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Dear Louise,

[Ending Violence Against Queensland \(EVAWQ\)](#) would like to thank you for this opportunity to provide further feedback for the Draft National Plan to End Violence Against Women and Children 2022-32 (the Draft). We would like to acknowledge the amendments that have already been made from the first iteration of the Draft, and hope that we can provide further considerations for improvement. There are several areas that EVAWQ have identified that need to be strengthened:

- 1. Strengthened measures and targets.**
- 2. Increased accountability in the language, recommendations, and measures for people using violence.**
- 3. Increased targeted approaches for sexual violence.**
- 4. Specific strategies to address reproductive coercion.**
- 5. Increased focus on women's health, and the impacts that violence has broadly on women's wellbeing.**
- 6. Sustained and substantial primary prevention.**
- 7. A strategy for long term stable affordable housing for people affected by gender-based violence.**
- 8. Increased systems collaboration.**

Strengthened measures and targets.

Clear and tangible measures are needed to embed accountabilities for all stakeholders to meet the actions and recommendations of the Draft. EVAWQ are aware that numeric targets will be developed and included in the First Action Plan, however the planned measures in their current form are ambiguous. For this plan to reflect the strong intention of the Queensland and Commonwealth government to stop domestic, family and sexual violence, there must be clearly articulated goals with associated actions that ensure men's perpetration of violence is measurably reduced and eradicated. It is also imperative that the agencies responsible for actions are clear about their responsibility to deliver and what the indicators for success look like.



Increased accountability in the language, recommendations, and measures for people using violence.

Placing accountability on the person using violence is essential to reframing the dominant narrative that people experiencing the violence are somehow responsible for the abuse. The National Plan has the responsibility to centre the fundamental premise that violence is *always* a choice. That the enormous harm caused to people, families and communities (and the costs associated) are entirely preventable, and that women and children stop dying from homicide when men stop using violence and control. EVAWQ have concern that there is not enough emphasis on this, and therefore suggest that perpetrator accountability be included as one of the “Cross-Cutting Principles”. There is language in the Draft that still needs to put the person using violence to the front, and there are a lot of instances of implied burden of safety on victim-survivors.

For example, the diagram on pg. 42 mentioned perpetrators only in the “Throughcare” section, and only mentioned “perpetrators are kept in view”. There is no discussion of intervention or accountability, where it could be addressed in all sections.

In discussions of life stage approaches (pg. 57), there is mention early intervention where individuals are most at risk, such as during pregnancy and relationship breakdown. It needs to be made clear that these initiatives should target the men and fathers who are at risk of using violence in these situations, rather than placing a burden on the potential victim-survivor to keep themselves safe.

Increased targeted approaches for sexual violence.

Sexual violence as an issue is often included in with domestic and family violence, and whilst there are many intersecting factors between the two areas, sexual violence does need to be addressed and discussed independently.

On pg. 12, one of the measures are “Reduction in prevalence of family, domestic and sexual violence over the life of the National Plan”. However, the indicators only discuss women aged 18 years and over as the targets of sexual violence. The Draft itself discusses how the prevalence of sexual violence among women starts at 15 years, making this younger cohort the biggest demographic as victims and perpetrators. Yet, this crucial age demographic will be missing as a data source, and therefore not included in the measures and actions.

The indicators in this section also only mention sexual violence by a partner, which needs to be extended to “someone known to them”, as often it may not be a partner but a friend, housemate, colleague or family member who is the perpetrator of the violence.

Sexual violence must have a range of independent measurements separate to its occurrence within the context of domestic, family and intimate partner violence.

Specific strategies to address reproductive coercion

There is concern that there is almost no discussion of reproductive coercion, including contraceptive and abortion coercion. These are extremely common types of violence and abuse that need to be addressed. The only reference is on pg. 20, “women with disability experience specific forms of gender-based violence, including reproductive coercion...”. While EVAWQ agree with discussing the



specific forms of violence that affect those of intersecting identities, it's concerning that there doesn't seem to be any acknowledgement that all women and people with uteruses can and do experience reproductive coercion. This needs to be not only named as a form of violence, but with measurable actions for prevention and response.

Increased focus on women's health, and the impacts that violence has broadly on women's wellbeing.

EVAWQ would like to address the need for a Queensland Women's Health Strategy, and for this to be developed alongside the National Plan so that clear and measurable change can be made. The link between DFV and negative health impacts, including poor mental health and mental illness are well-known. High rates of domestic violence are observed in the histories of those with child and adult psychiatric disorders, with consequences occurring across the lifespan.

The Draft does mention that violence can have a range of impacts on health and wellbeing, especially for children who have experienced or witnessed violence, but fails to address what those specific impacts are and solutions for care are. There is some mention of impacts on pg. 33, such as unintended pregnancy, sexually transmitted infections and long-term mental health issues, but there is no mention of cervical screening rates, chronic pain, or reproductive health.

There needs to be consistent recognition and response for people accessing mental health who use patterns of coercive control violence and abuse, using an accountability model and we need to create a diverse system that is accessible with specialised responses for vulnerable groups built on each cohorts lived experience.

The Draft needs to explicitly detail strategies to support access to, and provision of, trauma-informed, free and holistic access to healthcare, and include measures to achieve this.

Sustained and substantial primary prevention.

Primary prevention of violence remains the single most important goal to reduce violence against women and their children. The Draft needs to include a substantial and sustained approach to primary prevention, and have this be a significant investment from the Government. We appreciate that the gendered drivers of violence have been addressed in the Draft, but there is still a big focus on responding to violence rather than addressing it, with only one of the identified measurements talking to changing of community attitudes. The National Plan has a unique position of measuring targets for the next decade, which allows time for meaningful change to take place. This is the only way that gender-based violence will be eliminated in one generation.



A strategy for long term stable affordable housing for people affected by gender-based violence.

EVAWQ would like to acknowledge that the Draft addresses housing as a barrier to create safety for victim-survivors. However, we believe that a strong plan for long-term housing needs to be developed and included with the Draft. The current housing crisis and lack of safe and affordable housing has a direct impact on women experiencing violence, and on the ability for refuges and shelters to function as designed. Women are staying in refuge for up to a year in some places across Queensland, due only to the lack of availability for social housing or private rentals.

The Draft needs to include reducing rates of homelessness for women, and developing a clear plan to address safe, sustainable, and affordable housing, as a measure.

Increased systems collaboration.

A truly integrated service system (beyond the specialist DFV sector and the criminal justice system) is required to effectively prevent and respond to increasing reports of violence. Collective effort, reduced duplication of resources, consistent data and its ethical analysis and use, transparent evaluation of investment and in particular, genuine prioritisation and representation of communities and people who are at greater risk of violence and abuse, just makes sense. National coordination for reduced perpetration of gender-based violence and improved safety is absolutely possible, as there are initiatives already in place that demonstrate that.

EVAWQ welcomes consistency around risk and safety assessments and information sharing and a clear plan on how this can be achieved across jurisdictions.

It is encouraging to see a commitment to a national approach to principles of coercive control, but legislative change is one piece of a very complex problem. Listening to concerns raised by victim/survivors in QLD and NSW, there needs to be commitment to first genuinely understanding how these laws will improve the safety for everybody and in particular people who are already over criminalised, are living in poverty and/or are not already able to access these kinds of protections in an adequate or equitable way. Without this we will likely do more harm than good. There is no question there is a need for an improved whole of system response to domestic, family and intimate partner violence but a nationally consistent understanding of what DFV is, is a necessary first step.

Death Reviews of homicide victims show that there are a range of services and people in the community that have connected with the victim-survivor at some point, whether this is a GP, teacher, or Centrelink service officer. Everyone has a role to play in preventing and responding to violence against women, and there needs to be improvements as to how this currently functions. The gendered drivers of violence need to be understood by all if there is to be a shared framework of response and prevention.



Concluding notes:

We do not presume to represent the experience of First Nations women and girls, but rather, we support representation and participation of Aboriginal and Torres Strait Islander people captured through Wiyi Yani U Thangani, the Women's Voices Report.

Comprehensive consultation with First Nations girls and women has taken place in the preparation and development of Wiyi Yani U Thangani, and importantly, this was led by Aboriginal and/or Torres Strait Islander women. We advocate for the findings to be incorporated into the National Plan.

Disappointingly, the only reference to this report was made on Page 72; "the impact of violence on Aboriginal and Torres Strait Islander women and children, as well as the key protective factors that are essential if Aboriginal and Torres Strait Islander communities are to be free from violence". Like the very important "Hear her voice" report from the Women's Safety & Justice Taskforce, Wiyi Yani U Thangani elevates the experiences and voices of First Nations women and children, particularly those living in rural and very remote communities, and we urge the Department of Justice and Attorney General to keep the issues generously shared by thousands of women and girls at the forefront of this plan

Thank you again for the opportunity to provide feedback and work alongside government to create safe and equal communities for all people.

Please reach out with any questions or if we can further assist in anyway,

Yours Sincerely,

Ending Violence Against Women Queensland

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