

**NATIONAL PLAN TO END VIOLENCE AGAINST WOMEN AND  
CHILDREN 2022-32**

**WOMEN'S HEALTH GOULBURN NORTH EAST SUBMISSION  
24 FEBRUARY 2022**

**Contact: Women's Health Goulburn North East  
Policy and Advocacy Coordinator**

---

[whealth@whealth.com.au](mailto:whealth@whealth.com.au)

## **Acknowledgements**

Women's Health Goulburn North East acknowledges the wisdom, living culture and connection of the Traditional Custodians of the unceded lands on which we work, and acknowledge the profound disruption of colonisation and the Stolen Generations on Aboriginal and Torres Strait Islander peoples. We also respect the self-determination of First Nations people.

We are intersectional in our approach and are proud to stand beside generations of great women whose work has brought us closer to equality for all. We believe in shared and just cultural transformation that embraces diversity, and these acknowledgements are part of the ethical principles that guide our work and conduct.

## **About Women's Health Goulburn North East**

Women's Health Goulburn North East (WHGNE) is a proudly feminist organisation supporting the creation of equal, just, and resilient communities in rural and regional Victoria. We believe in shared and just cultural transformation and locate our work within an ecosystem of broad global alliances working across social movements.

Gender and climate justice sit at the heart of our work, and the urgency of addressing what have become existential crises is what propels us to extend our vision beyond reformative tweaks to inadequate existing systems, towards unapologetically bold and truly transformative change. Our submission draws on the work of women's movements across the globe.

Although we are grappling with the devastating impacts of the COVID-19 pandemic within our communities, we continue to work in solidarity to co-create a vision for the future in which women and children in Australia not only live free from violence, but enjoy equality, justice, respect, and care as members of a society that has actively dismantled systems of oppression, inequality, and discrimination.

## Summary position statement

Women's Health Goulburn North East welcomes this opportunity to provide feedback on the draft National Plan to End Violence Against Women and Children 2022-32.

The first National Plan has been historically significant for spearheading a comprehensive, whole-of-community approach to addressing gender-based violence and violence against women. Its creation of the foundational infrastructure of the Australian National Research Organisation (ANROWS) and Our Watch have been crucial for building the evidence base, recommending policy and setting the tone and standard for prevention work across the country. We rely heavily upon the output of both organisations for our prevention work in regional and rural Victoria.

Despite the formation of this infrastructure and collaboration the first National Plan has inspired, government and community commitments to ending violence against women have yet to translate into substantial outcomes. Indeed, violence against women continues to plague this country, with data from [Safe and Equal](#) indicating there was an increase in police attendance at incidents of family violence, and an uptick in the frequency and severity of such violence in Victoria during the pandemic.

Furthermore, the pandemic has exacerbated the power imbalances and systemic inequalities that compound gender-based violence. The pandemic has revealed the need for:

- deep listening to the voices of women and gender-diverse people, particularly when it comes to issues that shape and impact their lives.
- radical, wellbeing-focused processes, policies, institutions, and systems that realise accessibility, inclusion, cultural safety, and equity.
- the need for us to avoid diluting “intersectionality” into tokenism, misappropriation, or disrespect.

The draft National Plan comes at a crucial time in our country's history, giving us the opportunity to undertake systemic transformation towards equality and safety for women and gender-diverse people. The draft National Plan must reflect not just the historic opportunity at hand, but also the urgency of this work, and dire need for strategic systemic change to dismantle the drivers of violence, which are so deeply embedded in our national psyche, attitudes, behaviours and socio-economic systems. Recognition of the need to “transform the social, political and economic aspects of our society that

enable and sustain gender inequality” must be underpinned by comprehensive objectives, actions, and targets to guide our communities through this process.

While the draft National Plan articulates an appealing and widely held vision of an Australia free of violence “where all women and children live free from fear and violence, thrive, and reach their full potential, and where women and children and LGBTIQ+ people of all genders are safe at home, at work, at school, in the community and online,” this vision is not supported by a strategy comprising clear targets, action or timeframes for achieving this.

We add our voice to those of our colleagues in the violence prevention, women’s health, and gender equality sectors in [calling for a radical overhaul of the draft National Plan](#), so that it provides a detailed, strategic framework for ending violence by 2032. In its current format, the National Plan does little more than reiterate statistics and data that those working in this sector – and the women and gender-diverse people represented by the statistics – know all too well.

Recognising that our submission is prevention focused, we call for an overhaul of the Plan so that it includes:

- **An acknowledgement that colonial violence was the first violence against women and children in this country and that this violence lingers on in racist economic, political, social, welfare, legal and justice systems.** Intergenerational trauma associated with ongoing colonialism sits at the heart of First Nations people’s experiences of gender-based violence, and violence prevention in Australia must be grounded in treaty, reconciliation, and collective truth-telling – truth not only about the atrocities that this country was founded upon, but also about the deep knowledge and innovation held by Indigenous communities that could shift us all, as a nation, towards justice, care, and wellbeing.
- This acknowledgement must follow through with **meaningful support and resourcing of a dedicated, stand-alone Aboriginal and Torres Strait Islander National Plan shaped for and by First Nations people.**
- **Clear alignment with the evidence and recommendations laid out in the second edition of Our Watch’s Change the Story prevention framework.** This framework sets out detailed, evidence-based recommendations for the scope and nature of a national violence prevention plan such as this, including explicit advice around the roles, responsibilities, and leverage points for change for all levels of government, specialist women’s organisations and civil society organisations, and

those involved in the diverse array of settings in which people live, work, play and socialise.

- **Tangible and meaningful roles and strong leadership of the federal government, and governments at state and local levels**, in recognition of the unique access government has to policy and legislative levers to affect cultural, structural, and systemic change.
- **A stronger intersectional lens** that demonstrates the complex interplay of power and privilege, oppression and discrimination that underpins gender-based violence against women. This must illustrate the experiences, needs and aspirations of women and gender-diverse people living at the intersections of systems of oppression – including Indigenous women, LGBTIQ+ people, women living with disability, low-income women, women living across rural, regional and remote Australia, women from migrant and refugee backgrounds, sex workers, women in incarceration, women living in institutional settings and victim-survivors of gender-based violence. **It must also demonstrate the ways that systems of power and privilege award influence to certain men and perpetuate, justify, excuse and minimise violence against women.**
- **A revisiting of the inclusion of children and young people throughout the Plan**, to ensure that they are more than an “add-on” to women, and that they are truly represented as victim-survivors of gender-based violence in their own right.
- **The implementation of all 55 recommendations of the Respect@Work report** as a matter of urgency.
- Detailed **legislative and policy measures for creating a safe, fair and equitable socio-economic system** that would equalise power, resources and decision-making between women, men, and gender-diverse people.
- **Federal and state gender-responsive legislative and budgeting processes** that would require all policy and budgeting decisions to be scrutinised and evaluated for their impact upon women, gender-diverse people and intersectional equality.
- **Long-term, secure, and sustained funding of the primary prevention sector**, to enable the sector to maximise the reach and impact of its work.
- **Greater strategic clarity around the “actions” that appear within the Prevention Focus Areas**, as to who, how and when “actions” will be undertaken.
- **Commitment to a national anti-racism strategy**, to support all action towards eliminating violence against Aboriginal and Torres Strait Islander women and gender-diverse people.

**Q1. The draft National Plan includes a clear explanation of the prevalence, drivers, and different forms of gender-based violence in Australia**

We contend that the National Plan's explanation of the prevalence, drivers, and forms of gender-based violence lacks the intersectional lens required and needs a complete rewrite.

Gender inequality is undoubtedly a key driver of gender-based violence in Australia. However, it is by no means the only driver, nor is it, in some contexts, the most significant driver of violence against women. The entanglement of gender inequality with multiple and intersecting systems of power and privilege like colonialism, racism, sexism, homo-, bi- and transphobia, ableism, ageism, classism, and heteronormativity leads to systemic inequalities, which in turn impacts that the prevalence and nature of violence against women. These systems do not just create the grounds upon which women are discriminated against or disrespected – they also create the conditions whereby “white, heterosexual, cisgender, able-bodied men with higher levels of education and income” are afforded power and influence ([Our Watch](#), 2021:29).

The nuances of this intersectionality are lost in the National Plan. The Plan fails to recognise that in some contexts violence prevention work must place a greater emphasis on addressing other drivers of violence – for example, racism, ableism, or colonialism. Without this nuance, the Plan presents a one-size-fits-all account of what violence against women looks like, and how we, as a nation and community, might tackle it.

Similarly, this section of the Plan barely discusses the prevalence, drivers, or forms of violence against children, despite its acknowledgement of children as “victims of gender-based violence in their own right”. Children seem to have been included in this Plan as an “add-on” to women who experience gender-based violence, and this treatment is dangerously inadequate. It is critical that any report or strategy that claims to listen to, respond to and address violence against children, can demonstrate a model of two-way communication directly with children, and report directly back to children, as per the recent pioneering work of the [UN Special Representative to the Secretary General on Violence Against Children](#).

We are by no means experts in this field, and as such will leave a deeper analysis of the inadequacies of this Plan, when it comes to children, to our colleagues who do hold expertise in this area. However, it is imperative that specialists are engaged to contribute to this Plan to ensure it does justice to its commitment to recognise and support children and young people as victim-survivors in their own right.

**We recommend this section of the Plan:**

- Applies a stronger intersectional lens to its discussion of the prevalence, drivers, and forms of gender-based violence and violence against women, drawing upon the pioneering work of Our Watch's second edition of Change the Story.
- Includes specific data and qualitative detail of the experience of women and gender-diverse people living at the intersections of these systems of oppression – including Indigenous women, LGBTIQ+ people, women living with disability, low-income women, women living across rural, regional and remote Australia, women from migrant and refugee backgrounds, sex workers, women in incarceration, women living in institutional settings and victim-survivors of gender-based violence - to better illustrate the complexity of these systems and to demonstrate a commitment to listening to and amplifying women's and gender-diverse people's voices.
- Pays greater heed to the way systems of power and privilege award influence and resources to white, hetero, cis, able-bodied men at the expense of women and gender-diverse people; the way these systems perpetuate, justify, excuse, and minimise violence against women; and how identifying these systems at play in our society can support the creation of more targeted and effective violence prevention actions.
- Is overhauled, regarding the inclusion of children and young people throughout the Plan, to ensure that they are more than an "add-on" to women, and that they are truly represented as victim-survivors of gender-based violence in their own right.

**Q2. The draft National Plan meaningfully reflects issues highlighted through stakeholder consultations and the National Summit on Women's Safety, including the experiences of victim-survivors.**

We are concerned that the Plan fails to commit to the principles of Indigenous self-determination.

This failure is implicit in the proposal that an Aboriginal and Torres Strait Islander National Plan fall under this mainstream National Plan. This flies in the face of concerted advocacy by Indigenous stakeholders, services, organisations, and communities for an Aboriginal and Torres Strait Islander plan to be a dedicated, stand-alone strategy that is created and stewarded by Indigenous people; resourced and supported by governments.

This failure to reflect feedback from consultations with, and advocacy by, Indigenous stakeholders risks embedding into this Plan exactly the type of unequal power dynamics and colonial mindset that underpin the very issues the Plan claims it is seeking to tackle.

The National Plan has also failed to respond to stakeholder and community feedback urging the Federal Government to immediately implement all 55 recommendations of the Respect@Work report. The finalised National Plan must cement government support for all these recommendations, as a demonstration that government is taking a leadership position on creating safe, inclusive and gender equal workplaces.

We supported the [submission by our peak body, Gender Equity Victoria](#), during the stakeholder consultation period in 2021, with particular interest in ensuring the finalised Plan addresses the systemic socio-economic factors that perpetuate and drive gender-based violence and violence against women.

That submission called for governments at all levels to pull the policy and legislative levers available to them to head off the national epidemic of gender-based violence and violence against women. It recommended the implementation of gender-responsive budgeting at a federal level – following in the footsteps of the Victorian Government’s announcement that it would do the same in 2021 – and called for governments to take action to address gendered poverty and economic inequality via measures such as:

- gender equal job creation,
- ending insecure work,
- ending gendered job segregation,
- the provision of social and community housing,
- a living wage, and
- reforms to taxation, superannuation, child support payments, parental leave policies and more.

Measures such as these would create the safe, fair and equitable systems women, men, gender-diverse people and communities need to realise the ‘zero violence’ society envisioned by this Plan. Without them, violence prevention work can only affect superficial change.

The Plan has not committed to any of these measures. Indeed, it fails to present any strategies for systemic, policy and legislative change. This will surely undermine the efficacy of any prevention work done at the community or organisational level. In the words of Our Watch, “work addressing attitudes



towards violence and gender at the community or organisational level needs to be accompanied by legislative, institutional and policy support that promotes gender equality and accountability for violence and discrimination” ([Our Watch](#), 2021:61).

**We recommend that:**

- The Plan reflects the advocacy of Indigenous women and communities and supports a stand-alone, self-determined Aboriginal and Torres Strait Islander National Plan, created for and by First Nations people. Actions within the mainstream National Plan must include the support and resourcing of this Indigenous plan.
- The Federal Government commit to implementing all 55 recommendations of the Respect@Work report as a matter of urgency, to demonstrate leadership on this issue.
- The Plan include detailed legislative and policy measures for creating a safe, fair and equitable socio-economic system that would equalise power, resources and decision-making between women, men, and gender-diverse people and prioritise the care and wellbeing of women, men, and gender-diverse people.
- The Plan establish federal and state gender-responsive legislative and budgeting processes that would require all policy and budgeting decisions to be scrutinised and evaluated for their impact upon women, gender-diverse people and intersectional equality; towards ensuring that all government decision-making is undertaken with intersectional equality in mind.

**Q3. The four Foundation Principles (gender equality, the diverse lived-experiences of victim-survivors are informing policies and solutions, Closing the Gap, and intersectionality) appropriately underpin the National Pillars and actions within the National Plan.**

The four Foundation Principles are, indeed, sound, however we contend that the National Plan fails to interrogate the principle of intersectionality and apply an intersectional lens across the document, including across the National Pillars and actions.

The Plan deals only with the way intersectionality produces different forms of disadvantage and violence, rather than looking at the nuances of how it also creates power, privilege, and influence for select groups and individuals, and how this power is systemically protected and perpetuated in Australia.

It is critical power and privilege are explored in this Plan, because without such an examination, the Plan's actions will not address the root causes of gender-based violence and violence against women and will only affect the most superficial change.

**We recommend that:**

- Greater attention is paid to the Intersectionality Pillar, and the way that it shapes not only oppression, discrimination, and disadvantage, but also power and privilege. This will ensure that all 'shades' of the unequal systems that drive violence against women are brought into the light and can contribute to the formulation of culturally safe and effective prevention actions that address the root cause of this violence.
- The Intersectionality Pillar provide a better explanation of the fact that, in some contexts, other systems of oppression – racism, ableism or classism, for instance – are greater drivers of violence than gender inequality. This will enable prevention actions throughout the Plan to be people-centered and more responsive to the needs, safety and aspirations of women and gender-diverse people in all their diversity.

**Q4. The four National Pillars in the draft National Plan provide a holistic approach to identifying and responding to gender-based violence and (Q5) reflect the family, domestic and sexual violence service system.**

Our background in primary prevention means we have greater expertise and understanding of the Prevention Pillar, and it is around this pillar that we wish to focus this section of our submission.

We are concerned at the superficial nature of the Prevention Pillar, as a whole. The 'actions' contained within each focus area are not 'actions' at all. They provide no strategic direction for how, where, by whom or when "community attitudes and social norms justifying....violence against women" will be "actively changed," or "the condoning of other forms of violence based on discriminatory attitudes" will be "challenged."

Without greater detail as to how and when these essential actions will be achieved, and who is responsible for achieving them (and evaluating their achievement), this document cannot be recognised as a "Plan" at all.

It is also worrying that individualised, attitudinal 'action' dominates this section of the Plan and that legislative and policy measures that tackle the factors that reinforce gender-based violence and violence against women are missing from these Focus Areas. As we have stated in previous sections of our submission, addressing the social context in which gender-based violence and violence against women takes place means challenging and dismantling systems that undermine gender equality, and creating and strengthening social support structures for gender equality in public and private life.

Focusing on individual, community or corporate action – for example, the Plan's commitment to "Giv[ing] women and girls with disabilities the tools and confidence to challenge sexism, harassment and the specific forms of violence and abuse" - without promoting broader social justice for these women and girls by tackling the diverse and intersecting forms of systemic oppression and discrimination, will not lead to the elimination of gender-based violence and violence against women.

As a Women's Health Service specialising in primary prevention, we are dismayed that the National Plan fails to adequately recognise or commit to supporting women's services and specialist prevention services for their vital leadership, expertise, skills, research, resources, and effectiveness as drivers of policy and cultural change in this space. Indeed, the Plan fails to recognise or champion the critical roles of any women's, civil society or community organisations working in primary prevention.

It does, however, call for the recognition and championing of "the critical role of the corporate sector in preventing violence through fostering gender equality in the workplace and designing products and services that are safe and prevent misuse." In doing so, it fails to recognise that this work is only possible because corporate actors rely upon the expertise of services like ours. This "action" sounds suspiciously like Naomi Klein's "[disaster capitalism](#)" - the direction of public funds, support, resourcing and kudos towards corporate actors, to enable them to address and profit from what is well understood to be a [public health crisis](#). This is alarming, particularly as it appears to come at the expense of recognition or support of the demonstrated effectiveness of organisations like ours.

This section of the Plan requires a drastic rethink, to better align with both the reality of existing, proven, and culturally safe primary prevention work in Australian society, and with the recommendations of Our Watch, as detailed in its description of the "Key elements of an effective prevention infrastructure" (2021:101-106). Australia is home to some of the world's most progressive intersectional women's services, civil society actors and research agencies, and it is critical this Plan commits to providing long-term, secure funding of these actors, to maximise the impact of their work.

The focus area of the plan that deals with the “empowerment of Aboriginal and Torres Strait Islander voices” is grossly lacking due to its omission of a national strategy for addressing systemic racism and ongoing colonialism in Australia, both of which underpin inequality and violence against Aboriginal and Torres Strait Islander women and gender-diverse people. Violence against First Nations women and gender-diverse people will not be eliminated, nor will First Nations women be “empowered to work with governments” as long as racism exists in the attitudes, norms, practices, services, systems, structures, policies, and relationships with which those First Nations women come into contact.

**We recommend that the Prevention Pillar commit to:**

- Long-term, secure, and sustained funding of the primary prevention sector, to enable the sector to maximise the reach and impact of its work.
- The application of a gender responsive lens to all policy and legislation, at all levels of government, to ensure it creates the conditions for safety, fairness and equality for women and gender-diverse people in all their diversity.
- The methodological dismantling, reform and/or reimagining of policy and institutional settings that underpin gendered economic inequity and exacerbate gender-based violence and violence against women. The reform process must enable and support women and gender-diverse people in all their diversity to sit at the decision-making table and contribute their perspectives, voices and lived experience to shaping systems and policy that meets their needs. As a starting point, these reforms should focus upon (but should by no means be limited to):
  - Social security systems, their eligibility requirements, and the ease of accessing these systems. This must include an analysis and overhaul of the interplay between Australia’s punitive immigration legislation, and eligibility for social support mechanisms. This must focus on parenting payments, child-support payments (as but two examples) and include a commitment to increasing social security rates to ensure they enable people to live in dignity and security.
  - Superannuation legislation, to ensure parity is built into the system to enable women to retire with financial security, independence, and dignity.
  - Taxation systems and their contribution to economic inequity in Australia.
  - The gendered segregation of the labour market and the devaluing of the largely feminised foundational/care economy.
  - Gendered pay equity.
  - Employment legislation that includes the provision of paid gender-based/family violence leave.

- Greater strategic clarity around the “actions” that appear within the Prevention Focus Areas, as to who, how and when “actions” will be undertaken.
- Commitment to a national anti-racism strategy, to support all action towards eliminating violence against Aboriginal and Torres Strait Islander women and gender-diverse people.

**Q6. The draft National Plan reflects the needs and experiences of women and children.**

As stated multiple times above, the draft National Plan does not reflect the needs and experiences of women and children. It does not live up to its claim of treating “children as victim-survivors of violence in their own right” and requires radical reassessment to ensure it does not inadvertently create harm.

Likewise, Aboriginal and Torres Strait Islander women have been unrelenting in their call for a stand-alone, culturally safe National Plan, shaped for and by First Nations women and communities. They have called for the financial and political support of governments of all levels; a call which seems to have been disregarded in this Plan.

Until this Plan includes a commitment to the self-determination of Aboriginal and Torres Strait Islander people in shaping their own strategic direction in this space, it cannot be considered reflective of the needs of women and children.

Finally, we reiterate our previous statements around the need for long-term, sustained, secure funding of Women’s Health Services and other civil society actors across the country who have demonstrated expertise and place-based relationships of care in this space. These services are shaped by the particularities of the communities and individuals with which, and for whom, they work.

Throughout the Covid-19 pandemic, they have demonstrated themselves to be nimble and proactive in responding to community need, remarkably efficient despite the diminishing funding support that flows their way, and genuinely motivated by the opportunity for a whole-of-society transformation towards a care and wellbeing economy.

The draft National Plan's failure to make a strong commitment of support towards these services reflects a lack of understanding of how well they could continue to meet, with greater funding support, women, and children's needs.

### **Measuring success**

Finally, we wish to make comment on the evaluation and reporting element of the Plan.

It is concerning that this section of the Plan has not yet been fleshed out in detail, and merely points to future work to determine an evaluation framework and set of indicators for determining the effectiveness of the "actions" within the Plan.

We are particularly alarmed that efforts to evaluate the success of the Plan will not feature qualitative data, which would embed women and gender-diverse people's voices in this document. The inclusion of qualitative data would be in keeping with what the Plan envisions is needed for success: "To succeed we must listen, engage and be informed by diverse lived experiences. The voices and experiences of victim-survivors are essential to delivering trauma-informed services and solutions."

Qualitative data provides the opportunity for women and gender-diverse people's voices not only to be heard, but to explore the nuance of complex phenomena associated with intersectional experiences of gender-based violence and violence against women. The quantitative "big data" can only be enhanced by the inclusion of qualitative "thick data", indeed, qualitative data can ["rescue Big Data \[quantitative data\] from the context-loss that comes with the processes of making it usable."](#)

Weaving women and gender-diverse people's voices through the Plan as a whole, and any evaluation work that is to stem from it, is crucial to ensuring this document is a "living" one, that challenges exclusive knowledge hierarchies and demonstrates that it values different forms of wisdom and complex intersectional perspectives of our communities.