



Working with
Women Alliance

SECOND ACTION PLAN: STRUCTURAL PROBLEMS REQUIRE STRUCTURAL SOLUTIONS

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Acknowledgement of Country

The Working with Women Alliance acknowledges the Traditional Custodians of the land on which we work and live.

We pay our respects to Aboriginal and Torres Strait Islander Elders past and present, and we value the enduring connection Aboriginal and Torres Strait Islander people have to this land.

We value Aboriginal and Torres Strait Islander histories, cultures, and knowledge.

We recognise that Aboriginal and Torres Strait Islander women and communities have long led work to prevent and respond to violence, and that solutions must be grounded in self-determination, culture, healing and community control.

Language Note

In this submission, the Working with Women Alliance adopts the use of 'gender-based violence' as an inclusive term to acknowledge the targeted perpetration of violence against gender-diverse people. We also recognise that gender-based violence often refers to the disproportionate impact of violence against women and children, as is reflected in the title of the *National Plan to End Violence against Women and Children*.

At times, WwWA uses 'women' or 'women and children' for brevity, or where this reflects the evidence, policy settings or services being discussed. This should not be read as excluding gender-diverse and non-binary people from the analysis or recommendations. WwWA recognises the distinct ways violence can be shaped by homophobia, biphobia, transphobia, intersex discrimination and other forms of stigma and exclusion, and the need for safe, affirming, accessible and community-led responses.



About the Artist

Sheri Skele, also known as Bigi Nagala, is a proud Bidjara woman and contemporary Aboriginal artist, who explores and shares her rich cultural tapestry, personal experiences, and healing aspirations.

Hailing from South West Queensland's vast Bidjara land, rich Indigenous cultural heritage, healing sites, pristine bushlands, lagoons, wildlife, and ancient waterways, Sheri's art captures this sacred landscape.

About WwWA and this submission

The Working with Women Alliance (WwWA) is a national membership-based organisation representing two connected portfolios: gender-based violence and gender equality. Across these portfolios, WwWA has more than 900 members, including specialist services, advocates, researchers, lived-experience representatives, peak bodies and organisations working across women's safety and economic security.

WwWA is one of the five National Women's Alliances funded to ensure women's voices, experiences and expertise are central to national policy development. Through this role, WwWA works with members, civil society and the Australian Government to provide evidence-based, intersectional gender equality advice on the areas of greatest impact and influence under Working for Women: A Strategy for Gender Equality.

We welcome the opportunity to contribute to consultation on the Second Action Plan under *the National Plan to End Violence Against Women and Children 2022-2032*. WwWA members view the development of the Second Action Plan as a pivotal moment to shape the next phase of national efforts. To inform this submission, WwWA undertook extensive engagement with members across both portfolios. This included countless conversations, member meetings, surveys, roundtables, working groups and ongoing written feedback. WwWA acknowledges that this engagement occurred while members were already managing significant pressures across the sector. As this submission makes clear, the sector is already stretched. Members contributed to this process while managing high demand, limited funding, workforce pressures and the ongoing work of supporting women, children and communities.

WwWA is deeply grateful for that contribution, and recognises it as further evidence of the sector's commitment to ending gender-based violence.



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EXECUTIVE SUMMARY

This submission has been developed with one goal in mind: ending gender-based violence in Australia.

Individualised and incident-based understandings of violence are mirrored in Australia's policy settings. When violence is treated as something that happens to individuals, the policy response too often becomes about helping victim-survivors disclose, navigate, complain or recover after harm has occurred. This leaves the broader systems that enabled the harm largely untouched. If the Second Action Plan is to shift the dial, it must move from individual responsibility to system responsibility. This submission is structured around that argument.

Chapter 1 sets this out in detail by showing the scale and structural nature of gender-based violence, and how individualised and incident-based understandings are reproduced in policy settings.

Chapter 2 addresses the priority areas in the consultation paper. It does not answer each consultation question separately because the issues raised by the Working with Women Alliance (WwWA) members do not sit neatly within those categories. Victim-survivor safety is shaped by housing, poverty, migration status, legal systems, child protection, employment, education, health, disability, age, geography and community connection. These issues cannot be separated in practice, so they should not be separated in policy.

Chapter 3 makes clear that intersectionality cannot be retrofitted. Too often, policy is designed around a presumed default victim-survivor, with communities then added in later as priority cohorts. This approach will continue to miss people. First Nations women, migrant and refugee women, women with disability, LGBTIQ+ people, older women, young people, sex workers, single mothers and women in rural, regional and remote communities experience distinct forms of gender-based violence, as well as distinct forms of system harm. If those experiences are not named in the Second Action Plan, they become less visible in policy settings, funding arrangements, data and implementation.

Chapter 4 sets out a reform agenda for a genuine whole-of-government response. It identifies practical reforms across Commonwealth portfolios, including housing, social services, education, employment, the Attorney-General's portfolio, health and environment. The point is simple: victim-survivors do not experience violence within portfolio lines, so the Second Action Plan cannot be delivered through portfolio silos.

WwWA has also prepared a standalone submission on sexual violence to sit alongside this broader paper. This is because sexual violence is still too often treated as the silent 'S' in domestic, family and sexual violence. Sexual violence can occur within domestic and family violence, but it also occurs across many other settings and relationships. It has its own drivers, service needs and system gaps. If the Second Action Plan does not name sexual violence clearly, it will continue to be absorbed into broader FDSV responses and lost in implementation.

Cross-cutting recommendations

The cross-cutting recommendations below set out the foundations WwWA believes are needed for the Second Action Plan to become a genuine whole-of-government implementation plan, rather than another set of disconnected activities.

Recommendation: Fund the national response at the scale of the crisis

The Commonwealth must commit to sustainable, long-term funding that is commensurate with the scale of the crisis and directed to frontline services. Specialist services must be funded not only for immediate crisis response but for the full continuum of activities required under the National Plan, including prevention and systems integration. The Second Action Plan and its funding settings must recognise community-led and context-specific services as core safety infrastructure, not as add-ons. These organisations are the trusted entry points to safety and support and are already doing prevention, early intervention, response and recovery work, but are too often treated as supplementary to the mainstream system rather than as part of the system itself.

Recommendation: Move from individual responsibility to system responsibility

The Second Action Plan must grapple with a deeper conceptual problem in Australia's response to violence against women and children: our policy settings too often reflect an individualised and incident-based understanding of violence. This does not provide the structural change needed to shift the dial. The Second Action Plan must shift responsibility from individuals onto the systems and institutions responsible for preventing and meaningfully responding to violence.

Recommendation: Treat sexual violence as a distinct and urgent national priority

Sexual violence is still too often missing, minimised or treated as the silent "S" in FDSV. WwWA has prepared a standalone sexual violence recommendations paper because sexual violence is not always named clearly, and where it is named, it is too often absorbed into broader domestic and family violence settings in practice. The paper sets out the specific reforms needed to treat sexual violence as a distinct and urgent national priority.

Recommendation: Establish a genuine whole-of-government reform agenda

The Second Action Plan must make safety a shared responsibility across government. This means setting clear responsibilities for each relevant Commonwealth portfolio and connecting the National Plan to the national strategies and reform agendas that shape victim-survivors' lives.

Recommendation: Track and coordinate existing recommendations for implementation accountability

Governments must start implementing the recommendations already made to them, rather than requiring victim-survivors and the sector to keep re-prosecuting the same problems. WwWA recommends that National Cabinet and relevant national ministerial councils provide regular public updates on implementation of major recommendations, starting with the 2024 Senate inquiry into missing and murdered First Nations women and children.

RECOMMENDATIONS SUMMARY

1. Whole-of-government: Embedding safety across Commonwealth systems

- 1.1 Prioritise the migration system in the next systems abuse audit
- 1.2 Embed Safety Impact Assessment in Commonwealth policy design
- 1.3 Amend the PGPA act or associated rules to establish a standing systems abuse prevention obligation
- 1.4 Strengthen the feedback loop between frontline evidence and government action
- 1.5 Create a pathway for independent investigation of systemic administrative harm

2. Social Services: Financial safety as core safety infrastructure

- 2.1 Improve the Leaving Violence Program to reflect the realities of leaving violence
- 2.2 Introduce a universal safety supplement
- 2.3 Move toward a statutory financial safety entitlement for victim-survivors
- 2.4 Establish a national youth text and webchat service
- 2.5 Audit and reform the payment and program settings for young victim-survivors

3. Housing and Homelessness: No safety without housing

- 3.1 Review homelessness definitions and data collections to recognise violence as a form of homelessness
- 3.2 Strengthen the Leaving Violence Program as a homelessness prevention measure
- 3.3 Set national housing targets for victim-survivors
- 3.4 Embed safety and gender-responsive criteria in Commonwealth housing funding
- 3.5 Match capital investment with operational support

4. Education: Building safety across the education life course

- 4.1 Develop a whole-of-portfolio life-course framework for education
- 4.2 Strengthen Consent and Respectful Relationships Education so it reflects young people's lived experiences
- 4.3 Develop a national school response framework for gender-based violence
- 4.4 Use ATEC's mission-based compacts to build the workforce capability needed to deliver the National Plan
- 4.5 Establish a targeted HELP debt reduction scheme for specialist FDSV roles

5. Employment and workplace relations: Work as safety infrastructure

- 5.1 Immediately strengthen paid family and domestic violence leave so victim-survivors can access workplace support safely and without unnecessary barriers
- 5.2 Build employer capability and transparency on FDSV as a workplace safety issue.
- 5.3 Ultimately establish a positive duty requiring employers to prevent and respond to FDSV affecting workers
- 5.4 Ensure employment services do not penalise victim-survivors for the impacts of violence
- 5.5 Embed recovery-to-employment pathways in the future employment services system

Recommendations Summary

6. Attorney-General: Strengthening justice responses to violence

- 6.1 Strengthen the Family Court's response to matters involving child sexual abuse allegations
- 6.2 Expand Aboriginal and Torres Strait Islander liaison roles and establish equivalent specialist liaison roles for other court users facing access barriers
- 6.3 Improve consistency and transparency in the family courts through better data and oversight
- 6.4 Fund specialist sexual violence legal and navigation services as core justice system infrastructure
- 6.5 Improve safeguards of victim-survivor records
- 6.6 Strengthen self-determined Aboriginal and Torres Strait Islander justice pathways and solutions
- 6.7 Use national leadership to improve police responses to gender-based violence

7. Health: Treating violence as a health system priority

- 7.1 Make women's brain health and FDSV-related acquired brain injury the next priority women's health area following women's cardiovascular health
- 7.2 Position FDSV-related acquired brain injury as a cross-portfolio issue in the Second Action Plan
- 7.3 Establish nationally consistent screening, referral and recovery pathways for FDSV-related acquired brain injury
- 7.4 Co-design and fund Aboriginal and Torres Strait Islander-led brain health pathways

8. Environment: Climate emergency is a risk multiplier for violence

CHAPTER 1:

Conceptual shifts required to end violence

Individualised understandings of violence do not reflect the scale or structure of harm

Across WwWA consultations, members consistently identified the need for a deeper conceptual shift in how governments and the broader community understand gender-based violence. Violence is still too often understood as an individual incident or a private experience, rather than as a widespread social and structural problem. This framing cannot account for the dynamic and evolving forms of violence that can be perpetrated across institutions, households and lifetimes. While investments in cultural change are important, governments must lead by example and ensure that policies, programs and regulatory systems do not reproduce and reinforce individualistic framings of gender-based violence.

It is clear that violence is a widespread, systemic and structural problem:

- Two in five (8 million) Australians have experienced physical and/or sexual violence since the age of 15. That is 39% of women and 43% of men.¹
- One in four women and one in 14 men have experienced violence by an intimate partner since the age of 15, and one in five women and one in 16 men have experienced sexual violence since the age of 15.²
- Among LGBTIQ+ respondents to the 2019 Private Lives 3 survey, 1 in 2 had experienced sexual assault and 3 in 5 had experienced intimate partner violence.³
- One in 20 students have experienced sexual assault and 1 in 6 students have experienced sexual harassment since starting university.⁴
- One in three workers have experienced workplace sexual harassment.⁵
- In 2022, more than one in three Australian men (35%) aged 18-65 years had perpetrated intimate partner violence in their lifetime.⁶
- Approximately 40% of boys aged 13 to 17 believe that women lie about domestic and sexual violence.⁷
- One in five Australian men reported sexual feelings towards children and/or have sexually offended against children.⁸
- More than 60% of Australians have experienced at least one form of child maltreatment.⁹ One in six women, and one in nine men have experienced childhood abuse.¹⁰ Among those who experienced child sexual assault, nearly 80% experienced it more than once.¹¹
- Of the 40,087 reported victims of sexual assault in 2024, 81% were female, and 39% were aged 10-17.¹²
- In 2023, there were 28 women aged 55+ who were victims of family and domestic violence homicides and related offences.¹³
- There are an estimated 50 sexual assaults in residential aged care every week in Australia.¹⁴

Rather than a niche problem for a select number of individuals, gender-based violence is a structural, whole-of-community problem. Framing gender-based violence as an individual problem prevents adequate response mechanisms because it makes violence appear episodic and private, even where data shows that violence is patterned and structurally enabled. If violence is understood only as an individual experience, the conditions that make violence widespread are out of view.

Individualising violence also shifts responsibility for prevention, response and recovery onto victim-survivors. When violence is understood primarily as something that happens to an individual, attention can turn to what that person must disclose, report, prove, navigate or recover from. This can obscure the actions and accountability of the person using violence and the systems they engage to enable that violence. It can also privatise violence as a personal crisis to be managed by the person harmed, rather than a public failure requiring structural accountability. In this way, individualised understandings of violence can reproduce a form of moral conservatism, where violence is treated as a modern 'personal sin' rather than a widespread pattern sustained by power (misogyny, racism, homophobia, etc). This is reinforced when therapeutic or psychological support becomes the dominant pathway through which recovery is imagined. Counselling and mental health support are essential, but they cannot become the only answer to recovery from violence. When recovery is framed primarily as an individual therapeutic process, the structural conditions that produce harm and enable perpetrators remain invisible.

In institutional settings, the focus is on the complaint and the procedural and reputational risk it creates. The person who names violence becomes the person to be managed while the person who uses violence remains less visible. This matters because disclosure can become treated as the disruption, rather than the violence. This is particularly visible in workplaces, universities, schools and other institutions where complaints-based processes can turn the victim-survivor into the institutional problem to be resolved. The system waits for an individual to name harm, then requires that individual to carry the process through extremely slow and unsafe systems.

Individualised understandings of violence are mirrored in policy settings

An individualised understanding of violence is reflected and reproduced across current policy settings. Governments have, to date, significantly invested in gender-based violence response, and there is no doubt that important work is occurring across portfolios. However, activity alone will not reduce violence if the underlying model continues to replicate individualised framings by placing the burden on victim-survivors to disclose repeatedly as they engage with inaccessible and siloed systems, and experience re-traumatisation to access support or accountability. A government can 'throw everything' at violence while still relying on policy tools that leave the structure of violence intact. WvWA members have repeatedly identified this across several policy/program settings including:

- **Complaints-based regulatory schemes;** where compliance activities are directed reactively through complaints.
- **Ombudsman and complaints pathways;** which may provide redress after harm but usually require victim-survivors to have the time, resources and confidence to pursue a formal process.
- **Opt-out technology settings;** where individuals are expected to actively protect themselves after exposure to harm, instead of safety being built into platforms.
- **Pilot programs;** where small programs are funded over short-term cycles, leaving organisations to face funding cliffs. This impacts community trust, sector workforce retention and program maturity. Pilot programs have been used to fund work that has an existing evidence base or unfunded work that has happened for years or decades through the goodwill of sector employees. Pilot programs should only be funded for programs that are genuinely new and innovative, or likely to receive ongoing funding if successful.
- **Police responses;** where the violence is often assessed as an incident, rather than understood as a broader pattern of violence, which can contribute to misidentification.
- **Individual workplace entitlements;** such as paid domestic and family violence leave, where the entitlement depends on worker disclosure of violence with varying evidentiary burdens.
- **Fair Work and employment pathways;** where the system often relies on individual workers to raise complaints and pursue enforcement when they are experiencing violence or economic insecurity.
- **Child protection systems;** where poverty and experiences of violence are treated as individual parental failures requiring punishment rather than coordination of support and intervention in the conditions that exacerbate violence in the first place.
- **Service navigation models;** where the policy answer becomes helping individuals move through fragmented systems, rather than fixing the fragmentation.
- **Short-term crisis responses;** where support is activated once someone reaches a threshold of visible harm, rather than investing earlier in the conditions that prevent violence and system contact.
- **One-off crisis payments;** where victim-survivors are given support after violence has escalated.
- **Individualised capability-building;** where safety and inclusion are often treated as something individual workers need to learn, rather than a systems issue.
- **Mutual obligations;** where income support is conditional on compliance even when violence, trauma, caring responsibilities, housing insecurity or unsafe family circumstances make compliance unrealistic or unsafe. These settings can treat non-compliance as individual failure, rather than a sign that the system is not recognising violence, coercion or crisis.

The Government must use the Second Action Plan to interrogate the basis of existing policy settings. If the policy architecture remains complaints-based, disclosure-dependent, program-funded and individually enforced, it will not reduce the prevalence of violence or the scale of harm. A structural understanding of violence requires structural policy models that make safety possible.

A genuine whole-of-government approach

The same individualised logic can also appear at a whole-of-government level. A genuine whole-of-government approach would mean that every portfolio would understand violence prevention and response as core responsibilities, rather than additional or extra activities on top of business-as-usual work. Under the Second Action Plan, there is a risk that portfolios outside The Department of Social Services (DSS) or the Attorney General's Department make discrete contributions and present those activities as evidence of their commitment to ending gender-based violence. A single program or policy measure can be valuable, but this value is undermined if the core work of that portfolio continues unchanged. A genuine whole-of-government approach requires every relevant portfolio to examine how its policy settings affect safety, including where those settings create risk, enable systems abuse or make it harder for victim-survivors to leave violence.

This requires stronger government plan architecture. Gender-based violence intersects with multiple national plans, strategies and reform agendas. This includes elder abuse, housing and homelessness, disability, social security, employment, migration, digital safety, child support, child protection and aged care. These plans often govern the very systems that determine whether victim-survivors can access safety, yet they are not always meaningfully connected to the National Plan. This creates a risk that one plan names safety as a priority while another plan drives settings that increase dependence, poverty, housing insecurity, systems abuse or institutional harm. The Commonwealth should ensure that the Second Action Plan includes shared actions that sit between plans, with clear responsibility for implementation across portfolios. This is particularly important where there is significant crossover between gender-based violence and other policy agendas.

For example, older women's experiences of domestic, family and sexual violence, elder abuse, financial abuse, sexual violence in aged care and homelessness cannot be addressed through either the National Plan or the elder abuse plan in isolation. Similarly, housing strategy cannot sit outside the National Plan when safe housing is a condition of leaving violence. Disability reform cannot sit outside the National Plan when reduced supports can increase dependence on unsafe relationships and decrease economic security. Gambling regulation, alcohol policy, digital safety and media standards cannot sit outside prevention when they shape perpetrator behaviour, financial safety and online harm. The Commonwealth should ensure that the Second Action Plan establishes clear architecture for shared responsibility between plans. Without this, the National Plan risks becoming a parallel women's safety strategy that sits beside the major systems shaping women's lives, rather than changing how those systems operate. If governments are serious about shifting the dial, safety must be embedded into the architecture of government planning.

Life-course understanding of gender-based violence

Gender-based violence is rarely experienced as a single event. It can begin in childhood, continue through adolescence, reappear in adult relationships, be compounded through systems, and take different forms in older age.¹⁵ This is why individualised and incident-based understandings of violence are so limited.

Policy fails when it responds to one moment of harm even though victim-survivors may be carrying the cumulative impact of violence across years, institutions and systems. A life-course approach recognises that violence changes form over time. It also recognises that earlier experiences can shape later safety, health, relationships, housing, employment, parenting, financial security and trust in systems. A child who experiences sexual abuse, family violence or institutional harm may later experience violence in peer relationships, intimate relationships, workplaces, housing systems, health systems or legal systems. An adult victim-survivor may be carrying trauma that was never recognised or responded to. An older woman may be experiencing violence from a partner, adult child, carer or institution, in circumstances where the language of gender-based violence is not routinely applied.

The Commonwealth should ensure that the Second Action Plan uses a life-course frame to connect systems that currently operate separately. This means asking what safety requires at different stages of life and ensuring the policies, services and national plans that touch those stages are working cohesively. Stronger connections between the National Plan and other national frameworks as listed above will be necessary to achieve this reframing. These systems shape whether people are safe at different stages of life, even when they are not labelled explicitly as gender-based violence policy. The Commonwealth should therefore ensure that the Second Action Plan requires life-course implementation across policy design, funding, data and accountability. Naming children, young people, adults and older women as priority groups will not be enough if the systems that they interact with remain disconnected. If violence is treated as a series of separate incidents, policy will continue to miss the cumulative harm carried across people's lives.

Research spotlight: The [un]Silencing of Older Women

The [un]Silencing of Older Women: A Life Stages Approach for the National Plan to End Violence Against Women and their Children provides a practical example of what a life stages approach can look like in the National Plan.¹⁶

Developed for the Embolden2024 National Festival with Older Women's Network NSW as a project partner, the paper brings older women into the centre of the National Plan by linking their experiences to specific recommendations across prevention, early intervention, response, recovery and healing, and measurement. As the paper states, "In our ageist world, the failure to explicitly include activities that will support older women, perpetuates the silence and silencing of older women."



Escalating harms

The National Plan and the consultation paper both name certain forms of violence as 'emerging', particularly in relation to technology-facilitated abuse. However, the language of 'emerging' is a misnomer.

WwWA members emphasised that the language of 'emerging' harms can minimise accountability by implying novelty, when the utility behind these harms is longstanding. As members noted in consultation, these harms are not emerging; what is emerging is the policy and system response. Victim-survivors have experienced these harms for generations, although new technologies, platforms and institutional practices create new ways for perpetrators to intensify and conceal violence.

Technology-facilitated abuse has evolved since the adoption of the internet and smartphones, but it is not a distinct form of violence; rather, it is a vehicle that enables the perpetration of violence. What is currently changing is that the perpetration of violence is being intensified and spread at a faster rate than social norms, institutional responses and law reform can keep up with. The idea of 'emerging' harms obscures and shifts policy focus away from the responsibility of the systems, structures and institutions responsible for violence prevention, and accountability for people who use violence.

CHAPTER 2:

Priority areas of the consultation paper

The consultation paper identifies five priority areas for the Second Action Plan. We have not adopted the consultation paper's structure in full, and do not respond to each question separately. Instead, we address the main issues raised across the five priority areas, drawing on the deeper and more detailed themes that emerged through member consultations. Many issues raised by members cut across the consultation paper's categories, particularly where victim-survivor safety is shaped by housing, income, migration, health, education, justice and trusted community services. This section therefore responds to the consultation paper while preserving the broader structural analysis that emerged through our engagement.

Priority Area 1: Victim-survivors

A major barrier to safety is that services are operating beyond capacity. Victim-survivors may be encouraged to seek help, disclose earlier or engage with systems, only to be turned away, waitlisted or referred elsewhere because services do not have the funding, workforce or infrastructure to respond. This includes specialist services, sexual violence services, legal services, housing and homelessness services, Aboriginal Community Controlled Organisations (ACCOs), migrant and refugee women's services, LGBTIQ+ services, disability-led services, youth services and other trusted community-based access points. The Commonwealth must be honest about this baseline within the Second Action Plan: improving identification and referral will not improve safety if the services victim-survivors are referred to remain funded to operate in permanent crisis.

Safety also cannot be understood only as a service response. Services are essential, but a victim-survivor's ability to leave violence and sustain safety is shaped by access to housing, income, healthcare, legal assistance, transport, childcare and employment protections. Where these supports are inaccessible or conditional, victim-survivors may remain unsafe even if services are available. The Commonwealth must therefore address both service capacity and the broader policy settings that determine whether safety is practically possible within the Second Action Plan. Otherwise, victim-survivors will continue to be referred between systems that are not resourced, aligned or accountable enough to meet their needs.

There is also no single victim-survivor experience. The question of what would make the biggest difference to safety must be answered by recognising that different communities face different risks and pathways to support. The Second Action Plan must therefore build safety around the full diversity of victim-survivors, rather than expecting communities to fit into systems designed without them in mind.

Member Spotlight: The Survivor Hub MeetUps

The Survivor Hub is an initiative that creates safe and supportive spaces for victim-survivors of sexual violence. Through regular online and in-person MeetUps across Australia, The Survivor Hub provides opportunities for victim-survivors to connect, share knowledge and support each other through different stages of recovery. The MeetUps are peer-led and facilitated by survivors, with specialist trauma counsellors and/or social workers present at many groups to provide additional support where needed.

This model demonstrates the value of peer-led recovery spaces as part of sexual violence recovery infrastructure. Peer-led models offer something distinct from crisis response, counselling or legal advice: a space where victim-survivors can be believed, hear from others who understand, and rebuild connection and confidence in ways that are guided by their own needs.

The Second Action Plan must recognise recovery as a distinct and necessary part of the national response.

No safety without housing

In almost every consultation, when members were asked what would make victim-survivors safer, the answer was housing. Housing is the condition that determines whether safety is possible. A safety plan cannot overcome the absence of a safe home. Legal advice, crisis support, and financial assistance are all limited if pathways to housing do not exist.

Housing sits across the whole continuum. It can prevent violence by reducing dependence on unsafe relationships. It can enable earlier intervention by giving people options before crisis. It is also central to response when someone needs to leave immediately. It is also recovery and healing because victim-survivors need stable, long-term safety to rebuild their lives.

Housing also needs to reflect the real circumstances of victim-survivors' lives. Safety may depend on location, privacy, disability access, cultural safety, proximity to schools and services, family size, transport, affordability, and whether victim-survivors can stay with children and pets. Broad housing supply matters, but it does not answer the central safety question: whether victim-survivors can access safe, appropriate and long-term housing when they need it. Concern for the safety of pets was raised as a significant and often overlooked barrier to leaving violence. For many victim-survivors, pets are part of the family and may also be used by perpetrators as a tool of coercion, threat or control. If crisis accommodation, refuge models and housing pathways cannot accommodate pets or provide safe alternatives, victim-survivors may delay leaving or return to violence.¹⁷

Spotlight: RSPCA's Keeping Australians and their Companion Animals Safe program

The safety of animals is a critical but often overlooked barrier for victim-survivors leaving violence. Pets are part of a victim-survivor's family, recovery and safety planning, and they can also be used by perpetrators as a tool of coercive control. The RSPCA's *Keeping Australians and their Companion Animals Safe* proposal seeks to address this barrier by funding emergency boarding and veterinary support for animals, funding refuges to become pet-inclusive, and providing an education program to enable vets and other frontline workers to identify FDSV risk and pathways to safety for victim-survivors earlier. RSPCA identifies that companion animals are estimated to be involved in 70% of domestic violence cases, and that 54% of surveyed domestic violence clients said concern for their animal caused them to delay leaving an abusive situation. WvWA supports RSPCA's goal to scale this work nationally. The program is estimated to cost \$45.2 million over four years and deliver net benefits of \$150 million, with a benefit-cost ratio of 3.9, meaning that for every \$1 invested, at least \$3.90 is returned to the Australian community.

The connection with economic security

We also heard that victim-survivors with mortgages and shared assets face barriers that are not well recognised in housing policy. A person may appear to have financial resources on paper, while having no safe or practical access to them because of economic abuse, coercive control or delayed property proceedings. Means testing and financial eligibility rules can be unfairly exclusionary where victim-survivors have income or assets on paper but no access or even knowledge of those resources. This matters for housing because safety is immediate, but access to property, settlement or financial resources is often not. A victim-survivor may need housing now, while the systems that could release funds or resolve ownership take months or years.

Awareness of economic abuse is increasing; however, specialist support for victim-survivors of economic abuse continues to be under-resourced and underfunded. It is strongly correlated with other forms of abuse, such as technology-facilitated abuse and systems abuse. Economic abuse is experienced by 78-99% of victim-survivors¹⁸ and costs victim-survivors \$5.7 billion per year.¹⁹ Despite the prevalence, funding design for specialist economic abuse services continues to dictate service eligibility criteria, with many specialist economic abuse services facing funding cliffs that impact service maturity and workforce retention. It requires specialist expertise to address, as mainstream financial counselling services do not necessarily have the specialist FDSV knowledge or nuanced understanding of the impacts of FDSV to provide the safe and secure support that victim-survivors need.

Member Spotlight: Centre for Women's Economic Safety Money Clinics

Sixty-three per cent of women in high financial stress in Australia have a history of economic abuse, yet specialist support for this form of family violence remains limited.

The Centre for Women's Economic Safety (CWES) Money Clinics were developed in 2021 to fill this gap. Money Clinics provide free, confidential, one-to-one specialist financial counselling and financial safety planning nationally to victim-survivors of economic abuse in the context of family violence.

In 2025, CWES Money Clinics supported 592 women, non-binary and gender-diverse people, including 70+ nationalities, 37% in rural or regional Australia, 4% First Nations people and across all states and territories of Australia. CWES also delivered 997 individual appointments and successfully had \$1,122,513 of financial abuse-related debts waived.

An independent evaluation of CWES Money Clinics by Sax Institute shows clients reporting statistically significant improvements in their personal wellbeing, financial situation and financial confidence after engaging with Money Clinics. Further information on CWES Money Clinics can be found in the Centre for Women's Economic Submission to the Consultation on the Second Action Plan.

Priority Area 2: Prevention and early intervention

WwWA members consistently raised that prevention, early intervention and response are deeply connected and often happen simultaneously. While these categories can be useful for policy design, they do not reflect how safety is built in practice and can obscure the experiences of victim-survivors.

This is particularly clear in the work of specialist services. A risk assessment may be understood as response work because it happens after violence has been identified, but it is also prevention work. It helps a victim-survivor name the violence, identify patterns and risk, make a safety plan and access support before harm escalates further. This can prevent re-victimisation and reduce long-term exposure to violence for children and communities. Prevention must also be about preventing re-occurrence or escalation of violence. Prevention opportunities exist across every domain, including early intervention, response and recovery.

Legal services must also be understood as part of the prevention and early intervention landscape, not only as something people access after post-crisis.

FVPLS services are a clear example of this. For Aboriginal and Torres Strait Islander women and children, early access to culturally safe legal and non-legal support can help prevent escalation, child removal, homelessness and further system harm.

FVPLS services also build trust with community, which can create safer pathways to disclosure, legal protection and support. Through the Second Action Plan, governments must recognise this role and ensure dedicated funding for FVPLS-led early intervention and wrap-around support.

Prevention also needs to be understood as systems work and as government responsibility. Government systems can either make people safer or create new risks. The Commonwealth should therefore ensure that the Second Action Plan treats systems as prevention infrastructure, which means designing safety into policy settings from the beginning, rather than leaving victim-survivors and frontline services to manage the consequences when systems fail. This includes the systems governments run and regulatory schemes which enable violence. For example, gambling reform is violence prevention work. Gambling-related harm can drive economic abuse and family violence, and where gambling is present in a family there is up to a 30 per cent higher risk of family violence.²⁰ Decisions about gambling advertising and industry accountability therefore sit squarely within the prevention architecture of the National Plan. When key reforms, such as on gambling advertising, are delayed or watered down, the objectives of the National Plan are undermined.

Traditional prevention settings, such as schools, also need to be understood more broadly. Prevention happens every day in schools, not only through formal programs or curriculum. Teachers and school staff shape how young people understand power dynamics and harm, and they need to be supported to do this work safely and consistently. Schools are also places where gender-based violence is already occurring and where disclosures may be made; prevention activities before exposure to gender-based violence are practically impossible for many people. The Second Action Plan must therefore move beyond treating schools only as curriculum delivery sites, and recognise them as institutions with prevention, early intervention and response responsibilities. This includes clearer obligations to respond to school-related gender-based violence, including the persistence of sexual harassment and misogyny directed at teachers by boys, and the ways school-level responses can minimise or fail to address these harms.



Priority Area 3: Children and young people in their own right

WwWA members continuously raised child sexual abuse as needing urgent government attention, particularly where it intersects with family law. The National Plan and the National Strategy are often treated as separate policy frameworks, but in practice the harms intersect. Domestic and family violence and child sexual abuse can occur in the same families, be raised in the same family law proceedings, and require the same systems to identify risk and protect children.

Child sexual abuse also exposes the limits of individualised and incident-based understandings of violence. It is often framed as an isolated perpetrator problem, a safeguarding failure or a small number of institutional ‘bad apples’.²¹ With 1 in 4 Australians having experienced child sexual abuse, this framing does not reflect the scale of this crisis in Australia.²²

Research spotlight: Child sexual abuse in family law

Research commissioned by the National Centre for Action on Child Sexual Abuse titled *Improving legal, policy and practice responses to the intersection of domestic violence perpetration and child sexual abuse offending* analysed 65 published family law decisions between 2018 and 2023 involving allegations of both domestic violence and child sexual abuse. The findings show how gendered these matters are in practice: mothers made the initial allegations in 90.7% of matters, and the research found that mothers who raised allegations of domestic violence and child sexual abuse were less likely to obtain custody than fathers. In some matters, shared parenting was upheld despite domestic and family violence allegations being substantiated by other agencies.²³ 40% of parents were self-representing in all or part of the proceedings.

The research shows that protective parents, most often mothers, can be placed in an impossible double bind in family law proceedings. Practitioners reported that some mothers are advised not to raise child sexual abuse concerns because the allegations are difficult to prove and may harm their case. At the same time, if these concerns are not raised, mothers may later be judged as failing to protect their children. The research also found that some mothers may remain in violent relationships because they believe they can better monitor and protect their children while living with the perpetrator than after separation, where parenting arrangements may require children to spend unsupervised time with an alleged perpetrator.

Recognising children as victim-survivors requires policy settings and services that recognise the specific contexts in which children and young people experience violence, including family settings, early intimate relationships, peer relationships, schools, workplaces, care settings and online environments. A key issue is that young people’s experiences of violence are not always captured by systems designed around adult relationships. Youth intimate partner violence may not involve cohabitation, shared finances, de facto status or long-term financial dependence. This can make violence harder to identify and can exclude young people from legal protections, income support, housing pathways and specialist services. Young people can fall between systems where they are treated as children for some purposes and expected to navigate adult systems for others.

As noted in the consultation paper, children and young people are experiencing a range of escalating harms, accelerated by technology and online spaces. Within the Second Action Plan, the Commonwealth must also recognise that children and young people are experiencing escalating and changing forms of harm such as image-based abuse, coercive control in relationships and from family members, harmful sexual behaviours, exposure to violent pornography, online misogyny and more.²⁴ These harms are central to how many young people experience gender-based violence. The Commonwealth should avoid treating technology-facilitated abuse as a separate category of violence within the Second Action Plan. Technology is often the mechanism through which the above harms are perpetrated or intensified. For children and young people, this means online harm cannot be addressed only through digital safety settings. It must be understood as part of the broader violence landscape they are navigating across relationships, schools, workplaces, social settings and online environments.

Priority Area 4: People who use violence

WwWA members raised that individualised understandings of violence can be harmful when applied to people who use violence. In this context, violence can be framed as an individual behaviour, prompted by mental ill-health, loneliness or personal circumstances. This framing ignores the gendered and structural conditions that enable violence. While men's mental health is important, mental health programs must not be framed as violence prevention. Governments must be clear that any programs funded under the Second Action Plan must be designed to prevent and interrupt gender-based violence. If programs rely on an individualised frame, they risk treating violence as a problem of men's distress or disenfranchisement rather than a demonstration of men's power. This can mean programs are funded without confronting the power dynamics and patterns that drive violence.

An overly individualised approach to people who use violence also risks obscuring institutional responsibility for enabling violence. Many systems and institutions already engage with people who use violence, or see the behaviours that can come before escalation, including harassment, threats, stalking, coercive control, technology-facilitated abuse, sexual harassment and repeated boundary violations. But because violence is treated as a private matter, or as something only the justice system can deal with, these settings – including employment or education – do not see intervention as an institutional responsibility.

Members who have engaged with the university sector described this clearly. Universities often respond to complaints of gender-based violence as though they are running a criminal investigation, rather than managing risk within an institution responsible for student safety. Members described universities using former police officers to conduct investigations, applying high evidentiary thresholds, imposing strict confidentiality clauses that operate as de facto non-disclosure agreements, and referring matters to police before claiming their hands are tied because of police involvement. Some universities have pointed to the failures of police and courts to argue that they cannot be expected to do more.

This institutional understanding, across universities and a range of other settings, fundamentally misunderstands their role. When institutions rely on criminal justice framings, they limit their responsibility to whether an allegation can be proven elsewhere. This is a narrow reading of institutional power. Instead, they should be asking what they can do to recognise risk, to prevent further harm and interrupt patterns of violence within their own environment. Schools, universities, workplaces and services are not courts, but they do have responsibilities to ensure people can safely participate in community life.

This requires a cultural shift and can be supported by clear frameworks to help institutions recognise patterns of harmful behaviour, manage risk, prevent further harm and avoid collusion with people using violence. Different settings will need different tools, and those tools must comply with procedural fairness, privacy, discrimination law, work health and safety, child safety, education rights and other legal obligations. But those obligations should not be used as reasons for inaction. Without clear frameworks, institutions shift the burden back onto victim-survivors, who are left to manage risk, make repeated complaints, avoid shared spaces or wait for police or court outcomes. Inaction amounts to institutional tolerance of violence.

Priority Area 5: System integration and workforce

Given the widespread nature of gender-based violence, the ability to respond must not be held only by a small, specialist workforce. Instead, gender-based violence response skills must be embedded into qualifications and professional expectations of mainstream workforces most likely to encounter victim-survivors and people who use violence. This includes healthcare professionals, teachers, the legal profession, as well as workers across government systems and services.

Specialist services have mature fit-for-purpose models, but their funding means they are often forced to narrow their work to immediate crisis response. This means services that should be undertaking the full agenda of work required under the National Plan, such as prevention and workforce integration, are pushed into permanent triage. It becomes a snake eating its own tail: demand rises, staff are only resourced to respond to crisis, burnout increases, workers leave, and the remaining workforce is left with even less capacity to do the broader work that would make the system function better. The Commonwealth must recognise specialist services as core national response infrastructure within the Second Action Plan and fund them to do the full scope of work the National Plan requires, not just the work that can be squeezed out of a system operating beyond capacity.

Non-specialist and community-based services must also be understood as core parts of the response system. Victim-survivors may first disclose to LGBTIQ+ organisations, migrant and settlement services, disability services, youth services, health services, schools, workplaces, legal services, housing services or other trusted community settings. These services are not peripheral or adjacent in practice. For many people, they are the safest entry point into support.

Capability-building therefore cannot be treated as an individual worker issue. It is not enough to offer cultural competency training and expect workers to overcome unsafe service design. Systems need to be built so that safety, inclusion and responsiveness are embedded into policies, entry points, referral pathways, data, governance and accountability. This is particularly important for LGBTIQ+ people, migrant and refugee women, First Nations women, women with disability, young people, older women and people in rural, regional and remote communities, who may not trust or be able to safely access mainstream pathways.



Member spotlight: Project Respect's *Specialised Sexual Violence Counselling*

Project Respect works with women and gender-diverse people with experience in the sex industry, and with women and gender-diverse people who have experienced sexual exploitation. Project Respect developed its specialised sexual violence counselling service in response to barriers many service users faced when seeking support after violence, including stigma and discrimination, lack of trust in services, and the burden of having to explain their context to practitioners. The service is free, person-led and non-judgemental, and is delivered face-to-face in Melbourne or by telehealth across Victoria. Project Respect's model is unique in Australia and receives inquiries from interstate but is not funded to support people outside Victoria. This points to a national gap in specialist and long-term recovery support.



Sexual violence as a distinct priority area

Sexual violence must be a significant priority in the Second Action Plan. Across WwWA's sexual violence roundtable, members were clear that sexual violence is still too often treated as the silent 'S' in FDSV where it is lightly named in national policy but then lost in implementation. The Commonwealth should therefore treat sexual violence as a distinct and urgent priority area within the Second Action Plan. This does not mean separating sexual violence from the rest of the National Plan. Sexual violence can occur within domestic and family violence, and it also intersects with child sexual abuse, reproductive coercion, workplace harassment, technology-facilitated abuse, institutional violence and violence across the life course. But it is not interchangeable with domestic and family violence. It has distinct drivers, service models, workforce needs, legal issues, prevention requirements and data gaps.

WwWA has prepared a separate sexual violence recommendations paper to sit alongside this broader submission and inform the development of the Second Action Plan. That paper sets out the specific reforms needed to make sexual violence visible and to drive real change on a harm that is rapidly rising.

CHAPTER 3:

Intersectionality cannot be retrofitted

Ending gender-based violence requires a shared commitment to safety, dignity and human rights for all. It also requires policy settings that recognise difference. Communities do not all experience violence in the same way, and systems will continue to miss people if responses are designed around a presumed default victim-survivor.

Systems as violence: justice and child-protection systems as enacting violence

Incarceration costs Australian governments \$6.8 billion each year.²⁵ As part of the Second Action Plan, governments must consider how they can begin to redirect funds toward culturally appropriate supports. Examples of these supports include housing, income security, community-controlled services, healing, family support and non-carceral pathways led by people with lived experience. Investment in ACCOs and other community organisations will allow the growth of more holistic, wrap-around place-based support, better enabling community members to access prevention and early intervention supports such as legal services, establishment of safe housing, and income security.

Prisons and justice systems can keep victim-survivors both physically and metaphorically trapped in a cycle of recurring violence, replicating experiences of gender-based violence.²⁶ For example:

- The majority of women in custody (70-90%) have experienced abuse by intimate partners.²⁷
- Women released from prison are 16 times more likely to die from violence than women of the same age in the general population.²⁸
- People entering prison in Australia are around 66 times more likely to be homeless than people in the general community.²⁹

For Aboriginal and Torres Strait Islander women, the interaction of gender-based violence with policing, child protection and legal systems is especially acute. These systems do not simply respond to violence. Too often, they compound it through racism, misidentification, surveillance, punishment and removal:

- Aboriginal and Torres Strait Islander women are more likely to be misidentified as the person using violence, reflecting systemic racism, biased policing and the failure of systems to recognise the person most in need of protection.³⁰
- Aboriginal and Torres Strait Islander women make up 3.8% of Australia's female population yet make up 47.8% of the female prison population.^{31,32}
- Aboriginal women are overrepresented among women experiencing homelessness, making up women.³³

- Almost half (44%) of the children in out-of-home care in Australia are Indigenous, and Aboriginal and Torres Strait Islander children are 12 times more likely than non-Indigenous children to be in out-of-home care. This number has been steadily increasing over the last five years.³⁴

These rates of displacement and incarceration signal that Australia's systems continue to fail victim-survivors. Policing, prisons, child protection, social security and family law operate together to punish mothers for poverty and victimisation, with particular harm for Aboriginal and Torres Strait Islander women whose motherhood is shaped by punitive colonial systems of surveillance and removal. Addressing the harms of violence for Aboriginal and Torres Strait Islander women requires addressing the systems that create and perpetuate violence, including child protection, incarceration and post-release exclusion.

If governments want to end violence in a generation, then they must recognise systems violence as part of the continuum of gender-based violence. This must begin with acknowledging the racism and colonialism that have shaped core systems such as policing and child protection.

Aboriginal and Torres Strait Islander Women

Violence against Aboriginal and Torres Strait Islander women, girls and gender-diverse people occurs at disproportionately high rates and with intensified severity. Aboriginal and Torres Strait Islander women are 34 times more likely to be hospitalised for family violence than non-Indigenous women, and 11 times more likely to die due to assault.³⁶

For Aboriginal and Torres Strait Islander women, violence is not just interpersonal. Policy settings that apply a binary understanding of the victim-perpetrator dynamic do not align with, nor acknowledge Aboriginal and Torres Strait Islander understandings of harm, accountability and healing. These binary understandings evade government responsibility for the colonial systems that perpetuate intergenerational trauma, systemic racism, and gender-based violence through surveillance and punishment of Aboriginal and Torres Strait Islander women and families.

Government systems and many mainstream frontline services are ill-equipped to respond to victim-survivors in a culturally safe way. As a result, Aboriginal and Torres Strait Islander victim-survivors are deterred from help-seeking, and experience increased rates of housing instability and economic insecurity, misidentification, child removal, and incarceration. Almost all (90%) of incarcerated Aboriginal and Torres Strait Islander women have experienced physical, sexual or emotional abuse, often across multiple points in their lives.³⁷

Gender-based violence cannot be addressed without genuine self-determined and Aboriginal and Torres Strait Islander-led solutions. Without this leadership, our current systems will continue perpetuating the effects of colonisation, dispossession, intergenerational trauma, and systemic racism, all of which are preconditions for violence against Aboriginal and Torres Strait Islander women, girls and gender-diverse people.

LGBTIQA+ communities need more than just inclusive language

LGBTIQA+ communities continue to be relegated to the margins of domestic, family and sexual violence policy. LGBTIQA+ people are not consistently visible in data, are not embedded in core policy design, and do not have dedicated national funding or a national LGBTIQA+ FDSV peak to support sector development and accountability. The upcoming 2027 LGBTIQA+ primary prevention framework will be an important step in recognising the specific drivers of violence against LGBTIQA+ communities. However, it will require matched infrastructure to support implementation and genuine change. This includes dedicated funding, community-led services, workforce capability, data collection, governance and mechanisms to ensure LGBTIQA+ communities are meaningfully included.

Mainstream understandings of domestic, family and sexual violence do not always recognise how violence is experienced by LGBTIQA+ people. Highly gendered and heteronormative frameworks can make some forms of violence less visible, particularly where violence occurs within LGBTIQA+ relationships, chosen families, families of origin, community settings or online spaces. This can mean that LGBTIQA+ victim-survivors are not recognised as victim-survivors, the person using violence is not properly identified, and the specific dynamics of abuse are missed.³⁸ LGBTIQA+ people also experience distinct forms and contexts of violence, including sexual violence motivated by homophobia or transphobia, abuse through dating apps, non-consensual outing, image-based abuse, AI-generated abuse, workplace sexual harassment, family violence linked to rejection of a person's sexuality or gender identity, and violence intended to punish or change who a person is. Online spaces are also escalating sites of harm, where misogyny, homophobia, biphobia, transphobia, racism and other forms of hate can normalise abuse and increase the risk of offline violence.³⁹



Member Spotlight: LGBTIQ+ Health Australia

LGBTIQ+ Health Australia's FDSV work shows what community-controlled leadership can make visible. Through national roundtables, sector reports, communities of practice, advisory representation and sexual violence prevention pilots, LHA has helped identify the specific forms of violence experienced by LGBTIQA+ people and the systems changes needed to respond. This includes work on violence in intimate relationships, families of origin, care settings, financial abuse, sexual violence, disability, intersex bodily autonomy, and safety for LGBTIQA+. The Commonwealth should recognise this leadership as national safety infrastructure and resource LGBTIQA+ organisations to shape implementation from the start within the Second Action Plan.

Migration status is a structural determinant of safety

Multicultural women's safety is often shaped by migration status. For many women, violence is intensified by visa dependency, limited access to income support, fear of government systems, language barriers, and uncertainty about whether seeking help will affect their ability to remain in Australia. Temporary visa status can be used as a tool of control where perpetrators may threaten deportation, withdraw sponsorship, withhold immigration documents, control access to digital accounts, or use the complexity of the migration system to keep women unsafe. Income support barriers were raised as a major safety concern. Where women cannot access social security, crisis payments, Medicare, housing support or affordable legal advice, leaving violence may not be practically possible.^{40,41} We also heard that migration processes can reproduce harm. Short response windows, complex evidence requirements, limited interpreter access and unsafe digital communication channels can place additional pressure on women in crisis, and the system can become another site of control.

Multicultural, migrant and settlement services are often the first and safest place women go when experiencing violence, as they are trusted. Despite this, these services continue to be treated as peripheral to 'mainstream' FDSV services. This does not reflect how women seek help, and it means the services most likely to receive early disclosures are not funded or recognised as core parts of the system.



Member Spotlight: Settlement Services International Australia's FDSV Prevention and Response Group

SSI's DFSV Prevention and Response Group works closely with the multicultural and settlement sector, community sector, the DFSV sector and government to improve safety and access for people from migrant and refugee backgrounds. Grounded in SSI Australia's Model of Culturally Responsive FDSV Practice, its sector capacity building work supports services to respond more effectively to migrant and refugee women and children experiencing FDSV. This work recognises that many services need support to understand how FDSV intersects with migration experiences, visa insecurity, systemic barriers and cultural dynamics. SSI Australia provides collaborative practice support, sector training, communities of practice and advice on practice approaches to help services move beyond a one-size-fits-all response.

Practitioners report increased confidence working with victim-survivors from diverse backgrounds, stronger service partnerships and a better understanding of the barriers migrant and refugee women and children face when disclosing violence and seeking support. Continued investment in culturally responsive FDSV practice expertise and sector capacity building is critical to creating a service system where all victim-survivors can access safe, appropriate and effective support. Further information on SSI Australia's work and priorities for culturally responsive FDSV responses can be found in SSI Australia's own submission to the Second Action Plan consultation.

Rurality shapes both risk and access to safety

Women living rurally, regionally and remotely experience violence in contexts that metro-designed systems do not adequately recognise. Geography shapes both the risk of violence and the ability to access safety through distance from services, lack of transport, limited housing and childcare, poor digital connectivity, privacy concerns in small communities, and limited access to police, courts and specialist supports. Rurality also changes how violence is experienced and responded to. In small communities, victim-survivors may be known to local police, health workers, service providers or the person using violence, which creates real fears about privacy and can cause retaliatory harm.⁴² Technology cannot be assumed to solve access barriers. Online or phone services may assist some victim-survivors, but they are not safe or accessible for everyone. Poor connectivity, lack of private space, device monitoring and technology-facilitated abuse can all make digital service access unsafe. This is particularly acute where a person is geographically isolated and cannot easily access another device or service.

The climate emergency further exacerbates risks of violence for people living rurally, regionally and remotely. This is due to geographical factors that cause greater exposure to environmental disasters, inadequate rural infrastructure to respond and recover, and pressure on already-constrained services such as healthcare and domestic and family violence services. Extreme heat is associated with higher rates of intimate-partner violence, sexual violence, online hate speech, and first-time perpetration of violence.^{43,44} The climate emergency also intensifies conditions associated with heightened risks of gender-based violence: stress, mental ill-health, traumatisation, lack of sleep, and increased isolation and proximity to perpetrators. For rural and remote communities, these conditions are often further intensified due to economic dependence on agricultural industries that are affected by environmental disasters.

People with disability

Women with disability experience disproportionately high levels of FDSV. People with disability can also experience unique forms of disability-specific violence beyond intimate-partner violence. People with disability interact with many more services compared to people who do not have disability, and therefore, there is a higher risk of experiencing violence. This could be through support relationships, service settings, institutions, group homes and other care-related settings.⁴⁵

Disability Representative Organisations and WwWA members have called for a disability working group, led by Disability Representative Organisations, to be funded to support implementation of the Second Action Plan, including fair remuneration. The working group would have a core function to provide guidance and support to governments in implementing The National Plan to End Violence against Women and Children. Successful implementation of the Second Action Plan needs to be done with women with disability, rather than asking women with disabilities to provide unpaid advice through separate consultations.

The NDIS is critical enabling infrastructure to realising the National Plan and reforms will disproportionately impact women with disability. Women and girls with disability are less likely to be eligible for the NDIS than men and are at heightened risk of exclusion under tightened access and eligibility settings. Apparent savings will not remove need but instead displace costs into other systems, including health, housing and crisis services. Changes that reduce access to supports or increase uncertainty risk undermining progress against the government's commitment to end gender-based violence within a generation. Without clear alignment between the NDIS and the National Plan, there is a significant risk that reforms will shift pressure onto already stretched systems and erode the effectiveness of coordinated government efforts to improve outcomes for women with disability.



Alliance leadership: Women with Disabilities Australia

Women with Disabilities Australia (WWDA) is one of the National Women's Alliances and the national representative organisation for women, girls and gender-diverse people with disability. WWDA's approach to the Second Action Plan highlights that disability expertise must be built into implementation, not added through separate or unpaid consultation after decisions have been made. WWDA is calling for a funded disability-led gender-based violence working group, led by Disability Representative Organisations and WWDA, with paid involvement from women, girls and gender-diverse people with disability who bring lived experience and policy expertise. This mechanism would support government to identify and address disability-specific issues across the life of the Second Action Plan, including violence in support relationships, service settings, institutions, group homes and care-related settings. It would also help ensure income, housing, NDIS supports, transport, accessible information and social participation are treated as safety issues.

Older women

Older women are one of the most overlooked groups in the gender-based violence conversation. As Older Women's Network NSW describe, older women face the compounded impacts of both gender-based violence and abuse of older people.⁴⁶ This means their experiences can fall between systems, with FDSV responses not always designed for older women, and aged care or elder abuse responses not always equipped to recognise gendered violence.

Being female, older and single increases the risk of housing insecurity, particularly where women have experienced low-paid work, caring responsibilities, separation, violence, poor health, age discrimination or job loss.⁴⁷

Many older women experiencing homelessness do not fit the assumed profile of homelessness. They have worked, raised children, survived abusive relationships and remained independent until a crisis pushed them into housing insecurity. This matters for the Second Action Plan because older women may not be visible in standard service pathways or data.

The Commonwealth should ensure that the Second Action Plan is explicitly linked to the National Plan to End the Abuse and Mistreatment of Older People 2026–2036, so older women are not split across disconnected policy agendas. That plan recognises ageism as a driver of abuse and includes focus areas on community awareness, laws and systems, service capability, evidence and collaboration. This also requires better data. Older women's experiences should not be collapsed into broad age categories such as '55 plus' or '65 plus'. More granular age-disaggregated data is needed to understand violence in midlife, later life, aged care and institutional settings, and to ensure smaller or less visible groups are not diluted when priorities are amalgamated.

Healing and recovery must also be meaningful for older women. Many older women have carried trauma across their lives and may disclose violence for the first time in later life. The Second Action Plan must recognise that older women need age-appropriate pathways to safety, housing, legal assistance, health care and recovery, and that these pathways must be connected to aged care, elder abuse, homelessness and FDSV systems.

Sex workers

The complex regulation and criminalisation of sex work across Australian jurisdictions increases sex workers' risk of experiencing both systemic and interpersonal violence.

Sex workers' experiences of systemic violence are grounded in the criminal regulation of sex work. Those who experience sexual violence or workplace exploitation are not always protected by workplace health and safety laws and are discouraged from accessing legal support due to the risk of facing criminal charges themselves.⁴⁸ The criminalisation of sex work necessarily leads to systemic violence perpetrated through policing, carceral systems, child protection agencies, immigration and social security systems.⁴⁹ Sex workers also face significant barriers accessing victim support and healthcare services due to the fear of legal consequences, child protection interventions, victim-blaming and discrimination.⁵⁰

For migrant sex workers, legal consequences may include deportation. Systemic violence is perpetrated through law enforcement initiatives intended to combat human trafficking and sexual exploitation. These operations can be used to 'legitimise' targeted deportation of sex workers,^{51,52,53} and the Scarlett Alliance's Asian Migrant Sex Worker Advocacy Group describe these operations as "government-funded harassment and discrimination."⁵⁴ This is despite evidence that most human trafficking crimes occur outside the sex work industry.⁵⁵

Not only does the criminalisation of sex work enable violence against sex workers, but it encourages the narrative that sex workers are not and should not be part of the solution in ending gender-based violence. Sex worker organisations play a pivotal role in ending gender-based violence by highlighting systemic violence, advocating for sexual and reproductive health, and informing conversations on topics such as porn, healthy masculinities, consent and sexuality.⁵⁶

The WwWA notes that while sex workers were highlighted in the National Plan, they received just one mention in the First Action Plan. WwWA urges government to consider forming effective, tangible actions in the Second Action Plan that work towards ending violence towards sex workers.

Young people

Young women experience gender-based violence in distinct settings shaped by social contexts. This includes the transition from secondary to tertiary education, the formation of early and foundational intimate relationships and increasing independence, often without a stable income or safe and secure housing.⁵⁷ Existing policy and legislation do not always reflect these unique and heightened risk factors. This leaves young people to navigate systems that are ill-equipped to respond to their circumstances. Structural approaches to ending violence, including policy settings and funding agreements, must consider the varying circumstances in which violence occurs and respond accordingly.

Young women and gender-diverse people are overrepresented in experiences of sexual violence and technology-facilitated abuse. Sexual violence occurs in settings where young people congregate and seek community, such as online forums, school, university, nightclubs, and festivals. In these contexts, sexual violence is often normalised through peer dynamics and the use of alcohol and substances. Technology-facilitated violence is also pervasive: one in four young people under 15 have experienced non-consensual tracking, and one in ten have experienced image-based abuse.⁵⁸ Girls are three times more likely than boys to experience non-consensual sharing of images and online sexual solicitation by an adult.⁵⁹ Online spaces are increasing young people's exposure to violence. More than one in two young people under 15 have experienced cyberbullying, and nearly 80% have seen content associated with harm.⁶⁰ Primary school students are creating non-consensual, sexualised deepfakes of their peers and teachers.⁶¹ More than 70% of dating-app users have experienced online sexual harassment in the past five years, and one in three have experienced acts of violence in person.⁶²

Single mothers

Single-mother families face an increased risk of poverty and deprivation due to costs and debts incurred through separation, and gender-inequalities that create barriers to economic security. The rates of poverty for single-parent households are three times higher than for couple-family households,⁶³ and the proportion of single-parent families that are mother-led is almost 80%.⁶⁴ Single mothers have a median taxable income of \$39,629.⁶⁵ Conditions of poverty and singlehood are risk factors for experiences of violence, including systemic violence through the Child Support System, social security system, child protection services, and the family court.

Single Mother Families Australia observes that recipients of Centrelink are at a higher risk of returning to violent homes because the level of income support is not sufficient for their costs of living.

The pervasive financial abuse that occurs through Child Support agreements is well documented: on average, paying parents owe primary caregivers \$7,261, equating to a total of \$1.9 billion unpaid child support.⁶⁶ Simultaneously, the child support system is weaponised by paying parents to accrue Centrelink debt on behalf of the primary carer: on average, recipients of child support payments owe \$3,452 to Centrelink.⁶⁷ Economic abuse contributes further to conditions of economic insecurity and poverty, which are often misinterpreted as a risk factor for parental neglect by child protection services and the Family Court, rather than a vulnerability indicator resulting from violence and economic abuse. The Family Court is also weaponised by perpetrators who initiate relocation orders that require victim-survivors to remain or return to their place of origin to participate in proceedings. This can occur even where a separation has occurred, and protective orders are in place. This mechanism is used to exert control over victim-survivors and to continue perpetrating violence.

CHAPTER 4:

A reform agenda for a genuine whole-of-government response

The complexity of gender-based violence means that no single government portfolio can deliver safety on its own. Victim-survivors do not experience violence within portfolio lines. They experience the combined effect of housing, income support, employment systems, education settings, health services, justice processes, migration rules, disability supports, digital systems and community services. For example, a woman trying to leave violence may be navigating Services Australia, childcare subsidies, workplace leave, housing insecurity and legal proceedings at the same time. A young person may be experiencing violence while falling between education, income support, housing and child protection systems. An older woman may be experiencing gender-based violence, elder abuse, housing insecurity and aged care risk, while the systems designed to respond sit under different plans and portfolios.

This is why the Commonwealth Government must establish a genuine whole-of-government reform agenda within the Second Action Plan. WwWA has identified key Commonwealth levers that can be used to address violence, while also recognising where shared responsibility across portfolios and jurisdictions is required.

National leadership as leverage for state and territory-based advocacy

Many of the systems that determine whether victim-survivors can access safety sit wholly or partly outside direct Commonwealth control, but jurisdictional complexity cannot become an excuse for inaction. WwWA members repeatedly emphasised that on state and territory matters, Commonwealth leadership is essential. When the Australian Government sets clear national expectations and reform priorities, it gives the women's safety sector a benchmark to take into state and territory advocacy. The Commonwealth also has practical leverage through funding agreements and service contracts, National Cabinet and other ministerial forums, regulatory standards, and national frameworks to set expectations.

Cross-cutting recommendations

The recommendations below reflect issues raised so consistently, and with such urgency, that they cannot be located within a single portfolio. They identify the broader foundations needed for the National Plan to succeed and what is required to genuinely shift the dial on gender-based violence.

Fund the national response at the scale of the crisis

Ending gender-based violence cannot be treated as a national priority while the services victim-survivors rely on are funded to operate in permanent crisis. The most common issue raised by WvWA members was the gap between national ambition and funded reality. Specialist domestic and family violence services, specialist sexual violence services, women's legal services, community legal services, family violence prevention and legal services (FVPLS), frontline housing and homelessness services and other specialist services have mature fit-for-purpose models. However, they are not consistently funded to meet demand or deliver the full scope of work required under the National Plan. The Second Action Plan must commit to sustainable, long-term funding that is commensurate with the scale of the crisis and reaches the frontline. Services must be funded not only for immediate crisis response, but for prevention, early intervention, recovery, workforce support, secondary consultation, collaboration and systems integration. Too often, chronic underfunding forces services to narrow their work to the most immediate risk in front of them. This means broader work that is essential to the National Plan is deprioritised or done unfunded, even though response is also prevention when it supports safety earlier, interrupts escalation and prevents further harm.

The Second Action Plan and its funding settings must also recognise community-led and population-specific services as core safety infrastructure, not as add-ons. LGBTIQ+ services, migrant and settlement services, disability-led organisations, youth services, older women's organisations, ACCOs, and other trusted community organisations are already doing prevention, early intervention, safe disclosure, referral and recovery work. For many communities, these organisations are the trusted entry points to safety and support.

Move from individual responsibility to system responsibility

The Second Action Plan must grapple with a deeper conceptual problem in Australia's response to violence against women and children: our policy settings too often reflect an individualised and incident-based understanding of violence. This does not match the scale or structural nature of violence in Australia.

This individualised approach shows up across policy settings, including workplace entitlements, complaints pathways, service navigation models and systems that require victim-survivors to disclose violence to access support or depend on victim-survivors pushing uphill through systems with deeply entrenched institutional resistance to change. This does not reflect what we know about violence, including under-reporting, low disclosure rates, fear of retaliation, systems abuse and the risk of not being believed. It also does not provide the structural change needed to shift the dial. The Second Action Plan must move beyond adding more individual pathways into systems that are not working and instead place the burden of responsibility on systems and institutions to prevent and meaningfully respond to violence.

Treat sexual violence as a distinct and urgent national priority

Sexual violence is too often treated as the silent ‘S’ in FDSV. While it can occur within domestic and family violence, it is not interchangeable with it. Sexual violence occurs across the life course and across many settings, including workplaces, schools, universities, institutions, aged care, online spaces and peer relationships. It requires specific expertise, specific services and specific accountability. The Second Action Plan must ensure sexual violence is visible, funded and measurable. WvWA has also prepared a standalone sexual violence recommendations paper to sit alongside this broader submission. This is not because sexual violence sits outside the whole-of-government reform agenda. It is because sexual violence is too often acknowledged in principle and then absorbed into broader domestic and family violence settings in practice. The standalone paper sets out the specific reforms needed to ensure sexual violence is visible in the Second Action Plan.

Establish a genuine whole-of-government reform agenda

Victim-survivors do not experience violence within portfolio lines. Their safety is shaped by the interaction of housing, income support, employment systems, education settings, health services, migration rules, disability supports, aged care, justice processes, digital systems and community services. The Commonwealth must therefore set clear responsibilities for each relevant Australian Government portfolio within the Second Action Plan. A genuine whole-of-government approach also means connecting the National Plan to the other national strategies and reform agendas that shape victim-survivors’ lives. This includes the plans named in the consultation paper, such as the *National Strategy to Prevent and Respond to Child Sexual Abuse* (the National Strategy), *Our Ways – Strong Ways – Our Voices*, and *Safe and Supported*. It must also include housing and homelessness, disability and National Disability Insurance Scheme (NDIS) reform, aged care, migration, employment services, social security, health, digital safety, disaster response and climate adaptation. The Commonwealth should ensure that the National Plan does not sit beside the major systems shaping victim-survivors’ lives but should change how those systems operate. Safety must be a shared responsibility across government.

Track and coordinate existing recommendations for implementation accountability

Australia does not lack evidence about gender-based violence. Governments have already received recommendations through inquiries, royal commissions, parliamentary committees, death reviews, sector reports and lived experience consultations. Victim-survivors, families, communities and services should not have to keep re-prosecuting what governments have already been told. The task now is implementation. WwWA recommends that National Cabinet and relevant national ministerial councils provide regular public updates on implementation of major recommendations relevant to gender-based violence, including those outside the National Plan, beginning with the 2024 Senate inquiry into missing and murdered First Nations women and children. These updates should make progress visible and keep pressure on governments to treat recommendations as live commitments.

Whole-of-government machinery: Embedding safety across Commonwealth systems

Lead portfolio: Prime Minister and Cabinet, Women, Finance, Public Service

Shared responsibility: All Commonwealth departments and agencies

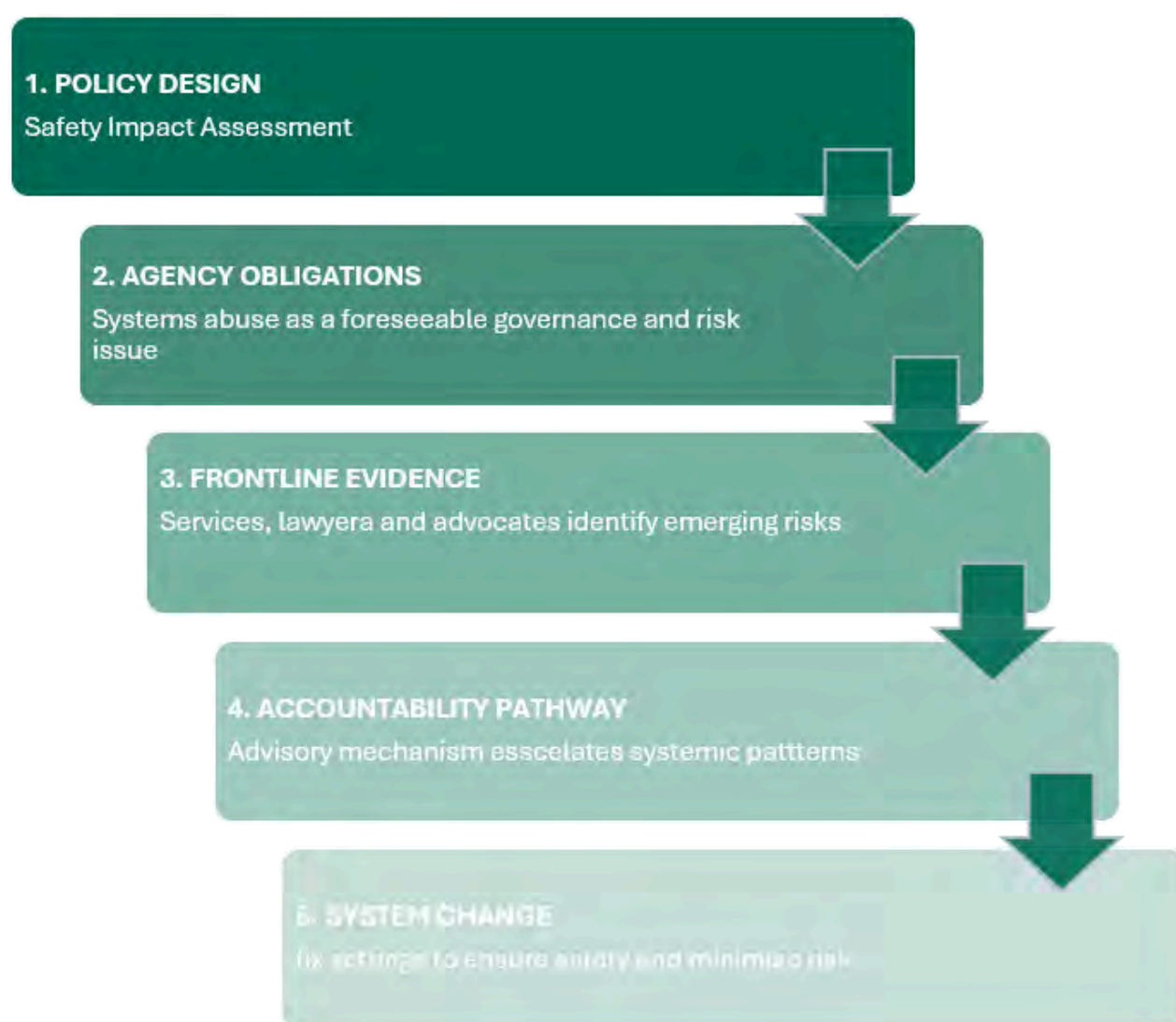
Why these portfolios matter

The machinery portfolios, including the Office for Women, Finance, the Public Service, government services and Prime Minister and Cabinet, hold the levers that determine how safety is built into Commonwealth decision-making. These portfolios shape Cabinet and Budget processes, public administration, service delivery standards and whole-of-government implementation. The Office for Women has already led important work through the Commonwealth Systems Abuse Audit and Safety by Design work. The Commonwealth should now turn that work into enduring Federal Government architecture within the Second Action Plan.

The problem we must solve

Commonwealth systems can be weaponised by perpetrators through payments, debts, compliance processes, identity settings, information sharing, privacy, complaints pathways and service access. The Commonwealth systems abuse audit is an important first step, but an audit is still a point-in-time exercise. Perpetrators will continue to adapt as rules, technologies, administrative processes and information-sharing arrangements change. A system that is reviewed today may create new risks tomorrow. Systems abuse prevention therefore needs to be an active and ongoing responsibility across Commonwealth agencies, not a periodic audit that identifies harm after victim-survivors and frontline services have already had to manage the consequences.

The problem is also broader than perpetrator misuse. Commonwealth systems can create risk through ordinary design choices, including what information is recorded, who can see it and how people are notified. Departments have a responsibility to minimise those risks, even where there is no evidence yet that a perpetrator has misused the system. For example, the Additional Child Care Subsidy Child Wellbeing provides additional childcare support where a child is vulnerable or at risk of harm, abuse or neglect, including in circumstances involving domestic and family violence. While this subsidy is an important support for victim-survivors and children escaping violence, its design can also create safety risks. Because the entitlement attaches to the child, both parents have visibility of subsidy or enrolment information through Services Australia or childcare records/communications. This can create unsafe disclosure pathways where an unsafe parent is able to infer that violence or child safety concerns has been disclosed.



What WwWA recommends

The Commonwealth should use the Second Action Plan to turn systems abuse prevention into a standing Australian Government responsibility. This means embedding safety into Cabinet processes, agency governance, service design and accountability mechanisms. The solution is connected architecture that requires departments to identify systems risk before harm occurs and respond quickly when frontline services identify emerging patterns.

Recommendation 1.1

Prioritise the migration system in the next systems abuse audit

The Commonwealth should ensure that the Second Action Plan recognises the migration system as a critical site where systems abuse can occur. WwWA members have raised how temporary visa status and migration processes are used by perpetrators to threaten deportation and control victim-survivors. The next systems abuse audit should prioritise the migration system and the Department of Home Affairs, in partnership with specialist multicultural, migrant and refugee women's organisations, including Australian Multicultural Women's Alliance (AMWA) and Settlement Services International (SSI). WwWA also urges the government to engage directly with the recommendations made by these organisations through their own submissions and consultation processes, and to draw on their specialist expertise to inform migration, safety and systems abuse reform for migrant women and victim-survivors on temporary visas.

Recommendation 1.2

Embed Safety Impact Assessment in Commonwealth policy design

Strengthen existing Gender Impact Assessment and Cabinet processes by requiring a safety-from-violence lens for relevant Cabinet submissions and New Policy Proposals. Higher-risk proposals should require a standalone Safety Impact Assessment, particularly where reforms involve payments, debts, housing, migration, digital identity, justice, education, child and family systems, service navigation or information sharing. This would ensure policies are tested for systems abuse, unsafe disclosure pathways, privacy risks and unintended safety impacts before implementation.

Recommendation 1.3

Amend the Public Governance, Performance and Accountability (PGPA) framework to establish a standing systems abuse prevention obligation

Create an enduring obligation requiring Commonwealth agencies and departments to identify and reduce the risk that their systems, processes and powers may be weaponised by perpetrators or create safety risks through ordinary design. This should be embedded through amendments to the Public Governance, Performance and Accountability Act 2013 or associated rules, so systems abuse is treated as a foreseeable governance risk. Agencies should be required to consider perpetrator misuse and system-created risk, including account visibility, information sharing, notification settings and administrative processes that may expose victim-survivors to harm.

Recommendation 1.4

Strengthen the feedback loop between frontline evidence and government action

Expand the existing systems abuse stakeholder engagement mechanism so frontline services, legal experts and specialist advocates can raise emerging risks as they appear. Membership should include women's legal services, community legal centres, financial counsellors, migration law experts, First Nations specialist services, disability advocates and other organisations that see systems abuse through casework. The mechanism should have a process for urgent issues to be raised between meetings.

Recommendation 1.5

Create a pathway for independent investigation of systemic harm.

Where repeated administrative harm, cross-agency failure or agency inaction is identified, there should be a clear pathway for referral to the Commonwealth Ombudsman. This pathway should not rely on individual victim-survivors making complaints after harm has occurred. It should allow frontline services, legal services and specialist advocates to raise patterns of systems abuse, unsafe system design or repeated administrative harm that they are seeing through casework. This would recognise systems abuse as a public administration issue, not only an individual service complaint, and would provide an independent accountability pathway where Commonwealth systems are being misused or causing repeated harm.

Member Spotlight: Single Mother Families Australia

Single Mother Families Australia (SMFA) is a lead national organisation providing policy advice and expertise on issues impacting single mother families. SMFA provides a range of platforms that give voice to lived realities for single mother families, translating experiences of hardship, poverty and gender-based violence into strategic policy advice. SMFA has a large focus on systems abuse and has published policy briefs on income support payments, the Child Support System, child protection services, the Family Court, and safe housing. These systems affect single mothers' economic security and intersect with safety and experiences of violence.

SMFA's advocacy on the weaponisation of the Child Support System has amassed government attention on systems abuse. This includes the Commonwealth Ombudsman and Inspector General of Taxation's 2025 reports on the failures of the Child Support System, and the 2026 Commonwealth Ombudsman's report. These inquiries identified that Services Australia and the Australian Taxation Office are contributing to systemic abuse and gender-based violence. The government's systems abuse audit and 2026-27 Budget announcements to improve the child support system are, in part, outcomes of work led by SMFA.

SMFA's advocacy success is an example of how a strengthened feedback loop between frontline evidence and government action would support targeted and effective systemic interventions. Establishing a formal pathway for frontline services to recommend an independent investigation into systemic harm would recognise that systems abuse is a public administration issue, and not the responsibility of individuals.

Social Services: Financial safety as core safety infrastructure

Lead portfolio: Social Services

Shared responsibility: Services Australia / Treasury / Finance

Why this portfolio matters

As the owner of the National Plan, the Social Services portfolio holds some of the most direct Commonwealth levers for victim-survivor safety. These include crisis financial support, income support settings, Services Australia processes, funding for specialist services, debt and compliance settings, family and child safety programs, and the national infrastructure for FDSV responses.

For victim-survivors, financial safety is often a precondition for leaving violence, remaining safely separated and rebuilding stability after abuse. The Leaving Violence Program recognises this by providing eligible victim-survivors leaving violent intimate partner relationships with up to \$5,000 in financial support, including up to \$1,500 in cash, with additional support through goods and services, safety planning, risk assessment and referrals for up to 12 weeks.

The Social Services portfolio is also central to children and young people's safety. Young people may experience violence in family settings, early intimate relationships, peer relationships, workplaces, education settings and online environments, but current systems do not always recognise young people as victim-survivors in their own right. Income support rules, age-based eligibility settings, Services Australia processes and service pathways can all affect whether a young person can leave violence safely.

The problem we must solve

The current problem is that financial safety is still treated too narrowly. The Leaving Violence Program is an important measure, but the current payment does not reflect the real and ongoing costs of leaving violence. Anglicare's 2026 analysis estimates that a conservative one-month leaving and stabilising package now costs \$7,017, compared with \$4,099 in 2016.⁶⁸ This estimate includes rent, bond, energy, water, groceries, internet, phone, fuel, moving costs, temporary accommodation and childcare, but does not capture longer-term costs such as legal representation, debt, relocation, replacement household goods, lost income and recovery.

The design of the current program also excludes many victim-survivors. Eligibility is focused on intimate partner violence, leaving out victim-survivors experiencing other forms of domestic, family and sexual violence where financial support may be needed to establish safety. Access is also limited by a 12-month restriction and a 12-week eligibility window linked to changed living arrangements, even though leaving violence is often non-linear and may involve returning, relocating again, post-separation violence, financial abuse and ongoing housing insecurity. This means financial support is still operating as a capped crisis response rather than as safety infrastructure.

Young people face a related but distinct gap. Current systems can treat young people as dependent on parents or guardians even where home is unsafe. Services Australia can recognise a young person as independent where it is unreasonable for them to live at home because of extreme family breakdown, violence or serious risk, but this still requires assessment and evidence. Young people may also be unable to safely access banking, identity documents, housing, income support or adult FDSV pathways without practical support.

What WvWA recommends

The Commonwealth should use the Second Action Plan to turn systems abuse prevention into a standing Australian Government responsibility. This means embedding safety into Cabinet processes, agency governance, service design and accountability mechanisms. The solution is connected architecture that requires departments to identify systems risk before harm occurs and respond quickly when frontline services identify emerging patterns.

Recommendation 2.1

Expand the Leaving Violence Program

The Commonwealth should strengthen the Leaving Violence Program within the Second Action Plan, so it better reflects what it takes to establish safety. The current program is an important Commonwealth safety measure, but its design is too narrow, and the payment level does not reflect the contemporary cost of leaving violence. The Australian Government should:

- Increase the payment to \$8,000 to better reflect the contemporary cost of leaving violence and provide a modest buffer for costs not captured in conservative estimates.
- Expand eligibility beyond intimate partner violence so victim-survivors experiencing other forms FDSV violence can access support where financial assistance is needed to establish safety.
- Extend the eligibility window and review the 12-month access restriction to recognise that leaving violence is rarely a single event and that victim-survivors may face renewed or escalating risk after the first point of separation.
- Introduce a supplementary payment within the program for victim-survivors whose safety needs are not resolved by the initial payment, including where housing insecurity or ongoing risk is clear during the existing support period.
- Build specialist financial safety support into the program, including access to specialist economic abuse support and financial counselling where victim-survivors are dealing with coerced debt, unsafe accounts, damaged credit histories, social security debts, unpaid bills or other financial harms caused by violence.

Recommendation 2.2

Introduce a universal safety supplement for victim-survivors

The Commonwealth should introduce a universal Safety Supplement for victim-survivors where FDSV creates additional financial need. A Safety Supplement should sit within the income support system and be available where violence creates additional costs, regardless of the primary payment a victim-survivor receives.

This matters because victim-survivors are not one cohort sitting on one payment. They may be students, single parents, people accessing JobSeeker, carers, young people, older people, people with disability, or people trying to stabilise after leaving violence. They may already be receiving different forms of income support, but those payments are not designed to recognise the specific and ongoing financial impacts of violence. They may already be receiving different forms of income support, but this specific payment would be designed to recognise the specific financial impacts of violence. This reform would move financial safety from a one-off crisis response toward a core part of Australia's social security architecture.

Recommendation 2.3

Ultimately establish a statutory financial safety entitlement for victim-survivors

The Commonwealth should ensure that the Second Action Plan commits the Australian Government to moving beyond a crisis payment model and toward a statutory entitlement to financial safety support for victim-survivors. Where a victim-survivor meets clear statutory criteria and financial support is necessary to establish or maintain safety, support should be available as an entitlement.

Special appropriations are already used where government creates a legal entitlement available to everyone who satisfies specific criteria, including demand-driven payments such as the age pension. They are also used where a cash-limited annual appropriation is not appropriate for an entitlement-based program. A statutory financial safety entitlement would apply the same logic to violence: if the Commonwealth accepts that financial support is necessary to escape violence and remain safely separated, then access should be demand-driven. This reform would recognise financial safety support as core social infrastructure, consistent with other enduring commitments such as income support and Medicare, rather than treating women's safety as discretionary crisis spending.

Recommendation 2.4

Establish a national youth text service

The Commonwealth should establish a national youth text service for young people experiencing intimate partner violence and other forms of gender-based violence. Precedent exists in national text and chat services, such as through Lifeline, that predominantly service young people. A digital entry point would provide a safer and age-appropriate pathway into support. This would help fill the gap between prevention education and crisis response by creating an earlier and more accessible pathway to support.

The case for this investment is strong. The National Women's Alliances' 2026–27 Pre-Budget Submission costed a national youth-based intimate partner violence text service at \$15 million over four years, with an estimated five-year benefit of \$90 million and a social return on investment of 6.0. The proposal is identified as an unfunded early intervention gap and mapped to Pillar 2 of the National Plan.

Recommendation 2.5

Audit and reform the Department of Social Services and Services Australia settings for young victim-survivors

The Commonwealth should require a youth safety audit of DSS and Services Australia settings within the Second Action Plan to identify where government systems create unsafe barriers for young people experiencing violence. The audit should examine whether current settings assume parents or guardians are safe or willing to support a young person, and whether parental and partner income tests, evidence requirements, family contact expectations, mutual obligation settings, debt settings and identity requirements increase risk.

This should include a specific review of Youth Allowance and 'unreasonable to live at home' processes. Young people should not be required to obtain evidence from an unsafe parent, rely on a person using violence, or prove family breakdown through processes that make them less safe. The audit should lead to reforms that allow young victim-survivors to access income support and practical assistance without being pushed back into unsafe homes or homelessness.

Housing and Homelessness: No safety without housing

Lead portfolio: Housing and Homelessness / Treasury

Shared responsibility: Social Services / Finance / states and territories / Housing Australia / specialist homelessness services / specialist FDSV services / Aboriginal community-controlled housing and family violence sectors

Why these portfolios matter

The link between housing insecurity and violence is clear. Specialist Homelessness Service data shows that in March 2026:⁶⁹

- More than 59,000 women were experiencing or at risk of homelessness, representing almost two in three specialist homelessness service clients;
- Domestic and family violence was the leading cause of homelessness, and has been trending upward over the last decade;
- Approximately half (49%) of women accessing specialist homelessness services reported domestic and family violence as the reason for seeking support.

The problem we must solve

Housing is fundamental to preventing and responding to violence against women and children. While governments have committed to increasing housing supply through initiatives such as the Housing Australia Future Fund (HAFF) and investments in crisis accommodation, current housing policy settings do not meet the existing or projected needs of women and children escaping violence.

WwWA members consistently report that, although crisis and transitional accommodation are important, they do not provide long-term housing security. Too often, victim-survivors receive support at the point of crisis but are left without a viable pathway into stable housing. As a result, women and children may cycle through short-term accommodation, be placed in unsafe or unsuitable settings, remain on social housing waiting lists, or return to violent homes because safe alternatives are unavailable.

Current housing policy remains focused on increasing supply, with insufficient attention to safety and the specific needs of victim-survivors. While increasing housing stock is essential, supply alone will not improve outcomes unless housing is designed and delivered with safety, accessibility and long-term recovery in mind. Broad housing targets do not ensure that women and children escaping violence can access safe and appropriate housing when they need it. Commonwealth housing funding streams privilege large-scale delivery, speed and cost efficiency. This can price out specialist women's and community housing providers, particularly where they are proposing smaller, safer, gender-responsive models. It can also push providers towards housing that is efficient on paper but unsafe in practice. For victim-survivors, safe housing may need to be dispersed, confidential, close to services, designed around children and supported by trauma-informed tenancy management. Large, identifiable developments can create risk where they make victim-survivors easier to locate, concentrate people with complex safety needs without adequate support, or fail to account for the particular ways violence follows women and children after separation.

What WwWA recommends

Recommendation 3.1

Review homelessness definitions and data collections to recognise violence as a form of homelessness

The current ABS definition of homelessness recognises that homelessness is not only rooflessness, and that a person may be homeless where their living arrangement is inadequate, insecure, or does not allow control of and access to space for social relations. However, current homelessness data does not adequately capture victim-survivors who are forced to remain in or return to a violent home because there is no safe housing alternative. WwWA members believe that the definition of homelessness should be expanded to capture scenarios where a victim-survivor wishes to leave their dwelling because of violence, but cannot due to a deficit of safe or affordable exit points. The Commonwealth should also recognise returning to violence as a homelessness outcome where the reason for remaining or returning is the absence of a safe housing pathway within the Second Action Plan.

This would help governments measure not only visible homelessness, but the hidden homelessness created when people cannot leave safely or are forced back into unsafe housing.

Recommendation 3.2

Strengthen the Leaving Violence Program as a homelessness prevention measure

Leaving violence is the point at which housing insecurity can become homelessness. The Commonwealth should recognise the Leaving Violence Program as both a financial safety measure and a homelessness prevention measure within the Second Action Plan. The current Program provides up to \$5,000 in financial support, including up to \$1,500 in cash and the remaining funds in goods and services. It also provides safety planning, risk assessment and referrals to other services for up to 12 weeks. This existing support period should be used to identify where a victim-survivor's housing risk has not been resolved by the initial payment. Anglicare's Cost of Leaving Report 2026 shows that the current \$5,000 package is below the contemporary cost of leaving. The report estimates that a conservative one-month 'leaving and stabilising' package now costs \$7,017, up from \$4,099 in 2016. This estimate only includes immediate costs such as rent, bond, utilities, groceries, phone, internet, fuel, moving costs, temporary accommodation and childcare.⁷⁰

Recommendation 3.3

Set and track national housing targets for victim-survivors

Identify housing targets through Specialist Homelessness Service data and updated modelling on housing demand. This should build on Equity Economics' 2021 *Nowhere to Go report*, to identify the unmet need for homes for women and children escaping violence.⁷¹ The original *Nowhere to Go* report found that a lack of available social and affordable housing was driving women to return to perpetrators or into homelessness and estimated that around 16,810 additional social housing properties were needed to address this issue at that time. However, since the report's publication, housing and rental availability and cost-of-living pressures have worsened significantly, making it likely that the scale of unmet need has increased. This modelling should be used to inform measurable national housing targets under the Second Action Plan. These targets should cover the full housing pathway, including crisis accommodation, transitional housing and long-term social housing. The Commonwealth should publish annual reporting on these targets, including how many victim-survivors are housed and average wait times across jurisdictions. Reporting should be disaggregated by age, disability, Aboriginal and Torres Strait Islander status, cultural and linguistic diversity, location and household composition where safe and appropriate.

Recommendation 3.4

Embed safety and gender-responsive criteria in Commonwealth housing funding models

Safety and gender-responsiveness should be embedded as standard funding criteria wherever Commonwealth housing investment is intended to improve safety for victim-survivors. Criteria should consider whether proposed housing is safe in practice. This includes consideration of location, density, privacy, perpetrator risk, disability access, suitability for children, cultural safety, transport, affordability, pet safety, proximity to services and access to specialist support.

This would build on existing Commonwealth programs such as Safe Places and the HAFF Crisis and Transitional Accommodation Program but should not be limited to targeted rounds or application processes. As climate change worsens, gender-responsive housing criteria must also include minimum standards that safeguard women and children from unsafe living conditions, including inadequate, costly, and inefficient heating, cooling and insulation.



Spotlight: YWCA Australia's Housing that pays back report

YWCA Australia's *Housing that Pays Back* report shows that gender-responsive housing more than pays for itself. A conservative cost-benefit analysis of YWCA's 528-tenancy housing portfolio found that every \$1 invested generates \$2.02 in measurable public benefit, rising to \$4.66 in scenarios where stable housing supports family reunification after out-of-home care. Across 731 residents, the portfolio avoids around \$3.5 million each year in health costs, \$2.8 million in justice system costs and \$1.5 million in homelessness system costs.



Recommendation 3.5

Pair capital funding with operational support for victim-survivor housing.

Commonwealth housing grants that deliver homes for victim-survivors should include operational funding alongside capital investment. Capital funding can build or acquire the housing, but it does not fund the specialist support often needed to make housing safe and sustainable in practice. Victim-survivors and their children escaping violence may need ongoing wrap-around support to move in safely, manage risk, sustain a tenancy, support children, navigate systems and rebuild economic security. If housing is being funded as part of the response to violence, the funding model must include the operational support required.

Education:

Building safety across the education life course

Lead portfolio: Education

Shared responsibility: States and Territories / ECEC services / Schools / Higher Education Providers / Skills and Training

Why this portfolio matters

The Education portfolio holds critical levers for preventing and responding to gender-based violence across the life course. Education settings are the most consistent institutions in children and young people's lives.

The Education portfolio has already demonstrated significant leadership, particularly through the *Action Plan Addressing Gender-based Violence in Higher Education* and the *National Higher Education Code to Prevent and Respond to Gender-based Violence*. These reforms provide a useful precedent for understanding education settings as institutions with responsibilities that go beyond awareness-raising or curriculum delivery. This logic should inform the education portfolio as a whole.

While early childhood education and care, schools and higher education require different models because of their regulatory and jurisdictional complexities, the underlying principle remains the same: education settings are institutions responsible for shaping safe cultures and responding to violence.

ECEC	Schools	Higher Education
•Mandatory child safety training •National Quality Framework and the National Quality Standard (ACECQA) •National approved learning framework •State and territory based regulatory schemes	•Consent and Respectful Relationships Education (CRRE) (department) •The National Respectful Relationships Education Framework (department) •Australian Curriculum (ACARA) •State and territory based curriculum	•The National Higher Education Code to Prevent and Respond to Gender-based Violence & Higher Education GBV Regulator (Action Plan to Address Gender-based Violence in Higher Education) •National Student Ombudsman accepts GBV-related complaints

The Education portfolio also shapes the future workforce that will implement the National Plan. Graduates in health, education, law, social work, counselling, psychology, community services and related professions are likely to encounter victim-survivors, receive disclosures, identify risk or make referrals. Embedding family, domestic and sexual violence capability in relevant qualifications is therefore a prevention and response measure, not only a workforce measure.

The problem we must solve

Education is designed as a developmental journey. Children are introduced to concepts, skills and behaviours in age-appropriate ways, with learning reinforced and expanded as they move through different stages of education. However, the policy architecture underpinning the portfolio does not always operate in the same way. Early childhood education and care, schools and higher education each have relevant initiatives, but these operate separately rather than as part of a connected pathway. As a result, children and young people move through education settings over time, and the systems, expectations and policy responses around them do not necessarily build on one another. A whole-of-portfolio life-course framework is needed to connect this work through a shared logic, while recognising that early childhood education and care, schools and higher education will each require different, but cohesive approaches and responsibilities.

Within schools, Consent and Respectful Relationships Education (CRRE) is essential prevention infrastructure, but it needs strengthening. Children and young people are navigating sex, relationships and harm in rapidly evolving social and digital environments that are outpacing curriculum review cycles. Current CRRE content and implementation do not adequately address the realities of young people's experiences, including pornography-related harms, image-based abuse, online misogyny and technology-facilitated abuse. As a result, there remains a significant gap between the education young people receive and the harms they encounter.

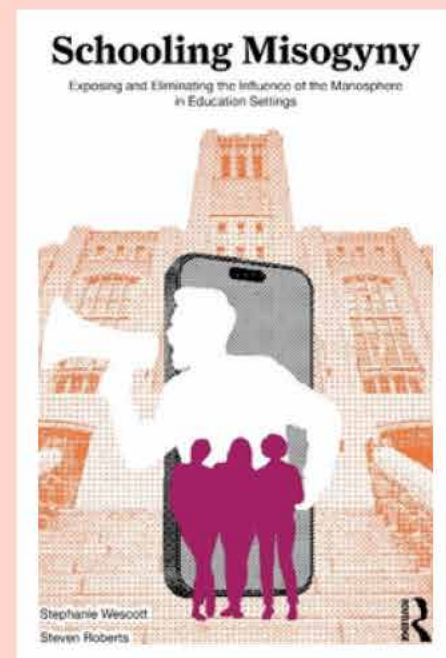
At the same time, school staff are managing increasingly complex prevention and response responsibilities. Teachers are responding to disclosures of violence, harmful sexual behaviours, the influence of online misogyny, and violence occurring in homes, relationships, peer groups and online environments. They are also experiencing gender-based violence themselves, including harassment and image-based abuse perpetrated by students and colleagues. Despite this, there is no clear national framework that recognises schools as institutions with distinct responsibilities for preventing and responding to gender-based violence. Schools continue to be treated primarily as sites of curriculum delivery, rather than as settings that require comprehensive prevention, response and accountability mechanisms.

The Education portfolio also plays a key role in shaping the future workforces needed to deliver the National Plan. Given the scale of gender-based violence in Australia, graduates across social work, psychology, education, health, law and community services are likely to engage with violence in their work, whether or not they enter specialist FDSV roles. Victim-survivors, people using violence and children affected by harm are already present in mainstream settings, including schools, health services, legal services and community organisations. Yet FDSV capability is not consistently built into the qualifications that prepare people for these roles. This creates a gap between the work graduates are likely to do in practice and the preparation they receive before entering the workforce. If the national response depends on mainstream services identifying risk earlier and responding better, then the education and training system must prepare those workforces before they enter practice. FDSV capability should be treated as a core professional competency in relevant qualifications instead of optional professional development.

Research spotlight: Schooling Misogyny

Stephanie Wescott and Steven Roberts' book, *Schooling Misogyny: Exposing and Eliminating the Influence of the Manosphere in Education Settings* confronts an escalating crisis in Australian schools: the influence of manosphere-aggravated misogyny as a form of school-related gender-based violence (SRGBV). It shows why schools cannot be treated only as sites for curriculum delivery. They are also institutions where gendered power is learned, performed, challenged or normalised.

It shows how misogynistic online cultures are shaping school environments, affecting students and teachers, and challenging schools' capacity to prevent and respond to gender-based violence. The book is an important resource for policymakers and educators seeking to build safer school communities and strengthen education's role in the national effort to end gender-based violence.



The workforce challenge is also a retention challenge. Specialist FDSV services need qualified and experienced staff to respond to high demand and complex risk, yet the work is trauma-intensive and turnover is high. Specialist services are also competing with better-resourced sectors that offer higher pay and roles with less exposure to vicarious trauma. Shortages are exacerbated by short-term and insecure funding, which makes it difficult for specialist services to offer the stability needed to retain skilled workers. As new policy is considered under the Second Action Plan, the Commonwealth must also plan for the workforce the reforms depend on. For example, the *National Higher Education Code to Prevent and Respond to Gender-based Violence* requires higher education providers to hire staff with experience and expertise in risk assessment, coercive control and trauma-informed practice. This is necessary reform, but it also creates demand for a workforce that has often been trained and developed inside underfunded specialist services. Without targeted policy to improve workforce pipeline and retention, government reforms may unintentionally draw skilled workers out of the specialist sector while relying on that same sector to support implementation.

What WwWA recommends

Recommendation 4.1

Develop a whole-of-portfolio life-course framework for education.

Within the Second Action Plan, the Commonwealth should require the Department of Education to develop and publish a whole-of-portfolio life-course framework for its contribution to ending gender-based violence. This framework should connect the work already occurring across early childhood education and care, schools, higher education and relevant tertiary pathways, and identify how prevention, safety and response should build over time as children and young people move through education settings.

The framework should clarify the role of each education setting as part of one portfolio contribution to the National Plan. It should show how early-years prevention connects with school-based respectful relationships education, how school-based prevention connects with safe institutional response, and how the National Code can inform broader expectations of education settings as institutions with responsibilities to prevent and respond to gender-based violence. The framework should be used to guide policy development, funding decisions, program design, monitoring and evaluation under the Second Action Plan. It should not replace the different models required across early childhood education and care, schools and higher education, but should provide a shared policy logic so that these settings are not operating as disconnected initiatives.

Recommendation 4.2

Strengthen Consent and Respectful Relationships Education to reflect young people's lived experiences.

CRRE is essential prevention infrastructure, but current content and implementation are not reflective of young people's experiences of sex, online harm or misogyny.

- **Use future Commonwealth funding agreements to extend CRRE to Years 11 and 12.** Jurisdictions and non-government school sectors should be required to identify how CRRE will be delivered to senior secondary students, such as through wellbeing programs, pastoral care and partnerships with specialist providers. Senior secondary students should not lose access to prevention education at the point when they are navigating more complex relationships, digital environments and transitions into adulthood.
- **Seek agreement through the Education Ministers Meeting for ACARA to regularly review and update CRRE content.** Current national content risks falling behind the realities children and young people are experiencing, particularly in relation to online harms, coercive behaviours, image-based abuse, harmful peer dynamics and rapidly changing social norms around relationships. CRRE should be prioritised for targeted updates outside the full Australian Curriculum review cycle, so prevention education can respond to emerging and escalating harms before 2032.
- **Support schools to connect with local services and support pathways.** CRRE can increase disclosures of gender-based violence, requiring schools to connect students with appropriate support. Governments should support schools to build and maintain relationships with local specialist and community services, ensuring prevention education is linked to local service systems and that schools are not expected to respond to disclosures and harm in isolation.

Member spotlight: Women's Community Shelters' Walk the Talk program

Women's Community Shelters' Walk the Talk program shows how effective respectful relationships education can be when connected with specialist services.

The program has two phases: an education phase delivered in schools by Enlighten Education, and an action phase facilitated by Women's Community Shelters, where students support their local women's shelter through a year-long project. Since 2019, more than 23,000 students have taken part in the program. In 2025 alone, 6,333 students participated, 100 per cent said they would recommend it to others, and students generated more than \$290,000 in community value through volunteer, goods and donations.

Walk the Talk is a strong example of how prevention can move beyond awareness, connecting students to practical action, specialist knowledge and the local services working to keep women and children safe. Students learn about healthy relationships, consent, gender stereotypes, boundaries, domestic and family violence, coercive control, how to respond to disclosures and how to seek help. They then take that learning into action by 'adopting' their local shelter and contributing to practical support through donations, fundraisers and campaigns. The Commonwealth should build on models like Walk the Talk within the Second Action Plan by recognising that effective CRRE is strengthened when schools are connected to specialist services and local safety infrastructure.

Recommendation 4.3

Develop a national school response framework for gender-based violence.

Within the Second Action Plan, the Commonwealth should support the development of a national response framework for schools through the Education Ministers Meeting. This framework should establish expectations for preventing, identifying, recording, escalating and responding to school-related gender-based violence where it is experienced by students, teachers, school leaders and other school staff.

The framework should include a dedicated focus on school-related gender-based violence experienced by teachers and other school staff. Where teachers experience sexual harassment, misogyny, threats, technology-facilitated abuse or other gendered harm from students, the response cannot depend on an individual teacher's capacity to document and manage harmful behaviour. Education systems must have clear obligations to prevent and respond to gender-based violence against staff, including where the harm is perpetrated by students. This should include a review of how work health and safety obligations are being recognised and enforced in school settings, and whether reporting pathways and regulatory mechanisms are adequate to protect teachers and other staff from school-related gender-based violence. If schools are to be treated as prevention settings, they must also be safe workplaces.

Recommendation 4.4

Use ATEC's mission-based compacts to build the workforce capability needed to deliver the National Plan.

The Education portfolio should use its tertiary education levers to build FDSV capability before graduates enter the workforce, while also supporting retention in specialist frontline roles. The Australian Tertiary Education Commission (ATEC) should use its mission-based compacts to negotiate with higher education providers to embed FDSV capability into qualifications that prepare graduates for roles likely to engage with victim-survivors or deliver prevention work. This should include education, health, law, social work, counselling, psychology, community services and other relevant disciplines. Given the scale of gender-based violence in Australia, this capability should not be treated as niche or optional. The National Plan relies on a broad workforce that includes teachers, nurses, lawyers, social workers, psychologists, youth workers, disability workers and community sector workers. Many will encounter violence in practice but are not consistently prepared through their qualifications to recognise risk and respond safely.

Example: Using ATECs mission-based compacts to build workforce capability

Mission-based compacts are useful because they allow government to negotiate place-based and provider-specific commitments. For example, a university with a large nursing or health program in a region with limited access to forensic medical examiners could be supported to embed sexual violence-specific curriculum and forensic medical exams capability into relevant qualifications. This should include trauma-informed care, forensic pathways, evidence preservation, referral protocols and clinical placement partnerships with local sexual assault services or hospitals. This would help build the workforce pipeline in places where victim-survivors currently face long travel times, delays or no timely access to forensic medical examinations.

Recommendation 4.5

Establish a targeted HELP debt reduction scheme for specialist FDSV roles

The Australian Government should establish a targeted HELP debt reduction scheme for graduates employed in specialist FDSV services. The National Plan relies on a skilled specialist workforce, but that workforce is under sustained pressure. Services are responding to high demand while managing workforce shortages and burnout due to the demanding nature of the work.

There is clear policy precedent for using HELP debt reduction to attract and retain workers in areas of national workforce need, including existing schemes for eligible doctors, nurse practitioners and teachers working in rural, remote and very remote areas.⁷²

A similar model should be used to support retention in specialist FDSV services. The scheme should begin with workers employed in eligible specialist FDSV roles, with staged debt relief linked to verified service. This would ensure the benefit is tied to workforce retention, rather than immediate debt cancellation on graduation. Part-time work should be counted on a pro-rata basis, so the scheme is accessible to workers with caring responsibilities or varied employment patterns. This would recognise the specialist FDSV workforce as core national infrastructure and help retain skilled workers beyond the early-career period, when attrition is often highest.

Employment and workplace relations: Workplaces and employment services as safety infrastructure

Lead portfolio: Employment and Workplace Relations

Shared responsibility: Fair Work Ombudsman / Fair Work Commission / Workplace Gender Equality Agency / Safe Work Australia / Social Services / Services Australia / Workforce Australia / states and territories / employers / unions / employment service providers

Why this portfolio matters

The Employment portfolio holds critical levers for victim-survivor safety and economic security. Work is not separate from safety and domestic and family violence can impact engagement in the workforce, performance and career progression.⁷³ There is also increasing evidence of direct perpetrator workplace disruption, particularly through the use of digital technologies. Economic security makes it possible for a victim-survivor to leave violence, remain safely separated and rebuild life after abuse. When work is lost, unsafe or insecure, violence can push victim-survivors further into poverty and dependence on the person using violence. Employment infrastructure is therefore central to the National Plan. Workplaces can be protective, for both victim-survivors and people who use violence, and they can be places where employers build cultures that challenge abuse, protect economic security and prevent workplace systems from being used to continue harm. The Employment portfolio can shape workplace understandings of violence as an economic security issue, rather than a private matter separate from work. The delivery of safe and meaningful employment services can also be shaped by the Commonwealth. For victim-survivors, employment support can either create a pathway toward safety or deepen risk through compliance settings that do not recognise violence, trauma, caring responsibilities and recovery.⁷⁴ The employment services system should therefore be understood as part of the National Plan's economic security and recovery infrastructure.

The Employment portfolio matters because it shapes the conditions that determine whether victim-survivors can stay connected to work, access support safely and move toward sustainable employment. Within the Second Action Plan, the Commonwealth should use these levers to make workplaces and employment services part of the national effort to end gender-based violence.

The problem we must solve

Current employment settings recognise that violence affects work, but they do not yet amount to a coherent employment response under the National Plan. Paid family and domestic violence leave is an important entitlement, and workplace health and safety settings recognise that violence can create risks at work. However, the current framework still relies too heavily on victim-survivors identifying the risk, disclosing violence, satisfying workplace processes and navigating systems that may not be safe or trauma-informed. This places too much of the burden on the person experiencing violence. This is particularly clear in relation to paid leave, which is limited in scope, does not cover sexual violence outside family and domestic violence, and can be difficult to access where employers require evidence or where workers do not feel safe disclosing.

Many employers still understand FDSV as something to accommodate after a worker discloses, rather than as a workplace safety and prevention issue. This is a problem because violence can intersect with work in many ways. Perpetrators may use workplace systems, devices, rosters, work time, workplace locations or hybrid work arrangements to continue abuse. Research on domestic violence and working from home, as detailed below, shows that home and work are no longer separate spaces in practice, and that relying on visible signs of violence or worker disclosure is not enough to keep people safe. Current employment standards offer limited guidance on responding to workers who use violence. Workplaces are settings where people who use violence are employed, supervised and given access to systems, information and resources. Without clearer expectations, employers may miss opportunities to prevent misuse of workplace systems, respond safely, protect victim-survivors' privacy or address abusive behaviour connected to work. This leaves employers uncertain, and leaves victim-survivors carrying the risk.

Research spotlight: When home is the workplace

Mihajla Gavin and Dr Ruth Weatherall's 2026 article, *When Home is the Workplace: Foregrounding Ethical Responses to Domestic Violence When Working-from-Home*, examines how workplaces responded to domestic violence risk when home became the workplace during COVID-19 lockdowns and argues that legal compliance alone is not enough to keep victim-survivors safe where violence intersects with work. The research reveals how the boundaries between home and work are increasingly blurred. The article cautions against workplace responses that rely too heavily on visible signs of violence or worker disclosure, because this can leave responsibility sitting with victim-survivors to make risk visible before employers act. Gavin and Weatherall argue for a stronger ethical responsibility on employers to prevent and respond to domestic violence risk across work-related spaces, not just to meet minimum legal obligations once violence is disclosed.⁷⁵

Employment services create a separate but connected problem. For victim-survivors, unemployment is not always an individual labour market issue. It may be shaped by violence, trauma, financial abuse, unsafe housing, legal processes, caring responsibilities or post-separation abuse. Employment services are also a key site at which to identify domestic and family violence risk. A system that starts from job search and compliance can miss addressing conditions that make employment possible. Mutual obligations are the clearest example of this risk. A victim-survivor may miss appointments or be unable to complete activities because they are managing the impacts of violence. The current system triggers payment suspension and compliance activities at this point, instead of safety checks. Payment suspension can then increase poverty, housing insecurity and financial dependence on the person using violence. Mutual obligations can also mirror the surveillance and control victim-survivors have experienced in violent relationships, particularly where they are required to prove hardship, justify non-attendance or comply with activities under threat of losing income

What WvWA recommends

Recommendation 5.1

In the short term, strengthen paid family and domestic violence leave so victim-survivors can access workplace support safely and without unnecessary barriers.

The entitlement is an important recognition that violence affects work and economic security, but it should be improved so it better reflects the realities and practical steps victim-survivors may need to take to establish safety and remain in employment. This includes:

- **Extend paid FDV leave to include sexual violence.** Paid FDV leave should be extended to workers dealing with the impacts of sexual violence who need time away from work for medical care, counselling, legal assistance, police processes, safety planning or recovery. This would bring the entitlement into closer alignment with the National Plan, which recognises sexual violence as a core form of gender-based violence with serious impacts on safety and economic security. It would also address one example of a broader policy problem across government, where sexual violence is recognised in principle but too often excluded from the design of practical supports and entitlements.
- **Remove the power for employers to require evidence.** Requiring workers to produce evidence can create a significant barrier to access, is inconsistent with a trauma-informed approach, and can expose victim-survivors to privacy risks.
- **Require employers to actively promote the availability of paid FDV leave.** The entitlement is not meaningful if workers do not know it exists or do not feel safe accessing it. Promotion should be, in the first instance, targeting priority cohorts such as multicultural communities, First Nations people, LGBTIQ+ people, people with disabilities and others at higher risk of experiencing violence.
- **Review the adequacy of the current 10-day entitlement, with a pathway to increase it to 20 days.** The current 10-day entitlement does not reflect the realities of violence, which can require ongoing legal, medical, housing, financial and recovery-related action over time. Government should review options to increase the entitlement so it better reflects the steps victim-survivors must take to establish safety and remain in employment.

Recommendation 5.2

In the medium term, shift workplace culture so FDSV is understood as a workplace safety and prevention issue.

The government should focus on shifting employers' understanding of FDSV as a private or individual issue that is only managed after a worker discloses. Paid leave is important, but it cannot be the whole workplace response. Workplaces also shape culture. They can either minimise violence as something that happens 'outside work', or they can build norms and systems and practices that support safety.

This requires clearer national guidance and stronger transparency about what employers can do in practice. Employers need to understand how FDSV can affect work, how workplace systems can be misused by people using violence, and how workplace cultures can either support victim-survivors or make it harder for them to seek help. This should include:

- **Develop national guidance on FDSV as a workplace issue.** Guidance should help employers understand FDSV as a workplace safety and prevention issue. This should explain how workplace systems, devices, rosters, work locations, work time and working-from-home arrangements can be used to continue abuse. It should also provide practical advice on safe referral pathways, hybrid work, responding where workers use violence, privacy, and how employers can act early without increasing risk. The guidance should support employers to build workplace cultures where violence is not minimised as a private issue, and people using violence are not able to rely on workplace systems or silence to continue harm.
- **Expand WGEA reporting on employer action to prevent and respond to FDSV.** Relevant employers should report on the steps they are taking to prevent and respond to FDSV affecting workers, including manager training, safe referral pathways, workplace adjustments, safeguards against misuse of workplace systems, and responses where workers use violence. This would help shift FDSV from a private issue managed only after disclosure, to a workplace safety and prevention issue that employers are expected to actively consider. It would build transparency and drive a culture shift that normalises employer responsibility.
- **Use WGEA reporting to shift workplace practice before stronger duties are introduced.** WGEA reporting should be used to build transparency about how employers are responding to FDSV in practice, where workplace systems may be allowing risk to continue, and where sectors need more targeted guidance. This would help shift expectations before stronger regulatory duties are introduced and reduce the risk that future obligations become tick-box compliance or lead to responses that inadvertently increase risk for victim-survivors.

Recommendation 5.3

Establish a positive duty for employers to prevent and respond to FDSV affecting workers.

In the long term, the Australian Government should establish a positive duty requiring employers to take reasonable and proportionate steps to prevent and respond to FDSV where it affects workers.

A positive duty would move workplace responses away from relying on victim-survivors to disclose or manage risk on their own. It would make clear that employers have a proactive responsibility to consider how work, workplace systems and workplace cultures can either support safety or allow violence to continue. The duty should apply where FDSV affects a worker's safety, employment, economic security, participation at work or access to workplace systems. It should not be limited to violence that occurs in a physical workplace. Work now occurs across physical, digital, hybrid and home-based settings, and workplace systems, devices, rosters, information, vehicles and work time can all be used to continue abuse. A positive duty should also be supported by a proactive regulatory model to ensure the duty does not simply become another disclosure-dependent regulatory pathway but instead creates real employer accountability for preventing and responding to FDSV affecting workers.

Recommendation 5.4

In the short term, ensure employment services do not penalise victim-survivors for the impacts of violence.

The Commonwealth should require immediate safeguards within the Second Action Plan, so victim-survivors are not pushed further into poverty or risk through employment services compliance settings. Violence can affect a person's ability to attend appointments, engage with providers, complete activities or accept work. Payment suspension in these circumstances can increase financial dependence on a person using violence and undermine safety planning. This includes:

- **Extend the current domestic violence mutual obligation exemption from 16 weeks to 12 months.** The Department of Employment and Workplace Relations and the Department of Social Services should review the adequacy of the current 16-week exemption and introduce a longer exemption pathway for victim-survivors. At minimum, the current exemption should be extended to 26 weeks, with a simple extension process where FDSV-related barriers continue. FDSV-related non-attendance should not trigger payment suspension or compliance action while an exemption or extension is being assessed.
- **Separate domestic from 'relationship breakdown' in exemption categories.** Grouping violence with relationship breakdown minimises the nature of violence and can allow perpetrators to access the same exemption category as victim-survivors.
- **Recognise victim-survivors as a specialist cohort within employment services.** This should include victim-survivors whose experiences fall outside an intimate partner violence framework, including violence from family members, carers, kin or household members.
- **Require FDV risk reporting and management frameworks across all mainstream employment services providers.** Ensure providers are trained and ready to respond to FDV disclosures and are required to report management plans in all grant funding requirements.

Recommendation 5.5

In the medium term, embed recovery-to-employment pathways in the future employment services system, particularly within Stream 3 Intensive Services.

For victim-survivors, unemployment is often not just a skills gap or labour market problem. Long-term unemployment can be a trauma response, shaped by violence, coercive control, housing instability, child protection involvement, financial abuse and the physiological impacts of living in survival mode. The future system should not start from immediate job search where safety and stability have not been established. It should fund the conditions that make safe and sustainable employment possible. This includes:

- **Avoiding referral roundabouts by directly commissioning specialist community organisations as recognised employment services partners.** Specialist organisations should not only be subcontractors to large providers, because the trust and relationships that make this work effective are difficult to preserve in subcontracting models.
- **Funding the full recovery-to-employment model.** Employment services should fund prevocational support, practical barrier removal, post-placement mentoring and ongoing advocacy, not only job placement.
- **Measuring whether employment is safe and sustainable.** Outcomes should include sustained employment, wellbeing, social connection, and whether support helps women stabilise, not only short-term placements.

Member spotlight: GOGO Foundation's Inclusive Work Program

GOGO Foundation's Inclusive Work Program shows why employment services need to start with safety, trust and recovery, not immediate job search. The program supports women with complex barriers to employment, most of whom have experienced family, domestic or sexual violence, through trauma-informed prevocational support, practical barrier removal, mentoring and pathways into safe, sustainable work. The program works because it funds the conditions that make employment possible, including confidence, social connection, practical supports and continuity of care. The outcomes are significant: GOGO reports that 51 per cent of Inclusive Work Program graduates are in employment or career-focused study within six months, and 74 per cent report increased social connection.

Attorney-General: Strengthening justice system responses to violence

Lead portfolio: Attorney-General

Shared responsibilities: Federal Circuit and Family Court of Australia / states and territories / legal sector / FVPLS / police

Why this portfolio matters

The Attorney-General's portfolio has a central role in shaping Australia's legal architecture in response to evolving norms and harms. WwWA members were clear that despite progress, the justice system can too often reinforce and exacerbate harm. Victim-survivors report being sidelined as peripheral in their own claims, exposed to lateral and procedural harm, misidentified or subjected to post-separation abuse facilitated by systems designed to protect. For many victim-survivors, the question is not only whether justice is available; it is whether seeking justice will make them safer.

While important progress towards improving the family court systems and supporting specialist legal assistance has occurred, there is an urgency to reflect upon the effectiveness of these reforms, respond to changes in the offending profile of perpetrators and keep abreast of shifting norms that strengthen safety and access.

The problems we must solve

For the purposes of the Second Action Plan, WwWA has identified three major areas of concern for members:

- Safety within the Federal Circuit and Family Court of Australia (FCFCOA)
- Prioritising justice responses to sexual violence offending and survivor experience
- National leadership on policing reform.

WwWA members were clear there must be strong capability within the FCFCOA in response to family violence, child sexual abuse, economic abuse and post-separation systems abuse, as well as ongoing risk assessment throughout proceedings. Risk should not be treated as a static entity throughout proceedings, and litigation is a serious trigger for escalation. We recognise that initiatives like The Lighthouse Model and the triaging of cases through specialist lists prioritise safety in response to screened risk. However, without evaluation and oversight of these measures, there is concern that these reforms are not proceeding as intended.

Aboriginal and Torres Strait Islander women, women on temporary visas, women with disability, culturally and linguistically diverse women and LGBTIQ+ people can face additional barriers to using legal systems safely. WwWA members raised the need for stronger resourcing for Aboriginal liaison roles, earlier access to culturally safe legal support, and improved First Nations-led legal pathways through FVPLSs. There is concern among members that due to resourcing pressures, access to legal help is predicated on a crisis having occurred. The consequences of this under-resourcing mean the preventative role of legal counselling is not recognised and that victim-survivors can be incognisant of their rights prior to escalation.

Justice responses to sexual violence remain one of the clearest examples of systems failure. Most victim-survivors do not report to police, and of those who do, many matters do not progress. WwWA members described sexual violence as effectively decriminalised because the gap between prevalence, reporting, investigation, criminal proceedings and prosecution is significant and attrition at each stage is high.

Recently, there has been improved understanding among survivor advocates regarding the use of claimant records to undermine the character of claimants in sexual offending cases. Counselling notes, employment records, phone data, private diaries and other information can be sought through legal processes and used to discredit or intimidate victim-survivors. WwWA members have also raised concerns about records held by Commonwealth-funded domestic, family and sexual violence services being disclosed under subpoena, often with limited opportunity for victim-survivors to know, object or appeal. Clients who rely on services funded to support them must be able to do so with an expectation that their information will be protected.

The effectiveness of policing responses and culture towards domestic violence and sexual offending have been interrogated at a jurisdictional level.^{76,77,78} While the findings of these reports may be implemented locally, there appears to be a siloing of these investigative models and findings. WwWA members see opportunity in the commissioning of similar evaluations of police responses and culture under the Second Action Plan and implementing relevant findings nationally. WwWA members described police systems that too often respond to the incident in front of them rather than the pattern of violence behind it. This contributes to misidentification, particularly for Aboriginal and Torres Strait Islander women and where victim-survivors have avoided police because of racism, fear of child removal or previous unsafe system responses. Once misidentification is entered into police systems, it can follow a victim-survivor into future callouts, child protection processes and family law proceedings.

What WwWA recommends

Recommendation 6.1

Strengthen the Family Court's response to matters involving child sexual abuse allegations.

The Family Court has improved its understanding of family violence and coercive control, but similar institutional reform is needed in relation to responding to child sexual abuse allegations. This should include stronger judicial and workforce capability to identify and respond to child sexual abuse, particularly where it co-occurs with domestic and family violence, and safer mechanisms for children's experiences to be heard and understood in family law proceedings.

Recommendation 6.2

Expand Aboriginal and Torres Strait Islander liaison roles and establish equivalent specialist liaison roles for other court users facing access barriers.

WwWA members recognise the value of Indigenous Family Liaison Officers (IFLOs) in supporting families to understand and engage with the Court process. There is strong demand for more IFLOs, and for greater coverage outside metropolitan locations. Building on the IFLO model, the Court should also establish equivalent specialist liaison roles for people with disability, migrant and refugee women, and LGBTIQ+ court users to improve safe participation and navigation.

Recommendation 6.3

Improve consistency and transparency in the family courts through better data and oversight.

Members have raised with us concerns regarding delays and inconsistencies within the FCFCOA and the effectiveness of pre-existing reforms. The government should strengthen visibility and oversight of how family law matters involving family violence, child abuse and systems abuse are currently handled, beyond the existing annual reporting requirements. This should include:

- Establishing an independent Federal Judicial Commission supporting system-wide visibility of issues such as delay, registry variation, family violence matters and child sexual abuse allegations
- Operationalising the prescribed standards and requirements outlined under Part IIIAA of the Family Law Act to establish an accreditation framework for family report writers.
- Reporting on the uptake and impact of 102NA provisions across jurisdictions and their impact on proceedings.
- Improving public family court data, including through a renewed Australian Institute of Family Studies (AIFS) Court Outcomes Project, to better understand outcomes and whether safety reforms are working as intended.

Recommendation 6.4

Fund specialist sexual violence legal and navigation services as core justice system infrastructure.

This funding should be long-term and at levels that meet demand, including:

- Renewing and expanding funding for specialist sexual assault legal services, so victim-survivors can access independent legal advice before and during engagement with police, prosecution or court processes.
- Independent legal representation in criminal proceedings, available from the point a decision is made to prosecute, so victim-survivors have a lawyer with standing acting in their interests.
- Integrated legal services and justice system navigation to help victim-survivors understand their options and navigate justice pathways.
- Commitments to ongoing funding beyond time-limited pilots.

Recommendation 6.5

Improve safeguards of victim-survivor records

Safeguarding victim-survivor records should be a priority in the Second Action Plan. WwWA members have consistently raised serious concerns that counselling notes, health records, phones, and more are sought for release under subpoena which have no probative bearing, only to unpick claimant credibility. Victim-survivors should not have to choose between therapeutic counselling or medical care and their privacy.

- Task the SCAG to develop a national framework that establishes minimum standards for protecting victim-survivor records, including counselling, health, digital and other private records.
- Ensuring victim-survivors have access to independent legal advice and representation where their private records are sought in criminal proceedings.
- Consider establishing new privilege protections for non-legal justice navigation and integrated legal services, to support safe participation and protect victim-survivors' communications, in partnership with women's legal support services.
- Requiring Commonwealth-funded services that collect victim-survivor information to have clear procedures for responding to subpoenas and other requests for records.

Recommendation 6.6

Strengthen self-determined Aboriginal and Torres Strait Islander legal pathways and solutions.

FVPLS services are core safety infrastructure and a critical part of self-determined First Nations responses to violence. This should include:

- Sustained investment in FVPLS to deliver culturally safe legal and non-legal support, with expanded geographic coverage where services are currently unavailable or difficult to access.
- Dedicated funding for FVPLS-led early intervention and prevention work, recognising that early legal protection and wrap-around support can prevent escalation, child removal, homelessness and further system harm.
- A funded national child protection notification and referral pathway to FVPLS, so Aboriginal and Torres Strait Islander women receive legal advice and wrap-around support as soon as child protection becomes involved.
- Supporting Aboriginal and Torres Strait Islander-led justice pathways and decision-making processes, including culturally grounded approaches such as Circle Sentencing, Family Yarns, and other community-led models.

Recommendation 6.7

Use national leadership to improve police responses to gender-based violence.

WwWA members have consistently raised that victim-survivors should not face a postcode lottery when they report violence, seek protection or try to engage with police safely. The Commonwealth should use the Second Action Plan, SCAG and relevant national policing forums to set clearer expectations for safe, consistent and accountable police responses to FDSV. This should include:

- Developing national minimum standards for police responses to FDSV.

- Funding alternative reporting and evidence preservation pathways for victim-survivors who are not ready to formally report, including anonymous reporting and evidence preservation options.
- Independent reviews of sexual violence reporting, proceedings and attrition across jurisdictions.
- Implementing Recommendation 2 of the Senate Inquiry into Missing and Murdered First Nations Women and Children by tasking the Police Ministers Council to review existing police practices across jurisdictions.

Health: ***Treating violence as a health priority***

Lead portfolios: Health

Shared responsibility: States and territories / aged care sector / NDIS / ACCHOs / disability representative organisations

Why this portfolio matters

Health services are one of the most universal touchpoints in Australia, meaning victim-survivors are likely to come into contact with the health system before, during and after violence. Half of hospitalisations due to assault (not including emergency department presentations that did not progress to admission) were due to FDV,⁷⁹ and one in five people hospitalised for FDV had at least one additional hospital stay due to assault.⁸⁰

This makes the Health portfolio critical to early identification and recovery. The Health portfolio also shapes aged care and disability systems that affect safety, autonomy and access to support across the life course. For older women and women with disability, these systems can be pathways to care and connection, but they can also be settings where violence, abuse, neglect, coercion and sexual violence are hidden or minimised. The Second Action Plan must recognise these systems as part of Australia's safety infrastructure and make these specific forms of violence visible, including sexual violence in aged care settings and the safety impacts of NDIS reforms.

The Australian Government has made significant recent investment in women's health and has committed to addressing gender bias and preventable harm in healthcare. The Second Action Plan is a critical opportunity to build on the work of the Health Justice Partnership by expanding on commitments to address the health impacts of gender-based violence. WwWA is calling on the Health portfolio to embed gender-based violence response as core business.

The problems we must solve

The Health portfolio can make an immediate and practical contribution in two key areas: FDSV-related acquired brain injury and reproductive coercion. FDSV-related acquired brain injury is a serious but under-recognised health impact of violence. It can affect memory, communication and decision-making, which may change the support victim-survivors need to seek help and navigate services. When systems do not recognise or accommodate these impacts, women can be misread as disengaged, inconsistent or difficult, rather than understood as victim-survivors carrying the health impacts of violence. Brain injuries can also impact victim-survivors' access to legal and justice pathways.

Despite limited national data, available evidence indicates substantial unmet need:

- Victorian research indicates that around two in five women and 1 in 4 children admitted to hospital due to family violence have sustained an acquired brain injury.⁸¹
- 80 per cent of women presenting to hospital for family violence have head or facial injuries, yet most are not screened for brain injury.⁸²
- Rising rates of sexual violence and non-fatal strangulation are increasing the risk of brain injury.⁸³

Many women access hospitals, primary care and family violence services with undiagnosed brain injury. Because mild traumatic brain injury and concussion often do not appear on imaging, identification relies on symptom-based assessment and trauma-informed questioning, which are not routinely used in frontline settings. As a result, opportunities to detect risk early, adapt safety planning and support recovery are often missed.

Reproductive coercion and abuse (RCA) are also under-recognised forms of gender-based violence. It undermines reproductive autonomy and bodily integrity through behaviours that pressure, force or manipulate decisions about contraception, pregnancy, continuation or termination. Like FDSV-related brain injury, it is often missed unless health systems ask the right questions in safe, trauma-informed ways. It can occur alongside other forms of domestic, family and sexual violence, and can have serious consequences for a person's safety, health, economic security and autonomy.⁸⁴ Reproductive coercion and abuse remain under-identified in Australia, in part because there is limited and inconsistent national data.⁸⁵ Available evidence indicates:

- 1 in 7 people seeking pregnancy options counselling in Australia report experiencing RCA.⁸⁶
- It is significantly more common among people who are experiencing other forms of domestic and family violence.⁸⁷
- It occurs at higher rates for people who experience intersecting forms of inequality, such as women with disability who are at greater risk of forced sterilisation.⁸⁸

Aboriginal and Torres Strait Islander people have been subjected to state-supported, structural and interpersonal forms of reproductive coercion since colonisation. Contemporary responses must therefore be grounded in cultural safety, self-determination and partnership with Aboriginal Community Controlled Health Organisations and First Nations women. This is essential to ensure reforms do not reproduce distrust or harm through mainstream health systems.

What WwWA recommends

Recommendation 7.1

Make women's brain health and FDSV-related acquired brain injury the next priority women's health area following women's cardiovascular health.

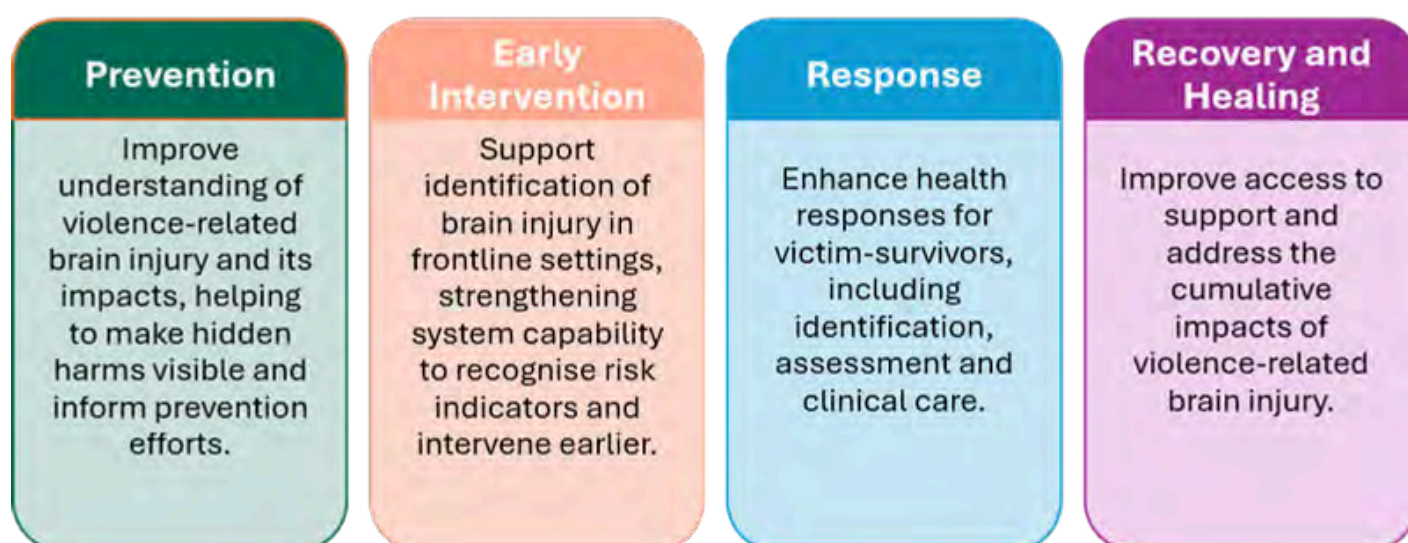
This would be a major Health portfolio contribution to the Second Action Plan, recognising that gender-based violence has serious, long-term and under-recognised health impacts. Brain injury in women remains significantly overlooked, particularly where it is caused by repeated head trauma, strangulation or other forms of violence. A priority women's health area would help shift this issue out of the margins and support national action on early identification, referral pathways, workforce capability, rehabilitation and data. It would also recognise that brain health is connected to women's safety, mental health, dementia risk and long-term recovery.

Recommendation 7.2

Position FDSV-related acquired brain injury as a cross-portfolio issue in the Second Action Plan.

Brain injury has intersections across health, social services, justice and more. Recognising FDSV-related acquired brain injury would create practical opportunities to strengthen each pillar of the National Plan by improving prevention, earlier identification of risk, safer service responses and long-term recovery pathways. This should include identifying several cross-portfolio actions, including:

- Incorporating brain injury into the National Principles for Risk Assessment and Risk Management.
- Working with states and territories to include concussion, repeated head trauma and strangulation-related injury in family violence risk assessment frameworks.
- Tasking Australia's National Research Organisation for Women's Safety (ANROWS) to develop targeted guidance on FDSV-related brain injury for health, family violence, justice and related workforces.



Recommendation 7.3

Establish nationally consistent pre-screening and screening for FDSV-related acquired brain injury.

The Health portfolio should work with states and territories to establish nationally consistent pathways for identifying and responding to FDSV-related acquired brain injury in frontline settings where victim-survivors present. This must recognise that mild traumatic brain injury and concussion may not appear on imaging and often require symptom-based assessment and trauma-informed questioning. There should be:

- Nationally consistent pre-screening and screening protocols in frontline settings where victim-survivors present.
- Strengthened capability in existing concussion and brain injury services to recognise and respond to FDSV-related brain injury.
- Uplift for hospitals to identify and respond to brain injury in a trauma-informed and culturally safe way.

Recommendation 7.4

Develop Aboriginal and Torres Strait Islander-led brain health pathways.

Within the Second Action Plan, the Commonwealth should recognise that FDSV-related acquired brain injury for Aboriginal and Torres Strait Islander women is shaped by factors beyond service gaps, such as racism, colonisation, fear of child removal and distrust of state systems that have historically perpetuated harm.

This should include:

- Aboriginal and Torres Strait Islander-led screening and referral pathways.
- Clear consent and information-sharing safeguards so screening or diagnosis does not create further harm to Aboriginal and Torres Strait Islander women.
- Investment in regional and remote brain injury supports, including multidisciplinary concussion and brain injury services designed with Aboriginal and Torres Strait Islander communities.

Spotlight: NATSIWA member survey on Aboriginal and Torres Strait Islander women and FDSV-related brain injury

The National Aboriginal and Torres Strait Islander Women's Alliance (NATSIWA) is the national peak body representing the voices, leadership and policy priorities of Aboriginal and Torres Strait Islander women across Australia. As a fellow National Women's Alliance, NATSIWA supported WwWA's work by conducting a member survey on Aboriginal and Torres Strait Islander women's experiences and perspectives on FDSV-related brain injury.

The survey responses make clear that FDSV-related brain injury is still not being seen or understood in the health systems Aboriginal and Torres Strait Islander women navigate. NATSIWA members described brain injury from head injuries, strangulation and repeated violence as poorly understood, even when women had presented many times with injuries or long-term symptoms. Women are focused on surviving the violence and establishing safety, which means the effects of brain injury can be left unnamed until much later. Respondents identified health, mental health, family violence, police and justice settings as places where brain injuries are missed. This matters because when brain injury is not recognised, women's responses to violence can be misunderstood. Several NATSIWA members raised concerns about Aboriginal and Torres Strait Islander women being labelled as aggressive, unstable or difficult, rather than being understood as women responding to violence and possible brain injury.

The survey also showed why screening cannot be treated as a simple technical fix. NATSIWA members saw screening and diagnosis as potentially helpful, but only if done safely. There was strong concern that formal diagnoses could be used punitively, including through child protection involvement or other forms of system harm. Respondents called for clear consent, clear boundaries on information sharing, practical safety planning, access to Aboriginal and Torres Strait Islander workers and advocates, and screening led by Aboriginal and Torres Strait Islander services. The message was clear: Aboriginal and Torres Strait Islander women need to be believed, not blamed for impacts of violence. FDSV-related brain injury is real, serious and life-changing, but will continue to be missed if systems read the impacts of violence through racism, stereotypes or assumptions about women's behaviour. Government must fund Aboriginal-led, culturally safe pathways that allow women to access care, healing and rehabilitation without fear that diagnosis or disclosure will be used against them.

Recommendation 7.5

Develop a national implementation plan on reproductive coercion and abuse under the Second Action Plan and women's health reform agenda.

The Health portfolio should lead a national implementation plan on reproductive coercion and abuse, connected to both the Second Action Plan and the women's health reform agenda. The plan should include:

- Developing nationally consistent definitions and guidance on reproductive coercion and abuse.
- Improving data collection and measurement so RCA is visible in national reform work.
- Commissioning clinical guidance, training and resources for healthcare providers, especially in primary care, reproductive healthcare and pregnancy options counselling.

- Embedding co-design with Aboriginal and Torres Strait Islander women, Aboriginal Community Controlled Health Organisations, women with disability and specialist services.
- Reporting publicly on implementation through the Second Action Plan or its Activities Addendum.

Recommendation 7.6

Strengthen access to safe and equitable reproductive healthcare for victim-survivors.

The Commonwealth should recognise that reproductive coercion and abuse cannot be addressed without safe access to reproductive healthcare within the Second Action Plan. The health portfolio should use levers to reduce barriers to care and ensure healthcare providers can identify and respond to RCA safely, including through:

- Reviewing Medicare support for longer, trauma-informed consultations related to abortion, contraception, pregnancy options counselling and RCA.
- Strengthening national training for general practitioners and other healthcare workers.
- Using Commonwealth funding agreements and national health reform levers to improve access to lawful abortion and reproductive healthcare and ensuring referral pathways are timely, enforceable and safe where services are not available on site.
- Ensuring responses are accessible for women with disability, migrant and refugee women, young women, gender-diverse people and people experiencing socioeconomic disadvantage.

Environment:

Climate emergency is a risk multiplier for violence

Lead portfolios: Environment and Water / Climate Change and Energy / Emergency Management

Shared responsibility: States and territories / National Emergency Management Agency / Employment / Housing and Homelessness / Health / Social Services

Why these portfolios matter

The Environment portfolio is relevant to the Second Action Plan because the climate emergency shapes the systems and conditions that make safety possible. Climate-related disasters increase the conditions in which violence can escalate. During and after disasters, victim-survivors may be displaced from their homes, cut off from services, pushed into financial crisis, isolated from support networks, or forced into closer proximity with people using violence. Housing stress, service disruption, caring responsibilities and recovery costs can all intensify at the same time, making it harder to leave violence, stay safely separated or rebuild after harm. As climate disasters become more frequent, disaster and emergency management must embed a gender-lens that recognises disasters as settings where the risk of gender-based violence can increase.

The problems we must solve

Climate change is increasingly recognised as a driver of gender-based violence, compounding existing inequalities and creating conditions that place women and girls at greater risk. In Australia, environmental disasters and climate-related events can intensify known risk factors for violence, including stress, trauma, financial hardship, housing instability, sleep disruption, social isolation, and increased alcohol use. Disasters can also trap women in closer proximity to perpetrators, disrupt support networks and services, and reduce opportunities for help-seeking and early intervention.

Evidence from Australia and internationally shows that violence against women often increases following disasters and national emergencies. Research has identified increased rates of domestic and family violence after bushfires and during the COVID-19 pandemic, including higher numbers of first-time reports and escalating severity of abuse.⁸⁹ Heatwaves have also been associated with increased violence against women, with one study estimating a 28% rise in femicide during periods of extreme heat.⁹⁰ As climate change drives more frequent and severe disasters, these risks are expected to grow, with global estimates suggesting tens of millions more women and girls could experience intimate partner violence under higher warming scenarios.⁹¹

Climate change also undermines women's safety through its impacts on health, housing and economic security. Women are disproportionately affected by climate-related health risks, particularly extreme heat, and are more likely to experience housing stress, reliance on rental or social housing, and homelessness. Rising energy costs, insurance premiums and climate-related housing pressures can increase women's dependence on abusive partners and make it more difficult to leave unsafe situations.

Despite these clear links, the intersection of climate change and gender-based violence remains insufficiently recognised in policy and disaster planning. A gender-responsive approach to climate adaptation and disaster preparedness is needed across government portfolios to ensure that violence prevention, housing security, health services and emergency responses are designed to address the specific risks faced by women and girls as the climate crisis intensifies.



Spotlight: Gender and Disaster Australia

Gender and Disaster Australia (GAD) is the leading national organisation providing evidence-based training and resources on the gendered nature of disasters. GAD's work is supporting Australia to adopt a gender-responsive approach to climate action and disaster management that will prioritise the safety of all Australians.

- GAD publishes national Gender and Emergency Management Guidelines, with their third edition due in 2026.⁹²

- They provide Lessons in Disaster training to the emergency services sector, local government, health sector, disaster response agencies, and communities across every state and territory. Additional training modules for Leaders and Volunteers will be tested during 2026.⁹³
- They conduct research focused on the experiences of women, LGBTIQ+ people, and men in disaster contexts.⁹⁴
- GAD hosts webinars and develops resources and videos (with a recent video receiving 18,000 views in a week) to amplify their research and inspire gender-responsive climate and disaster management action.⁹⁵

GAD has recently received philanthropic funding to deliver two major projects, commencing in 2026. The first will develop a First Nations Framework for Gender and Disaster led by two First Nations organisations in the NT, and the second will develop a baseline report on women and LGBTIQ+ people in the emergency sector. This project is phase one of a larger project aimed to enhance the representation of women and LGBTIQ+ people in leadership roles across the emergency sector.

What WwWA recommends

Recommendation 8.1

Develop a national gender and climate action agenda under the Second Action Plan.

This agenda should align Australia's domestic climate and disaster policy with existing gender equality and women's safety commitments, including the *Working for Women Strategy*, the National Plan, *Our Ways – Strong Ways – Our Voices*, the Closing the Gap targets, and relevant international frameworks including the Belém Gender Action Plan and the Sendai Gender Action Plan. The Commonwealth should also include public reporting on Australia's progress against international climate and gender commitments within the Second Action Plan.

Recommendation 8.2

Embed Gender-Responsive Climate Impact Assessment in government policy design.

Aligning with the previous recommendation of embedding safety in Gender Impact Assessments, it should be further expanded to include a Gender-Responsive Climate Impact Assessment. This would ensure that relevant Cabinet Submissions and New Policy Proposals are assessed against the risk of contributing to the climate emergency, which intensifies climate-related harms for women and other marginalised cohorts. Additionally, criteria should include assessment of specific emergency management and climate resilience initiatives. The Impact Assessment would be applied to policies like AusAlert, where numerous concerns have been raised about unintended safety risks for victim survivors who may have their hidden phones exposed.



Recommendation 8.3

Invest in gender-responsive disaster preparedness, response and recovery capability across emergency management, health and community services.

Disaster preparedness, response and recovery are often unresponsive to gender and safety needs. A review of the 2022 NSW floods found that emergency centres did not consider safety precautions for women, LGBTIQ+SB people or children, resulting in sharing spaces with perpetrators of violence, sex offenders, and even people whom they had restraining orders against.

The Australian Government has a key opportunity to lead and to ensure that gendered vulnerabilities are taken seriously in disaster prevention and response across the country. The Australian Disaster Recovery Framework, the National Disaster Risk Reduction Framework and the National Strategy for Disaster Resilience all fail to mention women, gender or violence even once within their texts – indicating a significant gap in our national approach to ensuring safety in the context of disasters in Australia.

References

1. Australian Bureau of Statistics. (2021-22). Personal Safety, Australia. <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/2021-22>
2. Department of Prime Minister and Cabinet. (2024). Gender-based violence in Australia at a glance. <https://www.pmc.gov.au/resources/unlocking-the-prevention-potential/gender-based-violence-australia-glance-august-2024>
3. Australian Institute of Health and Welfare. (2025). Family, domestic and sexual violence: LGBTIQ+ people. <https://www.aihw.gov.au/family-domestic-and-sexual-violence/population-groups/lgbtqa-people>
4. Universities Australia. (2021). Report on the prevalence of sexual harassment and sexual assault among university students in 2021. <https://universitiesaustralia.edu.au/wp-content/uploads/2022/03/2021-NSSS-National-Report.pdf>
5. Australian Human Rights Commission. (2022). Time for respect: Fifth national survey on sexual harassment in Australian workplaces. https://humanrights.gov.au/data/assets/file/0026/46817/2022.11.25_time_for_respect_2022_final_digital.pdf
6. Australian Institute of Family Studies. (2025). The use of intimate partner violence among Australian men. <https://aifs.gov.au/sites/default/files/2025-06/TTM-Insights-3-IPV%20Chapter.pdf>
7. Meger, S., & Reynolds, K. (2026, March 6). 40% of teenage boys believe women lie about domestic and sexual violence: new research. The Conversation. <https://theconversation.com/40-of-teenage-boys-believe-women-lie-about-domestic-and-sexual-violence-new-research-276978>
8. University of New South Wales Australian Human Rights Institute. (2023). Identifying and understanding child sexual offending behaviours and attitudes among Australian men. <https://www.humanrights.unsw.edu.au/sites/default/files/documents/Identifying%20and%20understanding%20child%20sexual%20offending%20behaviour%20and%20attitudes%20among%20Australian%20men.pdf>
9. Higgins, D. J., Mathews, B., Pacella, R., Scott, J. G., Finkelhor, D., Meinck, F., Erskine, H. E., Thomas, H. J., Lawrence, D. M., Haslam, D. M., Malacova, E. & Dunne, M. P. (2023). The prevalence and nature of multi-type child maltreatment in Australia. The Medical Journal of Australia, 218, S19–S25. <https://doi.org/10.5694/mja2.51868>
10. Australian Bureau of Statistics. (2021-22). Personal Safety, Australia. <https://www.abs.gov.au/statistics/people/crime-and-justice/personal-safety-australia/2021-22>
11. Higgins, D. J., Mathews, B., Pacella, R., Scott, J. G., Finkelhor, D., Meinck, F., Erskine, H. E., Thomas, H. J., Lawrence, D. M., Haslam, D. M., Malacova, E. & Dunne, M. P. (2023). The prevalence and nature of multi-type child maltreatment in Australia. The Medical Journal of Australia, 218, S19–S25.
12. Australian Bureau of Statistics. (2024). Recorded Crime - Victims. <https://www.abs.gov.au/statistics/people/crime-and-justice/recorded-crime-victims/latest-release>

References

13. Older Women's Network NSW. (2021). LifeStages: The [un]silencing of older women: A life stages approach for the National Plan to End Violence against Women and Their Children. <https://voices.ownnsw.org.au/wp-content/uploads/2025/11/Life-stages-approach-for-the-national-plan-to-end-violence-against-women-and-their-children.pdf>
14. Department of the Prime Minister and Cabinet. (2024). Unlocking the prevention potential: Accelerating action to end domestic, family and sexual violence. <https://www.pmc.gov.au/sites/default/files/resource/download/unlocking-the-prevention-potential-4.pdf>
15. Warren, A., Blundell, B., Chung, D., & Waters, R. (2024). Exploring categories of family violence across the lifespan: A scoping review. *Trauma, Violence, & Abuse*, 25(2), 965–981. <https://doi.org/10.1177/15248380231169486>
16. Barrett, C., Lee, Y., Gillbard, A., Smith, R., Nicholl, D., Rowe, G., Westgate, R., Doughan, H., Darling, G., & Young, R. (2024). The [un]Silencing of Older Women. A Life Stages Approach for the National Plan to End Violence Against Women and their Children. <https://www.emboldenfestival.com/uploads/1/5/3/9/15399992/lifestages.pdf>
17. Gwynn, L. (2026, June 20). RSPCA DV pet support helps victims leave abusers. Australian Broadcasting Corporation. <https://www.abc.net.au/news/2026-06-20/rspca-dv-pet-support-helps-victims-leave-abusers/106797672>
18. Kutin, J., Russell, R., & Reid, M. (2017). Economic abuse between intimate partners in Australia: Prevalence, health status, disability and financial stress. *Australian and New Zealand Journal of Public Health*, 41(3), 269-274. <https://doi.org/10.1111/1753-6405.12651>
19. Deloitte Access Economics. (2022). The Cost of Financial Abuse in Australia. Commonwealth Bank of Australia. <https://www.commbank.com.au/content/dam/caas/newsroom/docs/Cost%20of%20financial%20abuse%20in%20Australia.pdf>
20. Foundation for Alcohol Research & Education. (2025, September 25). Community organisations call for AFL, NRL to phase out alcohol, gambling advertising ahead of surge in violence towards women and children on grand final night. <https://fare.org.au/community-organisations-call-for-afl-nrl-to-phase-out-alcohol-gambling-advertising-ahead-of-surge-in-violence-towards-women-and-children-on-grand-final-night/>
21. Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings. (2023). Volume 8: Chapter 18 – Overseeing child safe organisations. https://www.commissionofinquiry.tas.gov.au/report/listing/volume-8/chapter-18/_nocache
22. Higgins, D. J., Mathews, B., Pacella, R., Scott, J. G., Finkelhor, D., Meinck, F., Erskine, H. E., Thomas, H. J., Lawrence, D. M., Haslam, D. M., Malacova, E. & Dunne, M. P. (2023). The prevalence and nature of multi-type child maltreatment in Australia. *The Medical Journal of Australia*, 218, S19–S25.
23. Salter, M., Woodlock, D., Dragiewicz, M., Banks, C., Embleton, A., Lynch, A., Olejnikova, L., Maltzahn, K., McLeod, D., & Breckenridge, J. (2026). Improving legal, policy and practice responses to the intersection of domestic violence perpetration and child sexual abuse offending. National Centre for Action on Child Sexual Abuse. <https://nationalcentre.org.au/wp-content/uploads/2026/06/NC-Comissioned-Research-Salter-Improving-Responses-Final-Report.pdf>

References

24. Australian Institute of Health and Welfare. (2026). Family, domestic and sexual violence: Children and young people. <https://www.aihw.gov.au/family-domestic-and-sexual-violence/population-groups/children-and-young-people>
25. Justice Reform Initiative. (2025, February 5). Urgent reform required as Australia's prison bill tops \$6.8 billion a year. Justice Reform Initiative. <https://www.justicereforminitiative.org.au/urgent-reform-required-as-australia-s-prison-bill-tops-6-8-billion-a-year>
26. Australia's National Research Organisation for Women's Safety. (2020). Women's imprisonment and domestic, family and sexual violence. <https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2020/07/16102534/ANROWS-Imprisonment-DFV-Synthesis.1.pdf>
27. Ibid.
28. Ibid.
29. Ibid.
30. Australia's National Research Organisation for Women's Safety. (2020). Accurately identifying the "person most in need of protection" in domestic and family violence law: Key findings and future directions. <https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2020/11/25063655/ANROWS-RtPP-Nancarrow-PMINOP.pdf>
31. Australian Human Rights Commission. (2024). Statistics about Aboriginal and Torres Strait Islander women and girls. <https://humanrights.gov.au/human-rights-education/stats-and-facts-about-discrimination/statistics-about-aboriginal-and-torres-strait-islander-women-and-girls>
32. Australian Bureau of Statistics. (2025). Prisoners in Australia. Australian Bureau of Statistics. <https://www.abs.gov.au/statistics/people/crime-and-justice/prisoners-australia/latest-release>
33. Australian Housing and Urban Research Institute. (2026). No matter where you look, women face housing challenges. <https://www.ahuri.edu.au/analysis/brief/no-matter-where-you-look-women-face-housing-challenges>
34. Productivity Commission. (2026) Report on Government Services 2026: 16 Child protection services. <https://www.pc.gov.au/ongoing/report-on-government-services/community-services/child-protection/>
35. Brennan, D. (2024, July 31). "Deplorable": More than 1 in 10 Aboriginal children in Victoria have been removed from their families, new data reveals. National Indigenous Times. <https://nit.com.au/31-07-2024/12820/more-than-1-in-10-aboriginal-children-in-victoria-have-been-removed-from-their-families-new-data-reveals>
36. Australian Institute of Health and Welfare. (2019). Family, domestic and sexual violence in Australia: continuing the national story 2019. <https://www.aihw.gov.au/getmedia/b0037b2d-a651-4abf-9f7b-00a85e3de528/aihw-fdv3-fdsv-in-australia-2019.pdf.aspx?inline=true>
37. Australian Law Reform Commission. Drivers of incarceration for Aboriginal and Torres Strait Islander women. <https://www.alrc.gov.au/publication/pathways-to-justice-inquiry-into-the-incarceration-rate-of-aboriginal-and-torres-strait-islander-peoples-alrc-report-133/11-aboriginal-and-torres-strait-islander-women/drivers-of-incarceration-for-aboriginal-and-torres-strait-islander-women/>

References

38. Rainbow Health Australia. (2020). Pride in prevention: A guide to primary prevention of family violence experienced by LGBTIQ communities: Evidence guide. La Trobe University. https://s3-ap-southeast-2.amazonaws.com/figshare-production-eu-latrobe-storage9079-ap-southeast-2/31712594/RainbowHealthAustralia_PrideinPreventionEvidenceGuidescreenversion.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIARRFKZQ25KW2DIYRU/20260726/ap-southeast-2/s3/aws4_request&X-Amz-Date=20260726T235333Z&X-Amz-Expires=10&X-Amz-SignedHeaders=host&X-Amz-Signature=75abed2f6cb28aab9fd802fd8cb037ce5c6331b1fee0f993d4984d4b9eae2e50
39. eSafety Commissioner. (n.d.). Gendered violence. Australian Government. <https://www.esafety.gov.au/key-topics/gendered-violence>
40. Watts, A. J., Rock, S., Gately, N., & Smith, A. L. (2025). Barriers to family and domestic violence support for culturally and linguistically diverse women in Australia: A systematic review. *Journal of Family Violence*. <https://doi.org/10.1007/s10896-025-00976-0>
41. Settlement Services International. (n.d.). Keep migrant and refugee women safe from violence. <https://www.ssi.org.au/causes-and-campaigns/keep-migrant-and-refugee-women-safe-from-violence/>
42. Campo, M., & Tayton, S. (2015). Domestic and family violence in regional, rural and remote communities: An overview of key issues. Australian Institute of Family Studies. https://aifs.gov.au/sites/default/files/publication-documents/cfca-resource-dv-regional_0.pdf
43. Stevens, H. (2023). As the temperature rises, so do rates of domestic violence. Royal Australian College of General Practitioners. <https://www1.racgp.org.au/newsgp/clinical/as-the-temperature-rises-so-do-rates-of-domestic-v>
44. Australian Institute of Health and Welfare. (2026). Family, domestic and sexual violence: Factors associated with FDSV. <https://www.aihw.gov.au/family-domestic-and-sexual-violence/understanding-fdsv/factors-associated-with-fdsv>
45. Australian Institute of Health and Welfare. (2026). Family, domestic and sexual violence: People with disability. <https://www.aihw.gov.au/family-domestic-and-sexual-violence/population-groups/people-with-disability>
46. Barrett, C., Lee, Y., Gillbard, A., Smith, R., Nicholl, D., Rowe, G., Westgate, R., Doughan, H., Darling, G., & Young, R. (2024). The [un]Silencing of Older Women. A Life Stages Approach for the National Plan to End Violence Against Women and their Children. <https://www.emboldenfestival.com/embolden2024.htm>
47. McFerran, L. (2010). It could be you: Female, single, older and homeless. Older Women's Network NSW. <https://ownnsw.org.au/wp-content/uploads/2019/10/ItCouldBeYou.pdf>
48. ScarlettAlliance. (2025). Decriminalisation of sex work. <https://scarletalliance.org.au/wp-content/uploads/Decriminalisation-of-sex-work-30-June-2025.pdf>
49. Scarlet Alliance. (2021). Briefing paper on full decriminalisation of sex work. https://scarletalliance.org.au/wp-content/uploads/2021/02/briefing_paper_full_decrim.pdf

References

50. Scarlet Alliance. (2025). Decriminalisation of sex work.
51. United Nations Human Rights Council. (2025). Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata*. <https://docs.un.org/en/A/HRC/60/28/Add.1>
52. Scarlett Alliance. (n.d.). Companies are using the Modern Slavery Act to discriminate against sex workers. <https://scarletalliance.org.au/wp-content/uploads/Modern-Slavery-Act-Review-Position-Statement.pdf>
53. Scarlett Alliance. (2024). Submission to the TIP Report, <https://scarletalliance.org.au/wp-content/uploads/2024-02-01-Scarlet-Alliance-Submission-to-the-TIP-Report-1-1.pdf>
54. United Nations Human Rights Council. (2025). Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata*
55. Scarlett Alliance. (2023). Key Issues for Asian Migrant Sex Workers: Our 2023 Agenda. <https://scarletalliance.org.au/2023-key-issues-paper-asian-migrant-sex-workers/>
56. Scarlet Alliance. (2025). Decriminalisation of sex work. <https://scarletalliance.org.au/wp-content/uploads/Decriminalisation-of-sex-work-30-June-2025.pdf>
57. Wendt, S., Natalier, K., & Goudie, S. (2025). Young women's experiences of violence and homelessness. *Violence Against Women*, 31(6–7), 1423–1446. <https://doi.org/10.1177/10778012241243053>
58. Henry, N., Flynn, A., & Powell, A. (2019). Image-based sexual abuse: Victims and perpetrators. *Trends & issues in Crime and Criminal Justice*, 572. Australian Institute of Criminology. <https://doi.org/10.52922/ti09975>
59. Walsh, K., Mathews, B., Parvin, K., Smith, R., Burton, M., Nicholas, M., Napier, S., Cubitt, T., Erskine, H., Thomas, H. J., Finkelhor, D., Higgins, D. J., Scott, J. G., Flynn, A., Noll, J., Malacova, E., Le, H., & Tran, N. (2025). Prevalence and characteristics of online child sexual victimization: Findings from the Australian Child Maltreatment Study. *Child Abuse & Neglect*, 160. <https://doi.org/10.1016/j.chiabu.2024.107186>
60. eSafety Commissioner. (2026). The online experiences of children in Australia: Snapshot – Cyberbullying. Australian Government. <https://www.esafety.gov.au/research/the-online-experiences-of-children-in-australia/snapshot-cyberbullying>
61. Ortolan, M., & Tran, D. (2024, June 13). Victorian teachers also victims of fake explicit images created by students using AI. Australian Broadcasting Corporation. <https://www.abc.net.au/news/2024-06-13/ai-generated-deepfake-pornography-school-students-teachers/103969414>
62. Wolbers, H., Boxall, H., Long, C., & Gunnoo, A. (2022). Sexual harassment, aggression and violence victimisation among mobile dating app and website users in Australia. Australian Institute of Criminology. <https://doi.org/10.52922/rr78740>
63. Duncan, A., & Twomey, C. (2024). Child poverty in Australia 2024: The lifelong impacts of financial deprivation and poor-quality housing on child development. Bankwest Curtin Economics Centre. <https://bcec.edu.au/assets/2024/08/BCEC-Child-Poverty-in-Australia-2024-web.pdf>

References

64. Single Mother Families Australia. (2026). Profile of single mother families. <https://smfa.com.au/wp-content/uploads/2026/05/SMFA-Single-Mother-Profile-060526.pdf>
65. Department of Social Services. (2025). Child Support Program Data – June 2025. https://data.gov.au/data/dataset/6379b974_e547-4303-a361-6edebbb52550/resource/18214bed-8639-470b-91eb_51b2a811470d/download/child-support-program-data-june-2025.pdf
66. Commonwealth Ombudsman. (2025). Weaponising Child Support: when the system fails families. https://www.ombudsman.gov.au/_data/assets/pdf_file/0022/318460/Weaponising-Child-Support-when-the-system-fails-families.pdf
67. Cook, K., Byrt, A., Edwards, T., & Coen, A. (2025). Opening the black box of child support: Shining a light on how financial abuse is perpetrated (Version 1). Swinburne. <https://doi.org/10.25916/sut.26983363.v1>
68. Anglicare Sydney. (2026). Cost of leaving report 2026. <https://assets.anglicare.org.au/asset/52433ada-8ada-4ee4-b0bc-73a5c3d2bc9a/cost-of-leaving-report-2026.pdf>
69. Australian Institute of Health and Welfare, (2026), Specialist Homelessness Services Monthly Data, Australian Government, <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-monthly-data/contents/monthly-data>
70. Anglicare Sydney. (2026). Cost of leaving report 2026.
71. Equity Economics. (2021). Nowhere to go: The benefits of providing long-term social housing to women that have experienced domestic and family violence. Everybody's Home. https://static1.squarespace.com/static/61b14c4abbc81a1543f55180/t/62185d457ad63d191d0af100/1757808859803/EE_Women+Housing_Domestic+Violence_WEB_SINGLES.pdf
72. Hunter, R. (2025) Independent Review of HELP Debt Reduction Program – Final Report, <https://www.education.gov.au/download/20191/independent-review-help-debt-reduction-program-final-report/44115/document/pdf>
73. Fitz-Gibbon, K., Pfitzner, N., McNicol, E., and Rupanagudi, H., (2021) Safe, thriving and secure: Family violence leave and workplace supports in Australia, Monash University, https://www.researchgate.net/profile/Kate-Fitz-Gibbon/publication/357621412_Safe_Thriving_and_Secure_Family_violence_and_workplace_supports_in_Australia/links/61d6b76fd450060816909d0f/Safe-Thriving-and-Secure-Family-violence-and-workplace-supports-in-Australia.pdf
74. Cortis, N. Bullen, J., & Hill, T. (2016). Supporting women to find and keep jobs following domestic violence (Issues paper 1). UNSW Social Policy Research Centre, <https://www.anrows.org.au/resources/supporting-women-to-find-and-keep-jobs/>
75. Gavin, M., & Weatherall, R. (2026). When home is the workplace: Foregrounding ethical responses to domestic violence when working-from-home. Work, Employment and Society. <https://journals.sagepub.com/doi/full/10.1177/09500170261434879>

References

76. Independent Commission of Inquiry into Queensland Police Service Responses to Domestic and Family Violence. (2022). A call for change: Report of the Independent Commission of Inquiry into Queensland Police Service responses to domestic and family violence (Part 3: The cultural changes needed). Queensland Government. <https://www.qpsdfvinquiry.qld.gov.au/about/assets/commission-of-inquiry-dpsdfv-report-part-3.pdf>
78. ACT Government. (2024). Sexual assault (police) review report: Responding to recommendation 15 of the Listen. Take action to prevent, believe and heal report (2021). https://www.act.gov.au/_data/assets/pdf_file/0003/2440164/The-Sexual-Assault-Police-Review-Report.pdf
- Corruption and Crime Commission. (2025). Review of WA police investigation: Events prior to Floreat family violence incident. Government of Western Australia. <https://www.ccc.wa.gov.au/sites/default/files/documents/CCC%20-%20Review%20of%20WA%20Police%20investigation%20-%20Events%20prior%20to%20Floreat%20family%20violence%20incident.pdf>
79. Australian Institute of Health and Welfare, (2026), Family, Domestic and Sexual Violence Summary, Australian Government, <https://www.aihw.gov.au/family-domestic-and-sexual-violence/resources/fdsv-summary#services>
80. Australian Institute of Health and Welfare, (2021) Examination of hospital stays due to family and domestic violence, Australian Government, <https://www.aihw.gov.au/reports/family-domestic-and-sexual-violence/examination-of-hospital-stays-due-to-family-and-do/summary>
81. Brain Injury Australia. (2018). The prevalence of acquired brain injury among victims and perpetrators of family violence. <https://www.braininjuryaustralia.org.au/wp-content/uploads/BRAININJURYAUSTRALIAfamilyviolencebraininjuryFINAL.pdf>
82. Ibid.
83. Women's Health NSW. (2024). Non-fatal strangulation and acquired brain injury in the context of sexual violence: An evidence brief. https://www.itleftnomarks.com.au/wp-content/uploads/2024/03/WHNSW_NFS-ABI_Evidence-Brief-2024.pdf
84. Children by Choice Association Inc. (n.d.). Reproductive coercion and abuse. <https://www.childrenbychoice.org.au/advice-and-support/reproductive-coercion-and-abuse/>
85. Ibid.
86. Australian Institute of Health and Welfare. (2026). Family, domestic and sexual violence: Pregnant people. <https://www.aihw.gov.au/family-domestic-and-sexual-violence/population-groups/pregnant-people>
87. Children by Choice Association Inc. (n.d.). Reproductive coercion and abuse.
88. Vallury, K. (2022). Reproductive coercion and abuse among clients with disabilities of an Australian pregnancy options counselling service. Children by Choice Association Inc. <https://www.childrenbychoice.org.au/wp-content/uploads/2025/12/Reproductive-Coercion-and-Abuse-among-clients-with-disabilities-of-an-Australian-pregnancy-options-counselling-service-1.pdf>

References

89. Australian Women's Health Alliance. (2025). Towards climate, health and gender justice: Addressing the intersecting impacts of climate change. <https://australianwomenshealth.org/wp-content/uploads/2025/07/Towards-Climate-Health-and-Gender-Justice-Addressing-the-Intersecting-Impacts-of-Climate-Change-Final.pdf>
90. Sanz-Barbero, B., Linares, C., Vives-Cases, C., González, J. L., López-Ossorio, J. J., & Díaz, J. (2018). Heat wave and the risk of intimate partner violence. *The Science of the Total Environment*, 644, 413–419. <https://doi.org/10.1016/j.scitotenv.2018.06.368>
91. Sovacool, B. K., & In, J. (2026). Harness gender empowerment to achieve climate justice, sustainability, and equity. *Environmental Science and Policy*, 176. <https://doi.org/10.1016/j.envsci.2026.104314>
92. Gender and Disaster Australia. (2023). Gender and Emergency Management Guidelines. <https://genderanddisaster.com.au/gem/>
93. Gender and Disaster Australia. (2026). Lessons in Emergency Training. <https://genderanddisaster.com.au/training/>
94. Gender and Disaster Australia. (2026). Australian led research on gender-based violence in disasters. <https://genderanddisaster.com.au/research/>
95. Gender and Disaster Australia. (2026). Gender and Disaster Australia is the national leader working at the intersection of gender and disaster. <https://genderanddisaster.com.au/>



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