

# Analysis of the Fourth Action Plan of the National Plan to Reduce Violence against Women and their Children

The table below maps out the principles of the Fourth Action Plan (which will underpin the implementation plan) against AWAVA’s policy position.

| Fourth Action Plan Principles  | AWAVA’s submission on the Fourth Action Plan <sup>1</sup>  |
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| <p>1. Reducing violence against women and their children is <b>everyone’s business</b> and we all have a role to play.</p> <p>2. We must address <b>gender inequality</b> to stop violence — women will never be safe if they are not equal.</p> <p>3. <b>The voices of Aboriginal and Torres Strait Islander peoples</b> must inform responses to the family and sexual violence experienced in their communities.</p> <p>4. We must address the <b>diversity and lived experiences of women</b> and their children affected by violence.</p> <p>5. Where <b>children</b> are involved, responses must be age appropriate, child-centred, and tailored to their specific needs and stages of development.</p> <p>6. Actions must be <b>evidence-based</b> and help build an understanding of what works to respond effectively to, and prevent, violence against women and their children.</p> <p>7. <b>System and service responses</b> must work to end the cycle of violence, keep people safe and prevent domestic, family and sexual violence.</p> <p>8. A holistic approach to <b>working with perpetrators</b> of domestic, family and sexual violence is needed across all actions — informing prevention, deterrence, rehabilitation, and ensuring accountability.</p> | <p><b>1. Approaches to end violence against women and their children</b></p> <ul style="list-style-type: none"> <li>- Reducing violence against women and their children through prevention activities</li> </ul> <p><b>2. Addressing violence against diverse groups of women and their children</b></p> <ul style="list-style-type: none"> <li>- [...] against Aboriginal and Torres Strait Islander women</li> <li>- [...] against women from culturally and linguistically diverse communities</li> <li>- [...] against women with disability</li> <li>- [...] against people who identify as LGBTIQ+</li> <li>- [...] against specific age groups of women</li> <li>- Addressing the impact of violence on women living in financial hardship and/or poverty</li> <li>- [...] against women in the sex industry</li> <li>- Addressing the impact of violence on women in prisons</li> <li>- Responding to the impact of family and domestic violence on children</li> </ul> <p><b>3. Addressing different types of violence against women</b></p> <ul style="list-style-type: none"> <li>- Addressing sexual harassment</li> <li>- Addressing sexual violence</li> <li>- Addressing technology-facilitated abuse</li> <li>- Linkages with efforts to address elder abuse</li> <li>- Responding to trafficking (incl. for sexual exploitation), forced marriage, dowry abuse, reproductive coercion, FGM, forced sterilisation of women with disability, and unnecessary medical procedures on intersex infants</li> </ul> <p><b>4. Strengthening systems</b></p> <ul style="list-style-type: none"> <li>- Housing affordability and long-term housing options</li> <li>- Making it safer for women to access justice</li> <li>- Social security system improvements</li> <li>- Addressing the intersection of DFV and migration status</li> <li>- Responding to human trafficking and sexual exploitation</li> <li>- Developing workforce capability</li> </ul> <p><b>5. Strengthening services</b></p> <ul style="list-style-type: none"> <li>- Supporting the medium to long-term safety, recovery and wellbeing of women and their children through adequately funded specialist women’s services</li> <li>- Investing in services’ capability and quality standards</li> </ul> <p><b>6. Improving coordination and governance</b></p> <ul style="list-style-type: none"> <li>- Coordinated responses to addressing violence against diverse groups of women, including with State and Territory based service systems</li> <li>- Improved involvement of civil society</li> <li>- Transparent, independent and ongoing monitoring and evaluation</li> </ul> |

<sup>1</sup> AWAVA (2018), Submission on the development of the Fourth Action Plan, <https://s3-ap-southeast-2.amazonaws.com/awava-cdn/awava/wp-content/uploads/2018/09/08135743/AWAVA-4AP-Submission-FINAL.pdf>

1. The Fourth Action Plan of the National Plan to Reduce Violence Against Women and Their Children<sup>2</sup> (the Fourth Action Plan) sets out priorities to underpin the implementation plan which will be released at a later date.
2. It is understood that the implementation plan will include Commonwealth measures announced in the 'Our Investment in Women's Safety' and the 2019 Federal budget.<sup>3</sup> The latter includes additional funding to Family Advocacy Support Services and a new budget measure titled 'Department of Veterans' Affairs: Partner Service Pensions — eligibility alignment'.<sup>4</sup> In addition to Commonwealth measures, the implementation plan will include States and Territories relevant measures.
3. The Fourth Action Plan principles overall are positive and address the issue of preventing and responding to violence against women holistically and in its complexity. The next step should be a clear articulation of these principles through a rigorous implementation plan.
4. A monitoring and evaluation system is needed to identify which actions remain incomplete, and which require further development from previous Action Plans, such as the Third Action Plan's commitment to address migration status, and to determine the effectiveness of current initiatives funded under the NAP. This data will be crucial in informing the design of any future National Plan.
5. While the Fourth Action Plan principles correspond with many measures put forward in AWAVA's policy position, some of the key areas have not yet been translated into measurable actions. Others will require specific attention in the implementation plan. To this end, AWAVA would like to highlight following:
  - **Diversity and intersectionality lens:**
    - In AWAVA's submission on the development of the Fourth Action Plan<sup>5</sup>, we outlined an extensive list of diverse groups of women and how they are impacted by domestic and family violence, sexual violence and other forms of violence against women. The main argument of AWAVA's work is not a separation of those experiences from a 'general' experience of VAW but rather an application of an intersectionality lens in policy and practice. These are the many and diverse experiences of women experiencing violence. There is no one typical experience. The same position has been expressed during the public consultations on the Fourth Action Plan.
    - The need to embed intersectionality in policy and practice has also been articulated by the UN:
      - "[...] To consider that gender-based inequalities are exacerbated when coupled with other grounds of discrimination and disadvantages, and therefore to use an "intersectionality lens" in policy initiatives [...]"<sup>6</sup>
      - "[...] calls upon States to ensure access to justice and accountability mechanisms and remedies for the effective implementation and enforcement of laws aimed at preventing and eliminating discrimination against women and girls, taking into account the multiple, intersecting and aggravating forms of discrimination [...]"<sup>7</sup>

<sup>2</sup> Commonwealth of Australia (2019) Fourth Action Plan. National Plan to Reduce Violence Against Women and their Children. An initiative of the Commonwealth, state and territory governments.

<sup>3</sup> AWAVA (2019) AWAVA's analysis of the 2019-2020 Federal Budget, [https://awava.org.au/2019/04/15/research-and-reports/2019-2020-federal-budget?doing\\_wp\\_cron=1566955033.1462240219116210937500](https://awava.org.au/2019/04/15/research-and-reports/2019-2020-federal-budget?doing_wp_cron=1566955033.1462240219116210937500)

<sup>4</sup> The Government will provide \$6.2 million over four years from 2019-20 (and \$1.4 million per year ongoing) to ensure equal treatment of former spouses and former de-facto partners of veterans concerning access to the partner service pension when they separate from their veteran partner.

<sup>5</sup> AWAVA (2018), Submission on the development of the Fourth Action Plan, <https://s3-ap-southeast-2.amazonaws.com/awava-cdn/awava/wp-content/uploads/2018/09/08135743/AWAVA-4AP-Submission-FINAL.pdf>

<sup>6</sup> 2016, A/HRC/33/10, HRC Resolution 33/10. The human rights to safe drinking water and sanitation, OP9 (d)

<sup>7</sup> 2017, A/HRC/RES/35/18, HRC Resolution 35/18, Elimination of discrimination against women and girls, OP. 10

- “Essential services must also respond appropriately to women and girls who face multiple forms of discrimination [...]”<sup>8</sup>
  - Throughout the Fourth Action Plan there are indications of how VAW affects diverse communities and whether any challenges emerge based on one’s identity and/or circumstances. We welcome the inclusion of groups that are commonly excluded, such as mentions of the stigma attached to the reporting of sexual violence by women in the sex industry and barriers to access sexual and reproductive health services experienced by international students.
  - Some important groups that are placed in precarious settings when it comes to the experiences of violence were not mentioned, however. These included women on temporary visas and their children who are experiencing DFV.
  - Despite the stated commitment to an intersectional lens, the actions indicated in the Fourth Action Plan can be described as taking a diversity approach, which is not the same. A diversity approach in the context of reducing violence against women involves the identification of diverse groups of women and their experiences of violence. However, this is only the first step to actualising an intersectional approach. A further step is required in analysing how status and identity categories interact with various systems (such as family law, social security and migration) to further compound an advantage or disadvantage, and in responding to the experiences of women subject to these compounding disadvantages so as to facilitate their equal access to justice and support. This has not yet been undertaken in an extensive way.
  - Adopting an intersectional lens throughout VAW prevention and response will ensure that other factors and circumstances often contributing to experiences of violence such as poverty, the impact of racism, homophobia and transphobia, and ableism among many others, will be also taken into account and addressed in a holistic manner.
- **Resourcing**
  - No new funding has been announced since the ‘Our Investment in Women’s Safety’ Package that will flow directly to specialist service provision by organisations with gender expertise and cultural competency.
  - The Fourth Action Plan explicitly acknowledges that with an investment in primary prevention and awareness raising activities will come an increase in demand for support services. Yet, no new investment was made in the direct delivery of frontline women’s specialist services, which are the primary responders to women and their children experiencing violence and abuse. This is of serious concern, and AWAVA calls on the government to remedy its initial approach through a substantive investment in women’s specialist services.
  - We welcome the government’s commitment towards achieving gender equality as an overarching goal. Yet this process requires concrete measures such as reducing the gender pay gap, access to affordable housing, child care and safe workplaces for women. The National Women’s Alliances can provide advice about the key measures that need to be taken.
- **Recognition of specialist women’s services**
  - AWAVA as a National Women’s Alliance is a strong voice for a range of organisations providing specialist women’s services, culturally competent and community controlled services for Aboriginal and Torres Strait Islander women, women from culturally and linguistically diverse backgrounds and women with disability, sexual assault services and women’s legal services.

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<sup>8</sup> Essential Services Package for Women and Girls Subject to Violence Core Elements and Quality Guidelines, UN Women

- These services are working with women through best practice principles and evidence-based approaches. Specifically, they adhere to AWAVA's best practice principles as specialist women's services which involve:
    - A rights-based approach
    - The advancement of gender equality and women's empowerment
    - A client-centred approach
    - Maintaining women's safety as central
    - Holding perpetrators to account
    - Ensuring accessible, culturally-appropriate and sensitive services<sup>9</sup>
  - Critically, this specialisation is not yet recognised nor reflected in federal government policy to address violence against women and their children, and larger mainstream services continue to be privileged in the allocation of funding.
  - We note and welcome that some grant rounds under the Fourth Action Plan require applications to be led by specialist organisations with demonstrated expertise. This type of requirement should be rolled out across the full range of funded programs in the VAW area, keeping women's rights and gender equality central to grant guidelines. AWAVA submit that the definitions used for specialist organisations must be consistent with the best practice principles outlined above.
- **Omission of key system improvements**
    - The principles to underpin the implementation plan do not spell out necessary changes and reforms within the family Law, migration, child protection, social security and health systems.
      - Gender equality cannot be achieved and VAW cannot be reduced where women with disability are forcibly sterilised or intersex children undergo harmful and unnecessary medical procedures where the only purpose is to make them fit into a rigid gender binary.
      - Gender equality cannot be achieved and VAW cannot be reduced where women lack access to income and are forced to remain with abusive partners, including situations where they are subject to welfare management through cashless debit cards, compulsory programs like ParentsNext, and where women are not eligible for any support because of their visa status or because their abusive partners leave them with a debt to repay.
      - Gender equality cannot be achieved and VAW cannot be reduced where the family law system is not effective in prioritising the safety of women and their children.
      - Gender equality cannot be achieved and VAW cannot be reduced where Aboriginal and Torres Strait Islander children are being removed from their families at endemic rates.
    - In our submission on the development of the Fourth Action Plan<sup>10</sup>, we outline a number of changes required within the systems response that are necessary steps towards both reducing VAW and providing just and fair outcomes for victims/survivors of violence.
  - **Prevention and response**
    - The Fourth Action Plan focuses on prevention as a key priority and one that needs to be pursued over a longer timeframe. Commentary following release of the Plan drew attention to the need for immediate action and urged governments not to accept the persistently high

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<sup>9</sup> AWAVA, 'The Unique Role of Specialist Women's Services in Ending Violence Against Women', brochure <https://awava.org.au/wp-content/uploads/2017/08/SWS-Brochure-web-version.pdf>; AWAVA (2016), 'The role of specialist women's services in Australia's response to violence against women and their children: Policy Brief' <https://s3-ap-southeast-2.amazonaws.com/awava-cdn/awava/wp-content/uploads/2016/04/01082955/AWAVA-Specialist-Women-Services-Policy-Brief-2016.pdf>

<sup>10</sup> AWAVA (2018), Submission on the development of the Fourth Action Plan, <https://s3-ap-southeast-2.amazonaws.com/awava-cdn/awava/wp-content/uploads/2018/09/08135743/AWAVA-4AP-Submission-FINAL.pdf>

rates of violence currently being experienced by women and their children in this Country. Discussions about the relative importance of prevention and crisis response need to acknowledge the long-term nature of prevention and gender-equality work, whilst demanding action to meet the urgent needs that exist right now.

- Addressing violence against women and their children now must also be acknowledged as a preventative measure in itself. Allowing violence to continue reinforces the normalisation of abuse, whereas taking practical steps to support women’s and children’s safety reinforces expectations that abuse will not be tolerated.
  - Key critical gaps that exist right now include the severe under-resourcing of specialist women’s services across the jurisdictions including ongoing case management support, women’s specialist accommodation services, safe at home services, and women’s legal services, a lack of affordable housing, a lack of reform in key systems such as social security, family law and migration, a lack of co-design and coordination across jurisdictions, and a reluctance to put intersectional feminist leadership at the centre.
6. We welcome the inclusion of “formal support services” and “information support mechanisms”<sup>11</sup> in the Fourth Action Plan, for instance, workplaces or hospitals. Attention to multiple systems and mechanism was key in AWAVA’s policy position. We look forward to working with the government on the implementation plan in developing policy and practice in these new areas.

In sum, the Fourth Action Plan is positive in articulating some strong principles for addressing violence against women and their children in a holistic way, and is to be welcomed for giving attention to diverse groups of women previously marginalised in policy development. Challenges remain in embedding an intersectional lens in policy, resourcing (in particular to specialist women’s services), and systems improvements in key areas including migration, family law and social security. AWAVA looks forward to working closely with the government towards the development of a robust implementation plan for the Fourth Action Plan that addresses measures of prevention and response to VAW in a holistic manner.

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<sup>11</sup> Commonwealth of Australia (2019) Fourth Action Plan. National Plan to Reduce Violence Against Women and their Children. An initiative of the Commonwealth, state and territory governments.