

23 February 2022

Ms Liz Hefren-Webb
Deputy Secretary, Families and Communities
Department of Social Services
Australian Government
GPO Box 9820
Canberra ACT 2601

Dear Ms Hefren-Webb

Draft National Plan to End Violence Against Women and Children 2022–2032

Good Shepherd welcomes the draft National Plan to End Violence Against Women and Children 2022–2032. There are few more urgent and significant tasks for government than eliminating men’s violence towards women and children.

As a family violence services provider, Good Shepherd is acutely aware of the dangers to women who cannot access timely service responses, and who are not appropriately supported to be financially secure and recover from violence. The next National Plan can change the course of service provision and government policy, providing clear, concrete directions for generational change over the next decade.

Overarching goals, principles and pillars

The draft Plan signifies progress in Australia’s response to family violence. We strongly support a ‘towards zero’ approach that pursues violence elimination, and welcome the four foundational principles, which recognise:

- that addressing gender inequality is key to ending violence against women and children
- the need to draw upon the lived experience of victim-survivors to design effective policies and solutions
- that working alongside First Nations leaders and communities to end violence against First Nations women and girls is critical to ending violence in Australia
- the need for an intersectional and evidence-informed approach that considers the complexity and diversity of people’s experiences of violence.

We strongly support the aim to ‘reimagine and transform the social, political and economic aspects of our society that enable and sustain gender inequality’. This requires interconnected policy measures and sustained investments across government, including in treasury, housing and social services portfolios, to end family violence. The National Plan should expressly acknowledge that gender inequalities and family violence have intensified during the pandemic (see e.g. [ANROWS 2021](#)), requiring additional investments and bolder policy.

Good Shepherd also welcomes the commitment to leadership and long-term, bipartisan investment across the four pillars of prevention, early intervention, response and recovery. These pillars are well-established elements of the family violence response and key to ending violence.

While the first National Plan was understandably focused on crisis-stage services, we welcome the greater focus on recovery-stage services in the next National Plan. As the draft Plan acknowledges, recovery services help break the cycle of violence, set women up for long-term financial security, and enable women to create safe, nurturing environments for their children.

Over the next 10 years the National Plan must create more recovery services that offer open-ended support, enabling women to engage at different points during a non-linear recovery process. For example, the Good Shepherd/CommBank Financial Independence Hub has no time limits (women access support over an average period of eight months). Family violence services should have a clear recovery lens and be geared to victim-survivor needs at this stage. For example, family violence-related financial services should go beyond financial counselling and provide financial capability support that helps women realise longer-term goals.

Recovery, however, is not just about programmatic measures. The National Plan should set out a vision of economic security measures and supportive government systems – including family law and social security systems – that prioritise safety and enable recovery from violence.

National Family, Domestic & Sexual Violence Commission

We welcome the establishment of a national Family, Domestic & Sexual Violence Commission. The scale of the crisis demands an independent, well-resourced federal governance body. However, the Commission's remit must extend beyond 'responsibility for monitoring and reporting on accountability and evaluation frameworks against the National Plan'.

While the monitoring and accountability function is clearly important, the Commission will also need to provide leadership and strategy, and help guide coordinated action and services by federal, State and Territory, and local governments. This type of model applies in other areas pursuing a 'towards zero' vision, such as road safety. For example, the Victorian Transport Accident Commission works with its road safety partners (Victoria Police, the Department of Justice & Community Safety and VicRoads) to achieve the goal of zero road deaths and injuries. The Family, Domestic & Sexual Violence Commission may need to play a more active and interventionist role along with national partners (e.g. Our Watch) to achieve a similar goal in relation to family violence.

A nationally consistent family violence definition and a national risk assessment & management framework

Good Shepherd agrees that nationally consistent definitions of gender violence, including family violence, will support a shared understanding of violence and consistent responses. A clear, comprehensive definition will have significant power in guiding policy measures, service responses, law enforcement, resource allocation, data collection and outcomes measurement. We therefore look forward to a definition that captures diverse experiences of violence shaped by culture, race, gender identity, sexuality, age and disability.

Australia also needs a national risk assessment and management framework, and a national information-sharing regime, similar to the 'MARAM' framework in Victoria. This is a significant omission in the National Plan. Perpetrators and victim-survivors often move between jurisdictions, requiring coordination, consistency and agreement in risk identification and management across Australia. A national framework would also promote the safety of victim-survivors and the accountability of perpetrators interacting with a range of federal agencies and systems, such as the family law system, human/social services, and law enforcement.

Economic security measures

Women's economic inequity and insecurity are at the heart of gendered violence, making it more likely that violence will be perpetrated and sustained across a relationship by limiting women's choices or removing the option of an independent life. Consistent with previous research (e.g. [Campbell & Baxter 2021](#)), recent ANROWS research found strong evidence of a relationship between economic insecurity and recent intimate partner violence. Women with higher levels of financial stress were much more likely to have experienced physical or sexual violence or emotionally abusive, harassing or controlling behaviours in the last 12 months, compared with women who reported low levels of financial stress ([ANROWS 2022](#)).

A lack of money forces women to stay with abusive men. At least 1 in 4 women who want to leave a violent current partner are unable to do so because they do not have enough financial resources. This is the most common factor preventing women from separating ([ABS 2017](#)).

At this stage, the draft Plan makes welcome, but very high-level, statements about supporting women's financial recovery from violence, and the role of government and other systems in creating barriers to recovery and financial independence. The National Plan should commit to clear measures for dismantling these barriers and building safety and economic security, allowing for even more detailed strategies in the two five-year Action Plans.

Along with sector colleagues (e.g. [VCOSS 2021](#)), we suggest the National Plan could better use the Australian Government's major policy levers in areas such as social security, housing, workplace relations, family law and migration. We share [Respect Victoria's view](#) that 'the Plan should specify what areas of focus are the responsibility of the Commonwealth alone ... [which] is critical to ensure the Commonwealth mobilises the levers it can control (including those in the justice, welfare and economic portfolios).'

Priority economic security measures for the National Plan include:

- an ongoing financial support scheme, focused on embedding Escaping Violence Payments beyond the pilot stage, increasing the cap to \$10,000, and enabling easy payment access
- building a supportive, trauma-informed social security system that ensures women have sufficient resources to remain separated from abusive partners, guards against systems abuse by perpetrators, understands the nature of family violence and victim-survivor needs, and avoids compliance mechanisms that compound trauma and stymie recovery
- 'whole-of-life' financial capability services aimed at violence prevention and recovery, which connect women with resources and build financial skills and confidence at the time of major life stages/events such as early adulthood; entering/re-entering the workforce; pregnancy, childbirth and parenthood; and relationship separation
- concrete commitments to increasing the availability of affordable, sustainable housing for women and children leaving abusive relationships
- workforce participation measures such as 10 days of paid family violence leave; a minimum 26 weeks of paid, shared parental leave; affordable, accessible childcare; and tailored employment services, so victim-survivors can remain connected to jobs and incomes.

Housing, in particular, is fundamental to preventing family violence and enabling recovery. A lack of affordable, sustainable housing is one of the biggest barriers faced by Good Shepherd practitioners in assisting clients to live safely and recover from violence. We welcome the statements about housing in the draft Plan, including expanding 'safe at home' options, enhancing links between transitional and long-term housing, supporting private housing options, and delivering safe options for children and young people. However, the National Plan needs to go further and include express commitments to increase the supply of crisis housing, and address the national shortfall of around 16,000 social housing homes for victim-survivors

([Equity Economics 2021](#)). The gravity of this issue is extremely well-known and now even more significant due to [recent rent spikes and supply constraints](#). The National Plan should commit to a co-investment framework with the States and Territories to start addressing this critical issue.

Economic abuse measures

The National Plan should also provide clear, overarching directions for addressing economic abuse. Economic abuse is prevalent and has increased during the pandemic ([ANROWS 2021](#)) yet receives scant attention in the draft Plan. At the least, the National Plan can set directions for integrated economic abuse prevention measures, early intervention services and recovery programs, and professional training in recognising and responding to economic abuse across government, industry and community services.

Violence towards First Nations women and children

Good Shepherd recognises the appalling rates of violence towards First Nations women and children, caused by racism, gender inequality, intergenerational trauma, and the ongoing effects of colonisation and dispossession. We strongly support a dedicated First Nations women's safety plan, led by First Nations women, communities and services, grounded in principles of self-determination and community control, and informed by leading work such as the Australian Human Rights Commission's [Wiyi Yani U Thangani](#) report (2020) and the [Pathways to Safety](#) report by Change the Record and the National Family Violence Prevention Legal Services Forum (2021). The latter report calls for, among other things, the dismantling of economic barriers to safety, and reforms in housing, social security and economic development policy to build safety for First Nations women and children.

Funding and action timeframes

Good Shepherd welcomes implementation of the National Plan through two five-year Action Plans (rather than the current three-year Action Plans), which set up longer funding and implementation timeframes, allowing services more time to reach women and children, assist clients, and improve and innovate service offerings.

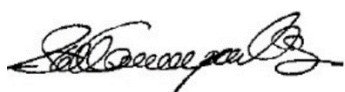
The National Plan will not work without sustained, bipartisan funding that matches the scale of the problem, especially following the onset and increased frequency and severity of family violence during the pandemic ([ANROWS 2021](#)). Significant funding commitments are required in the 2022-23 Federal Budget, given the previous budget was characterised as a down-payment on the next National Plan.

Meaningful targets and outcomes

Good Shepherd also welcomes the intention to develop quantifiable, measurable and ambitious targets under the two Action Plans, and the inclusion of an Outcomes Framework in the draft National Plan. At this stage, the draft targets and outcomes are relatively superficial and require much further development. Among other things, they will need to include indicators that capture economic abuse and economic drivers of violence against women.

Good Shepherd looks forward to working with government on the finalisation of the National Plan and the development of detailed Action Plans. Should you wish to discuss our response, please contact Marita Callanan at marita.callanan@goodshp.org.au.

Yours sincerely



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