The Hon Anne Ruston
Minister for Families and Social Services
Minister for Women's Safety

Dear Minister,

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

Gender Equity Victoria (GEN VIC) welcomes the extended consultation period to respond to the Draft National Plan to End Violence against Women and Children 2022-2032 ("the Draft Plan").

GEN VIC is the independent peak body for gender equity, women's health and the prevention of gendered violence representing over 50 gender equity organisation across Victoria. We work to end the harm of gender inequity because it is leads to poor outcomes to the physical, mental, emotional and economic health and wellbeing of women, men and gender diverse people.

Gender equality as the foundation principle

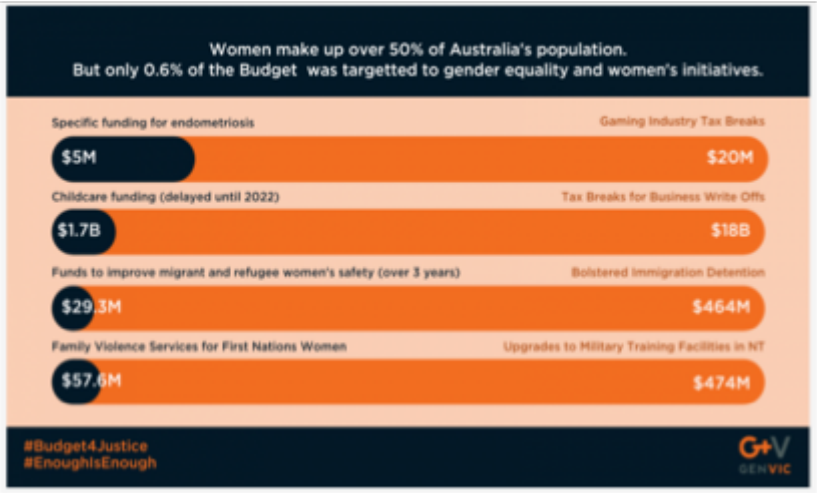
Despite gender equality being the first, and perhaps the most important foundation in the prevention of gendered violence, the Draft Plan fails to outline the strategic priorities the Federal Government will take to achieve gender equality in Australia. In our submission, GEN VIC highlighted the National Government's significant levers to address gender equality. It is responsible for national economic policy, national taxation reform, superannuation, housing and homelessness, childcare and supporting a living wage through the social security safety net. A gender lens needs to be applied to all this work and that project needs to be part of the Second National Plan.

Further, it is critical function of the Federal government to report to international instruments including the World Economic Forum's Global Gender Gap Index (GGGI), United Nations Sustainable Development goals (UN SDGs) and CEDAW Committee on Australia's national gender equality performance. Australia's global gender performance had been in decline for too long. In 2018, the CEDAW Committee criticised Australia's lack of a "comprehensive, national gender equality policy with performance indicators".

The Draft Plan should be addressing CEDAW's recommendations and delivering improvements to Australia's ranking on the World Economic Forum Global Gender Gap index. Noting that since 2021, Australia has gone backward on the GGGI from a high ranking of 15th in 2006 to a new low of 50th in 2021. The subindex where Australia performs the worst – 70th in the world – is Economic Participation

and Opportunity. While we educate men and women in gender equal numbers through primary, secondary and tertiary education (1st in the world), we let women down when they transition to work.

To address the gender gap on women and its economic impacts, there is a critical need to prioritise investment in gender equity in the federal budget. GEN VIC has noted that despite women making up over 50% of Australia's population, only a small proportion of investment was targeted to gender equality and women's initiatives in the federal budget 2021-22.



We reiterate our key recommendation points outlining key national strategies on addressing the harm of gender inequality to be included in the National Plan, as follows:

a) Address the harm of gender inequality in economic, social, cultural, business, sports, education and other settings using approaches that include a National Gender Equality Strategy, National Gender Equality Legislation and other strategic, policy, legislative, regulatory, and technical solutions across sectors informed by evidence and research findings.
b) Develop a National Gender Equality Strategy as part of the National Plan acknowledging that closing the gender gap is a critical precondition to ending violence against women and their children.

Sustained and long-term investments in the primary prevention sector

We applaud the inclusion of prevention as pillar one in the Draft Plan outlining the importance to stop violence from happening before it starts. We also agree that prevention should address multiple factors that drive violence against women such as gender inequality, disrespectful behaviours towards women, rigid stereotypical gender roles as well as other systemic structural factors. Most importantly, the Draft Plan uses the existing approach in the prevention sector developed by Our Watch, including Change the Story, Change the Picture and Counting on Change.

We know that primary prevention initiatives require policy, legislative, regulatory and institutional support, along with the broad, practical, 'on the ground' implementation across society. Despite the Draft Plan outlining the focus area for the next 10 years in primary prevention, it fails to address the

underlying issues the previous National Plan sought to accomplish - securing long-term and sustained investment in primary prevention initiatives.

To address underinvestment in the prevention of violence against women and children, we reiterate our recommendation as follows:

a) Mandate strategies and action plans in ensuring long-term and sustained investments in primary prevention over the Second National Plan's duration to achieve the primary goal of creating lasting intergenerational change of preventing violence against women.
b) Establish collective funding mechanisms that commit Federal, State and Territory governments to minimum levels of investment across prevention programs. This means establishing a national agreement in gendered violence prevention, with binding commitments from all jurisdiction. We strongly endorse Respect Victoria's submission in this regard.

The National Domestic Family and Sexual Violence Commission

We welcome the establishment of the National Domestic Family and Sexual Violence Commission ("Commission"), an independent executive agency under the *Public Service Act 1999* (Cth), as a new national infrastructure under the Draft Plan. The Commission was set up to be funded for $22.4 million over five years. It is outlined that the Commission will have responsibility for monitoring and reporting on accountability and evaluation frameworks against the National Plan across all government levels and ensuring it delivers real and tangible actions that prevent violence and intervene early and better support victim-survivors.

We believe it is important that the Commission is well integrated in the existing national structures of Our Watch, ANROWS and 1800 RESPECT. We would also like to see the Commission delivering strong leadership at the national level and to support the implementation of Respect@Work recommendations and the Independent Review into Commonwealth Parliamentary Workplaces. Further, it must work with state-based bodies existed in various jurisdictions, including Respect Victoria and Family Safety Victoria.

While we are pleased to see the allocation of $22.4 million for the next five years, we are concerned that the funding is not recurring.

Scope of the National Plan – including all forms of gendered violence

We welcome the Draft Plan widening the scope of violence against women and children to include all forms of violence, harassment, abuse and coercive control that women (and often young women and girls) experience. We also appreciate the affirmation in the Draft Plan that violence against women can be physical, sexual, emotional, psychological, social, cultural, spiritual, financial, technology-facilitated abuse (including image-based abuse), and stalking.

Addressing online abuse and gendered cyberhate

Since 2018, GEN VIC has been pioneering work to address the online abuse and gendered cyberhate against women. We initiated an active only bystander approach, creating a community which comes around and supports women when they are abused online and calls out violence and abusive behaviour. We are also pioneering work with media, politicians, and sports people to address online abuse as well as being the recipient of a recent eSafety grant to build resilience of young migrant women online. We are grateful for the support of E-safety Commissioner to continue our work in ending online abuse and gendered cyberhate in the coming years.

In relation to technology-facilitated abuse, we would like to see investment mandated by the Draft Plan in research to understand the prevalence of online abuse against women to build a stronger evidence based and to support our work to address industry responses to online abuse, given that the social media platforms have been criticised for not taking reporting of harassment and hate speech seriously.

Addressing sexual harassment of women

The Draft Plan should outline the priority and targets in addressing sexual harassment as it is prevalent among women in Australia. Given that sexual harassment shares the same gendered drivers as other forms of violence against women, it should be integrated into existing efforts to prevent violence against women across multiple settings, in line with the national primary prevention framework, Change the Story.

Therefore, we would like to see the Draft Plan mandate specific initiatives focused on the prevention of sexual harassment in workplaces, to capitalise on employer motivation and support implementation of any enforceable positive duty to prevent sexual harassment imposed on employers. In addition, the National Plan and its Action Plans needs to develop targeted and tailored strategies for workforces where the risk of sexual harassment is likely to be high because of the nature of the industry, conditions of work, or because employees experience job insecurity, discrimination, or exclusion from the mainstream workforce.

Thank you for the opportunity to contribute to the Draft for the National Plan to End Violence against Women and Children 2022-2032.

Kind regards,

Tanja Kovac
CEO
Gender Equity Victoria