

Response to the Draft National Plan to End Violence Against Women and Children 2022-2032

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About UnitingCare Australia

UnitingCare Australia is the national body for the Uniting Church's community services network and is an agency of the Assembly of the Uniting Church in Australia.

We give voice to the Uniting Church's commitment to social justice through advocacy and by strengthening community service provision.

We are the largest network of social service providers in Australia, supporting 1.4 million people every year across urban, rural and remote communities.

We focus on articulating and meeting the needs of people at all stages of life and those that are most vulnerable.

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Introduction

This submission is informed by input from UnitingCare Australia's network of organisations, who deliver services and support across the whole domestic and family violence spectrum, including early intervention and prevention, individual and group counselling, financial counselling and emergency relief, crisis accommodation, men's behavioural change programs, and systemic advocacy.

We acknowledge the strengths of the Draft Plan in its current form. Particularly we acknowledge the strength of:

- The dedicated plan for Aboriginal and Torres Strait Islanders,
- The Four Pillars,
- The clear acknowledgement of children as victim-survivors of gender-based violence in their own rights,
- The provision of evaluation and monitoring by the Domestic, Family and Sexual Violence Commission.

Notwithstanding, we believe there is room for considerable improvement of the Draft Plan. Our greatest concern and most powerful complaint against the Draft Plan in its current form is that it sits too far above the crisis it seeks to address. Our strongest recommendation is that this Draft Plan incorporate additional detail on how its goals are to be achieved and how we will track progress.

We also note the absence of clarity around responsibility and funding the objectives outlined in the Draft Plan. The Draft Plan reflects significant and admirable ambition. This ambition is welcome, but it will need to be backed with realistic resources and actions if these are to have any chance of being realised. The challenges the Victorian Government has faced in implementing the recommendations of the Victorian Royal Commission into Family Violence, even with a significant investment of resources, gives a strong indication of the level of resourcing that must be made if there is a serious commitment to achieve the aims of the plan.

This is a long-term strategy that will set the focus for the coming ten years. Failure to align the Plan with a practical path to success will frustrate our shared intent and the great effort, financial expenditure and time spent on this project. This plan needs to incorporate an increased focus on the impact of poverty and broader gender inequity on violence in Australia. Moreover, the Response Pillar needs to do more to delineate between different kinds of violence beyond intimate partner violence. The remainder of this submission focusses on additional key areas for extended explication and commitment. Those areas are:

- Working across government
- Working up and down government
- Delivering a strong plan for Aboriginal and Torres Strait Islanders
- Digital defence
- Survivor keeping control of the home
- Forced sterilisation
- Funding
- More indicators, tracked well

Summary of recommendations

<p>Overview</p> <ol style="list-style-type: none"> 1. Incorporate additional detail on how the Draft Plan's goals are to be achieved and how progress will be tracked.
<p>Working across government</p> <ol style="list-style-type: none"> 2. Strengthen program evaluation requirements regarding interaction with related Federal programs.
<p>Working up and down government</p> <ol style="list-style-type: none"> 3. Include an examination of existing State plans and programs. 4. Strengthen program evaluation requirements regarding interaction with related State and Local programs. 5. Establish a joint Commonwealth/State implementation oversight mechanism.
<p>Delivering a strong plan for Aboriginal and Torres Strait Islanders</p> <ol style="list-style-type: none"> 6. Fully-fund the stand alone plan for Aboriginal and Torres Strait Islanders and bring the plan online as soon as it can be completed well.
<p>Digital defence</p> <ol style="list-style-type: none"> 7. Ensure law enforcement agencies have sufficient powers to effectively detect and prevent online abuse of women and children. 8. Require online platforms to have minimum standards to allow users to easily report abusive material for removal.
<p>Survivor keeping control of the home</p> <ol style="list-style-type: none"> 9. Work with State Governments to strengthen the protective impact of family violence orders including across State boundaries. 10. Work with State Governments to collate data on the number of survivors who were able to stay in the family home.
<p>Forced sterilisation</p> <ol style="list-style-type: none"> 11. Enact uniform national legislation outlawing the sterilisation of girls with disabilities, except where there is a serious threat to their health or life, and adult women with disabilities without their free and informed consent. 12. Collect data and provide education on forced sterilisation of women and girls with disabilities in Australia, including those who are sterilised as a result of another medical procedure.
<p>Funding</p> <ol style="list-style-type: none"> 13. Increase funding for community services designed to lower rates of domestic violence, and to minimise the risks and suffering of victim-survivors, particularly for workforce and housing. 14. Monitor, with a view to extend, the average funding period of programs related to violence against women and children. 15. Increase income support and commonwealth funding of social housing.
<p>More indicators, tracked well</p> <ol style="list-style-type: none"> 16. Without delaying the implementation of the plan, make a specific request of stakeholders to provide input on the kinds of measures that will reflect success or failure of the Plan. 17. Without delaying the implementation of the plan, establish an expert panel to develop a domestic violence service outcome tree comparable to work undertaken by Uniting Vic.Tas partnered with Swinburne University. 18. Task the Productivity Commission with oversight and provide independent accountability like the Overcoming Indigenous Disadvantage Report.

Working across government

It is essential that this plan consider the interaction between schemes, programs, and policies across the whole-of-government. The success or failure of government action is dependent on how implementation is undertaken alongside existing programs and policies.

We note the Draft Plan readily recognises system interaction, for example the section on Criminal justice responses from page 21. We welcome the commitment for family violence services to work holistically with Child Protection Services and other family services to support greater integration of service front-doors.

A strong and sustained multi-disciplinary approach to delivery is essential to maximise program success and affordability. A strong multi-disciplinary approach is exemplified in the UK [Strengthening Families Program](#).

Recommendation: Strengthen program evaluation requirements regarding interaction with related Federal programs.

Working up and down government

The Draft National Plan in its current form ignores the practical realities of federation, including failing to acknowledge that each jurisdiction is starting from a different starting point. While considerable effort is undertaken in the Draft Plan to identify interrelation with Federal planned reform, there is no comparable analysis of State reforms or programs. Mexico and France are both mentioned in the body of the Draft Plan, New South Wales is not.

Many of the areas covered by the Draft Plan come within the responsibility of the States. More work needs to be done in considering how the Federal government can partner with State governments in delivering services in these areas. Particularly where resourcing assistance is needed or delivery is aided by a nation-wide perspective.

Recommendation: Include an examination of existing State plans and programs.

Recommendation: Strengthen program evaluation requirements regarding interaction with related State and Local programs.

Recommendation: Establish a joint Commonwealth/State implementation oversight mechanism.

Delivering a strong plan for Aboriginal and Torres Strait Islanders

Aboriginal men and women continue to struggle with the pain and suffering of dispossession, disadvantage, oppression, and discrimination. We were proud to call on the government to resource and support a stand-alone national action plan to end violence against First Nations women and children, written for and by First Peoples in our original submission to the Plan. We are pleased to see the government enacting this approach.

UnitingCare Australia is eager to ensure that the standalone plan for Aboriginal and Torres Strait Islanders is fully-funded and comes online as soon as it can be completed well. The plan also needs to account for the complexities that sit within the First Peoples context, including the deadly and intergenerational impacts of colonisation, and take a whole of community approach. It must also acknowledge that successful programs in prevention have the following key characteristics: safe cultural spaces to share, training First Nations People in response, and safety within communities.

Recommendation: Fully-fund the stand alone plan for Aboriginal and Torres Strait Islanders and bring the plan online as soon as it can be completed well.

Digital defence

Given the ever-changing online environment, there is a need to ensure law enforcement agencies are able to detect, prevent and remove abusive material online.

Platform users can have difficulty getting abusive material removed through the use of the complaints mechanisms provided by the online platforms. Some barriers currently in place include:

- Reporting structures that create strong disincentives for users to report abusive content, such as requirements to provide personal contact information;
- The inability to report publicly visible content without first creating (or logging onto) an account on the platform;
- Difficulty locating reporting tools on the interface, with, at times, inconsistent navigation between desktop and mobile versions of the platform; and
- The inability to report specific users, user profiles, specific posts, or a combination of these.

Recommendation: Ensure law enforcement agencies have sufficient powers to effectively detect and prevent online abuse of women and children.

Recommendation: Require online platforms to have minimum standards to allow users to easily report abusive material for removal.

Survivor keeping control of the home

On securing housing, the Draft Plan outlines the need to *Expand options for women and children to stay safely in their own home, rather than being made to leave by default*. This point needs to be linked to a commitment to make family violence intervention orders work to provide protection against perpetrators.

The failure to be able to enforce family violence intervention orders has undermined efforts by the Victorian government to allow the survivor to stay in the family home with the perpetrator being the one that needs to move out.

As noted by Alison Macdonald, CEO of Domestic Violence Victoria – “The lack of affordable housing in Australia continues to present a significant barrier to victims of family violence being able to leave violent relationships and establish safety in their lives. In fact, family violence is the leading cause of women and children’s homelessness in Australia”.

Recommendation: Work with State governments to strengthen the protective impact of family violence orders including across State boundaries.

Recommendation: Work with State governments to collate data on the number of survivors who were able to stay in the family home.

Forced sterilisation

As noted on page 12 of the Draft Plan, violence is perpetrated against women in the form of forced sterilisation. Women living with disability are disproportionately the victims of this violence.

Since 2005, UN treaty monitoring bodies have continuously recommended that the Australian Government enact uniform national legislation outlawing the sterilisation of girls with disabilities, except where there is a serious threat to their health or life, and adult women with disabilities without their free and informed consent.

Recommendation: Enact uniform national legislation outlawing the sterilisation of girls with disabilities, except where there is a serious threat to their health or life, and adult women with disabilities without their free and informed consent.

Recommendation: Collect data and provide education on forced sterilisation of women and girls with disabilities in Australia, including those who are made sterile as a result of another medical procedure.

Funding

There is not enough funding for community service programs designed to achieve lower rates of domestic violence, and to minimise the risks and suffering of victim-survivors. There is an insufficient workforce to deliver these services. There are insufficient assets to deliver these services, especially housing stock. Aggravating this challenge, funding is ad hoc and cannot be predicted. The result is backlogs and waitlists everywhere.

Low levels of income support from the Commonwealth and the absolute dearth of available housing both serve to pressure victims to remain in unsafe environments. More needs to be done on both fronts.

Investments also commonly see artificially diminished returns because funding durations are shorter than optimal and disproportionate periods are dedicated to the more expensive tasks of ramping-up and ramping-down programs.

Recommendation: Increase funding for community services designed to lower rates of domestic violence, and to minimise the risks and suffering of victim-survivors, particularly for workforce and housing.

Recommendation: Increase income support and commonwealth funding of social housing.

Recommendation: Monitor, with a view to extend, the average funding period of programs related to violence against women and children.

More indicators, tracked well

As foreshadowed in the introduction to this submission – We are deeply concerned that there are insufficient indicators tracking against the huge aspiration of the Draft Plan. An additional consultation opportunity directed exclusively at indicators and measures would greatly add to the plan's strength.

Recommendation: Without delaying the implementation of the plan, make a specific request of stakeholders to provide input on the kinds of measures that will reflect success or failure of the Plan.

Recommendation: Without delaying the implementation of the plan, establish an expert panel to develop a domestic violence service outcome tree comparable to work undertaken by Uniting Vic.Tas partnered with Swinburne.

Recommendation: Task the Productivity Commission with oversight and provide independent accountability like the Overcoming Indigenous Disadvantage Report.