rather than privileging narratives based only on the gender of the alleged victim

- prioritise behavioural context and evidence development
- ensure psychological skills are employed in the investigation of cross allegations

This reduces entrenched misclassification risk.

Recommendation 4: Expand Measurement of Harm Pathways

Current systems prioritise homicide and physical harm.

The Plan should expand measurement to include:

- indirect coercive control including reputation destruction with family and friends, interference with employment, threats of harm, threats of false allegations
- systems abuse
- misidentification (including time to correction)
- DV-linked psychological harm and suicide pathways

Recommendation 5: Embed Behavioural Expertise at Intake

Early-stage assessment should incorporate:

- behavioural and psychological expertise
- multidisciplinary capability

particularly in complex or ambiguous cases that involve crossing allegations or allegations of indirect abuse.

Conclusion

Australia's DFV system has made substantial progress in addressing severe and visible forms of harm.

The next stage of reform is to extend system capability to:

- recognise indirect coercive control
- resist institutional manipulation and 'gaming' by perpetrators
- enable safe early disclosure for all victims
- prevent escalation pathways such as suppression, misidentification and mode switching

A behaviourally informed, multi-lens approach will strengthen the effectiveness, accuracy, and equity of the domestic violence system.