



Submission to Department of Social Services National Plan to End Violence Against Women

16 September 2021

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.



Authorised by:

Jacqui Watt, Chief Executive Officer Email: jacquiw@ntv.org.au

Prepared by:

Elena Robertson Email: policyandresearch@ntv.org.au

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, and 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.

About Our Members

NTV represents nearly 200 members across Australia. Our membership 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.

Improving outcomes for Aboriginal and Torres Strait Islander Peoples

We invite views about using a strengths-based approach to reflect the long history of strong, resilient Aboriginal and Torres Strait Islander families and culture to identify solutions to ending all forms of family, domestic and sexual violence against Aboriginal and Torres Strait Islander peoples.

First Nations' communities are the experts on their own lives. Throughout the Summit, the call to action from First Nations' delegates, ACCOs and allies was clear: self-determination means a separate family violence plan, with fully funded ACCOs enabled to design, implement and evaluate prevention and intervention programs for and with their local communities.

We point to First Nations communities' expertise and understanding of the structural barriers to equality facing their communities. Providing long-term, flexible funding to ACCOs will enable people using violence in Aboriginal and Torres Strait Islander communities to be held accountable for their violence and change their behaviour over the long-term. ACCOs must be resourced to design, implement, and evaluate intervention programs that work for their communities. Giving more control to ACCOs over interventions for people who use violence is critical.

First Nations' communities need services designed by and for their communities. This must span across services- and it is an absolute imperative that service responders have contextual understanding and are sensitive to the impacts of intergenerational trauma. Aboriginal and Torres Strait Islander communities need and deserve the resources to enable full self-determination.

At the Women's Safety Summit, Prof Marcia Langton AO, Fiona Cornforth, Prof Sandra Creamer, Edward Mosby, and June Oscar AO spoke on the importance of data sovereignty. There are significant and dangerous gaps in the data on rates of victimisation and perpetration of violence within, between, and against First Nations' peoples and communities because criminal justice systems across Australia consistently misidentifies their women as the predominant aggressor, especially in cases involving a non-Indigenous man and an Indigenous woman; and systemic racism in the criminal justice system means First Nations women are less likely to report FDV.

The next National Plan must prioritise the needs and experiences of Aboriginal and Torres Strait Islander people and communities, and can do this by:

Creating a stand-alone National Plan for Aboriginal and Torres Strait Islander people with ACCOs and communities.

Prioritising data sovereignty for Aboriginal and Torres Strait Islander communities.

Allocating new and additional funding towards ACCOs to expand, improve, and innovate communityled family violence prevention, intervention, and recovery work.

Prioritise the lived experiences of Aboriginal and Torres Strait Islander people and communities, and recognise through tangible outputs that Aboriginal and Torres Strait Islander people are the experts on their own lives, needs, and experiences.

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Experiences for the LGBTQIA+ community

We invite views about the experiences of LGBTQIA+ people experiencing family, domestic and sexual violence, including the effectiveness of frontline services in responding to LGBTQIA+ people's experiences of violence and innovations to improve service system responses to support LGBTQIA+ people experiencing violence in their family or intimate partner relationships. (Maximum 500 words)

LGBTIQA+ Australians are the experts on their own lives, needs, and concerns. LGBTIQA+ organisations must be fully resourced through long-term, flexible funding that not only enables the provision of community-led services, but also empowers innovate in their programming.

Although there is a distinct lack of data and research into this area, the recently released Private Lives 3 provides major insights into domestic, family and intimate partner violence experience by LGBTIQA+ individuals and communities. The research found more than four in ten participants reported ever being in an intimate relationship where they felt they were abused in.

No to Violence undertook consultations in 2020 with LGBTIQA+ individuals and community organisations across Australia as part of our national roundtable into better responding to coercive controlling violence. It highlighted the significant barriers and inequity of service provision to LGBTIQA+ people experiencing family, domestic and intimate partner violence, receiving appropriate and safe victim supports, and accessing appropriate and timely perpetrator interventions.

LGBTIQA+ perpetrators do not find mainstream programs meet their needs. To change behaviour, groupwork programs require trusting dynamics - this means a safe environment for participants undertaking the work. Being able to relate to the life experiences of other participants is essential. Mainstream programs struggle to meet LGBTIQA+ participant needs.

Specialist organisations, like ACON and Thorne Harbour Health, are innovating in this space with self-referred perpetrator programs, but have insufficient, consistent funding to run programs at scale. There is also a lack of programs, outside NSW and Victoria, for GBT perpetrators.

The next National Plan must specifically recognise the reality of family and domestic violence in LGBTIQA+ communities. They cannot be excluded again.

Data must be collected—widely and consistently—on rates and experiences of family and domestic violence in the LGBTIQA+ community. We need data on gender identity and expression and sexual orientation if we are to prevent, respond to, and heal from all forms of family and domestic violence. If it is not counted, it is not seen.

The criminal justice system's history of discrimination and violence towards LGBTIQA+ Australians has had a lasting impact: LGBTIQA+ victim-survivors are less likely to report family violence or seek help from services, which means they aren't getting the help they need.

The next National Plan can support LGBTIQA+ communities to prevent, respond to, and recover from family violence by:

Prioritising data collection and analysis of LGBTIQA+ family violence experiences and using this research to develop evidence-based interventions.

Resourcing community-led organisations to implement programs aimed at prevention, reduction, & recovering from family violence

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Perpetrator interventions and working with men

We invite views on perpetrator interventions, including early intervention and behaviour change programs for men, including perspectives on the effectiveness of community-based interventions, justice system interventions and options for support for young people as both perpetrators and victims.

The Australian Institute of Criminology found that up to 55% of domestic violence offenders who come into contact with the criminal justice system have had prior offences. Children and young people who experience family violence are more likely to perpetrate violence and abuse in their adulthood. We need to break this cycle of violence by working with the people using it.

Our sector has been under-funded for decades. Funding in most jurisdictions (including FARS) does not meet the resourcing requirement for minimum standards. Funding contracts are often short term. There has also been a welcome increased focus in working with men who use family violence, leading to expanding waitlists. This means programs for men who use family violence are often struggling with staff attraction, retention, and program innovation.

If we are to break this cycle of violence, long-term funding is needed to ensure the sector can attract and retain qualified staff while innovating new programs, evaluating what works and implementing best practice guidance.

Building the evidence base has long been a sector imperative. We need a suite of evidence-based interventions beyond MBCPs—and this means building the evidence base.

We need a major, nation-wide research funding stream focused on building the evidence base and translating evidence into action.

We need evidence on 'what works' with different men who use violence: men in rural, regional, and remote areas; immigrant men; men from First Nations; men with alcohol & other drug usage issues; men who struggle with mental or physical disabilities; and men who come from diverse socio-economic backgrounds.

MBCPs are the most common form of perpetrator intervention – often the only funded program. This needs to be diversified. Restorative justice programs like those used in the ACT and Victoria, programs rooted in culture and Country like those run by the Bendigo and District Aboriginal Centre, and the Perpetrator Accommodation Scheme (PAS) are just a few examples of alternate perpetrator interventions.

The next National Plan must prioritise the safety of women and children keep men in view by:

Increase Commonwealth funded Family and Relationships Services (FARS) investment to meet the baseline needs and minimum standards of MBCP providers.

Allocating new and additional resources in the form of long-term funding to perpetrator interventions.

Prioritising and investing in a national evaluation framework for interventions that can be tailored for different contexts.

Double research funding under the plan, with the additional funding focused on action based and other research into best practice interventions with men who use family, domestic, intimate partner and sexual abuse.

Prioritise the expansion of the suite of perpetrator interventions by allocating new and additional funding for program innovation, piloting, MEL, and community-led programming.

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Health and wellbeing responses

We invite views about gaps and opportunities in health service provision for the identification, referral, treatment of and response to family, domestic and sexual violence. This could include views on how frontline health service providers (including GPs and antenatal care specialists) can identify, safely respond to and support people experiencing violence, the identification of key phases where violence begins or escalates (including pregnancy and the neonatal period, and in times of drug and alcohol use) and how we can support the long term mental and physical recovery of survivors of family and sexual violence and their families

The next National Plan must also prioritise investment in holistic perpetrator interventions and other family violence services. This includes increasing the availability of integrated services that, for instance, support perpetrators to change their behaviour while addressing health and wellbeing challenges such as problematic alcohol and other drug (AoD) usage or mental illness.

Men who perpetrate family violence often have a history of trauma, AoD use, and mental health challenges. This web of experiences is not, however, reflected in service provision, with family violence perpetrator interventions, mental health services, and AoD services operating independently, often with little cross-communication and consultation.

The next National Plan can support the integration of some services by funding better referral services; training for AoD and healthcare professionals on family violence, and training for family violence professionals on AoD and health issues; and funding the development of new and expansion of existing integrated programs like Taskforce's U-Turn program. U-Turn is Australia's only Men's Behaviour Change Program (MBCP) that specifically addresses participants' AoD usage and violence perpetration concurrently.

Primary prevention activities that address men's use of family violence will improve health outcomes, with there being similar patriarchal drivers of violence and abuse, and avoidance of help-seeking behaviour for mental and physical health. We know that far too often, boys who experience violence grow into men who perpetrate violence. Stopping the violence before it happens will halt intergenerational FV and trauma, preventing one of the leading causes of poor health outcomes for women.

The next National Plan can support the health and wellbeing of perpetrators as part of long-term behavioural change by:

Embedding family and domestic violence in National Men's Health Strategy.

Allocating funding to integrated perpetrator interventions that concurrently treat AoD issues and/or mental health issues. This should include funding to trial new interventions and conduct rigorous evaluation to ascertain the extent to which trials are effective. Ideally, a FV case manager and family safety contact worker are embedded across local or regional mental health services to manage serious risk whilst the perpetrator is accessing clinical mental health care.

Prioritising clearer referral pathways and establishment of shared casework models between community mental health and AoD services and perpetrator intervention services and establish

Funding family violence training for health, AoD and mental health workforces with learning outcomes centred on the application of non-specialist risk assessment tools, risk management plans, and safety plans.

Increased funding for family violence prevention activities as well as men's mental health campaigns focused on increasing help seeking behaviours.

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Legal responses including coercive control and national consistency

We invite views about legal responses to family, domestic and sexual violence, including coercive control. This could include perspectives on the potential criminalisation of coercive control, national consistency and inconsistency in legal and justice responses and domestic and family violence systems reform issues, including resourcing, education, upskilling and training, and awareness-raising.

Coercive controlling violence interferes with a person's liberty and autonomy; it is about power and control, exercising entitlement or ownership, and it causes substantial harm. It is the root of all forms of abuse, both physical and non-physical forms of violence.

Criminalisation of coercive control is only one tool for responding to coercive controlling violence and in and of itself do anything to protect women or hold men accountable for their violence. All jurisdictions' criminal justice and social service systems differ, and as such states and territories need to take localised approaches. Criminalising coercive control is and cannot be the end goal. Preventing and better responding to coercive control is the goal. Criminalisation must be viewed as a tool in this process. If the criminalisation of coercive control is to have a profound effect, identifying and intervening earlier is critical. This means ensuring that Men's Behaviour Change Programs (MBCPs) and other appropriate support services are available and accessible when needed – instead of lengthy wait lists or no intervention at all.

Responding to coercive control necessitates working with the communities most likely to be affected by coercive control and legal and criminal justice responses. This means embedding the experience, concerns, and needs of over-policed, marginalised communities (including, but not limited to, First Nations peoples, LGBTQIA+ communities, victim-survivors from migrant and refugee backgrounds, young Australians, and older Australians).

In addition to training for workforces in the criminal justice system, legislation criminalising coercive control must be developed through meaningful and ongoing community consultation. Criminalising coercive control without creating multiple and on-going opportunities for these communities to engage and embed their input will result in further misidentification of the primary aggressor as well as continued disproportionately high incarceration rates for marginalised groups. Non-criminal justice responses must be explored prior to or at least in tandem with new legislation.

The next National Plan can contribute to a criminal justice and legal environment that works for everyone by:

Fully funding and engaging in deep consultation processes with marginalised communities to understand what works and does not work.

Explore and resource non-punitive and non-criminal justice response mechanisms, such as restorative justice, that can quickly respond to family violence.

Engage is significant structural reform to embed a victim-centred, trauma-aware and -informed approach in all criminal justice institutions, inter alia the police and courts, through on-going, iterative training.

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Protecting and supporting children

We invite views about how the next National Plan can better recognise children as victim survivors of family and sexual violence in their own right, including the unique circumstances and needs of children experiencing family and sexual violence, tailoring support to address the experiences of children, including developing intersectional and inter jurisdictional capabilities and building capacity and capability across the legal and health sectors to support children as victim-survivors.

We must recognise children and young people as victims in their own right. This means recognising, in the National Plan, that children who witness violence are children who experience violence. Children

are not possessions, and their trauma is not only by proxy: children who witness and/or experience violence experience trauma.

Children who experience family violence are more likely to perpetuate the cycle of violence: young girls who experience and/or witness family violence are more likely to be victimised than are girls who do not experience and/or witness family violence; young boys who witness and/or experience family violence are more likely to become perpetrators than are boys who grow up without family violence. This means prevention and early intervention are key.

The ABS <u>recently released data</u> demonstrating that people who were sexually abused as children are at increased risk of sexual assault later in life: 'women who experience childhood sexual abuse were three times more likely to experience sexual assault later in life compared to women who had not been sexually abused as children (43% compared to 13%). For men, the risk was five times greater (18% compared to 3.4%).'

We need to fund and implement child-centric programs designed to put the safety of children first. This National Plan must prioritise the safety of children as victim-survivors in their own right—not just to protect our children, but to stop the cycle of perpetration and victimisation before it can start.

This means prioritising Respectful Relationships educations for children of all ages and giving children the tools they need to be critical of inequitable gender norms and violence-supportive attitudes. In the Women's Safety Summit, we heard that children in rural, regional and remote areas, and specifically First Nations children, who experience sexual assault are left waiting *days* to be seen. This means that for days, young survivors of sexual assault must wait, unwashed, untouched, uncomforted by their loved ones, for a forensic expert to fly in to remote areas. This is simply unconscionable.

The next National Plan must prioritise children as victims in their own right by:

Allocating new and additional funding to develop, expand, and improve child-centric services.

Embed a strengths-based approach in all child-facing services.

Increase the accessibility—aiming for universal accessibility by the mid-way point of the next National Plan—of child-centric emergency services, enabling all children in Australia to be seen by an expert in less than 12 hours in the event of sexual assault.

Provide additional funding to expand the number of parenting programs for men who use violence and abuse such as Caring Dads.

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Technology and abuse – challenges and opportunities

We invite views about both the opportunities and challenges that technology poses for women's safety and wellbeing. This includes the ways in which technology can empower women and assist victim-survivors to seek help, justice and protection, and the ways in which perpetrators can use technology to surveil, intimidate and inflict violence

The next National Plan must integrate the newest understandings of technology and domestic violence into its key actions and recommendations. During her presentation at the Women's Safety Summit, eSafety Commissioner Julie Inman Grant pointed to the need for nuanced evidence-based understanding and focus on technology-facilitated abuse (TFA). TFA is a sinister form of abuse that transcends space and often, visibility, making it easier for abusers to perpetrate coercive control and abuse.

As with all forms of violence against women, the way to shift the burden is through meaningful attitudinal and behavioural change that promotes gender equity and respectful relationships. Technology can be highly beneficial in this space. This National Plan must recognise opportunities to leverage technology- particularly in the post-pandemic environment – to engage with men who use family violence, such as online interventions in areas where there are no support. No To Violence has commenced action based, multi-jurisidctional research with ACON and Thorne Harbour Health into online interventions for GBTQ+ men who are perpetrators of family violence, and for men living in rural, regional, and remote areas who are perpetrators of family violence.

Further, perpetrators must bear the responsibility of preventing and stopping their abusive behaviours. The burden of prevention—through mitigating online participation—currently rests on the shoulders of women. This is unfair and replicates harmful, victim-blaming attitudes. Men must be responsible for preventing TfA and calling out other men who use TfA.

The next National Plan can protect women from TfA by:

Supporting the work of the eSafety Commissioner to hold tech companies accountable for the way users use and abuse their platforms.

Develop and resource on-going training for frontline services, including the police, on identifying and responding to TfA.

Embed TfA prevention in all primary prevention work, encouraging men to use technology responsible and clearly articulating the consequences for TfA. Online bystander intervention should be included in the next National Plan as a matter of priority.

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Service delivery in regional and remote areas

We invite views about service delivery and access to support for women and children experiencing family, domestic and sexual violence in regional, rural and remote areas. This could include the impact of geographic isolation, unique service delivery challenges, service availability and workforce issues

This National Plan must enforce the safety of victim-survivors living in rural, regional, and remote areas—and this means holding men who use abuse and violence in these areas accountable for their violence.

Holding men accountable in regional and remote areas is a persistent challenge for our sector. Rural masculinity can be structured in a way that privileges traditional masculinity and patriarchal family structures in rural communities, normalising male control and abuse—and thus justifying violence. A study in Victoria found that 'male violence had become normalised in some communities to the extent that women had experienced multiple forms of violence from men across their lifetime.'

Persistent short-term funding for the perpetrator intervention sector means staff attraction and retention is a consistent, major barrier—especially in regional and remote areas. This, in turn, reduces the availability and accessibility of perpetrator interventions like Men's Behaviour Change Programs (MBCPs.) Too often men in regional areas must travel several hours each way to access MBCPs when they are available—making disengagement more likely and decreasing the accessibility of programs for self-referred men. The challenge of physical accessibility is compounded by cultural accessibility: mainstream, metropolitan MBCPs may not address the unique experiences and triggers those men in rural and remote communities experience, like droughts, fires, floods, crop losses, or general isolation.

No to Violence is currently undertaking an action-research project investigating online interventions for perpetrators of violence in regional and remote communities. This project will be fully evaluated, and we look forward to sharing the results. Innovative projects like this must be prioritised and resourced.

The next National Plan can hold perpetrators in remote and regional areas accountable by:

Emphasising the importance of long-term funding for the family violence sector, including perpetrator intervention services.

Prioritising the expansion of perpetrator interventions like MBCPs, the Brief Intervention Service (BIS), Perpetrator Accommodation Scheme (PAS), and online interventions into RRR communities.

Prioritise training for police and allied services in remote and regional communities to ensure they can consistently identify and respond to FDV in all its forms.

Word count: 339/2410 characters

Service delivery reform and innovation, and measuring success

We invite views about how to address key service delivery challenges and gaps that arise when supporting people experiencing domestic, family and sexual violence, including how the service delivery system can best meet the needs of clients and staff. We particularly welcome perspectives on priorities for improving service delivery and the challenges and insights to measuring success of all responses (service delivery, primary prevention campaigns, etc.)

Holding men who use violence and abuse accountable means understanding perpetration: who is using violence, where violence happens, what types of interventions they might have gone through and what worked to change their attitudes and behaviours; the services they need; their changes, attitudes, and belief systems and the impact of this change work on the lives of victim survivors. Developing this understanding requires consistent data collection —data that our sector doesn't yet have.

Data collection for men's family violence interventions and the broader FDV sector must be fully funded through the National Plan. Collecting, collating, and analysing data takes significant organisational resources, and its time all governments fully fund this invaluable work.

Collecting, collating, and analysing data takes a huge number of resources and requires specific expertise. It is an absolute imperative that the next National Plan recognise this. Our sector must be remunerated for data collection with new and additional funding.

We need a national evaluation framework for MBCPs. We cannot say for certain whether MBCPs are effective: whether they have long-term impacts on men's behaviour and attitudes, whether men continue to or return to perpetration after they are exited, or whether their partner's and family members feel safer 6, 12 or 24 months into the future. A national evaluation framework for MBCPs and perpetrator interventions must be both aspirational and attainable: it must work for all States and Territories and must be developed in partnership with services and community organisations.

Our sector needs to be able to leverage data to measure our impact and to spur innovation. This necessitates data sharing and accessibility across States and Territories. We need a strong connection between governments—and creating a National Partnership Agreement which includes data collection and monitoring that lasts across the lifespan of the next National Plan is the first step.

The States and Commonwealth Governments are jointly responsible for preventing, intervening in, and ensuring Australian families can recover from family violence. It is a collective responsibility, with false boundaries of little consequence to victim survivors.

The next National Plan can contribute to service delivery and reform and measurement by:

Establishing and funding a National Partnership Agreement.

Fully-fund data collection, collation, and analysis for the family violence sector.

Prioritising and fully funding the development of a national evaluation framework to evaluate the efficacy of MBCPs and other perpetrator interventions across jurisdictions.

Migrant and refugee experiences of family, domestic and sexual violence

We invite views about the experiences of women and children from culturally, linguistically and religiously diverse backgrounds, how we can reduce barriers to reporting and seeking help, and how to improve outcomes for these women and children. This could include how to overcome structural barriers, the impact of migration status and the role of religious and/or cultural beliefs in experiences of violence

Migrant and refugee women have reduced access to services and criminal justice interventions, and therefore have specific needs when it comes to service accessibility. This is also the case for perpetrators from migrant and refugee communities.

We know that diverse communities need diverse responses. And this means ensuring that perpetrators of violence who come from non-Anglo, non-native English-speaking backgrounds can access services that are safe and relevant. The next National Plan must emphasise holding all perpetrators accountable for their violence through accessible and culturally appropriate interventions led by providers representing multicultural communities.

There are good examples of appropriate responses led by Settlement Services International and InTouch which have programs targeting men who use violence from non-English speaking backgrounds. However, the funding needs to be flexible and long-term to enables staff retention and program innovation and evaluation.

This accessibility must extend beyond MBCPs to include a safe and accessible justice system. This means enabling the criminal justice system to better communicate with people who are non-native English speakers. No to Violence is engaged in a research project with Victoria Legal Aid investigating the lived experience of men who have attended court as respondents in FDVOs. This research has demonstrated that men who come from non-Anglo, non-English speaking backgrounds require specific support to navigate and learn from their encounters with the courts.

To access Men's Behaviour Change Programs (MBCPs), men must meet certain English requirements, or belong to specific language groups where MBCPs are operated in language (in Victoria, this includes programs run by InTouch in Vietnamese and Dari). We need:

The development and implementation of specific MBCPs in more languages, that attend to the needs of specific communities. This means new and additional funding to develop MBCPs through a collaborative process.

Funding to hire and retain staff who can conduct facilitation, 1:1 counselling, and family safety contact work in language.

Funding to ensure men from these communities can access fully funded places in MBCP group sessions and other interventions.

Supporting women and children with disability

We invite views about strategies to prevent the occurrence of, respond to and provide support to, women and children with disability experiencing or at risk of violence. This could include consideration of structural and systemic changes needed to prevent violence against women and children with disability and service responses to women and children with disability can be improved and better coordinated

Women and children with disability experience abuse from multiple sources. In No to Violence's roundtable on coercive control and disability, participants highlighted various examples of the presentation of abuse in this field.

Participants strongly emphasised that abuse is endemic across the NDIS and noted that NDIS systems can enable all forms of violence towards women and children living with disability. This is especially the case when carers are also perpetrators or when one parent is the primary care giver, and the other parent is the perpetrator. During the roundtable, we also heard that there are major concerns around the introduction of new legislation criminalising coercive control and carer's defence.

Roundtable participants also stressed that men who perpetrate family violence may also be men who are living with disability.

The next National Plan must recognise that coercive control is a specific and significant concerns for people living with disability and disability advocates.

If we want to ensure people with disabilities rightfully live safe, dignified, and full lives, we need to listen to disability-rights advocates. People living with disability and disability advocates must lead conversations about their own communities.

The next National Plan can enshrine the rights of women and children living with disabilities by:

Prioritising structural reform to frontline services to ensure that services can quickly identify and respond to family violence perpetrated against women and children with disabilities.

Take the lead from disability advocates and people with lived experience as to the path forward.

Fully resource organisations run by and for people living with disabilities to ensure that lived experience is prioritised and embedded in programming.

Word count: 266/1797 characters