

FORMAL SUBMISSION

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

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August 2026 | contact@thriving.org.au | www.thriving.org.au

Executive Summary

This submission identifies a significant opportunity within the Second Action Plan. While the National Plan and consultation material recognise the role of employers in supporting workers experiencing domestic, family and sexual violence, it does not yet sufficiently recognise the role organisations play in supporting customers experiencing violence.

Every day, Australians experiencing violence interact with banks, insurers, telecommunications providers, energy retailers, water providers and other essential services. For many victim-survivors, these organisations become early points of disclosure, sources of practical support or, where systems are poorly designed, additional sites of harm.

The Australian Government has an opportunity to formally recognise essential service customer-facing organisations as part of Australia's prevention, early intervention, response and recovery infrastructure. This does not mean turning businesses into specialist family violence services. It means setting clear expectations that organisations whose products, services and frontline staff routinely intersect with the lives of victim-survivors should design safer systems, respond consistently and connect people to appropriate support.

Specialist domestic and family violence services are the cornerstone of Australia's response. This submission addresses a different and complementary gap, the role of the organisations people interact with every day as customers.

The consultation paper's introduction explicitly identifies business as part of the whole-of-community approach required: 'This next phase requires a whole of community approach that involves engaging with... business, Aboriginal Community Controlled and other community organisations.' This submission directly responds to that expectation, setting out how the business community's customer-facing role can be made practical, systematic and accountable.

The Second Action Plan could:

- Include in the plan a clear expectation that organisations have a role in supporting customers experiencing domestic and family violence, as well as their employees.
- Recognise essential services as part of the national response infrastructure, because they reach people before, during and after crisis
- Support scalable cross-sector coordination mechanisms that reduce fragmentation, repeated disclosure and administrative burden
- Build the evidence base on how domestic and family violence affects customer interactions with essential services and how better design can improve safety outcomes
- Recognise and promote Safety by Design approaches being embedded across all sectors, ensuring products, services and customer systems are designed to identify and reduce risks, minimise the need for repeated disclosure, and support safer outcomes for people experiencing domestic and family violence.

Why essential services matter

Essential service organisations occupy a unique position in Australia's response to domestic and family violence. Unlike specialist services, they engage with almost every Australian household. Unlike crisis services, they interact with customers before, during and after periods of violence. Unlike individual sectors, they collectively span the systems victim-survivors must navigate to maintain safety, housing, communication, energy, water, money and connection.

This reach creates both risk and responsibility. Perpetrators can weaponise ordinary service features, shared accounts, account access, address changes, location data, debt, disconnections, reconnections and customer communications. At the same time, well-designed products, trained staff and safe referral pathways can help people access support earlier, reduce repeated disclosure and prevent services from being used as tools of coercive control.

The Second Action Plan should explicitly recognise customer-facing organisations as part of the domestic, family and sexual violence ecosystem and support stronger integration between essential services, specialist services, regulators and government responses.

About Thriving Communities Australia

Thriving Communities Australia (TCA) is a national not-for-profit organisation driving systems change across essential services so every interaction upholds dignity, identifies support needs earlier, and enables people to access support when and how they need it. TCA works across the essential services ecosystem, bringing together business, government, community organisations and people with lived experience to build shared understanding, test practical solutions and support durable system change.

When people experience crisis or vulnerability, including family and domestic violence, financial hardship or natural disaster, essential services are often among their earliest and most frequent points of contact. These moments matter. A bank, telco, insurer, energy retailer or water provider can either help stabilise a person's situation or unintentionally add stress, confusion, delay or further harm.

TCA's approach is relational by design. It is grounded in lived experience, built on trust and focused on the systems that need to shift, rather than placing further burden on the individuals navigating them. In 2024–25, TCA connected more than 430 organisations across sectors, hosted 12 webinars and sector network meetings, delivered 21 strategic workshops and supported more than 1,600 attendees through its events.

This submission draws most directly on two flagship TCA initiatives:

One Generation - a cross-sector business alliance co-founded by TCA and Flequity Ventures, bringing together seven of Australia's leading essential service organisations: AGL, Energy Australia, Optus, Origin, South East Water, Suncorp and Yarra Valley Water, with a shared ambition to end domestic and family violence within one generation.

The One Stop One Story Hub (OSOS Hub) - a secure cross-sector referral platform delivered through Thriving Communities Australia, and designed with lived experience, enabling frontline workers across corporate, community and government organisations to connect people to support through one streamlined process.

Together, these initiatives demonstrate that the business community is already contributing to prevention, early intervention, response and recovery. The Second Action Plan is an opportunity to recognise and build on this capability nationally.

Priority Area 1: Victim-Survivors

The consultation asks what service and system responses would make the biggest difference to victim-survivors' safety, wellbeing, healing and recovery, and what barriers prevent people from seeking help or engaging with systems and services.

The essential service gap - grounded in lived experience

Victim-survivors are not only clients of specialist domestic violence organisations. They are also customers of the essential services they interact with every day. One Generation's lived experience research, drawing on insights from approximately 100 people with lived experience of domestic and family violence, found that nearly all participants reported that domestic and family violence affected their ability to access, manage or control their essential services.

Perpetrators can turn ordinary service features into tools of control. One Generation's research identified consistent patterns of misuse across essential services including:

- incurring debt, delaying payments or refusing to pay bills to create financial dependency and pressure
- opening accounts, loans or services in the victim-survivor's name without consent
- cancelling, reconnecting or threatening access to essential services as a condition of compliance or contact

- using transaction records, account activity, shared devices, location settings or communication channels to monitor the victim-survivor
- exploiting shared accounts, mortgages or account permissions to maintain leverage after separation
- using organisations as intermediaries to make contact, relay information or breach safety arrangements

"You almost start to wonder, do the perpetrators do a course or something? Because it's so textbook."

- Alexis, victim-survivor, One Generation research

These are not edge cases. They are the documented, lived reality of a significant proportion of people experiencing domestic and family violence in Australia and essential services can either enable this harm or actively help prevent it.

The Parliamentary Joint Committee on Corporations and Financial Services has identified financial abuse as a 'hidden epidemic' and called for stronger obligations on banks, insurers and superannuation providers (DFSVC, 2025). The ABS estimates 1.6 million women, 16% of adult women, have experienced partner economic abuse since the age of 15 (ABS, 2023, cited in DFSVC, 2025).

The consultation paper identifies improving how coercive control is recognised and addressed as a key opportunity for the Second Action Plan. Customer-facing essential service staff regularly encounter patterns that may signal coercive control, including unusual account activity, financial abuse, debt accumulation, repeated service disconnection and reconnection. With appropriate training, these interactions can become critical points for early recognition and support. The staff training standards, referral protocols and product design obligations proposed in this submission directly support the plan's coercive control priority by building recognition capacity outside the specialist service system.

What would make the biggest difference

The Second Action Plan could establish clear expectations that essential service customer-facing organisations identify, respond to and safely refer customers who may be experiencing domestic and family violence. Meeting this expectation requires more than training and goodwill, it requires practical capability, clear referral pathways and appropriate integration with specialist systems. It also requires a Safety by Design approach that treats harm prevention as a product and systems responsibility from the outset, not only a response to disclosure. To put this into practice, the Second Action Plan could support:

- national training standards for customer-facing staff across essential service sectors, grounded in lived experience and aligned with specialist advice
- sector-specific guidance on safe customer identification, disclosure, referral and follow-up protocols that do not increase risk
- Safety by Design requirements embedded across product development, digital release and system change processes, including structured assessment of how features such as shared account access, notifications, payment fields and usage data could be weaponised to monitor, control or financially harm a victim-survivor
- safe disclosure pathways, including digital and non-phone channels for customers who are being monitored or cannot safely make a call
- invest in cross-sector referral infrastructure that complements and strengthens existing domestic and family violence service systems, reduces repeated disclosure, enables earlier intervention and connects essential service organisations with specialist supports. The One Stop One Story Hub demonstrates that this approach is both achievable and capable of operating at national scale

Success should be measured by human outcomes, not only by activities completed. The most important indicators are whether victim-survivors repeat their story less often, access support more consistently, faster and safely, experience fewer service-related barriers and maintain greater control over information and decision-making.

The fragmentation barrier and how the OSOS Hub addresses it

Victim-survivors consistently report that simultaneously navigating multiple essential service organisations while experiencing, trying to leave, or recovering from family violence can be overwhelming. People may be required to repeat their story to banks, utilities, telcos, insurers, government agencies and community services, often at a time of acute risk and exhaustion.

The One Stop One Story Hub directly addresses this barrier. The OSOS Hub enables frontline workers across corporate, community and government organisations to connect people to multiple supports through a single, streamlined referral process. It reduces the burden on people to navigate complex systems or retell their story repeatedly at moments of vulnerability and crisis.

The Hub also functions as an important early intervention mechanism. It enables organisations to respond when indicators of risk or support needs are first identified, connecting people with relevant services earlier, before issues escalate and reduces the need for individuals to navigate multiple systems while managing the impacts of domestic and family violence.

To date, the OSOS Hub has enabled more than 15,500 referrals nationally across 30 corporate, community and government organisations. In the last three months, approximately 70% of referrals were successfully actioned within 14 days, with the receiving organisation making contact with the customer and providing support on their account.

Each referral represents a person who did not have to navigate the system alone, repeat their story unnecessarily or choose between safety and essential support. It also enables earlier identification of support needs providing a timelier and more coordinated response across the organisations involved in a person's recovery and safety.

"The OSOS Hub has transformed how we support people in crisis. Instead of working in silos, we're now part of a coordinated network that puts the person at the centre."

— OSOS Hub Partner

Diverse communities and cultural safety

Some essential service organisations have inconsistent and underdeveloped culturally safe practices when responding to domestic and family violence in customer interactions. The Second Action Plan could address this by supporting co-designed standards, accessible pathways, non-digital options and workforce capability across customer-facing sectors.

Priority Area 2: Prevention and Early Intervention

Prevention is most powerful when it is embedded in the everyday structures people already interact with. Essential services are among those structures for millions of Australians. A genuine whole-of-community approach must therefore include the customer-facing role of essential service organisations, not only their role as employers.

Essential services as prevention infrastructure

Essential service organisations have reach, that no single government program or specialist service can match. They interact with people in regular, practical and often trusted relationships. This reach represents an underused prevention and early intervention asset that the Second Action Plan could activate.

Essential service organisations can contribute to prevention and early intervention by:

- using customer communications, bills, apps, websites and service interactions to raise awareness of available support

- embedding Safety by Design principles across products, services and customer experiences so foreseeable misuse pathways are identified and reduced, helping prevent harm before it occurs.
- training customer-facing staff to recognise and respond to domestic and family violence, including financial abuse and coercive control, and to identify early warning signs such as account control, unusual access patterns, coerced debt and service misuse.
- developing and using shared frameworks and common language to help organisations move beyond compliance-driven responses and embed prevention as a core responsibility
- reducing the burden of repeated disclosure is also a practical early intervention measure. Where frontline workers in essential services can connect people directly to support, without requiring them to retell their story at each step, helps reduce the load on an individual. Cross-sector referral platforms such as the One Stop One Story Hub make this possible, enabling workers across corporate, community and government organisations to coordinate support without placing the burden of navigation on the person in crisis.

One Generation: moving business from intent to action

One Generation provides a practical pathway for businesses to move from intent to action. Launched in November 2024 with the backing of seven leading national essential service organisations, the alliance is building the frameworks, research and resources organisations need to act on prevention and safer customer support.

The alliance's lived experience research series identifies product and service design failures that enable harm and translates these into implementable actions. One Generation also supports businesses to design products, policies and services that centre victim-survivor voices and reduce retraumatisation in customer interactions.

"Businesses have a key role in ending gendered violence - not only to support employees but also to provide safe products and services for their customers."

- [REDACTED]

Safety by Design as a prevention responsibility

Prevention must extend beyond awareness raising and workforce capability. Products, systems and processes should be designed to prevent foreseeable misuse. Evidence from One Generation's research demonstrates that perpetrators weaponise legitimate service features, which means prevention efforts must include product design obligations and ongoing review of customer systems through a domestic and family violence lens.

TCA's work with the Essential Services Commission demonstrates that prevention can be embedded into both regulatory and industry frameworks through collaboration, capability building and shared understanding. The project brought together water and energy providers, regulators, Ombudsman schemes, Safety by Design experts including [REDACTED], specialist domestic and family violence organisations such as Centre for Women's Economic Safety (CWES), Safe and Equal, community organisations, and people with lived experience to explore how products, services and processes can be designed to reduce harm before it occurs.

Importantly, the project recognised that lasting change is unlikely to be achieved through compliance obligations alone. While regulation can establish minimum standards, organisations are more likely to create meaningful and sustainable change when they understand the nature of domestic and family violence, how harm can occur through everyday service interactions, and why Safety by Design matters within their own operating context. Through a series of cross-sector workshops, information sessions, lived experience interviews and expert panels, participants built a deeper understanding of domestic and family violence, coercive control and system-enabled harm, alongside practical approaches for embedding safety considerations into organisational design and decision-making.

This approach helped move the conversation beyond compliance and towards shared responsibility, supporting organisations to proactively identify risks, remove foreseeable misuse pathways and design safer customer experiences

from the outset. The project informed and supported the development of the [Design to Disrupt](#) paper and provides a model for how governments, regulators and industry can work together to embed prevention as a core organisational responsibility rather than a compliance exercise.

"Reading the experiences of victim-survivors and how utility accounts are used to exert power, cause fear and hold financial control, provides a stark reminder of why we need to keep focussing on this issue and challenge ourselves to do more."

— Gerard Brody, Essential Services Commission Chairperson and Commissioner

Technology-facilitated abuse as a product design imperative

The consultation identifies technology-facilitated abuse as an urgent and growing area of concern. TCA's research has identified patterns of abuse mediated directly through essential service products and the picture is more systemic than individual platforms acting in isolation.

People who cause harm are exploiting features across multiple services simultaneously: using smart home devices to surveil, shared account access to monitor spending and location, family plan features to track movements, and account management functions and chat channels to intercept communications or harvest personal details. Critically, information gathered across one service is being used to breach security on another, perpetrators accumulating enough personal detail from account interactions, statements and communications to correctly answer security questions and gain unauthorised access to accounts the victim-survivor believed were safe. This cross-service exploitation means that a victim-survivor can take steps to protect one account while remaining exposed through another.

These are not individual safety failures, they are product and service design failures, occurring across sectors and compounding each other. The Second Action Plan could encourage essential service providers to:

- Apply Safety by Design principles across products, services and customer systems, including the regular identification and mitigation of foreseeable misuse pathways that may enable financial abuse, coercive control or other forms of harm.
- Review the adequacy of identity verification, authentication and security question frameworks to ensure they do not unintentionally create risks for victim-survivors or provide opportunities for misuse.
- Implement Safety by Design principles across customer systems, recognising that prevention measures should operate whether or not a victim-survivor has disclosed their circumstances.
- Support cross-sector coordination to identify and address common safety risks, recognising that no single organisation can fully prevent system-enabled harm in isolation.

Priority Area 3: Children and Young People in Their Own Right

The consultation asks how governments, services, education settings, families and communities can better recognise and respond to children and young people experiencing violence or harm, and how the plan should respond to technology-facilitated abuse affecting young people.

TCA is not a specialist child or youth organisation, however our work across essential services demonstrates that children and young people are impacted by domestic and family violence in ways that intersect with service systems, yet often remain largely invisible within organisational responses.

Children and young people affected by domestic and family violence are often present but unseen in essential service interactions. When a victim-survivor contacts a bank, energy retailer, water provider, insurer or telco for help

navigating violence, the response that an organisation provides can directly affect the safety, privacy and stability of children in the household.

We also recognise that children and young people can experience domestic and family violence in their own right, including forms of financial abuse and coercive control. Through our work with frontline organisations, we have heard examples of young people being pressured or coerced into taking on debt, opening bank accounts, obtaining credit, registering businesses, or becoming financially responsible for obligations that primarily benefit a parent, family member or perpetrator. These experiences can have significant and long-lasting impacts on financial wellbeing, credit history, safety and future opportunities.

Without the appropriate tools, training or clear pathways to respond, essential service organisations can inadvertently leave situations unchanged. A person using violence may continue to access a shared account, monitor location services, use debt as leverage or control when utilities are connected. Children and young people living in these environments are affected by those outcomes too. Every service decision made about an adult customer in response to domestic and family violence has the potential to influence the safety and wellbeing of children and young people connected to that household.

The Second Action Plan could:

- ensure customer-facing staff training includes guidance on recognising when children and young people may be affected by domestic and family violence, and how to respond or refer safely
- establish clear expectations for telecommunications and technology providers to review, identify and address the ways their products and services can be used to facilitate surveillance, coercive control or abuse of victim-survivors and their children, informed by Safety by Design principles
- encourage financial institutions and other essential service providers to consider how financial abuse may affect young people, including the misuse of accounts, debt, identity information and financial products
- explore how the OSOS Hub's referral infrastructure can better connect essential service frontline workers with child safety and family support pathways

TCA acknowledges that our current research has focused primarily on adult victim-survivors' experiences of essential services. The Second Action Plan could support additional research with experts in this field and ensure children's experiences of essential service systems are not invisible.

Priority Area 4: People Who Use Violence

The consultation notes that people who use violence interact with many parts of the community and service system before violence escalates, including workplaces, health services, schools and families. It asks how services and communities can better recognise and respond safely.

The role of essential services and its limits

TCA is not a specialist provider of intervention or behaviour change services for people who use violence. However, through our work with essential service organisations, we regularly hear uncertainty about what role organisations should play when there are indications that someone may be using their services to facilitate harm.

Essential service organisations are not support services, counsellors or legal arbiters. They provide services people need to live, including energy, water, banking, telecommunications and transport. Their role is not to determine whether someone is a person using violence. Rather, their role is to understand where products, services and customer systems may be creating opportunities for harm, recognise the risk of victim-survivor misidentification, and respond in ways that prioritise safety, reduce risk and support continued access to essential services.

This challenge also extends beyond customer interactions. Essential service organisations, like any other organisation, may employ people who are victim-survivors and people who use violence. Organisations therefore require policies,

processes and workplace responses that support employee safety, appropriately manage harmful behaviour, and provide pathways to specialist assistance where required.

TCA's One Generation's research documents how people use essential service features to exercise coercive control: cancelling services, incurring debts in the victim-survivor's name, monitoring accounts and using access to utilities and communications as leverage. Seen through a domestic and family violence lens, these are not isolated service events but patterns that may indicate coercive control and system-enabled harm. Where these indicators emerge, the role of essential service organisations is not to determine intent or assign blame, but to take reasonable steps to improve safety, protect access to essential services and connect customers with appropriate support.

A number of essential service organisations have already demonstrated commitment to this through initiatives such as Respect and Protect and the growing adoption of Safety by Design principles which set visible expectations that organisations will actively work to prevent their products and services from being used as instruments of harm. The challenge is not a lack of commitment. Rather, many organisations remain uncertain about what is expected of them, what actions are appropriate, and where the boundaries of their responsibility begin and end.

The Second Action Plan could support the development of shared guidance for modern essential service organisations on responding to domestic and family violence. This work should bring together regulators, government agencies, specialist domestic and family violence organisations, employers, people with lived experience and industry representatives to establish a common understanding of responsibilities, boundaries and good practice.

That process should examine what essential service organisations can safely and appropriately do when their services may be facilitating harm, what legal and regulatory frameworks may currently prevent or enable action or inadvertent harm and how privacy, safety and accountability can be balanced across sectors.

The goal is not a single document but a shared framework, one that gives essential service organisations the clarity to act consistently, gives regulators a common basis for oversight, and gives victim-survivors confidence that the system around them is working in a coordinated way.

Priority Area 5: System Integration and Workforce

The consultation asks what would make the biggest difference in creating a more coordinated and connected system response, what workforce capabilities are most needed, and what approaches are most effective in improving collaboration and information sharing.

The missing integration opportunity

Governments have invested significantly in connecting specialist services. Building on these foundations, one of the greatest system integration opportunities is not creating entirely new service systems, but better connecting existing systems, across essential services, government agencies, community organisations and specialist domestic and family violence services.

The consultation paper identifies that victim-survivors must navigate multiple systems simultaneously, which aligns to what we see through our research and engagement with lived experience. Essential service organisations are often not identified as part of that complex system, despite the fact that many people in crisis interact with their bank, telco, energy retailer and insurer daily, sometimes hourly. TCA's systems change work shows that meaningful change happens through trust, the quality of the connections we create, the shared language we build and the practical pathways that allow organisations to act safely together.

The OSOS Hub as a model for system integration

The One Stop One Story Hub provides a working model of cross-sector integration and collaboration. It enables frontline workers across corporate, community and government organisations to connect people experiencing family violence, financial hardship and other vulnerability to multiple supports through a single, safe, streamlined referral

process. By reducing fragmentation and the need for repeated disclosure, the Hub helps people access support earlier and more safely.

To date, the OSOS Hub has enabled more than 15,500 referrals nationally across 30 organisations. Organisations that previously worked in isolation are now coordinating support around people experiencing hardship and family violence. The Hub has helped normalise early identification of support needs through targeted referrals, strengthen trauma-informed practice and embed safer, more consistent pathways into everyday service delivery.

For victim-survivors, the Hub reduces one of the most commonly reported barriers to help-seeking: the need to repeatedly disclose and relive traumatic experiences across multiple organisations. By enabling a single, coordinated referral pathway, the Hub helps reduce re-traumatisation, supports safer engagement with services, and connects people to support earlier.

There is also a less-recognised benefit worth noting: cross-sector referral tools like the One Stop One Story Hub may help reduce vicarious trauma exposure for frontline staff. Rather than requiring multiple staff across multiple organisations to hear the same person's full story repeatedly, the Hub enables a single referral process that connects the person to coordinated support.

Staff working with OSOS have also reported higher satisfaction when they can connect a person to broader assistance across multiple services, rather than being limited to what their own organisation alone can provide. This not only improves outcomes for people seeking support but also helps foster a stronger culture of care within participating organisations, where staff feel empowered to take meaningful action and contribute to a more coordinated response. Building this kind of referral infrastructure is therefore not only a service improvement but can also be an investment in workforce wellbeing, capability and engagement.

The Second Action Plan could:

- invest in cross-sector referral infrastructure that complements and strengthens existing domestic and family violence service systems, reduces repeated disclosure, enables earlier intervention and connects essential service organisations with specialist supports. The One Stop One Story Hub demonstrates that this approach is both achievable and capable of operating at national scale
- support the expansion and adoption of proven cross-sector referral models across additional industries, organisations and regions, building on existing specialist services, referral networks and community infrastructure rather than creating parallel or duplicative systems
- address potential structural funding and eligibility barriers that limit cross-sector referrals, ensuring specialist domestic and family violence services can safely receive and respond to referrals from essential service organisations as part of a coordinated service ecosystem
- strengthen collaboration between essential services, specialist domestic and family violence services, community organisations and government agencies to support more coordinated responses and reduce fragmentation across service systems
- Use de-identified insights from cross-sector referral data to identify service gaps, inform policy and funding decisions, and strengthen prevention and early intervention efforts, while maintaining strong privacy and safety protections.

The non-specialist workforce that already exists

Customer-facing staff across banking, energy, telecommunications, insurance, superannuation, water and retail represent an enormous non-specialist workforce. Their primary role is not domestic and family violence response, but they are often key points of engagement, disclosure or observation. With appropriate investment and safeguards, this workforce can become part of Australia's early support and referral infrastructure.

Through workshops and advisory work, organisations have begun to make earlier and safer decisions, redesign customer pathways and internal policies, shift from compliance-driven responses towards prevention, and collaborate on shared challenges rather than addressing them in isolation.

The Second Action Plan could:

- establish clear expectations for domestic and family violence awareness and referral capability across regulated essential service sectors, so that standards are consistent

This is consistent with the DFSV Commissioner's Recommendation 11, which calls on the Commonwealth to improve the capacity, cultural capability and safety of adjacent workforces, the category that directly encompasses customer-facing essential service staff (DFSVC, 2025)

Coordination, information sharing and accountability

The Second Action Plan could establish formal mechanisms to include essential services in national system integration work. This should include shared standards, safe referral pathways, privacy-conscious data use and public accountability for customer support measures.

The Second Action Plan could:

- establish a working group with modern essential services such as utilities, telco, water. financial services etc within Second Action Plan governance, with a clear mandate to embed customer-facing organisations into the national response
- encourage regulated essential service sectors to report publicly on domestic and family violence-related customer support measures through existing regulatory reporting where appropriate
- build a shared national evidence base on customer experiences, service barriers and system pressure

Formally Mobilising the Customer-Facing Role of Organisations

Australia has made important progress in building government and specialist service responses to family, domestic and sexual violence. What has not yet been fully realised is the role of the business community and essential service sector, not only as employers, but as the organisations through which Australians access the services they rely on to live safely and with dignity.

One Generation and the One Stop One Story Hub are not abstract policy ideas. They are operational programs already in motion, with growing reach across Australia's essential service sector. They demonstrate that change is possible and that customer-facing organisations are ready to contribute when expectations, tools and pathways are clear.

Action	Recommendations	Why it matters
1. Recognise that organisations have a responsibility to customers, not only employees	Explicitly recognise that modern essential services have a responsibility to customers experiencing domestic and family violence, as well as to their employees.	Staff capability is the foundation. Without trained, supported frontline workers, a customer-facing Domestic and Family Violence responsibility creates risk rather than safety. The two must be developed in parallel.
2. Recognise essential services as response infrastructure	Name modern essential service organisations, such as financial services, utilities etc as part of the domestic and family violence ecosystem within the plan's language and governance, including through an essential services working group within Second Action Plan governance.	Reflects the reality that banks, telcos, utilities, insurers and other providers interact with victim-survivors every day, often before specialist services do. Governance inclusion creates accountability, not just aspiration.

Action	Recommendations	Why it matters
3. Address the structural barriers to cross-sector coordination	Invest in cross-sector referral infrastructure that reduces repeated disclosure and connects essential services to specialist support. Encourage the adoption and expansion of proven cross-sector referral models across additional industries, organisations and regions, building on existing specialist services, referral networks and community infrastructure rather than creating new, parallel or duplicative systems	Builds on what is already working rather than creating disconnected new structures and ensures the referral system functions in both directions so victim-survivors are not left to bridge the gap themselves.
4. Establish standards and create the conditions for industry to meet them	Set national expectations for domestic and family violence awareness and referral capability in customer-facing essential service roles, developed with specialist services and lived experience leaders. Include sector-specific guidance on safe identification, disclosure, referral and follow-up protocols. Essential service sectors can then report publicly on Domestic and Family violence-related customer support measures through existing regulatory reporting.	Ensures consistent capability across the sector without diverting public funding away from specialist services
5. Make products and services safer by design	Strengthen accountability for essential service providers to audit their products for misuse pathways, review identity verification and security question frameworks that can be exploited across services and implement Safety by Design principles. Establish clear expectations for telecommunications and technology providers to address the ways their products can be used to surveil or control victim-survivors and children.	People who use violence exploit features across multiple services simultaneously, information gathered through one service is used to breach security on another. Prevention built into product design protects people whether or not they have disclosed their situation and does not require identifying any individual as a perpetrator.
6. Build shared understanding of roles, responsibilities and boundaries	Bring together regulators, government agencies, specialist domestic and family violence organisations and people with lived experience to establish the role essential service organisations can safely and appropriately play when their products, services or processes may be facilitating harm.	One of the barriers is the absence of shared understanding about what is expected and permitted across the system. A collaborative process involving all relevant parties would give essential service organisations the clarity to act consistently, give regulators a common basis for oversight, and give victim-survivors confidence that the system around them is working in a coordinated way.

Action	Recommendations	Why it matters
7. Build the evidence base together	Support the use of data emerging from cross-sector coordination to identify service gaps, plan funding and improve responses, without compromising individual privacy. Support further research into the intersection of essential services and domestic and family violence, including diverse community experiences that are currently underrepresented.	Ensures national policy is informed by what is happening at the intersection of essential services and domestic and family violence, making gaps visible and enabling continuous improvement across the sector.

Proposed outcomes for the Second Action Plan

The customer-facing role of organisations should be assessed against outcomes that matter to victim-survivors, staff and the broader system. TCA recommends that the Second Action Plan include outcome measures such as:

For victim-survivors

- People experiencing domestic and family violence can access essential services safely, without increasing risk or exposing them to further harm, and without their information being accessible to the person causing harm.
- People do not have to repeat their story across multiple organisations, a single, safe disclosure leads to coordinated support
- People can access help through whatever channel is safe for them, including non-phone and non-digital options, without being disadvantaged
- People maintain control over their own information, accounts and referral choices throughout their interaction with essential services

For the system

- Essential service organisations deliver a coordinated, consistent, safe and appropriate response to domestic and family violence, regardless of sector, size or location, ensuring access to support does not depend on which organisation a person contacts first
- Referral pathways between essential services and specialist domestic and family violence support are functional and flow in both directions
- Ensure a Safety by Design approach so service misuse, including misuse of accounts, debt, product features and communications infrastructure, is identified earlier and interrupted more effectively through better product design and staff capability
- De-identified data from cross-sector coordination informs service planning and policy, making gaps visible and driving continuous improvement

For the workforce

- Customer-facing staff have the training, tools and organisational backing to respond safely and confidently when domestic and family violence is present in a customer interaction
- Staff are not left to make difficult judgements alone, clear protocols, referral pathways and specialist support are available to them
- Boards and executives are accountable for domestic and family violence customer safety, with clear governance, oversight and risk management responsibilities.

- Domestic and family violence related risks, incidents and near misses are identified, reported and acted on, supporting continuous improvement and safer products, services and systems

The primary measure of success should be whether victim-survivors feel safer, are heard and can access support with dignity.

How TCA's Proposed Actions Align with the Consultation Paper

This section maps TCA's recommended actions directly to the priorities, evidence gaps and opportunities identified in the ANROWS consultation paper. It is intended to make clear that this submission is not proposing new priorities, it is responding to gaps the consultation paper's own evidence identifies as unmet.

TCA recommended action	Consultation paper priority / evidence gap	Why it matters to the plan
1. Recognise that organisations have a responsibility to customers, not only employees	Introduction: 'This next phase requires a whole of community approach that involves engaging with... business.' Priority Action 1 key opportunity: 'Systematically address systems abuse across sectors (e.g. financial or justice systems)' Priority Action 5 key opportunity: Strengthen support for workforces.... recognising risk of vicarious trauma	Staff capability and customer-facing responsibility must be developed in parallel. Without trained, supported frontline workers, a customer-facing Domestic and Family Violence responsibility creates risk rather than safety. TCA's submission is the direct operational response to the consultation paper's own statement that business must be part of this effort. Cross-sector referral tools can potentially reduce trauma exposure due to less frontline staff needing to hear an individual's story, as it only needs to be told once; any training standards must include staff wellbeing provisions alongside capability requirements.
2. Recognise essential services as response infrastructure	Priority Action 1, key opportunity: 'Systematically address systems abuse across sectors (e.g. financial or justice systems)'	Essential services are the sector through which financial and systems abuse is most frequently perpetrated. Recognising them within the plan's language and governance directly addresses this opportunity and creates accountability, not just aspiration.
3. Address the structural barriers to cross-sector coordination	Priority Action 5 key opportunity: Strengthen coordination, information sharing and continuity of care across sectors.	Increase investment in specialist domestic and family violence services to meet growing demand and strengthen the capacity of the broader service system to support referrals, collaboration and coordinated responses across sectors.
4. Establish standards and create the conditions for industry to meet them	Priority Action 5 key opportunities: Improve national coordination of workforce capability, role definition and conditions, including support for greater consistency in standards, training and practice across jurisdictions. Build workforce capability to respond to the full spectrum of violence including coercive control, sexual violence and technology-facilitated abuse.	Customer-facing essential service staff are the non-specialist workforce most likely to encounter financial abuse. National standards for this group, developed with people with lived expertise, front line and specialist family violence organisations, and reported through existing regulatory mechanisms, directly fill the gap the consultation paper identifies.
5. Make products and services safer by design	Priority Action 1, key opportunity: Develop fast, effective responses to emerging technology-facilitated abuse and harm.	Embed Safety by Design across all organisations as a core early intervention strategy, identifying and removing misuse pathways before harm occurs, reducing reliance

TCA recommended action	Consultation paper priority / evidence gap	Why it matters to the plan
	Priority Action 2, More work needed: Investment in early intervention outside the justice system.	on disclosure, and building on initiatives such as Respect and Protect to drive continuous improvement.
6. Build shared understanding of roles, responsibilities and boundaries	Priority Action 4, key opportunities: help communities and workplaces identify harmful behaviours. Priority Action 5: Improve collaboration and information sharing across services and sectors.	The barrier to wider action is not willingness, it is the absence of shared understanding about what is expected and permitted. A collaborative process involving regulators, government, specialist services and lived experience could establish what essential service organisations can safely do when their services may be facilitating harm and give the whole system a common framework to act from.
7. Build the evidence base together	Priority Area 1: Strengthened national data systems Priority Area 5: Cross-sector coordination and information sharing.	Data on referral patterns, service gaps and geographic distribution from referral systems like OSOS, could help fill the measurement gaps the consultation paper identifies, particularly for technology-facilitated abuse and financial abuse. Investment in this type of infrastructure reduces repeated disclosure and connects essential services to specialist support.

Conclusion

Ending violence against women and children within a generation requires every institution in Australian life to step up. Essential service organisations are not peripheral to this work. They touch every community, every demographic and almost every household. Their systems can either unintentionally enable harm or become practical pathways to safety, stability and recovery.

We recommend the Second Action Plan makes this expectation clear. Organisational responsibility must include customers as well as staff. Customer-facing organisations should be recognised, supported and held to clear standards so they can identify risk earlier, design safer products and services, reduce repeated disclosure and connect people to appropriate support.

TCA's work through essential services system change, One Generation and the One Stop One Story Hub demonstrates that cross-sector collaboration is possible and already underway. The opportunity now is to build on this existing momentum, strengthen the evidence base and formally integrate customer-facing organisations into Australia's national effort to prevent and respond to domestic, family and sexual violence.

TCA would welcome the opportunity to provide further evidence and to discuss how the Australian Government can partner with existing cross-sector mechanisms to build a more human, connected and prevention-focused essential services system.

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Appendix A: References

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End of Submission

Thriving Communities Australia | Consultation on the Second Action Plan | August 2026