

Feedback on the Draft National Plan to End Violence Against Women and Children

In this response to the draft National Plan, the Centre for Women’s Economic Safety (CWES) includes feedback on the National Plan as well as things we’d like to see included in the Action Plans to follow.

The draft National Plan describes itself as a “national blueprint for change and sets out our collective ambitions, priorities and targets for how we will work to end violence against women and children over the next ten years.” However, there is little detail of *how* this will be achieved. Given the commitment to two underpinning 5-year Action Plans, CWES hopes the Action Plans will include this detail.

We also note that the targets set in the draft National Plan are purposefully quantitative and the outcomes set are focused how systems operate, rather than how systems are *experienced* by women and children. The Centre for Women’s Economic Safety would like to also see qualitative measures of **how victim-survivors experience the systems they engaged with**, in alignment with the Foundation Principle of listening to survivor voices. The importance of the improving the quality of our collective responses should not be underestimated.

	CWES called for...	What is in the plan...	What is missing/needed/ Further commentary
1	“A focus on economic abuse”	<p>“A ‘towards zero’ approach to violence against women and children means that we will reimagine and transform the social, political and economic aspects of our society that enable and sustain gender inequality.</p> <p>It requires addressing individual behaviours as well as structural and societal drivers.”</p>	Economic abuse is not named in the national plan and there are just four mentions of “financial abuse”. While the plan mentions reimagining ‘social, political and economic aspects of society’ that contribute to gender inequality, there is no detail about how this will be achieved, nor recognition of the significant role of perpetrators in capitalising on these aspects of society to inflict economic abuse and constrain women’s lives. Without economic safety, there is no safety and this needs greater focus.
2	Co-design programs, processes and products with women with lived experience to ensure: economic safety, autonomy and dignity.	<p>“Foundation Principle:</p> <ul style="list-style-type: none"> - we need to draw upon the diverse lived experience of victim-survivors to design appropriate and effective policies and solutions - The plan commits to drawing on lived experience expertise in multiple ways including mechanisms for ongoing engagement and consultation.” 	CWES fully supports this Foundation Principle.
3	Review social security systems and payments with DFV lens and specifically: <ul style="list-style-type: none"> - remove couple rule from eligibility 	No mention of social security system.	For many women, access to income support is a key factor in their ability to leave an abuser, yet the social security system has requirements and policies that dangerously tie victims to abusive partners. The

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	<p>assessments in cases of DFV</p> <ul style="list-style-type: none"> - expand DFV exemption for all temporary visa holders experiencing DFV 		<p>system itself includes onerous processes that can overwhelm people already managing so much. Given the prevalence of DFV, the system needs to be overhauled in recognition of the circumstances of victim-survivors. The Foundation Principle of co-design with lived experience can inform this work.</p>
4	<p>Encourage industry to re-design products with economic safety lens</p>	<p>“The National Plan has a focus on building on this understanding [<i>of coercive control</i>] and encouraging a wide range of sectors, including policing and justice, finance and utility sectors and information technology sectors, to build capacity and appropriate responses to forms of financial abuse, abuse of process, and technology-facilitated abuse.</p>	<p>The focus on making this a whole-of-society approach is welcome. Everyone has a part to play and all sectors should commit to understanding their role, building their capacity, and adjusting or creating responses appropriately. The specific mention of financial abuse, abuse of process, and tech-facilitated abuse, is an excellent starting point.</p>
5	<p>Encourage adoption of minimum 10 days paid DFV leave including:</p> <ul style="list-style-type: none"> - Scheme to support small business to also offer this 	<p>No mention of this</p>	<p>The Action Plans should outline a plan to achieve 10 days paid DFV leave as the minimum expected response from employers. CWES argues that more important than offering DFV leave is for organisations to be better informed about DFV so that women feel safe enough to take up the leave, or other supports, if they need them.</p>
6	<p>Increase access to free and affordable childcare</p>	<p>No mention beyond a generic commitment to transform the “social, political and economic aspects of our society that enable and sustain gender inequality”</p>	<p>The Action Plans need a commitment to increase access to free and affordable childcare and early education.</p>
7	<p>Invest in financial capability programs that educate people about respectful and healthy money relationships</p>	<p>“Ensure programs are available for all ages, including, but not limited to, respectful relationships education, consent education and emotional literacy programs, which promote positive, equal and respectful relationships between people of all genders, in all contexts.”</p>	<p>Respectful Relationships curricula need to be expanded to address financial management by couples. This is not excluded by this statement in the draft plan but should be explicitly included, with associated funding, in the Action Plans.</p>
8	<p>Fund activities that raise awareness of economic abuse</p>	<p>There are multiple references to building awareness of gendered violence both through training and communications campaigns - but</p>	<p>The plan includes welcome recognition of the need to inform and influence community attitudes across society and build awareness and</p>

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		<p>none specifically about economic abuse.</p> <p>“Understanding and awareness of the drivers of violence as well as the ways perpetrators control victim-survivors also need to be embedded. in wider system responses, including justice, policing and health responses.”</p>	<p>understanding of the drivers of violence and forms of violence. Economic abuse is not explicitly referenced as needing greater awareness in the draft National Plan; this should be amended in the National Plan and further detail provided in the Action Plans.</p>
9	Support an expansion of CWES free money clinics for victims-survivors of economic abuse and DFV.	There is no recognition of the importance of early intervention in response to women experiencing economic abuse.	<p>The longer economic abuse goes on unchecked and unmitigated, the worse the damage, and the longer-lasting the consequences. Consideration needs to be given to how we learn what works in both changing perpetrators’ economically abusive behaviour and providing earlier support for victims. We also believe the Money Clinic approach shows promise as an early intervention and response to economic abuse.</p>
10	Fund 50 specialist DFV financial counsellors	There is no mention of financial counsellors or women’s and community legal organisations.	Financial counsellors, and women’s and community legal organisations, are the key responders to women experiencing economic abuse and to its most significant impacts. These services need recognition and support. There needs to be a national expansion of the number of DFV financial counsellors available.
11	Fund expansion of Restoring Financial Safety model (Westjustice/McCauley Community Services for Women)	No mention.	Action Plans should detail co-location models of support for women escaping and recovering from DFV including legal, financial and specialist DFV services.
12	Establish an Education Fund for older women with few assets.	No mention	The Action Plan should support cross-sector initiatives to educate or retrain older women victim-survivors to return to the workforce.
13	Maintain responsible lending laws	Not in scope.	N/A
14	Implement remaining recommendations of the <i>Small Claims, Large Battles</i> report (WLS Vic)	Plan says it will work to “provide better coordination and awareness of family safety issues in Australia’s family law system, and the piloting of programs within the courts to	CWES supports the Lighthouse Project and recommends it is expanded nationwide.

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		recognise and respond to family, domestic and sexual violence like the Lighthouse Project.”	We further call for the Federal Government to implement Recommendations 10, 11 and 12 of the Small Claims, Large Battles report.
15	Invest in social and affordable housing	The Plan says “Ensure women and children escaping violence have safe and secure housing, across the spectrum from crisis to longer term, sustainable social housing.”	CWES supports this aim but would like to see how this will be achieved. Investment is required in social housing in addition to better coordination between agencies, innovation in the private market, and supports to stay in their own home. The Action Plan must include this detail.

Escaping Violence Payment

CWES welcomes the Government’s investment in the **Escaping Violence Payment** and hopes this will become an ongoing plank of support for people wishing to leave a violent partner.