

SAFE+EQUAL

Standing strong
against family
violence

Draft National Plan to
End Violence Against
Women and Children
2022 - 2032

Safe and Equal Feedback

February 2022

Acknowledgement of Traditional Owners

Safe and Equal acknowledges Aboriginal and Torres Strait Islander peoples as the traditional and ongoing custodians of the lands on which we live and work. We pay respects to Elders past and present. We acknowledge that sovereignty has never been ceded and recognise First Nations peoples' rights to self-determination and continuing connections to land, waters, community and culture.

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About Safe and Equal

Safe and Equal is the peak body for specialist family violence services that provide support to victim survivors in Victoria. The interests of people experiencing, recovering from, or at risk of, family violence is at the heart of everything we do. Our vision is a world beyond family and gender-based violence, where women, children and people from marginalised communities are safe, thriving, and respected. We recognise the gendered nature of violence in our society, and the multiple intersecting forms of power and oppression which can compound the impacts of violence and limit people's access to services, support, and safety. We work closely and collaboratively with other organisations and support the leadership of victim survivors to amplify their voices and create change.

We provide specialist expertise across primary prevention, early intervention, response and recovery approaches and the inter-connections between them. Our work is focused on developing and advancing specialist practice for responding to victim survivors, building the capability of specialist family violence services and allied workforces, organisations and sectors that come into contact with victim-survivors; building the capabilities of workforces focused on primary prevention; and leading and contributing to the translation of evidence and research, practice expertise, and lived experience into safe and effective policy, system design and law reform.

We develop family violence practice and support workforces to ensure that victim survivors are safe, their rights are upheld, and their needs are met. The prevalence and impact of family and gender-based violence will be reduced because we are building a strong and effective workforce responding to victim survivors that can meet the needs of the community we serve, while also having a growing and impactful workforce working to prevent violence.

We work to strengthen and connect organisations, sectors, and systems to achieve safe and just outcomes for victim survivors irrespective of entry point, jurisdiction and individual circumstances. Joining efforts across prevention, response, and recovery we work to ensure the family violence system is informed and supported by a well-resourced and sustainable specialist sector. Our contributions to primary prevention workforces, initiatives and alliances contribute to social change for a safer and more respectful community.

We are building momentum for social change that drives meaningful action across institutions, settings, and systems for a safer and more equal society. Our workforce and practice development efforts are coupled with a partnership approach that builds community awareness and commitment to change. Our expertise and efforts enable citizens across the community to recognise and respond to family and gendered violence, hold perpetrators to account and support the ongoing recovery and empowerment of victim survivors.

We are a strong peak organisation providing sustainable and influential leadership to achieve our vision. The work we do and the way we work are integrated and align with our values. This is achieved through inclusive culture, and a safe and accessible workplace supported by robust systems and processes.

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Introduction

We welcome the opportunity to comment on the draft *National Plan to End Violence Against Women and Children 2022-2032* and we note the work and effort it has taken to get to this point.

National strategies are critical if we ever hope to comprehensively address our society's most wicked problems. To reduce, and ultimately end, family violence and violence against women and children, we need all parts of our community and all levels of government to commit to tangible, measurable actions, and for these to be backed by dedicated funding.

In order to do this, we need a clear overarching vision, objectives, outcomes and targets.

The National Plan should articulate the roles and responsibilities for each level of government in addressing family violence and violence against women. It should identify the drivers of violence, and the systemic and structural barriers to accessing support and safety, and attribute responsibility for addressing these to the appropriate level of government. Concrete actions and targets should flow from this.

The National Plan must clearly articulate what the Commonwealth Government's overall plan is to end violence against women and children, and this must include specifics.

The National Plan must also articulate a mechanism for how progress will be measured and evaluated. The evaluation of the previous plan and consultation reports that informed the development of this draft have not been publicly released, so we are unable to comment on whether the draft accurately reflects and builds upon these learnings.

It is critical that the Evaluation Plan and Outcomes Framework mentioned in the draft are developed in consultation with the specialist sectors and people with lived experience, and that they are made public to ensure accountability for this plan's implementation.

The Commonwealth Government has committed to open and transparent engagement with victim-survivors and the community in developing this National Plan. We call on the Government to revise this plan to articulate a concrete plan forward for how we as a nation will address family violence and violence against women and children.

Recommendations

- The National Plan must clearly articulate the role of each level of government and assign responsibility for actions and outcomes in the Plan to make clear which level of government is accountable.
- The Commonwealth Government develops a National Domestic, Family and Sexual Violence Workforce Recruitment and Retention Strategy including:
 - Developing a national capability framework for responding to family violence and sexual assault
 - Adding family violence and sexual assault workers to the Skills Priority List
 - Remuneration that reflects the considerable expertise, risk and complexity specialist practitioners hold.
- Strengthen the focus on safe and secure housing within the draft plan across all pillars to recognise the role housing plays in preventing, mitigating and helping victim survivors escape and recover from violence.
- Include economic and financial wellbeing in the National Plan, including actions directed at addressing systemic barriers that prevent victim-survivors from becoming economically and financially independent.
- Use the Commonwealth's job creation responsibilities to ensure access to employment for victim-survivors leaving perpetrators and in their recovery, including women from migrant and refugee backgrounds on temporary visas.
- Include a focus area with concrete actions under each Pillar of the National Plan that will improve access to mental health support to victim-survivors of family violence, including children and young people.
- The Commonwealth Government make good on its promise to develop a separate National Plan to End Violence against Aboriginal and Torres Strait Islander Women and Children. Aboriginal communities should be given the resources and remit to lead the development of this plan, in consultation with the Commonwealth Government, with a commitment from the Commonwealth Government to attach dedicated, secure funding to the Plan.
- Establish formal processes for engaging with victim-survivors and allocate commensurate funding over the life of the National Plan.
- Publicly release the KPMG evaluation of the first National Plan and the Monash consultation report that informed the development of the second National Plan.
- Clearly lay out a process and timelines to develop the Outcomes Framework and Evaluation Plan mentioned in the draft National Plan including which stakeholders will be involved and why.

Opportunities for Improving the Draft Plan

Strengthening the principles that underpin the plan

Safe and Equal welcome the principles included in the draft National Plan. In addition to these principles, we suggest including principles of “Children and young people as victim survivors in their own right”, “Perpetrator Accountability” and “Domestic, Family and Sexual Violence Specialisation”.

Children and young people as victim survivors in their own right

We applaud the explicit recognition in the draft National Plan that children and young people are victim survivors of family and gender-based violence in their own right and recommend this should be elevated to a principle of the National Plan.

While the draft National Plan acknowledges this truth, the substance set out within each pillar does not reflect it, with few focus areas mentioning children. Consequently, children and young people are relatively invisible in the draft Plan.

Children and young people experience family violence in complex and unique ways. These experiences can have life-long impacts and result in intergenerational trauma and disadvantage. Service responses to children and young people must be tailored according to their age and stage in development to help address the impact of violence.

Where there is mention of children and young people, the detail tends to focus on children and young people using violence. While this is important, children and young people who have experienced violence also need intervention and support. The National Plan must set out dedicated focus areas and tangible actions to truly recognise children and young people as victim survivors in their own right, because they have distinct needs that differ from victim-survivors who experience family violence for the first time as adults.

Perpetrator accountability

The draft National Plan has a good emphasis on changing men’s attitudes towards women and violence and men’s behaviour change interventions. However, there is a disproportionate focus on the criminal justice system’s role in holding perpetrators to account. While criminal justice responses are important, including “Perpetrator Accountability” as a principle will help embed this as a clear focus throughout the four Pillars of the National Plan and ensure accountability underpins prevention and early intervention initiatives as well as response.

Embedding perpetrator accountability across the continuum conveys the importance of engaging men and boys and challenging stereotypical masculinities as a primary prevention mechanism for addressing the gendered drivers of violence, and ultimately reducing and ending the risk of family violence and violence against women.

Including a principle of perpetrator accountability also helps focus all aspects of the family violence system, not just the criminal justice system, on keeping the perpetrator in view with the aim of keeping women and children safe.

Domestic, family and sexual violence specialisation

A principle explicitly recognising the importance of specialisation in the context of preventing and responding to domestic, family and sexual violence should also be included in the National Plan.

Specialisation describes the primary focus and reference point for an individual, service, or sector. Family violence specialisation, for example, is grounded in a nuanced understanding of the context, drivers, dynamics and impacts of this violence, with accountability to the safety, autonomy and wellbeing of victim survivors at its core. While it will take a whole of community and whole of system approach to end violence against women and children, this does not mean that all parts of the community or system have the same roles and responsibilities. Specialist responses to victim survivors and to perpetrators are absolutely critical and must be recognised and resourced adequately.

Specialisation must also inform broader approaches to preventing and responding to domestic, family and sexual violence, through leading and contributing to building the capability of all professionals and services that come into contact with victim survivors and perpetrators, evidence building and translation, and policy development and system design. Specialist domestic, family and sexual violence experts, along with people with lived experience, need to be consulted and their expertise valued and listened to when developing new program initiatives, allocating funding, developing research agendas and considering policy change and legislative reform.

The draft National Plan does not sufficiently acknowledge the importance of recognising and maintaining the skills and expertise of the specialist domestic, family and sexual violence response and prevention sectors. Specialisation should be highlighted as a principle and reflected in each of the pillars.

Strengthening the Pillars

We are pleased to see a commitment to action across the continuum of primary prevention, early intervention, response and recovery, and to see these pillars underpinning the structure of the draft National Plan.

In particular, we welcome the explicit focus on primary prevention in the draft National Plan and note the references to the national prevention framework, *Change the Story (2nd ed.)*¹. However, there are parts of the draft National Plan that do not seem to accurately reflect the evidence outlined in *Change the Story* and the links between that framework and this National Plan should be strengthened and made more explicit. For example, the draft National Plan opens with a section titled 'What we know about violence against women and children', yet this section does not reference the national framework or its evidence base around the specific gendered drivers of this violence. **We echo Respect Victoria's call for the National Plan's approach to primary prevention to go deeper, with national leadership and investment to deliver comprehensive action at scale across communities and settings.**

¹ Our Watch. (2021). *Change the Story: A shared framework for the primary prevention of violence against women in Australia* (2nd ed.).

We are also pleased to see an explicit focus on recovery. As the draft National Plan recognises, domestic, family and sexual violence response systems are predominantly crisis oriented and, consequently, investment into these systems has tended to overlook victim-survivors' longer-term recovery needs. Emphasis on recovery in the National Plan is important recognition of the need to resource this important work, which should be informed and led by specialist experts and people with lived experience.

While these pillars provide a strong basis around which to structure the next National Plan, the focus areas outlined within each pillar do not provide the detail or clarity about what the Government wants to achieve or how to do it that we would expect to see in a robust and considered National Plan. Commitment to specific action is critical, to provide a basis and accountability for the action plans tied to this 10-year plan.

The following recommendations would strengthen the focus areas and actions across all four pillars.

Articulate roles, responsibilities and relationships between all levels of government responsible for delivering on the National Plan

Ending violence against women and children requires sustained, coordinated investment and activity at all levels of government in Australia, as well as across the private sector and civil society. The National Plan is the most appropriate policy lever to articulate roles and responsibilities of all levels of government and describe how these responsibilities intersect and interact.

No pillar is the domain of any one level of government, and all four should articulate clear objectives and mutually reinforcing activity led by the Commonwealth, states and territories and at local levels.

One of the limitations of the first National Plan has been its lack of focus on inter-jurisdictional coordination – it is often seen as a Commonwealth plan. Better and more formalised coordination and governance is critical to the success of the next National Plan.

We have welcomed the establishment of a National Partnership Agreement in 2021 as a lever to support intergovernmental cooperation. This recognises addressing domestic, family and sexual violence as the responsibility of all governments and should be retained and committed to for the life of the National Plan.

RECOMMENDATION: The National Plan must clearly articulate the role of each level of government and assign responsibility for actions and outcomes in the Plan to make clear which level of government is accountable.

Improve focus on federal leadership and responsibility for driving systemic and structural change

While all levels of government have key roles and responsibilities under the next National Plan, this document provides a critical opportunity to articulate the areas in which the Commonwealth can lead in effecting systemic change to reduce the prevalence of violence

against women and children and remove the barriers that victim survivors face to accessing support and safety.

The focus areas in the draft National Plan are disproportionately weighted towards areas where states and territories hold primary responsibility for action, including the criminal justice system and policing, child protection, service integration and workforce capability building.

The Federal Government has sole responsibility for many systems and policies which are currently creating barriers for victim-survivors to escape and recover from family violence. The National Plan and associated action plans must include commitments to addressing these levers through:

- Increasing income support payment levels to improve women's economic security and ability to leave relationships without being at risk of poverty.
- Implementing the recommendations set out in the [Blueprint for Reform: Removing Barriers to Safety for Victims/Survivors of Domestic and Family Violence who are on Temporary Visas](#).
- Changing immigration law and eligibility criteria to access income support and Medicare for women on temporary visas so these victim-survivors are not forced to live in poverty with no housing options or access to medical care - this could be done by creating a new visa with rights to access these services.
- Holistic reform of the family law system to ensure safety of victim-survivors is prioritised and to reduce opportunities for systems abuse.
- Developing a National Housing and Homelessness Strategy to increase social housing stock to a level that meets demand to make it possible for more victim-survivors to access affordable, long-term housing and not be forced into homelessness if they leave a violent relationship.
- Working with states and territories to standardise legislative definitions of family violence, so victim-survivors receive equitable legal responses across jurisdictions and perpetrators are consistently held to account.
- Implementing a national, flexible and accessible financial support package program – administered via specialist domestic, family and sexual violence services – to provide victim-survivors with the funds needed to establish long-term safety and independence. This program must be accessible for all victim-survivors attempting to transition out of crisis, including those on temporary visas; and it should provide up to \$10,000 to purchase goods and services nominated by victim-survivors, with support from specialist services.
- Establishing a common, evidence-based family violence risk assessment framework across jurisdictions that embeds a common understanding of family violence risk and how to respond across all sectors of the human services system.
- Addressing the 'crisis response gap' at the interface of NDIS and specialist family violence services in close consultation with both sectors and victim-survivors with disabilities.
- Adding a Medicare item number for family violence counselling and therapeutic services, distinct from a general practitioner mental health treatment plan.

Recognise the role of specialist sectors and service providers

As outlined above, domestic, family and sexual violence specialisation should be recognised as a core principle underpinning the National Plan. This should be reflected across each of the pillars through commitments to:

- Long-term funding for specialist prevention and response services, including community-led services supporting specific population groups such as Aboriginal Community Controlled Organisations and LGBTIQ+ community-controlled services
- Prioritising specialist expertise and established service system infrastructure when funding new initiatives
- Re-orienting investment towards established and promising practice, rather than continually funding short-term pilot programs that have to be retrofitted into an existing system.
- Continuing and increasing long-term funding for key national infrastructure such as ANROWS, Our Watch and WESNET.

Adequately recognise the prevalence of sexual assault that occurs in the context of family violence

While the draft National Plan acknowledges the co-occurrence of domestic violence and sexual assault in the Recovery pillar, there is a lack of recognition in the draft National Plan of the prevalence of sexual assault in the context of family violence and the devastating impact this has on victim-survivors.

Victim-survivors who experience sexual assault within the context of family violence are at significant risk of harm and need access to coordinated support. The National Plan must include actions that promote collaboration between specialist family violence and sexual assault services to prevent siloed service responses that retraumatise victim-survivors.

Embed a structural understanding of Intersectionality

We support Intersectionality being included as a principle in the draft National Plan. However, its value and effectiveness as a principle is limited by a focus on individual characteristics and experiences.

Intersectionality recognises the way society's structures and systems marginalise some groups of people and privilege others. There is currently a lack of attention in the draft National Plan on structures and systems that intersect to oppress and marginalise groups of victim-survivors with certain characteristics or lived experiences.

Embedding intersectionality as a principle requires the National Plan to focus broadly on all forms of violence that women and children – and other marginalised people – experience. However, the draft Plan seems to focus almost exclusively on intimate partner violence.

For example, we have repeatedly heard from victim-survivors from migrant and refugee backgrounds and victim-survivors with disabilities that they do not see their experiences reflected in the draft National Plan. Victim survivors from migrant and refugee backgrounds are more likely to experience unique and complex forms of family violence such as forced

marriage, dowry abuse, abuse from extended family, isolation from their community and systems abuse via the migration system including threats to visa status.

Victim-survivors with disabilities are more likely to experience abuse within a broader range of relationships and settings (e.g. paid/unpaid carers, other family members, residential settings), by a greater number of perpetrators than for women without disabilities and systems abuse via discrimination in the family law and child protection systems.

There is a distinct lack of specific reference to addressing these experiences in the draft National Plan and this could be addressed in consultation with relevant cohorts and sectors as part of the first action plan.

Furthermore, different manifestations of family violence such as elder abuse and adolescent family violence in the home are not reflected consistently throughout the Pillars and focus areas. A truly intersectional approach requires consideration of these types of family violence, structural analysis of what drives these forms of abuse, and articulation of direct actions to address them.

Within each Pillar and subsequent focus area, concrete actions need to be identified that address policies and systems that have a disproportionately negative impact on different groups of victim-survivors and, in some cases, enable and promote systems abuse and cause harm.

A structural approach to intersectionality means that government policies, services and systems actively work to correct for power imbalances. This draft National Plan mentions intersectionality, but it has not applied it in a way that will prevent or reduce violence against women and children, particularly those who face additional marginalisation in our society.

Develop a national workforce recruitment and retention strategy for the specialist sectors

There is insufficient discussion of the importance of the nation-wide specialist workforce in driving and sustaining this work. A streamlined and coordinated approach to workforce recruitment, retention and development across all states and territories would enable quality assurance and greater alignment in delivering the actions under the National Plan.

There is some mention of workforce capacity building under different Pillars, however this needs to go beyond only training and extend to developing a national capability framework for responding to family violence and sexual assault that articulates the skills required to work with both victim-survivors and perpetrators – across sectors and systems. Further, it needs to include funding for service infrastructure, quality improvement, developing career pathways and remuneration that reflects the considerable expertise, risk and complexity specialist practitioners hold.

A critical gap in the draft plan is the lack of commitment to growing, investing in and building the capacity of specialist workforces at a national level across prevention, family violence response, sexual violence and perpetrator services (including men's behaviour change workforces). This is critically important given the current workforce shortages that are resulting in specialist services struggling to fill vacancies and existing practitioners experiencing burnout

and fatigue. The current shortages in the family violence and sexual assault workforces and anticipated future demand for these occupations warrants including family violence and sexual assault workforces on the Skills Priority List to ensure Commonwealth government resources and policy initiatives are directed to this area.

RECOMMENDATION: The Commonwealth Government develops a National Domestic, Family and Sexual Violence Workforce Recruitment and Retention Strategy including:

- Developing a national capability framework for responding to family violence and sexual assault
- Adding family violence and sexual assault workers to the Skills Priority List
- Remuneration that reflects the considerable expertise, risk and complexity specialist practitioners hold.

Emphasise the importance of safe and secure housing

Housing is currently only briefly mentioned in the focus areas under the Response Pillar and even more briefly under Recovery. However, being able to access safe, affordable accommodation is critical to achieving success across every Pillar. For example, ensuring women and children have access to affordable and safe housing can prevent them from becoming reliant on a perpetrator for housing. We also know that family violence is the largest driver of youth homelessness so ensuring young people who need to leave home early either because they have experienced family violence or are using violence in the home is critical to intervening early and preventing intergenerational abuse and trauma.

RECOMMENDATION: Strengthen the focus on safe and secure housing within the draft plan across all pillars to recognise the role housing plays in preventing, mitigating and helping victim survivors escape and recover from violence.

Include economic and financial wellbeing in each of the four pillars

At present, there is no reference to economic or financial wellbeing in the draft plan. The absence of any discussion related to economic independence for women and children is a major omission in the draft National Plan and ignores the Commonwealth's authority to address many of the systemic barriers that keep women and children experiencing family violence poor, including increasing income support payments, access to decent work, access to childcare, and access to community legal and financial counselling services.

Focus areas and actions that address economic and financial wellbeing are essential across all pillars to address the life-long impacts family violence has on women's economic outcomes and wellbeing. The inability to afford housing and risk of homelessness is one of the main reasons victim-survivors return to violent relationships and the lack of economic security, particularly access to income security and decent jobs is one of the key reasons why women can't stay safely in their own homes. Financial abuse is experienced by about 98% of victim-survivors of family violence and financial abuse can be perpetrated long after separation occurs.

Further, victim-survivors face significant barriers to accessing and maintaining employment. All Federal Government job employment services should recognise family violence as a

barrier to employment and create specialised pathways to get survivors into work. We also ask that Commonwealth Government work with state and territory governments to create a specialised job access network for all victim survivors of family violence who require security of income for themselves and their children.

RECOMMENDATIONS:

- Include economic and financial wellbeing in the National Plan, including actions directed at addressing systemic barriers that prevent victim-survivors from becoming economically and financially independent.
- Use the Commonwealth's job creation responsibilities to ensure access to employment for victim-survivors leaving perpetrators and in their recovery, including women from migrant and refugee backgrounds on temporary visas.

Embed access to mental health support for women and victim-survivors

The effects of family violence, and other types of violence on women and children, on victim-survivors' mental health is mentioned throughout the introduction of the draft National Plan but the importance of strengthening mental health responses across the continuum is not reflected in the focus areas and actions.

From how women's sense of self-worth is affected by how women's body images are displayed in the media, to understanding how mental illness presentations can be a result of or response to ongoing trauma from experiencing family violence, mental health affects women and victim-survivors across all parts of the family violence continuum. Accordingly, mental health needs to be addressed across the four pillars in the National Plan.

RECOMMENDATION: Include a focus area with concrete actions under each Pillar of the National Plan that will improve access to mental health support to victim-survivors of family violence, including children and young people.

Address the ongoing disproportionate impact of COVID-19 on women and their children and the family violence sector

The draft National Plan mentions the gendered consequences of COVID-19 in the preamble. However, actions to mitigate the impacts of the pandemic and other disasters across the family violence continuum is not reflected in the pillars or subsequent focus areas and actions.

It is not enough to only recognise the gendered impact of these events. Action needs to be taken to develop policies and support services to mitigate this gendered impact. A substantial body of evidence has been produced concerning the gendered impact of COVID-19 and bushfires in Australia. This evidence needs to be acted on and used to develop improved emergency response and planning frameworks and increase funding to services to work with women and other marginalised communities who are disproportionately affected by natural disasters.

Strengthen accountability to key stakeholders

More accountability to Aboriginal and Torres Strait Islander women and communities

We note that Aboriginal and Torres Strait Islander women have repeatedly called for a dedicated National Plan to address violence against First Nations women and that the Government committed to deliver this at the Women's Safety Summit last year.²

We are disappointed that the Government has failed to deliver on its promise and not only has failed to deliver a separate National Plan but failed to articulate any concrete actions likely to be taken in the proposed dedicated Action Plan.

RECOMMENDATION: The Commonwealth Government should make good on its promise to develop a separate National Plan to End Violence against Aboriginal and Torres Strait Islander Women and Children. Aboriginal communities should be given the resources and remit to lead the development of this plan, in consultation with the Commonwealth Government, with a commitment from the Commonwealth Government to attach dedicated, secure funding to the Plan.

More accountability to victim-survivors and genuine engagement

We welcome the commitment to engaging with people with lived experience and inclusion of a principle that speaks to how critical it is that diverse lived experiences of victim-survivors inform policies and solutions. For engagement with victim-survivors to be genuine and ongoing, the National Plan must clearly articulate formal processes for engaging with victim-survivors and adequate funding must be allocated over the life of the plan for this to occur.

RECOMMENDATION: Establish formal processes for engaging with victim-survivors and allocate commensurate funding over the life of the National Plan.

Strengthen monitoring and evaluation and increase transparency

Publish previous evaluations and reports concerning the last National Plan

The draft National Plan is intended to build on the achievements of the first National Plan. However, there is a lack of transparency about how the achievements of the first National Plan were identified and no evidence to support these statements due to the evaluation report not being publicly available. There is also limited examination of the gaps and challenges in the first National Plan that have led to the focus areas included in this National Plan. The draft Plan refers to 'a series of evaluations', but only references the 2021 KPMG evaluation which hasn't been published. Further, the Monash consultation report that informed the development of the draft has not been released.

RECOMMENDATION: Publicly release the KPMG evaluation of the first National Plan and the Monash consultation report that informed the development of the second National Plan.

² <https://nit.com.au/anne-ruston-heeds-calls-for-standalone-national-plan-to-reduce-violence-against-first-nations-women/>

Set clear timeframes and process for developing an Outcomes Framework

An Outcomes Framework with suggested outcomes and associated indicators for each of the four tiers of society (individual, service, system and community) should have been included as part of this draft National Plan.

While the draft Plan notes that the Outcomes Framework will be developed with stakeholders, there is no timeline or process outlined for how or when this will happen or who will be included in development. The absence of this detail undermines any confidence that this will happen.

Further, we note that in the draft National Plan, the Outcomes Framework includes tracking across individual, service, system and community tiers. This will provide a good insight into the scope and intensity of actions, as focusing on just one level of society in isolation will not work.

However, we have to stress the importance of focusing on *systemic* change as part – if not the key remit – of the National Plan. There are currently only two references in the Outcomes Framework to system-level outcomes.

The Outcomes Framework must map responsibilities at each level of government to specific outcomes to make it clear where authority and responsibility for achieving each outcome sits. The Outcomes Framework should also clearly list indicators of success. This level of detail cannot be left out of a National Plan.

RECOMMENDATION: Clearly lay out a process and timelines to develop the Outcomes Framework and Evaluation Plan mentioned in the draft National Plan including which stakeholders will be involved and why.

National infrastructure

We are pleased to see the work of Our Watch and ANROWS recognised in the draft National Plan. These organisations have made significant contributions to both reducing family violence and violence against women and building the evidence base since the first National Plan.

We do note however, that WESNET is not mentioned as part of this national infrastructure, despite its leading role across the country developing responses to technology facilitated abuse. We believe that ongoing, sustainable funding should be provided to WESNET under this National Plan, recognising their important work around technology-facilitated abuse.

Finally, Safe and Equal supports, in principle, independent oversight and monitoring to ensure transparency around the effectiveness of the second National Plan and forthcoming Action Plans. The establishment of any mechanism will require extensive consultation with specialist family violence services, women's organisations, and national prevention infrastructure bodies, as well as people with lived experience, to ensure that it is structured in a way that promotes transparency and accountability. The Family Violence Reform Implementation Monitor in Victoria is a good example of how an independent body can successfully monitor the progress and effectiveness of large-scale reforms. The Victorian Family Violence Reform Implementation Monitor should be used as a template for establishing a national oversight mechanism.