

Feedback on the Draft National Plan to End Violence against Women and Children 2022- 2032



Acknowledgment of Country

No to Violence acknowledges First Nations Peoples across these lands; the Traditional Custodians of the lands and waters. We pay respect to all Elders, past, present and emerging. We acknowledge a deep connection with country which has existed over 60,000 years. We acknowledge that sovereignty was never ceded, and this was and always will be First Nation's land.



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Dear NPAG Secretariat

Thank you for the opportunity to provide feedback on the *Consultation: Draft National Plan to End Violence against Women and Children 2022-2032*.

I am delighted to have this opportunity as a National Plan Advisory Group member to provide constructive feedback to inform the next decade of Australia-wide work to end men's family violence. on behalf of No to Violence.

No to Violence is Australia's largest peak body representing organisations and individuals working directly with men to end family violence. We have provided peak and advocacy support to our 185 members across Australia since 1993 in addition to operating the Men's Referral Service (MRS).

At No to Violence, we know that ending family and domestic violence must be seen as core business for government. We have spent the past 30 years developing safe and effective interventions for men who use family violence; while we specialise in targeted interventions to support men to change their behaviour, our primary concern is the safety and wellbeing of women and children. Always.

While we appreciate the work that has gone into this draft, we echo the concerns of other NPAG members and, indeed, the broader sector, that this draft National Plan does not do justice to the significant work undertaken by our sector in the lead-up to and during the 2021 Women's Safety Summit.

We agree with ACON, that this plan in its current form does not adequately address the needs of LGBTIQ+ populations, and we strongly support DVNSW and Safe and Equal in their respective calls for an expanded focus on perpetrator accountability and recognition of accountability as a key principle of the plan.

This draft National Plan is at a pivotal point. Significant national leadership and federal government investment in prevention, early interventions and men's behaviour change must happen if we are serious about reducing – and ending – the scourge of family and domestic violence in this country.

We all want a future free from men's family violence. We urge the Government to support the future with an intersectional and visionary National Plan with clear targets and measures that states, territories, and the national government can collaboratively work towards. This National Plan will be an enduring legacy of this Government.

Please find attached our feedback and recommendations.

We would welcome the opportunity to discuss this further. Thank you again for this opportunity to shape and influence this critical plan to improve the safety of all victim-survivors in Australia.

Yours sincerely



Jacqui Watt

Chief Executive Officer

About No to Violence

No to Violence (NTV) is Australia's largest peak body representing organisations and individuals working with men to end family violence. We are guided by the values of accountability, gender equity, leadership, change, and respect.

NTV provides support and advocacy for the work of specialist men's family violence interventions carried out by organisations and individuals. The work undertaken by specialist men's family violence services is diverse and includes but is not limited to Men's Behaviour Change Programs (MBCP), case management, individual counselling, policy development and advocacy, research and evaluation, training, workforce development and capability building.

NTV also provides a range of training for the specialist men's family violence workforce including a Graduate Certificate in partnership with Swinburne University, as well as professional development for all workforces who come into contact, directly and indirectly, with men using family violence.

NTV is a leading national voice and plays a central role in the development of evidence, policy, and advocacy to support the work of specialist men's family violence nationally and specific service delivery in Victoria, New South Wales, South Australia and Tasmania.

About Our Members

NTV represents 185 members Australia-wide. Our membership structure is inclusive of individuals and organisations ranging from specialist services to individuals and groups who have an interest in preventing and responding to men's family violence.

Process of developing submission

No to Violence was asked to provide feedback on the Government's draft National Plan to End Violence Against Women and Children. In doing so, we consulted with our sector, drawing upon the expertise of other peak bodies, holding member consultations, and speaking with our colleagues across our organisation. We thank all those involved for their generosity, respect, and conversation.

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Summary of No to Violence's Recommendations

Pillar 1: Prevention

No to Violence recommends:

- That the National Plan should highlight the gaps in current service and program coverage to inform priority areas under the Action Plans as well as recognising the progress made in primary prevention space.
- Clearly articulating the **starting point** for this National Plan to make it easier to track progress across the next 10-12 years.
- Highlighting **gaps** to reduce the risk of communities being missed in the upcoming Action Plans.
- That if we are asking **men to be accountable for their actions**, we need a National Plan that reflects a similar level of accountability.
- That the draft National Plan take a more intersectional lens by drawing upon the work of Our Watch's Change the Story and Change the story: Three years on; Changing the picture; Changing the landscape; among other critical prevention resources. Understanding the ways in which different layers of marginalisation and oppression operate as part of family violence is vital.

Pillar 2: Intervention

No to Violence recommends:

- That the next National Plan focus on increasing funding for researching *effective intervention strategies for children and young men* who use violence.
- Intervention strategies be delivered through a diverse lens by community members, so that the needs of each community are met.
- That the National Plan should focus on the importance of system effectiveness and system integration for the safety of women and children.
- That family violence research must include research with perpetrators, specifically expanding upon research done by ANROWS and other organisations into effective support mechanisms and enabling men not to choose violence.

Pillar 3: Response

No to Violence generally agrees with the approach taken in this pillar. We recommend:

- That a comprehensive and coordinated response system would require that staff in all specialist and public facing services receive ongoing training and professional development in effectively identifying and assessing risk for all perpetrators. Risk assessment and working with perpetrators more broadly are specialist skill sets. Our sector has had long-standing and significant workforce shortages extending beyond the Covid-19 pandemic.
- Training on safe working practices - working with perpetrators requires a very specific set of skills due to the risk of collusion and unsafe practice. It is vital that specialist services, including mental health workers and the judiciary, receive this training. No to Violence has a

long history of general and bespoke training and can readily assist in designing and delivering training for diverse workforces.

- A specific focus on changing behaviour and practice in the Family Court, legal, and criminal justice systems is added to the Plan. Our members note that cultural change in police and criminal justice institutions, as well as the need for competency-based responses by these institutions, is vital. ‘Enhancing training and awareness’ will not in and of itself lead to improved legal responses. No to Violence has experience working closely with the Victorian, Tasmanian, and New South Wales Police Services to embed best-practice principles in perpetrator identification and response. We know that change is possible and are ready to support the Government in its efforts to improve the responsiveness of all sectors to family and domestic violence.
- An increased focus on the intersections between the family violence system, family law system, and child protection system and how these systems collude and contribute to significant and ongoing safety risks for women and children and other victim-survivors in the Plan. Importantly, the Plan should focus on leveraging these intersections to promote safety for women and children and accountability for perpetrators.
- Developing specific measures to support system integration and systems and systemic accountability is a clear pathway to better and more consistent perpetrator intervention—and an important part of keeping all victim-survivors safe.

Pillar 4: Recovery

We congratulate the NPAG for the inclusion of this Pillar and we are here to innovate and support in this space. Therefore, No to Violence advocates for the inclusion of perpetrators in this section and that a whole-of-family approach is taken to recovery. The omission of perpetrators has several negative implications for the strength of the Plan and for the future of our sector:

- Without specifically including perpetrators in this section, we worry that restorative justice pathways may be undermined and that it sets the unfortunate precedent that the National Plan does not prioritise recovery pathways for perpetrators.
- This omission does not recognise that many perpetrators of violence, particularly adolescents who use violence, are also victim-survivors of violence.
- We feel that this section assumes that the recovery process for victim-survivors happens in isolation from the perpetrator – which is not always the case. Many men might have ongoing contact with children, some victim-survivors just want the violence to stop, and do not necessarily want their relationship to end. Recovery for perpetrators and victim-survivors takes many forms, including restorative justice and continued cohabitation.
- This section, in its current form, does not recognise the role intergenerational trauma plays in contributing to violence in Aboriginal and Torres Strait Islander families. A more intersectional framing for this section would enable a more nuanced understanding of violence and intergenerational trauma.
- Perpetrators need accessible and appropriate recovery services—without access to these services, too many men continue to use violence. Embedding accessible and appropriate perpetrator services should be an important part of this National Plan.

No to Violence Feedback – National Plan to End Violence against Women and Children 2022-23

General feedback (regarding pages 3-18 of the National Plan)

In general, No to Violence feels that this National Plan does not take adequate steps to shift the burden from victim-survivors to perpetrators. Australia must be bold and visionary if we want to stop family violence in the lifespan of this plan. Building an evidence base that has an informed understanding of perpetrators of violence, and what may work to address *their behaviours* is critical to stopping family violence.

Ideally, this plan should be centred around *building an evidence base* that can drive the design, implementation, and continued evaluation of approaches that successfully address family violence perpetration. The lack of current reliable data in the specialist family violence sector is a critical issue requiring a national approach and leadership.

At No to Violence, we are ready to support such a focus on data and evidence and have an important network of service providers from whom we can learn across Australia.

No to Violence echoes our colleagues from across the sector in raising the following points:

We are concerned that the draft National Plan does not make any mention of the National Partnership Agreement. The National Partnership Agreement is integral in breaking down the silos that currently hinder progress in our sector, between states and territories and in ensuring a fair, consistent approach to men's use of violence across the country.

This draft National Plan does not list any new initiatives, particularly regarding innovations coming out of COVID-19 by our sector.

This draft National Plan needs to be clearer about the measures and mechanisms by which its progress can and will be tracked. For instance, how will gender inequality and women's economic engagement be tracked?

This draft National Plan could offer more policy context. Given that this plan emphasises the need for collaborative systems and services, NTV feels the National Plan could offer more in terms of government policy and its role in creating a backdrop of safety and security for women. Victim-survivor safety is inextricably tied to seemingly 'neutral' policies. At No to Violence, we are very clear - and with 30 years' experience in the field - that the National Plan must acknowledge the deep connection between government policy and safety and security for people affected by family violence.

Cost of Family Violence

We recognise the incentive to put a cost to men's family violence—we need to show the toll this is taking on our society. However, we want to prioritise the visibility of the *human* cost of violence.

More could be done in this section to demonstrate that the financial burden placed on the state is not equivalent to the human damage endured by individuals and their families.

The subsequent section refers to gender-based violence; this language should be consistent. Family violence affects people of all genders, predominantly women. The 'cost of family violence' section refers only to the impacts of family violence on women and children - victim-survivors of all genders, employers and communities need to be included.

No to Violence believes that the economic cost of family violence should follow the explanation of the burden and implications of family violence. By beginning this section with an acknowledgement of the grave impacts of family violence, the National Plan would avoid being perceived as reducing the problem of family violence to an economic problem.

Gender Based Violence in Australia

No to Violence recommends that this section be re-worked with an intersectional feminist lens. Our members noted their concern that this National Plan lacks intersectional awareness of the gendered drivers of violence: it is vital that this Plan recognise the ways that different forms of oppression and discrimination intersect to enable violence and prevent help-seeking behaviour. Men are more likely to perpetrate violence against certain groups because those groups are marginalised, less able to seek help, and less likely to receive help when it is sought. The current framing, 'Certain groups within the community are at greater risk of experiencing family, domestic and sexual violence' may not do justice to this reality. No to Violence believes that, if we are to reach our goal of ending family violence for good, it is vitally important to ensure the burden of accountability lies with perpetrators.

No to Violence suggests replacing 'vulnerable' with 'marginalised.' It is important to recognise that marginalisation happens because of structural inequality, including gender inequality; people are not inherently vulnerable, but are made so by our systems. Making this point of distinction is important because perpetrators of family violence prey upon systems of marginalisation.

Building on Foundations

The section 'Building on Foundations' would be better placed within the introduction to ensure readers are aware of the decades of hard work done by service providers and advocates.

Establishing National Definitions

Consent: No to Violence recommends that the definition of consent be re-worked to clarify that it is an on-going process of enthusiastically agreeing to an interaction, most often physical and/or sexual in nature. The current definition does not sufficiently define consent, but rather offers an overview of why consent matters.

Domestic violence: No to Violence recommends that the definition of domestic violence be re-considered. Domestic violence does not solely occur in a 'domestic setting.' Domestic violence can occur in public, between two people who currently or previously cohabitate/d. Without specifying this, the National Plan risks rending the experience of young people, who are less likely to be

cohabitating with a partner, and other non-cohabitating people invisible. This is concerning as we currently do not have programs designed and funded for this cohort of young men but they have tremendous opportunity for early intervention programs to stop it at the start (knowing half of all perpetrators will go on to offend in subsequent relationships, this would be a serious economic and social saving if we could intervene with this group at this first offence stage)

Gender-based violence: No to Violence recommends this section be clarified that it is most often violence perpetrated by men against women, but also often perpetrated by men against people of other genders or of the same gender for perceived violation of gender norms. We believe this is a fundamental point that must be stressed throughout this National Plan. We endorse ACON's submission to NPAG which outlines, in great detail, the issue with this section.

Feedback on pillars and foundation principles

Pillar One: Prevention

General feedback:

No to Violence recommends that, as well as recognising the progress that has been made in the primary prevention space, the National Plan should highlight the gaps in current service and program coverage to inform priority areas under the Action Plans. The National Plan would be strengthened by including the following:

- Clearly articulating the **starting point** for this National Plan will make it easier to track progress across the next 10-12 years.
- Highlighting **gaps** will reduce the risk of communities being missed in the upcoming Action Plans.
- If we are asking **men to be accountable for their actions**, we need a National Plan that reflects a similar level of accountability.
- Our members are concerned that this draft National Plan does not sufficiently use an intersectional lens. Understanding the ways in which different layers of marginalisation and oppression operate as part of family violence is vital.

Primary prevention continues to underpin the foundation of our long-term strategy to stop violence against women and children and other individuals and groups impacted by gender-based violence in all its forms, before it starts.

The title of this focus area should be shortened, with the different elements (i.e. priority populations) spelled out below. Additionally, the delineation between Focus areas 1 and 2 could be clarified, as both seem to be speaking broadly community-level primary prevention initiatives. This section would be strengthened by a more nuanced understanding of intersectional oppression and marginalisation and the role of privilege in combatting family violence.

Strengthen positive, equal and respectful relationships between and among women and men, girls and boys, in public and private spheres

No to Violence and our members see young people (18-30 years) as a significant gap in the current landscape of prevention initiatives available. This section would be strengthened by highlighting the current gaps in program coverage, to inform priority areas under the Action Plans.

Our members encourage the Government to more specifically address the important role of on-going relationships education in strengthening relationships for all Australians.

Regarding digital literacy, it is also important to educate people about reporting mechanisms in the digital and online environment. We recommend this section clarifies that pornography can affect the attitudes and behaviours of adults, as well as those of children and young people.

At No to Violence we are developing a practice-based research stream to focus our efforts in engaging with young people and we would be happy to share this with the NPAG if there is an opportunity.

Empower Aboriginal and Torres Strait Islander voices

No to Violence suggests that any changes made to systems, processes, or legislation because of the National Plan considered the implications for Aboriginal and Torres Strait Islander communities. Ideally, Aboriginal and Torres Strait Islander people should be leading the development and implementation of culturally appropriate and trauma-informed approaches to responding to family violence in their communities.

No to Violence believes there is an important role for non-Indigenous Australians to play in addressing intergenerational trauma. While strengthening connections to culture and identity are important, this approach makes Aboriginal and Torres Strait Islander peoples responsible for 'doing the work' in much the same way that victim-survivors of domestic violence are often burdened with the responsibility of dealing with consequences of their perpetrator's actions. In all cases, the National Plan should be striving to shift the burden away from those who have experienced the trauma.

Our members shared that increasing the funding available to ACCOs; increasing the number of Aboriginal and Torres Strait Islander staff at mainstream organisations; and embedding lived expertise and trauma-informed practice across all service providers are important areas that need leadership from this National Plan and Australian governments.

Work with men and boys

No to Violence recommends this section clarify *how* the plan will support primary prevention interventions. While depictions of male 'champions' who don't use violence can be helpful, it can involve a level of risk. This is especially noted in examples where it is discovered that these men have engaged in abusive or inappropriate behaviours

Importantly, this section should acknowledge that challenging attitudes and behaviours that are deeply embedded in Australian society is an enormous task—requiring innovative initiatives to be developed, in addition to respectful relationships programs. Whilst the task is big, at No to Violence we are ready: we believe that understanding the different needs of different groups of young people

is fundamental to designing new and effective approaches. We know that we can promote a championing approach whilst also building in transparency and accountability. We are keen to use our 30 years' experience to assist in implementing these important national initiatives.

Pillar Two: Intervention

General Summary

No to Violence would like to see the National Plan focus on increasing funding for researching *effective intervention strategies for children and young men* who use violence. Intervention strategies must also be delivered through a diverse lens, so that the needs of each community are met. Importantly, intervention initiatives within community settings may be more effective if *driven by community members*.

Our members noted that the National Plan needs to focus on the importance of system effectiveness and system integration for the safety of women and children.

Our members noted that family violence research must include research with perpetrators, specifically expanding research into effective support mechanisms and enabling men not to choose violence. There is a lack of refined data into perpetrators and their pathways, including mapping their journey through family violence, social services and justice systems, in Australia.

As highlighted at the recent ANROWS Conference in the Intimate Partner Homicide plenary (including a workshop by the Manager Policy and Research, No to Violence), there is a lack of quality data sets for researchers to analyse so that they can provide practice advice to frontline workers as well as recommendations to policy makers for necessary system changes for earlier intervention at key points in the perpetrator pathways. Reports, launched by the Australian Institute of Criminology and the Australian Domestic and Family Violence Death Review Network at the conference, show the way in providing more detailed information on perpetrator pathways, key intervention points, and new program responses to stop different groups of men who use violence escalating towards the ultimate act of violence.

Ending the cycles of intergenerational violence with early intervention for both potential victims and perpetrators.

No to Violence supports the commitment to expanding support services in the family setting for children and young people who use violence. However, we know from our decades of expertise and the feedback of our members that the National Plan would be strengthened by ensuring there is equal commitment to building the evidence base for children and young people who use violence – both against family members but also intimate partner relationships (where they may not be cohabitating due to still residing in the family home). There is limited research around the causes, antecedents, presentation, and effective rehabilitation approaches for children and young people who use violence in intimate partner relationships.

However, there is excellent foundational work undertaken by several universities, including RMIT's Centre for Innovative Justice, on adolescent family violence in the home (AFVIH). NTV supports the expansion and funding of academic and sector research into AFVIH Australia-wide (from its strong base in Victoria), while urging new funding for work into 'first perpetration' by young boys and men as a new research area. This would involve examining and trialling programs designed for young

boys and men who have undertaken IPV and may or may not have received an IVO/AVO or police attention. This is an excellent opportunity to stop it at the start and divert a generation of future DV perpetrators (knowing that more than half of perpetrators will go on to perpetrate in subsequent relationships, there is a significant cost saving, both human and economic, in diverting half of all offenders). It does require significant investment in research and design to ensure a trauma informed, intersectional approach that brings together children and family services with health services, DFV services and community organisations such as sporting clubs and schools.

The family violence sector and associated sectors requires in-depth understanding of children and adolescent use of violence for intervention and diversion strategies to be effective. Effective intervention strategies for young people who have experienced victimisation and trauma require an integrated response spanning family violence, family services, and child protection. Our members have noted that improving system integration and interface would not only lead to more efficient systems, but better prevention and intervention programming.

Ensure the availability of support pathways for boys and men who identify as having attitudes and behaviours that may lead to violence to seek help.

To provide safe and supported behaviour change opportunities for boys, the next National Plan should commit to using messages within school and social media settings in a way that is conducive to behaviour and attitude change in young people.

Positive social media can be a powerful tool to normalise positive behaviour change for boys and men who use violence. Boys and men must be supported to recognise their behaviours and attitudes as problematic; this requires that gender equity education be embedded and reinforced through multiple mechanisms.

As NAS research has demonstrated, many young boys and men who have received a 'dose' of education within school setting, switch off current campaigns due to a perception they have finished learning and they understand consent. Current conversations around consent amply demonstrate that this understanding is wrong. Campaigns need to tap into young communications and media practitioners working to design evidence-based campaigns around what works to engage boys, young men, their friends and family to receive the right messaging.

Embed perpetrator programs into community and justice settings to reduce recidivism rates.

No to Violence suggests that this section could be strengthened with a clearer focus on the importance of accountability. Behaviour change—and thus cessation of violence—occurs when perpetrators understand their actions and take responsibility for them; we know that the threat of incarceration or other legal consequences is not in and of itself enough to prevent men's family violence.

No to Violence notes that the draft National Plan refers to 'novel approaches to monitoring.' We caution against any future reliance on electronic monitoring approaches: we have consulted with our members and found that there is no support for the introduction of electronic monitoring for medium and low-risk perpetrators. There is significant concern among No to Violence members that

electronic monitoring bracelets are an isolated response that fails to enable men to take accountability for their violence.

Project Vigilance, in Tasmania, found that some perpetrators wearing electronic monitoring bracelets did not re-offend against the partner who had taken out the order resulting in the electronic monitoring, but that they found new partners, perpetrated violence against these new partners, and were named as a respondent in a new intervention order. So far, evidence suggests that electronic monitoring alone is insufficient to enable men to stop their violent behaviours. However, we are open to exploring a range of options here with our members and would want to be involved in any pilots that may be designed.

No to Violence suggests the National Plan commits to greater investment in a suite of interventions, including post-participation programs, partner safety contact work, integrated and holistic programs, and better-funded perpetrator interventions, that we know work.

Supporting women at vulnerable points in their life

No to Violence refers to our previous comments on the use of the term ‘vulnerable’, which we feel conceals the role of structural oppression in the continued challenges and barriers encountered by marginalised groups. While we acknowledge that victim-survivors encounter acute points of risk that may lead to the onset of further violence or an increase in its severity, we feel that the language around vulnerability minimises the drivers of inequality at the centre of these challenges.

We also feel that the current section would be strengthened with an intersectional analysis to recognise the diversity of victim-survivors and their experiences. For example, we are aware that women in migrant and refugee communities experienced a significant risk of violence when a dowry is provided as a condition of marriage. No to Violence would like to see this section contain more diverse examples of contexts and situations where the risk of violence is increased.

Build sectoral and community capacity to identify family, domestic and sexual violence and to intervene early to prevent the escalation of violence and, over time, reduce instances of violence.

No to Violence commends the inclusion of this initiative in the draft National Plan. We understand that building community capacity to identify family violence and to intervene, means going to, working with, and taking the lead from community. This will involve, for instance, talking to community leaders, associations, and community representatives. Any efforts to educate communities on intervention strategies would be more effective if they were facilitated by community leaders or the community itself, so that the messages are conveyed in ways/languages that resonate with each community.

No to Violence completed a two-year program funded by DSS to establish ways of working with First Nations communities across Australia. We have –in alliance with ACCO partners –built a model for community engagement on men’s family violence.

The National Plan should emphasise the importance of cultural change in police and criminal justice institutions, as well as the need for competency-based responses by these institutions. 'Enhancing training and awareness' will not in and of itself lead to improved legal responses.

Examples of training provided include:

- **Introduction to working with men using family violence:** For professionals to learn the ways in which men's family violence is defined and understood, aimed at early career practitioners and new arrivals to men's services sector.
- **The Five Essential Discussion Tools:** Training for practitioners on strategies for de-escalation and safety and accountability planning.
- **Advanced Practice Series:** For the human service workforce to provide pragmatically focused learning, helping reduce harm to women and children impacted by high-risk family violence.
- **Public Facing Employees:** This a training program for any public servant to learn about active bystanders and refer concerns to the relevant authorities.

Pillar Three: Response

General feedback

No to Violence generally agrees with the approach taken in this pillar. We would add that a comprehensive and coordinated response system would require that staff in specialist services receive ongoing training and professional development in effectively assessing risk for perpetrators of all genders. Risk assessment and working with perpetrators more broadly are specialist skill sets. Our sector has had long-standing and significant workforce shortages extending beyond the COVID-19 pandemic.

Working with perpetrators requires a very specific set of skills: the risk of collusion and unsafe practice is so high that it is vital that specialist services—including mental health workers or the judiciary—need to receive training on safe working practices. The Coroner’s Inquest into the deaths of John, Jack and Jennifer Edwards (2021) revealed the tragic and catastrophic consequences of inadequate training and resourcing for workers who may or do come into contact with perpetrators of violence.

Collusion by specialist workers (or anyone) can lead to heightened risk for victim-survivors and potentially lead to increased harm. No to Violence’s Workforce Development team has the capacity and experience to address many skill shortages. We are currently working directly with the TAFE sector to develop certificates in ‘micro-skills’, and half of our training is tailored and bespoke.

We are particularly interested in changing behaviour and practice in the Family Court, legal, and criminal justice systems. Our members note that cultural change in police and criminal justice institutions, as well as the need for competency-based responses by these institutions, is vital. ‘Enhancing training and awareness’ will not in and of itself lead to improved legal responses.

Our members note that there is a lack of focus on the intersections between the family violence system, family law system, and child protection system and how these systems collude and contribute to significant and ongoing safety risks for women and children. Importantly, the Plan should focus on leveraging these intersections to promote safety for women and children and accountability for perpetrators.

Ensure a resourced service system with an appropriately skilled and qualified workforce is available to support all victim-survivors, including victims of sexual assault, and address perpetrator behaviour no matter where they are located or their individual characteristics

No to Violence urges that this National Plan emphasise the need for significant and urgent action to address services gaps for men in regional and remote areas, as well as for other men who face persistent accessibility challenges.

For instance, certain cohorts of men—gay, bi, trans or queer men, for example—may not be able to access a safe and appropriate MBCP regardless of where they live. The National Plan should present opportunities for a national approach to some cohorts, through online/hybrid responses and

increased funding for tailored programming, that can be run from one jurisdiction but service perpetrators in multiple locations/jurisdictions.

While having nationally consistent minimum standards is the ideal, we also recognise that several First Nations communities have worked with No to Violence to devise their own culturally appropriate Minimum Standards.

No to Violence suggests that there is potential for fully funded online Men's Behaviour Change Programs (MBCPs) to fill the gap for men in regional and remote areas. No to Violence has received philanthropic funding to conduct a pilot online MBCP with rural, regional, and remote men, as well as with gay, bi, and trans men, to understand the efficacy of for-purpose, tailored online programs for behaviour change. This research project is on track to be completed, with a full evaluation, by November 2022.

Embed understanding of the unique and specific challenges diverse communities face in relation to family, domestic and sexual violence.

No to Violence agrees with the importance of this intention. We currently lack data on perpetration rates of family, domestic, and sexual violence. No to Violence is eager to support a national initiative to improve data collection. We strongly urge the government to take the lead from marginalised communities on the best ways to collect data by and for their communities. In particular, we would like to endorse Recommendation 4 of inTouch's Response to the Fourth National Action Plan, which states organisations that currently work with migrant and refugee women must play a central role in building the capacity of the service system. It is our belief that it is better to build on the expertise and long service histories of organisations that work with marginalised people, rather than inventing new approaches that do not draw upon this vital work.

Further, we support feedback from ACON and Rainbow Health Australia: the National Plan in its current state too often renders the experiences and lives of LGBTIQ+ people invisible. No to Violence feels that this Plan would be strengthened—for all people in Australia—if specialist services were consulted on the best ways to address these existing gaps.

Ensure women and children escaping violence have safe and secure housing

No to Violence feels that the National Plan must give all victim-survivors the option to remain, safely, at home—and thus allocate resources to enable perpetrators to seek accommodation elsewhere. This section would be strengthened by acknowledging the importance of enabling victim-survivors to stay safely in their homes while perpetrators receive support and accommodation elsewhere. Specialist housing programs for men who use violence are being trialled by NTV and others in Victoria, and an evaluation by Ernst and Young has shown positive findings. There are other programs across Australia including in the ACT with residential rehabilitation for men ('Room For Change').

Emergency, short- and medium-term accommodation models for perpetrators are worth investing in.

No to Violence's Perpetrator Accommodation and Support Service (PASS, now Men's Accommodation and Counselling Service or MACS) has shown promising results in increasing victim-survivor safety while enabling perpetrators to leave home and receive the support—including accommodation—that they need.

No to Violence is excited to support the piloting of such projects, especially in rural and regional areas where perpetrators are too often left without options for accommodation. There is solid evidence from evaluations of PASS and other programs that perpetrator accommodation programs enable women and children to remain safely at home as while creating streamlined pathways for perpetrators to engage with behaviour change and other vital interventions during some of the riskiest periods for victim-survivors –when the relationship dissolves or women leave home.

No to Violence is able to support the development and implementation of perpetrator accommodation programs and looks forward to providing feedback on our experience and expertise.

Improve legal responses for all forms of violence, including coercive control and sexual violence

The differing legal systems across jurisdictions mean this section would be strengthened through consultation with victim-survivors and women's legal services across Australia. Informed by our detailed national consultations held in 2021, No to Violence remains concerned about the impact of the criminalisation of coercive control on Aboriginal and Torres Strait Islander and migrant and refugee communities. No to Violence can assist in strengthening this system by referring the NPAG to our members and sharing their feedback.

Our experience and that of our members tells us that a significant investment of funding is required to ensure every police officer and member of our criminal justice and judicial institutions has the requisite training to identify coercive controlling behaviours accurately and consistently. The Edwards Inquest in NSW is an example, applicable to every police force in Australia, of the consequences of a lack of training, as well as a lack of monitoring for compliance with policies, such as DFV Police Manuals. Incident-based policing, the continuing lack of bias training, misidentification of the predominant aggressor, assumptions about family law cases, and deeply ingrained racial and gender stereotypes enable too many men to murder their current or former partners.

No to Violence is already working closely with Victorian, New South Wales and Tasmanian Police Services providing a referral pathway for men who are apprehended. We believe this National Plan should include an interstate comparison of learnings from police responses and differing jurisdictional legal framework to intervene with men who use family violence. This would generate data, a baseline, and identify mechanisms for improvement of consistency. No to Violence is able to support in the development and implementation of data collection mechanisms. The role of technology in the perpetration and prevention of family, domestic and sexual violence

Our sector needs more and better data on the ways in which different perpetrators use technology, their motivations, and how this impacts risk for victim-survivors—the need for this data could be highlighted in this section. We know from our more than three-decades of work and the work of our

members that evidence-based practice is imperative in ending men’s family violence—but that we just don’t have the evidence we need, especially on new and emerging issues like technology facilitated abuse. Research on the role of technology in perpetration is important, as is research and data on the role of technology in prevention. This section would be strengthened were it to include research on the potential for technology to positively influence and enable behaviour change in perpetrators to help shift the burden from victim-survivors onto perpetrators. Our current philanthropic-funded research project on online MBCPs for rural, regional, and remote men, and gay, bi, and trans men is an example of such a project. We anticipate that the evaluation of this project will be completed by November 2022 and look forward to sharing these findings with the Government.

Pillar Four: Recovery

General feedback

We congratulate the NPAG for the inclusion of this Pillar and we are here to innovate and support in this space. Therefore, No to Violence advocates for the inclusion of perpetrators in this section and that a whole-of-family approach is taken to recovery. The omission of perpetrators has several negative implications for the strength of the Plan and for the future of our sector:

- Without specifically including perpetrators in this section, we worry that restorative justice pathways may be undermined and that it sets the unfortunate precedent that the National Plan does not prioritise recovery pathways for perpetrators.
- This omission does not recognise that many perpetrators of violence, particularly adolescents who use violence, are also victim-survivors of violence.
- We feel that this section assumes that the recovery process for victim-survivors happens in isolation from the perpetrator – which is not always the case. Many men might have ongoing contact with children, some victim-survivors just want the violence to stop, and do not necessarily want their relationship to end. Recovery for perpetrators and victim-survivors takes many forms, including restorative justice and continued cohabitation.
- This section, in its current form, does not recognise the role intergenerational trauma plays in contributing to violence in Aboriginal and Torres Strait Islander families. A more intersectional framing for this section would enable a more nuanced understanding of violence and intergenerational trauma.
- Perpetrators need accessible and appropriate recovery services—without access to these services, too many men continue to use violence. Embedding accessible and appropriate perpetrator services should be an important part of this National Plan.
- No to Violence notes that recovery for perpetrators can take many forms—but often starts with Men’s Behaviour Change Programs. The Men’s Referral Service (MRS) and Brief Intervention Service (BIS), both operated by No to Violence, are two services that enable men to start their change journeys. We have worked in close partnership with the Government on improving both services: we have implemented all recommendations from the government-funded evaluation of BIS; and are recruiting nationally for both MRS and BIS; and are excited to report that more men are contacting our services on a year-on-year basis. This demonstrates that including perpetrators and perpetrator services as part of the recovery pillar is vital.

Foundation principles

1. Gender equality

No to Violence wholeheartedly agrees that gender equality must be a foundational principle of the National Plan; however, we recommend the National Plan provide more specificity in terms of *how* this will be addressed. For example, what strategies, in what settings?

2. The diverse lived experiences of victim-survivors are informing policies and solutions

No to Violence recommends the National Plan specify that *diversity* of lived experience will be incorporated in the implementation of the National Plan and Action Plans, including diversity of race, age, cultural background, sexuality, ability, immigration status, socio-economic status, and other intersecting identities.

No to Violence knows that lived experience work can be challenging and nuanced. We know, from our work and the work of our members, that when working with people who have lived experience of family and domestic violence—be it as perpetrators or victim-survivors, or both—the principles of collaboration and co-production should be centred. Using consultation in isolation does not, unfortunately, lead to the same deeply meaningful and accessible research or program innovations that can be developed through collaboration and co-production.

The National Plan would be strengthened through a focus on best-practice for lived experience research and work—including the values of collaboration and co-production.

In doing so, specifying that support will be provided to victim-survivors throughout their participation in collaborative or co-produced research processes would demonstrate that the National Plan and Government understand the value of victim-survivors expertise and knowledge. This should include access to counselling services or similar, available during and after any involvement, as well as fair remuneration for lived experience work.

3. Closing the gap

The National Plan should specify that Aboriginal and Torres Strait Islander people will be overseeing, governing, developing, implementing and evaluating the Aboriginal and Torres Strait Islander Action Plan.

No to Violence endorses [Djirra's Key Calls](#) in response to the National Summit on Women's Safety both with regard to the National Plan and more broadly. These include

- Attention to women in prison: Family violence is both a cause and consequence of increasing Aboriginal and Torres Strait Islander women's incarceration, and these women must not be forgotten in this National Plan.
- The National Plan must ensure the specific needs of Aboriginal and Torres Strait Islander women with disabilities are addressed.
- Housing must be included as a focus area of the National Plan. Family violence is a key driver to Aboriginal and Torres Strait Islander women becoming homeless and a major factor preventing

women from leaving violent relationships. Many women are forced to choose violence over homelessness.

Further, No to Violence recommends the National Plan specifically name and acknowledge Aboriginal and Torres Strait Islander LGBTIQ+ Sistergirls and Brotherboys as distinct groups that require and deserve designated funding and focus.

The National Plan would be strengthened by embedding the right to truth telling, healing, and self-determination for Aboriginal and Torres Strait Islander communities.

4. Intersectionality

The National Plan draft states tailored supports for distinct intersectional groups will be a focus. No to Violence applauds this inclusion and suggests the National Plan outline *which* groups will be targeted for tailored supports and in what settings.

As noted elsewhere in this document, No to Violence suggests that this National Plan embed principles of intersectionality throughout.

Feedback on measuring success

General feedback

Without a national perpetration study, No to Violence is concerned that this plan will miss a vital opportunity to create an evidence base to measure and drive the actions in this plan. There is widespread agreement in sector and academia that we are lacking adequate measures of perpetration to track outcomes.

No to Violence recommends that the National Plan transparently outlines its plans for collecting and collating data regarding domestic and family violence experiences and service access, disaggregating data by age, sexual orientation and gender identity and expression, and migration status—among other potential identities and characteristics. For instance, data could be presented in the following cohorts: older people (aged 65+), children and young people, across genders and sexual orientations (including all members of the LGBTIQ+ population), and people from migrant and refugee communities.

While it is likely that data regarding these specific groups will be available in national surveys like the Personal Safety Survey and from services themselves, the Plan should make clear about its intention to ensure these groups are properly represented. Otherwise, it will be difficult to create evidence-based initiatives that are inclusive of marginalised populations.

No to Violence and our members encourage the National Plan to ensure that feedback from women and other victim-survivors on the performance of specific programs (like MBCPs) are carried forward. This is an important accountability and monitoring measure.

Data and evidence

Data and evidence are critical to showing change. Focusing on the importance of data and evidence would strengthen the National Plan and create a solid foundation for action. No to Violence hopes that this National Plan will build on the experience of developing NOSPI to implement a stronger approach moving forward.

We must start somewhere. We endorse what others on NPAG have said on this matter, and it is clear that monitoring, evaluation and reporting activities outlined in this section require more work to ensure they are fit for purpose.

The creation of a new specialist family, domestic and sexual violence data collection mechanism is a welcome improvement. The plan would be strengthened by clear guidance on how states/territories and frontline services will be supported to supply this data.

No to Violence is concerned that without a concrete plan that supports frontline workers and organisations, the outlined improvements to data collection will not be able to occur. Specifically, we would support consideration of long-term funding to cover additional staff time, and to also cover the cost of upskilling staff on areas such as data management, retention and information sharing.

Our members urge the Government to embed measures and structural indicators in the National Plan and subsequent action plans. We know that structural change is the only way to end men's family violence—and the ways we collect, analyse, and measure this data must be a central part of this National Plan.

Targets

While the key measures and indicators outlined are generally fit for purpose, No to Violence notes that 'a significant, positive change' is not an adequately precise measure. The Plan would be strengthened with clear and quantitative definitions of significance and the desired change in relation to negative or positive change for each indicator.

No to Violence would like to see the inclusion of a measure regarding family violence experienced by children and young people. Children and young people are victim-survivors in their own right and are likely to experience abuse within contexts where domestic violence is occurring.

We recommend using data from the Personal Safety Survey (PSS) to design these measures and indicators. The PSS collects and reports data on physical and sexual violence disaggregated by age and gender. The National Plan would be strengthened by drawing upon this existing, rich evidence base to develop specific measures to track our progress.

Outcomes

No to Violence applauds the focus of the outcomes framework on action at the individual, service, system, and community level. We feel that this is an adequate reflection of the complexities faced in

trying to solve the problem of violence against women and children, as well as a holistic understanding of what actions are needed to move forward.

Regarding Service level outcome 2.3 (as referred to in the draft National Plan), No to Violence suggests that this outcome is separated into three distinct areas: services are evidence-informed; services are culturally safe; and services are accessible. These outcomes should not be measured together due to the risk of masking underperformance in one or more areas.

For example, an organisation may demonstrate it is evidence-informed and accessible, but not necessarily taken concrete actions to improve its cultural safety. No to Violence suggests that in the Community Level Outcomes, an outcome is added that focuses on the role of community leadership. Community leadership is recognised as playing a vital role in a community's normalisation of attitudes linked to gender-based violence, especially for faith-based and migrant and refugee communities.

We suggest the following wording: 'Community leaders play an active role in preventing and responding to gender-based violence'.

Our members also note the importance of specifically engaging with faith-based organisations and communities given the ways in which faith and gendered inequality can intersect. Direct and specific engagement is important in ensuring all faith communities are part of Australia's violence-free future.

International context

Aligning the National Plan with CEDAW is a positive step forward.

However, the definitions and obligations under CEDAW are not referenced throughout this document. If CEDAW is to be cited as a driver of the National Plan, the relationship between CEDAW and the National Plan should be made clearer.

Australia is working towards advancing the rights of women and girls

No to Violence suggests removing the reference to the WPS Agenda from this section as it is unclear how it relates to the other text or the National Plan. The WPS Agenda, while an important and ground-breaking document, is specific to state-based, armed conflict; post-conflict resolution; and war. The WPS Agenda is not directly related to family violence nor signatories' responsibilities to end family violence.

Glossary:

No to Violence recommends that experts are engaged in the re-development of the glossary. No to Violence strongly encourages the Government to follow the lead of expert members of NPAG, like ACON, in developing the glossary. This is particularly needed for all definitions relating to gender identity and expression and sexual orientation, and the norms that govern these characteristics.

Overall, No to Violence appreciates that this National Plan is attempting to provide definitions for a huge range of topics. To that end, it is imperative that the glossary is not only correct, but also that it demonstrates a commitment to equality in the way it defines groups and ideas.

Some definitions for specific consideration:

- **Bisexual:** No to Violence recommends that this definition be re-written. Bisexuality is being emotionally, romantically, sexually, and physically attracted to multiple genders including one's own. Biological sex is not necessarily a factor in bisexuality and should not be defined as such.
- **Gay:** No to Violence recommends that this definition be re-written to reflect gender rather than sex.
- **Lesbian:** No to Violence recommends that this definition be re-written to reflect gender rather than sex.
- No to Violence recommends that the definitions for **cisnormativity** and **heteronormativity** be re-written. Cisnormativity and heteronormativity are not synonymous. Cisnormativity refers to the assumption and structuring of society in a way that assumes that all people are cis-gendered, that is, that their gender identity and expression aligns with the sex they were assigned at birth; heteronormativity refers to the assumptions and structuring of society in a way that assumes that all people are heterosexual, i.e. attracted exclusively to the gender considered 'opposite' of theirs on a binary system. Cisnormativity refers to gender identity and expression; heteronormativity refers to sexual orientation.
- **Diverse sexual orientation:** No to Violence recommends that this definition be re-written. The current definition simply lists three sexual orientations.
- **Gender equality:** No to Violence recommends that this definition be re-written. The current definition does not explain gender equality.
- **Non-binary:** No to Violence recommends that this definition be re-written to reflect gender rather than sex.

Conclusion and Recommendations

No to Violence recognises that significant consultation and work has been undertaken in developing this draft National Plan. Our sector has dedicated a tremendous amount of work and energy into this consultative and drafting process. We should be proud of the work undertaken, particularly considering the difficult circumstances of the past two years.

Australia is at a critical juncture and this National Plan is an opportunity to undertake a visionary, ground-breaking approach to change the course of our country. A bold and ambitious National Plan will save the lives of thousands of women and children and change the reality of family violence for generations to come.

It is imperative that we remember that this National Plan is more than just a document: it is our vision for a society free from men's family violence. We would recommend, as per the National Plan Advisory Group (NPAG) meeting, myriad consultations, and the written feedback of our colleagues, that this document requires further work. We urge the Government to consider the feedback we have provided on the draft National Plan's structure, use of language, the included proposed measurement mechanisms, and importance of building an evidence base.

Our key conclusion is that more work is required to ensure this Plan takes bold action in placing the burden of responsibility onto perpetrators. Our sector is ready and able to support the Government in developing a strong, ambitious, and transformative National Plan.

The time is right to shift our language, our focus, and our measures to hold perpetrators to account for their violence. Holding perpetrators accountable is the only way to stop the cycle of violence: we must demonstrate a deep commitment and plan to change the drivers of gender inequality that enable men's family violence.

This plan, and the leadership that drives it, is our chance to achieve that change. We look forward to working with the department and our colleagues across the sector and NPAG on the further development of this critical national plan.