



Submission: Developing the next National Plan to End Violence Against Women and their Children

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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.

Introduction

UnitingCare Australia welcomes the opportunity to make a submission on the development of the next National Plan to End Violence against Women and their Children (next National Plan).

We acknowledge significant inroads have been made since governments across Australia endorsed the inaugural National Plan in 2010. This includes the establishment of data collection and research infrastructure, law reform, and strengthened service responses to prevent and respond to violence against women and their children, including the creation of *Our Watch*, the *Stop it at the Start* awareness campaign, and national support services such as 1800RESPECT. Despite this, rates of family and domestic violence against women and their children have not reduced, and policy and service responses remain fragmented and variable. Since 2010, the rate of sexual violence against women and children has increased.

The stark reality is that much more needs to be done if we are to realise a future where all women and their children live free from violence – and where women are not only safe, but respected, valued and treated as equals in public and private life. With the 2010-2022 National Plan drawing to an end, this is a vital, urgent moment to create a comprehensive framework for meaningful and lasting change.

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.

As highlighted in the recent National Safety Summit, tackling violence against women and children requires a comprehensive, whole-of-society approach that works across multiple levels. While acknowledging the importance of adopting a holistic approach, this submission does not attempt to comment on all the topic areas canvassed in the consultation for the next National Plan. Instead, it identifies some overarching considerations that should inform future policy responses, as well as elaborating on key issues and priorities in relation to economic security, primary prevention, and work with perpetrators.

Meaningful and sustained change will not be possible without significant and guaranteed long-term investment, a commitment to continuous evaluation and improvement, and a much more comprehensive and concerted effort from governments at all levels to tackle the systemic, structural factors that contribute to and compound violence against women and children. This includes reforming the policy and institutional settings that underlie gendered economic disparities and heighten the financial insecurity of victim-survivors of violence. We need a new National Plan that:

- has a human rights focus,
- is comprehensive,
- informed by the voices of women and girls, and
- is based on an intersectional approach that recognises the multiple social, historical, and economic layers of inequality.

Not all women experience violence and its effects in the same way, and it is essential the gendered drivers, and reinforcing factors, of violence against women are considered together with other forms of social, political and economic discrimination and inequality.

This intersectional approach needs to inform the design and implementation of policies and program, and the way we track population-level progress toward prevention. All proposed actions should be considered in terms of the diversity of experiences of those they seek to support: including younger and older women, LGBTIQ women, culturally and linguistically diverse women, women with disability, and women from regional and remote areas. Policies and services need to be anchored in a person-centred approach.

Critically, the next National Plan must support and affirm the self-determination of First Peoples, with a standalone and well-resourced national action plan that reflects the diverse lived realities, needs and aspirations of Aboriginal and Torres Strait Islander peoples. All too often, First Peoples have been afterthoughts or add-ons in the development and implementation of policies to address violence against women and children. This must change.

The next National Plan should also reflect the critical importance of primary prevention, as well as providing for greater investment in properly evaluated programs that work with perpetrators.

Finally, UnitingCare Australia has welcomed the opportunity to contribute to consultations for the next National Plan, and we acknowledge the Federal Government's efforts to engage with a wide cross-section of the community in the development of priorities. It is critical, however, that listening and engagement continues beyond the recent round of consultations and the National Summit, so that all voices are heard and continue to inform the design and evaluation of actions. The next National Plan can only succeed if it works for everyone affected by gender-based violence. Strengthening and supporting this collective effort must continue, as a national priority, if we are to significantly reduce and ultimately eliminate violence against women and their children.

Summary of recommendations

- **Governments must resource and support a stand-alone national action plan to end violence against First Nations women and children, written for and by First Peoples.**
- **Self-determined, community-led solutions and services must be resourced, sustained and embedded across the entire family violence and intersecting services systems to improve outcomes for First Peoples.**
- **Commit to developing culturally safe, trauma-informed organisations and workforce development for all family violence responses and prevention.**
- **Recognise children and young people as victims-survivors of domestic, family and sexual violence in their own right, and ensure that their unique needs are addressed across the spectrum of policy, service delivery and legal system responses.**
- **Improve the coordination and integration of policy responses and services systems to prevent and respond to violence experienced and witnessed by children and young people. This includes addressing areas of intersection in the development and implementation of the next *National Plan for Ending Violence Against Women and their Children* and the next *National Framework for Protecting Australia's Children*, to ensure that full and consistent expression is given to the rights and needs of children within the domestic and family violence context.**
- **Ensure the next National Plan has a sustained focus on primary prevention, complementing early intervention and tertiary responses to domestic and family violence, with a whole-of-community approach backed up by integrated policy and long-term investment. The design and implementation of prevention strategies must incorporate considerations of diversity and intersectionality to ensure efforts are inclusive and accessible for everyone.**
- **Ensure a greater focus on working with perpetrators to prevent future cases of domestic and family violence. This includes increasing long-term investment in a spectrum of responses, strengthening referral pathways into programs, improving coordination between services, investment in workforce development, and increasing the evidence base for effective interventions.**
- **Include as a key performance and measurement benchmark in the next National Plan the effectiveness of the social security and family payments systems in promoting economic independence and security for women generally, and for victim-survivors of domestic and family violence specifically. This should include:**
 - **Ensuring social security rates are sufficient to enable women and children to live with dignity and participate in community life;**
 - **Amending the Social Security Act to allow single parents to receive Parenting Payment until their youngest child turns 16;**
 - **Reviewing the adequacy and indexation arrangements of Family Tax Benefit A and B;**
 - **Improving access to the social security system for all women who have experienced family violence, and streamlining access to payments;**
 - **Reviewing the impacts of the “couple rule” for accessing social security payments, and consider making individuals the basis of eligibility;**
 - **Removing the Targeted Compliance Framework from people in receipt of Parenting Payment Single;**
 - **Ensuring all frontline Centrelink and Child Support Agency staff are provided with trauma- and violence-informed training**

- **Removing systemic barriers to access arising from the intersection of migration and social security regulations, that deepen economic insecurity and prevent a significant proportion of migrant women from seeking safety and recovery.**
- **Reform child support payment arrangements to achieve a fairer system that supports women's economic security and prevents the child support being used as a tool to perpetuate abuse, including:**
 - **Improving child support compliance and increasing payer accountability to address the implications of non-compliance for women and their children;**
 - **Decoupling Family Tax Benefit assessments from child support to ensure mothers are not penalised for their ex-partner's failure to pay child support;**
 - **Removing legal loopholes and reviewing the child support formula to ensure it adequately accounts for women's care/work responsibilities and low earnings.**
- **Include access to safe and affordable housing as a standalone priority in the next National Plan.**
- **Increase the availability of immediate and long-term housing options for women and children leaving violence, including crisis accommodation, social and affordable housing, specialist youth accommodation, and "Safe at home" programs, in order to cater for the diverse needs of women and children escaping violence. This should include an immediate injection of Commonwealth funding to increase the availability of social housing for women and children leaving abusive relationships.**
- **Address the high effective marginal tax rates that penalise low and middle-income single parents and secondary earners for taking on work or more hours.**
- **Routinely implement a gendered analysis when developing and implementing taxation policies, including changes to personal income tax rates, the application of tax concessions and offsets, in addition to the interaction of tax, social security, child support, childcare and employment settings to ensure policies alleviate gendered income and wealth inequities.**
- **Improve women's economic security in retirement by building parity into Australia's superannuation system.**
- **Improve the economic security of women by addressing the undervaluing of work in highly feminised industries.**
- **Develop a joined-up response across government, business and the non-for-profit sector to strengthen supports in workplaces for victims-survivors of violence, and to address ongoing legislative, social and cultural gaps that impede effective workplace responses and contribute to poorer employment outcomes for victim-survivors.**
- **Provide flexible, paid domestic and family violence leave for affected employees.**
- **Increase investment in the care economy as a vital element in supporting women's economic security, including by reforming tax and social security settings to alleviate the economic burden on carers, and by increasing investment in care services and a better remunerated care workforce, including the provision of affordable universal child care, and sufficiently subsidised aged and disability care.**
- **Address the overrepresentation of women in precarious and insecure employment by developing policies that support people to practice equal sharing of care work and thereby increase women's representation in more secure work.**
- **Permanently remove mutual obligations and other barriers in the social security and employment services system that adversely impact women with caring responsibilities.**

Overarching considerations

Prioritise First Peoples' self-determination and community-led initiatives

It is imperative the next National Plan meets the needs of First Nations women and children through a commitment to the principles of self-determination. At the recent Women's Safety Summit, First Nations delegates were emphatic that if governments are serious about ending violence against First Nations women and children, they must resource and support a stand-alone national action plan, written for and by First Peoples.

The problems with existing approaches have been emphasised by members of the Uniting First Peoples Network (the Network), which is comprised of Aboriginal and Torres Strait Islander leaders from the Uniting Aboriginal and Islander Christian Congress (UAICC) and from the Uniting Church and its service agencies across Australia. Recurrent issues raised in our discussions with the Network include:

- mainstream or 'one-size-fits-all' approaches do not work, nor do interventions that view family violence as a singular and isolated problem, without taking into account the multiple, inter-related contextual factors that contribute to it and flow from it – place-based, flexible and holistic approaches are instead needed to ensure adequate, culturally safe, wrap-around service supports;
- one-off interventions that are not sustained do not work;
- services need to be trauma-informed and healing focused, recognising the impacts of colonisation and intergenerational trauma, and reflecting the importance of restoring/enhancing connection to Culture and community;
- chronic under-funding of community-led programs and responses; the funding which is available tends to be short term and patchy, and this works against a longer-term holistic approach and leaves significant geographic areas and communities without access to services and supports;
- both the design and evaluation of government-funded programs tends to be prescriptive, with inflexible KPIs and outputs that don't reflect community input and needs;
- First Nations youth and families are under-represented in early interventions that prevent family violence – the focus is overwhelmingly on crisis responses;
- systemic racism, intergenerational trauma, distrust of police and criminal justice responses, and fear of child removal prevents many women from disclosing violence or accessing services;
- systemic and structural factors (such as poverty, housing insecurity and homelessness) disproportionately impact First Nations women and contribute to the cycle of violence;
- while victims-survivors must always be at centre of any response to family violence, there also needs to be a focus on working with perpetrators and families.

Recommendations:

- **Governments must resource and support a stand-alone national action plan to end violence against First Nations women and children, written for and by First Peoples.**
- **Self-determined, community-led solutions and services must be resourced, sustained and embedded across the entire family violence and intersecting services systems to improve outcomes for First Peoples.**

- **The next National Plan should commit to developing culturally safe, trauma-informed organisations and workforce development for all family violence responses and prevention.**

Children and young people

It is vital the unique needs of children and young people is central to the new National Plan, with the child's voice and needs addressed as part of the whole spectrum of services and responses.

While there has, quite rightly, been a strong policy, research and programmatic focus on the rights and needs of women as victims and survivors of violence, this focus has at times resulted in neglect of the specific needs of children and young people as victims and survivors in their own right. Children and young people who experience violence have special needs for support and assistance, apart from their position as dependents of mothers experiencing abuse. In much of the current system and approach, the voice and experience of children is invisible, despite the profound and wide-ranging effects that experiencing and/or witnessing domestic violence can have on children and young people.

The voices of children and young people with lived experience must be elevated in policy development, program implementation and service delivery along with other key stakeholder representatives. More research is also needed that engages directly with children and young people. Better integration is required between the various services for children and young people, with better communication and coordination between family violence services and other systems including child protection, justice, education and family support systems such as those that deliver maternal and child health services. In addition, there is insufficient coordination across policy frameworks and strategies at the national level. In particular, greater consideration should be given to areas of intersection in the development and implementation of the next *National Plan for Ending Violence Against Women and their Children* and the next *National Framework for Protecting Australia's Children*, to ensure that full and consistent expression is given to the rights and needs of children within the domestic and family violence context.

Recommendations:

- **Children and young people must be recognised as victims-survivors of domestic, family and sexual violence in their own right, and their unique needs must be addressed across the spectrum of policy, service delivery and legal system responses.**
- **Ensure better coordination and integration of policy responses and service systems to prevent and respond to violence experienced and witnessed by children and young people. This includes giving greater consideration to areas of intersection in the development and implementation of the next *National Plan for Ending Violence Against Women and their Children* and the next *National Framework for Protecting Australia's Children*, to ensure that full and consistent expression is given to the rights and needs of children within the domestic and family violence context.**

Primary prevention

The next National Plan should ensure a sustained focus on primary prevention.

Primary prevention aims to stop violence against women before it occurs. It seeks to change the underlying drivers of this violence and the gender inequalities from which it arises. While efforts to support victims-survivors, and to prevent further harm and the escalation of abuse, are all essential elements in the National Plan, primary prevention is vital if we are ultimately achieve a future where all women and their children can live free from violence.

To make meaningful and enduring change, primary prevention requires a whole-of-community approach that is supported by integrated policy and long-term investment. To be effective, responses should:

- challenge the acceptance of violence against women;
- challenge the structures, norms and values that support and promote inequality and violence;
- promote women's independence and decision-making in their personal relationships and in their communities;
- challenge gendered power, gender stereotypes and gender roles;
- strengthen positive, equal, and respectful relationships;
- have an intersectional focus that acknowledges that the experience of gender inequality can be greater for some women based on other identities such as race, sexual and gender identity, and disability;
- promote and normalise gender equality in relationships, families, communities, institutions, workplaces, and wider society;
- complement and be implemented alongside early intervention and tertiary responses.

Key to preventing violence is working with children and young people to challenge stereotypical attitudes towards gender relations and promote respectful relationships. Particular attention should be given to ensure that programs are accessible for all children, including those living with disability; those from culturally and linguistically diverse communities; First Nations children; and children living in rural, regional and remote areas. More broadly, approaches to primary prevention need to be calibrated for the diverse communities in Australian society, and recognise that one size doesn't fit all. While measures to prevent violence must consider gender, it is also important other interesting drivers of violence are addressed, including colonialism and discrimination based on factors such as class, age, race, migration status, sexuality, gender identity, religion, and disability.

We need to move beyond only working with men as perpetrators. To prevent boys and men from using violence in the first place, effective primary prevention should support them to challenge harmful forms of masculinity as well as challenge attitudes, behaviours and structures that support or condone men's use of violence against women.

Effective prevention should include short-term strategies with rapid returns, but ignoring long-term investments increases community risk. Prevention strategies that focus only on individual behaviour change, particularly if these are short-term or one-off, are not enough to bring about lasting change.

Consideration should be given to place-based approaches, particularly in regional, rural and remote locations. School-based intervention also need to be augmented by programs that target children and young people who fall out of the education system.

Recommendation:

- **The next National Plan should ensure a sustained focus on primary prevention, complementing early intervention and tertiary responses to domestic and family violence, with a whole-of-community approach backed up by integrated policy and long-term investment. The design and implementation of prevention strategies must incorporate considerations of diversity and intersectionality to ensure efforts are inclusive and accessible for everyone.**

Working with perpetrators

The next National Plan needs to include a greater focus on working with perpetrators to prevent future cases of domestic and family violence. This includes investing in an earlier and more extensive system of perpetrator responses, strengthening referral pathways into programs, and strengthening coordination between services.

Funding for programs working with perpetrators is inadequate, piecemeal and uneven around the country. Perpetrator programs are seldom available in large parts of the country (particularly in more regional and remote areas). Organisations in our network have reported that perpetrator intervention programs frequently operate in a contractual environment in which prescribed approaches limit what providers are able to deliver. This includes aspects such as program length, program format, prescribed KPIs, and the qualifications and experiences of staff delivering programs. Currently, funding for perpetrator programs rarely allows for follow-up and working with people over the long term.

UnitingCare Australia believes there is a need to provide longer-term funding for a greater range of interventions and supports that are better coordinated, backed up by workforce development and training, and better measured and evaluated. Greater consideration needs to be given to strengthening referral pathways into programs, as well as improving linkages with relevant programs such as housing, mental health, and drug and alcohol services. It is also critical that programs are flexible and tailored to the contexts in which they delivered. This should include co-designed programs with First Nations communities that are holistic, trauma-informed and take into account the social, historical and political drivers of violence.

While it is essential to work with perpetrators to prevent future cases of family violence, there remains a lack of evidence as to what works in engaging men in behaviour change. Building this evidence base is essential to inform future reform activity and funding decisions at the state and national levels. This includes building a national evaluation framework for perpetrator interventions. It should also include longitudinal evaluation of the effectiveness of longer-term perpetrator intervention, engagement and ongoing contact.

Perpetrator programs should work in a collaborative, cohesive manner with specialist services for women and children to ensure that prevention and reduction of domestic and family violence remains at the forefront. We also need to move away from a one-size-fits-all approach to perpetrator interventions. Programs needs to be co-designed with communities and recognise the effects and impact of trauma, colonisation, and/or inequality.

Recommendation:

- **Ensure a greater focus on working with perpetrators to prevent future cases of domestic and family violence. This includes increasing long-term investment in a spectrum of responses, strengthening referral pathways into programs, improving coordination between services, investment in workforce development, and increasing the evidence base for effective interventions.**

Economic security

Women's economic security and safety are inextricably linked. Economic insecurity puts women at higher risk of violence as they have limited options for leaving an abusive relationship and are more exposed to economic abuse. Financial issues, including the inability to afford housing, are major factors in women's decisions about leaving or staying in violent relationships, and the economic difficulties arising from violence, including loss of wealth upon separation, reverberate through women's lives and increase hardship in the long-term. Navigating the complexities of the child support, social security, legal and banking systems presents a significant barrier to equitable outcomes, and many survivors simply forgo their rights and entitlements in order to move on with their lives. This can result in a further deepening of their economic disadvantage.

In addition to the next between economic insecurity and domestic and family violence, women with limited economic resources can also be at heightened risk of other forms of violence. For example, women who are homeless are at increased risk of physical and sexual assault and robbery.

Economic insecurity, like domestic and family violence, is a gendered problem. In Australia, women on average experience poorer economic outcomes than men, a problem that is consistent throughout their life course and contributes to growing rates of poverty and homelessness among older women. On average, women experience lower levels of workforce participation, higher levels work insecurity and underemployment, lower levels of pay, higher levels of financial stress, and reduced retirement savings. Not all women experience these economic disparities equally, and it is important an intersectional lens is adopted to understand the multiple drivers of economic insecurity for individuals. This is particularly the case for First Nations women, women with disabilities, migrant women, and women living beyond the metropolitan margins – groups that are more likely to experience higher rates of both economic disadvantage and domestic and family violence.

The next National Plan must address these economic inequities and ensure economic insecurity does not trap women in violent relationships. And it must guarantee that poverty is not the inevitable outcome of leaving an abusive relationship. Employment, social security, taxation, superannuation and child support policies *should* support and enable women, but currently they combine to undermine their economic security. Economic security – including access to adequate income support above the poverty line and safe and affordable housing – is key to enabling women to permanently leave violent relationships, rebuild their lives, and sustain themselves and their children after separation. In the longer term, economic security is critical to avoiding the risk of homelessness and poverty that is facing a growing proportion of older women from a range of backgrounds.

Improving women's economic security requires a multi-level, strategic framework that addresses the various interlocking structural, social, institutional and interpersonal factors that shape and influence economic outcomes for women throughout their lives. This includes policies relating to income support, child support, paid and unpaid care, tax and superannuation, housing affordability, and workforce participation. It also requires targeted measures to prevent and respond to economic abuse.

Access to social security and family payments

Access to adequate social security and family payments is vital to support women's economic security over the life course. It is also important to many women who are attempting to be free of an abusive relationship and can be critical to victim-survivors re-establishing themselves so they may rebuild their lives.

While Australia's social security and tax systems are constructed as gender neutral, there are numerous ways in which current settings produce unequal outcomes for women and men, primarily because gendered patterns around family and work persist. This undermines women's economic security in the short and longer term, particularly for women who experience domestic and family violence. Further, the inadequate rate of income support payments, particularly JobSeeker, along with the continued erosion of family payments and the application of a punitive compliance framework, has reduced the capacity of the social security system to shield women from poverty. Single parent households, which are overwhelmingly headed by women, are disproportionately affected by the gaps and shortcomings in our existing social security and family payment system.

The need to address these issues was acknowledged in the First National Action Plan, which prioritised social security reform as an immediate national initiative to be implemented, including increased funding for income support and family assistance payments. Yet specific reference to social security and family payments was omitted from subsequent action plans.

In addition to the inadequacy of payments, the structure and eligibility criteria of income support needs to be reformed to improve the economic security of women generally, and particularly for those experiencing domestic and family violence. This includes ensuring women on temporary visas, or those subject to the Newly Arrived Residents Waiting Period, are able to access income support. Our frontline services have reported that intertwined migration and social security regulations—particularly residency requirements for social security payments and public housing, and newly arrived residents' waiting periods—prevent certain groups of migrant women from seeking safety and redress after experiencing violence.

In addition, there is a need to move away from the 'couple rule', which uses assessment of relationship status as the basic determinant of entitlement in the social security system – an approach that is unique to Australia and is based on outmoded assumptions regarding traditional gender roles of the male breadwinner and dependent female.¹ As a 'member of a couple', women are paid at a lower rate, with payment precluded under the income test if their partner's income exceeds the relevant cut-out threshold. The dependency created by this approach disempowers women and stops them from having the financial capacity to leave an abusive relationship. It also provides an opportunity for one partner to use the 'system' to control the other. A victim-survivor may be denied payment or, if it is later determined she did not declare her relationship or accurately report her partner's income, may incur an overpayment debt and potentially face criminal prosecution for social security fraud – even if she claimed to be single under duress. In the application of this rule, domestic

violence is rarely treated as an exception. Moreover, when a relationship ends, Centrelink may interview the perpetrator to verify the date the relationship ended, providing further scope for the perpetrator to exercise coercive control.

In addition, the application of the couple rule and Centrelink's associated administrative arrangements can mean debt recovery cannot be waived for victim-survivors, even in situations where they were coerced or have done nothing wrong. This is because the discretion to waive a Centrelink debt in special circumstances is not available where 'another person' made the false statement, even if that other person is an abusive partner who has threatened the recipient. This means that a woman's abusive or violent partner can make the offending statement or omission, yet it will be the victim of violence who is encumbered with the debt and potentially face prosecution for fraud.²

Child support

The current settings for the child support system compound women's economic insecurity and provide opportunities for further economic abuse and coercive control. A victim-survivor may fear continued interaction with the other parent and avoid occasions of contact or opportunity for continuing control, and this may in turn influence their participation in the child support scheme—prompting decisions to, for example, not seek child support, end child support, change collection methods, or accept insufficient child support.

Perpetrators may use non-payment or threat of non-payment of child support as a form of coercive control. This is particularly problematic given calculations of other entitlements rely on Child Support payer lodgement of financial details. Subsequent late lodgement of tax returns leads to reassessment of Family Tax Benefit, which can result in an assessment of overpayment, with the mother accruing a social security debt. Often former partners have avoided paying child support by exploiting loopholes in the system, such as non-lodgement of tax returns or undertaking cash-in-hand work to reduce their taxable income.

Recommendations:

- **That a key performance and measurement benchmark in the next National Plan is the effectiveness of the social security and family payments systems in promoting economic independence and security for women generally, and for victim-survivors of domestic and family violence specifically. This should include:**
 - **Ensuring social security rates are sufficient to enable women and children to live with dignity and participate in community life;**
 - **Amending the Social Security Act to allow single parents to receive Parenting Payment until their youngest child turns 16;**
 - **Reviewing the adequacy and indexation arrangements of Family Tax Benefit A and B;**
 - **Improving access to the social security system for all women who have experienced family violence, and streamlining access to payments;**
 - **Reviewing the impacts of the "couple rule" for accessing social security payments, and consider making individuals the basis of eligibility;**
 - **Removing the Targeted Compliance Framework from people in receipt of Parenting Payment Single;**
 - **Ensuring all frontline Centrelink and Child Support Agency staff are provided with trauma- and violence-informed training**

- **Removing systemic barriers to access arising from the intersection of migration and social security regulations, that deepen economic insecurity and prevent a significant proportion of migrant women from seeking safety and recovery.**
- **Reform child support payment arrangements to achieve a fairer system that supports women's economic security and prevents child support being used as a tool to perpetuate abuse, including:**
 - **Improving child support compliance and increasing payer accountability to address the implications of non-compliance for women and their children;**
 - **Decoupling Family Tax Benefit assessments from child support to ensure mothers are not penalised for their ex-partner's failure to pay child support;**
 - **Removing legal loopholes and reviewing the child support formula to ensure it adequately accounts for women's care/work responsibilities and low earnings.**

Housing and homelessness

It is imperative access to safe and affordable housing for women of all ages is prioritised in the next National Plan. While ideally when situations of family and domestic violence arise the victim-survivor should have the choice to stay in their home, with the perpetrators removed, the reality is that many women and children need to leave to find safety. Access to housing continues to be one of the greatest challenges to supporting women and children experiencing family violence, and all too often our network organisations report that women return to violent partners due to the lack of affordable and secure housing.

Women, children, and young people who need to leave the family home often face lengthy waits and navigate fragmented services systems and processes when attempting to secure crisis support and temporary or longer-term accommodation. Family and domestic violence is the primary reason women and children seek specialist homelessness services, but only 3.2 per cent are currently receiving the long-term housing solutions they need.

UnitingCare Australia is pleased that "improvement of service system responses" has been included in the Draft Framework for the next National Plan, however it is vital that access to safe and affordable housing is included as a standalone priority.

Recommendations:

- **Include access to safe and affordable housing as a standalone priority in the next National Plan.**
- **Increase the availability of immediate and long-term housing options for women and children leaving violence, including crisis accommodation, social and affordable housing, specialist youth accommodation, and "Safe at home" programs, in order to cater for the diverse needs of women and children escaping violence. This should include an immediate injection of Commonwealth funding to increase the availability of social housing for women and children leaving abusive relationships.**

Taxation and superannuation

While tax settings are ostensibly gender neutral, they are very much gendered in their effects, compounding economic disparities between women and men. This is due to a range of factors, including gender inequities in employment, pay and working conditions, and the unequal caring and reproductive burden that women carry. Tax settings not only interact

with these factors to produce unequal economic outcomes, but can also further entrench gendered norms and patterns of caring by creating disincentives to women's workforce participation.

For women with children, the structure of the tax and transfer system results in poor financial payoffs from taking on more paid work. Any extra earnings can be offset by increased income tax, the imposition of the Medicare levy, reduced access to family payments (and in the case of single parents, child support payments), combined with the net cost of childcare. For women in this situation, the decision not to work or to work only a few hours per week, made on the basis of short-term financial effects because of high effective marginal tax rates, can have long-term consequences on the earning capacity of women over their lifetime. At the same time, it can reinforce gender social norms around financial dependence, unpaid care and household production.³

Superannuation policy settings further magnify and compound the negative impacts of the differing pay, workforce participation and caring responsibilities of women. At the same time, policy decisions to reduce the personal income tax for higher income earners (who are predominantly men), or the continuation of generation tax concessions on property and wealth (which overwhelmingly benefit men), reproduce and deepen economic inequalities between women and men. The cumulative effect of these various inequities over a woman's lifetime significantly increases her likelihood of relying the Age Pension and experiencing housing insecurity, homelessness and poverty in older age.

Recommendations:

- **Address the high effective marginal tax rates that penalise low and middle-income single parents and secondary earners for taking on work or more hours.**
- **Routinely implement a gendered analysis when developing and implementing taxation policies, including changes to personal income tax rates, the application of tax concessions and offsets, in addition to the interaction of tax, social security, child support, childcare and employment settings to ensure policies alleviate gendered income and wealth inequities.**
- **Improve women's economic security in retirement by building parity into Australia's superannuation system.**

Preventing and responding to economic abuse

It is imperative the next National Plan takes a comprehensive approach to preventing and responding to economic abuse. While economic abuse continues to be under-recognised and underreported, it has immediate and lasting harmful effects for many victim-survivors.⁴ Economic abuse is a frequent tactic of violence, however, victim-survivors of economic abuse often do not identify their experience as family violence. Policy settings and service systems are also not well equipped to prevent, identify and respond to economic abuse or the other economic harms associated with violence.

The next National Plan should support a spectrum of responses to address economic abuse. Preventing economic abuse should include addressing traditional gendered expectations and social norms regarding the management of finances, including perceived male superiority in handling financial matters and that romantic couples should join financial resources. There should also be support for education around healthy financial relationships and empowering women to safely manage their own finances, as well as wider educational efforts to increase

the awareness of economic abuse – in frontline services, in services, and the wider community.*

UnitingCare Australia acknowledges the efforts of certain industries to strengthen understanding of, and responses to, economic abuse. Organisations within our network have been involved in industry partnerships and collaboration to increase awareness and improve internal processes for identifying and responding to economic abuse with the banking sector and among energy providers. Yet progress has been patchy and inconsistent, and much more needs to be done. For example, when supporting victim-survivors who have issues with coerced debt, financial counsellors from within our network organisations have reported a frequent lack of consistency both between banks and within the same bank, as well as differing responses from different utilities and telecommunication providers. Current systems and processes need to be improved to reduce the use of ‘relationship debts’ as a form of economic abuse by reviewing and improving processes at the time of sign up, responses to disputes, and processes to enable the removal of liability when legally possible.

There also needs to be better identification of and support for women experiencing economic abuse, including through greater investment in financial counselling broadly and, specifically, specialised family violence financial counselling. Structural factors, such as legislation and regulatory settings, need to be reviewed and reformed to address those elements that undermine initial responses and work against longer-term recovery for women and children. This includes addressing gaps and inconsistencies in consumer credit laws, including insufficient protection for consumers who enter into loans under duress, as well as inadequate hardship provisions to support the financial security of women following economic abuse.

Recommendations:

- **Make economic abuse a priority in the next National Plan, backed up by measures that include:**
 - **Increasing investment in specialist financial counsellors to deliver frontline economic abuse services to meet the growing demand;**
 - **Increase awareness and understanding of economic abuse in industry and the wider community;**
 - **Improving systems and processes to prevent, detect and respond to economic abuse across services, business, the legal system and government;**
 - **Ensuring laws and regulations minimise opportunities for economic abuse and strengthen consumer protections for victims-survivors of economic abuse;**
 - **Supporting education and financial literacy programs to mitigate and prevent and economic abuse, including education around healthy financial relationships and empowering women to safely manage their own finances.**

Work, employment and care

Increasing women’s economic security will require measures focused on workforce participation, equitable wages and retirement incomes, as well as addressing the undervaluing of care work and the unequal caring and reproductive burden which women carry.

Closing the gender pay gap is key to improving economic security for women. As with many other gender equality measures, progress to reduce the gender pay gap reversed during the

* These measures should complement those needed to address financial elements of elder abuse.

pandemic. The factors that contribute to the gender pay gap are well known and documented, including lower pay rates in female-dominated industries, a lack of workplace flexibility combined with women still being expected to take on more unpaid care duties than men, and discrimination and bias in hiring, pay decisions and promotions. As with many other gender equality measures, progress to reduce the gender pay gap has reversed during the pandemic. Over the last year, the national pay gap has grown to 14.2 per cent for full-time employees, a difference of \$261.50 each week.

In addition to measures to reduce gender disparities in pay, addressing domestic and family violence appropriately and effectively in the workplace is critical to the safety and economic security of victims-survivors. There continues to be a range of legislative, social and cultural gaps that impede appropriate and effective workplace responses. This includes the lack of awareness among employers and the wider community of domestic and family violence as a workplace issue; the lack of paid leave provisions and protections against unfair dismissal for all employees in cases of family violence; the lack of legislated protections against workplace discrimination arising from domestic and family violence; the persistence of workplace cultures that fail to support employees to disclose violence and receive support; and the lack of clear and robust domestic and family violence policies and procedures in many workplaces. Addressing these gaps will require a joined-up response from government, businesses, and non-for-profit employers – an approach that acknowledges that support is needed over time to help women sustain their positions in the workforce whilst seeking to create safety from harm.

A further factor that underpins the relative economic insecurity of women is the undervaluation of care, both paid and unpaid. The vast majority of unpaid carers in Australia are women. According to the Australian Human Rights Commission, Australian women make up 68 per cent of primary carers for people with a disability and older people, while at the same time women spend triple the time caring for children in comparison to men each day. Women bear the economic cost of providing unpaid care, but they are not remunerated for it. The aged care workforce taskforce headed by Professor John Pollaers found women in the Australian workforce are also more likely to be employed in industries which feature care work, with pay rates significantly lower than the rates of pay for comparable roles in male-dominated industries.

The implications of under-valued work, such as care work, being undertaken by women are wide-ranging. Lower salaries for women lead to lower superannuation balances once they retire and lower rates of home ownership, and this is in turn linked to the increasing numbers of homeless women and women living in poverty over the age of 50. Low salaries also increase the likelihood of economic insecurity, with many women not being able to work multiple jobs due to their unpaid caring duties at home.

The disproportionate burden of care borne by women is compounded by the lack of adequately funded and affordable care services such as childcare, aged care and disability support services, and this in turn affects women's earning capacity and workforce participation. Undervalued and underpaid women have for years been going above and beyond to fill the gaps in the system. Women do the work of caring, the work of loving and they do it for free. The fact that women assume the bulk of caring roles – both paid and unpaid – underpins economic inequalities and undermines the overall economic security of women.

Recommendations:

- **Improve the economic security of women by addressing the undervaluing of work in highly feminised industries.**
- **Develop a joined-up response across government, business and the non-for-profit sector to strengthen supports in workplaces for victims-survivors of violence, and to address ongoing legislative, social and cultural gaps that impede effective workplace responses and contribute to poorer employment outcomes for victim-survivors.**
- **Provide flexible, paid domestic and family violence leave for affected employees.**
- **Increase investment in the care economy as a vital element in supporting women's economic security, including by reforming tax and social security settings to alleviate the economic burden on carers, and by increasing investment in care services and a better remunerated care workforce, including the provision of affordable universal child care, and sufficiently subsidised aged and disability care.**
- **Address the overrepresentation of women in precarious and insecure employment by developing policies that support people to practice equal sharing of care work and thereby increase women's representation in more secure work.**
- **Permanently remove mutual obligations and other barriers in the social security and employment services system that adversely impact women with caring responsibilities.**

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