



**Australian Government
Department of Social Services**

**Feedback on the draft National Plan to End
Violence against Women and Children**

Submission

February 2022

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The MAV is the statutory peak body for local government in Victoria. The MAV would like to acknowledge the contribution of the councils who responded to our request for their comments and advice during this consultation. While this submission aims to broadly reflect the views of local government in Victoria, it does not purport to reflect the exact views of individual councils.

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1 Acknowledgements

The MAV acknowledges Aboriginal and Torres Strait Islander peoples as the traditional custodians of the land, and we offer our respects to their Elders past, present and emerging.

The MAV appreciates the feedback and input provided by councils who were able to review the draft submission.

2 Executive Summary

The MAV strongly supports the aims of the draft *National Plan to End Violence against Women and Children 2022-2032* (the draft National Plan) to reduce and ultimately end violence against women and children, along with the broad approach and focus of the National Pillars and Foundation Principles. The National Pillars of prevention, early intervention, response and recovery offer a generally holistic approach along the spectrum of intervention required to end violence against women and children. Similarly, the focus of the Foundation Principles on gender equality, the diverse lived-experiences of victim-survivors informing policies and solutions, Closing the Gap, and intersectionality is endorsed by the MAV. It provides a framework to include the voices, experiences and needs of under-represented members of our communities and those at greatest risk and most impacted by violence.

To be effective the National Plan must include specific commitments and actions from the Federal Government. Greater clarity is also needed on how the National Plan will provide support to other levels of government and sector stakeholders to deliver on actions.

For the Plan to succeed, the actions and approaches described within each National Pillar must be evidence-based and build on the investment of the National Plan to Reduce Violence against Women and their Children 2010-2022 (the first National Plan). They must genuinely reflect the body of research developed by Australia's National Research Organisation for Women's Safety (ANROWS) and prevention frameworks developed by Our Watch. It is also critical that the explanations and actions behind the Foundation Principles are evidence-based, embedded throughout the entire Plan, and reflect the views of those they seek to support, particularly victim-survivors, Aboriginal and Torres Strait Islander peoples, and all groups included by applying an intersectional lens.

The MAV calls for closer alignment across all the National Plan's definitions, approaches and actions to Our Watch's *Change the Story (second edition)*, *Changing the Picture* and the newly released *Changing the Landscape*. Greater articulation of the actions and commitments that will address gender inequality and the evidence-based drivers of violence against women, described by Our Watch, is needed. The investment in Our Watch and ANROWS to develop leading evidence and shared frameworks has been an invaluable outcome of the first National Plan. Continued investment in these shared frameworks, along with building on practitioner experience, must form the foundation of all future work to ensure this investment is capitalised upon through a nationally consistent approach.

The MAV supports the development of an Outcomes Framework and establishment of the Family, Domestic and Sexual Violence Commission to oversee reporting, monitoring, and evaluation. The Outcomes Framework outlined in the draft National Plan requires further development to adequately support the monitoring and evaluation of short and medium-term

outcomes that will measure progress along the way. An effective framework should include achievable and measurable short, medium and long-term objectives that align with immediate, mid and longer term actions covering the ten-year span of the Plan. Without the inclusion of short and medium-term outcomes at more regular intervals, it will not be possible to see measurable progress and understand if progress is on track, until the end of the Plan. The MAV also recommends increasing the collection and availability of local government area data to support monitoring and evaluation at the local level.

The MAV recommends the final version of the plan incorporates a stronger focus on the influence of the current social and economic context on family violence. The COVID-19 pandemic continues to have an unprecedented impact on communities across the country, exacerbating factors contributing to increased levels of gender inequality and family violence. Inclusion of this context in the National Plan is critical. Measures to address these issues could form part of the short, medium and long-term evaluation. There may also be opportunities to develop, implement and measure actions specific to dealing with family violence and gendered violence in a crisis-recovery sense, and evaluate their efficacy. This could have broader lessons for other crisis-oriented family violence situations.

The MAV calls for the roles of each level of government to be more clearly defined within the National Plan, reflecting that each level of government brings specific strengths and opportunities to the Plan's objectives and implementation. While the draft National Plan refers to the important role that 'all levels of government' must play to reach the goal of ending violence against women and children, it does not clearly articulate the differing roles and responsibilities of Federal, State, and local government.

The MAV would specifically like to see the role of local government, an important partner in the complex system of government, community and individual partners working towards the shared goal of ending violence against women and children, reflected in the National Plan. The role of local government sits largely in the prevention pillar of the Plan with a limited role in early intervention, response and recovery. The MAV notes that the only specific articulation of local government's role in the draft National Plan is under the response pillar, which the MAV views as a limited and conditional aspect of the role of local government.

The Victorian local government sector has more than a decade's experience working to prevent family violence and all forms of violence against women, building the capacity of services, staff and communities. The significant support and investment of the Victorian Government over this time has seen a considerable increase in engagement from councils leading to the development of locally tailored, innovative initiatives, programs, and partnership work at the local level. The additional investment of \$3.58 million in 2022-2025 to support councils implement the *Local Government Guide for Preventing Family Violence and all forms of Violence Against Women* will take this engagement to the next level encouraging whole-of-council approaches to primary prevention across the State.

The MAV calls for the National Plan to support similar investment in other States and Territories to ensure consistent approaches across the country. The MAV sees significant opportunity to build upon Our Watch's [Prevention toolkit for local government](#), which was funded under the first National Plan, to support councils nationwide.

The MAV advocates that the Action Plans to be developed under the National Plan include investment in primary prevention in local government. This investment could be provided directly to councils across the country or via investment in the Australian Local Government Association (ALGA) and the State and Territory Local Government Associations, as articulated in our [submission](#) for ‘*Developing the next National Plan to Reduce Violence against Women and their Children*’ (July 2021).

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

The following are the Municipal Association of Victoria (MAV) responses to the survey consultation.

Question 11: The draft National Plan includes a clear explanation of the prevalence, drivers, and different forms of gender-based violence in Australia.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

- Support further alignment with Our Watch frameworks
- Drivers of different forms of violence must underpin actions throughout
- Requires greater focus and articulation of actions to progress gender equality and address the drivers of violence
- Role of men and masculinities needs deeper exploration and explanation
- Stronger focus on perpetrators needed
- Strengthen evidence analysis and investment where gaps persist

Complete response:

The MAV supports the description of structural drivers of violence against women and gender inequality at the beginning of the Plan, where they align with Our Watch’s frameworks, *Change the Story*, *Changing the Picture* and the newly released *Changing the Landscape*.

The discussion of drivers and different forms of violence against women, along with the actions committed to, do not adequately underpin later discussion or action within the Plan.

Greater articulation of the actions and commitments that will address gender inequality and the evidence-based drivers of violence against women, described by Our Watch, is needed.

For example:

- while the plan states “the primary driver of violence against women is gender inequality”, there is a lack of focus on how the Plan will support progress towards gender equality
- the actions described in the Plan do not specifically address the four drivers of violence against women and children

- the explanation of the role of men and masculinities does not adequately explain the ways in which men who may not use violence themselves often still contribute to a culture that condones and allows violence against women to occur, and
- there is a lack of focus on perpetrators with explanations and actions instead focusing on victim/survivors, and bystanders.

The Plan would also benefit from further analysis of the evidence, and funding research where gaps in evidence persist, in relation to cohorts, such as older women, LGBTIQ+ people and women with disability.

Question 12: The draft National Plan meaningfully reflects issues highlighted through stakeholder consultations and the National Summit on Women’s Safety, including the experiences of victim-survivors.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

Key points raised by MAV and ALGA through stakeholder consultations not reflected include:

- role of local government recognised as the tier of government closest to community with unrivalled reach to where people live, learn, work and play
- investment in primary prevention officers in State/Territory Associations to build capacity of the sector by encouraging councils within each jurisdiction to utilize *Prevention toolkit* and lead change at the local level.

Complete response:

Submissions to the consultation from the MAV and ALGA advocating that local government be formally recognised within the Plan, and roles and responsibilities defined are not reflected.

The MAV submission highlighted that nationally local government can have significant impact across all four pillars of the Plan, especially prevention. Building the capacity of local government by, for example, funding dedicated primary prevention officers in State and Territory Local Government Associations, could greatly increase capacity to influence change at the local level.

In Victoria, for more than a decade, councils have demonstrated a commitment to supporting the culture and community change that is needed to prevent violence against women. With significant investment from the Victorian Government councils have developed community strategies, implemented workplace policy and organisational change programs, delivered projects addressing the drivers of violence across diverse community settings, and led their communities in partnership with diverse community organisations. The National Plan should support similar investment in other State and Territories to ensure a consistent national approach.

As the tier of government closest to the community, councils have unrivalled reach to where people live, learn, work and play in every community across Australia. While not specialist family violence services, local government intersects with women and children, particularly

through their Maternal and Child Health and early years services. In Victoria these services are prescribed by legislation to identify and respond to disclosures of family violence. Other council services also receive disclosures or suspicion of family violence and therefore need to potentially work with both victim/survivors and perpetrators. Health Justice Programs like [MABELS](#) are situated in council universal services, to ensure access for women and children to required practitioners. The relationships that councils have with diverse communities and organisations, and their provision of universal services has them well placed to engage in the early intervention and recovery pillars, along with prevention and response.

The role of local government in these spaces should be described and defined in the National Plan with support to scale up and engage councils from other jurisdictions in this work. Investment in Our Watch’s *Prevention toolkit for local government*, funded by the first National Plan, could support this nationwide.

Question 13: The four Foundation Principles (gender equality, the diverse lived-experiences of victim-survivors are informing policies and solutions, Closing the Gap, and intersectionality) appropriately underpin the National Pillars and actions within the National Plan.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

- Foundation Principles approach is supported
- Structural and systemic issues underpinning the Principles require greater explanation and alignment to Our Watch’s prevention frameworks
- All underrepresented voices inform decision-making, planning, design, and responses
- Actions associated with Principles need to be evidence-based and trauma-informed
- Further development on an intersectional approach would benefit all four Principles.

Complete response:

The MAV supports the approach and focus of the four Foundation Principles. We do believe further development is required to reflect the structural and systemic issues underpinning them. The explanation for each Principle should more closely align with the structural and systemic explanations/definitions in Our Watch’s *Change the Story*, *Changing the Picture* and *Changing the Landscape*.

It is critical that the explanations and actions of the Foundation Principles are evidence-based, trauma-informed, embedded throughout the entire Plan, and reflect the views of those they seek to support, particularly victim-survivors, Aboriginal and Torres Strait Islander peoples, and all groups included by applying an intersectional lens.

Throughout the Plan, continued reference is made to the need to include the underrepresented voices of victim-survivors in decision-making, planning, design, and responses. Family members, friends, peers, colleagues etc. of the victim-survivor are not included in the Plan’s

glossary. It would be beneficial to include these voices in all action planning and responses particularly in cases where a person did not survive family violence.

Further work is needed around intersectionality particularly with groups including LGBTIQ+, geographical location, urbanity/regional/rurality, cultural and faith groups, older women, carers and women with disability.

The MAV believes the Plan would benefit from further development of these Principles, including engagement with the groups described above, to ensure they genuinely underpin and are embedded throughout the Plan and are reflected in concrete actions.

Question 14: The four National Pillars in the draft National Plan provide a holistic approach to identifying and responding to gender-based violence.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

- National Pillars provide a generally holistic framework across spectrum of intervention
- Greater embedding of ANROWS and Our Watch evidence base in each National Pillar required
- Greater consideration of the prevention Pillar needed to ensure it is underpinned by the drivers of violence and focuses on systemic and structural interventions
- Roles and responsibilities of each level of government and sector stakeholders should be clearly defined in each Pillar

Complete response:

The MAV agrees that the four National Pillars provide a generally holistic framework across the spectrum of intervention but the approach within each Pillar requires further development to ensure it is holistic and evidence based.

The actions and approaches described within each National Pillar should build on the investment of the *National Plan to Reduce Violence against Women and their Children 2010-2022* (the first National Plan) by genuinely reflecting the body of research developed by ANROWS and prevention frameworks developed by Our Watch. In particular, the MAV would like more consideration given to the prevention pillar, ensuring it is underpinned by the drivers of violence and focused on the structural and systemic interventions required for long term change. The early intervention pillar should also include a stronger focus on women’s empowerment and strengths, without losing attention to changing men’s behaviours.

The roles and responsibilities of each level of government and sector stakeholders should be more clearly defined under each Pillar, along with commitments, actions and support the Federal Government will provide to these partners.

As the peak body for Victorian councils, the MAV would particularly like to see the role of local government, which is primarily in prevention, better articulated. Currently, the only specific mention of local government is under the response Pillar which is a limited aspect of our role.

Local government strongly intersects with many of the settings currently highlighted under the prevention Pillar of the draft National Plan such as workplaces, sport, the arts and community, children, youth and family organisations. Councils are a significant community connector that can reach many more diverse settings and engage their local communities through universal services such as libraries, aged care and aging well, youth, neighborhood houses, animal management, local laws, rates and revenue, and emergency/disaster management. Councils also have an important role in reaching regional, rural, and remote communities.

Further, councils are often one of the largest employers in the LGA. As a workplace they have an opportunity to establish respectful organisational cultures that create safe and equitable environments. They are also responsible for addressing internal sexual harassment and assaults, disclosures of family violence and managing safety plans for staff.

Current social contexts such as climate change and the increase in violence against women and children when disasters and emergencies occur should be considered in the Plan.

Although local government’s role within the National Plan should primarily sit under the prevention Pillar, it is also important in define our role in the pillars of early intervention, response, and recovery. As described in Question 11, some services provided by Victorian councils such as maternal and child health, early years, and youth services are required to identify, respond to and report family violence. The nature of councils’ universal services also results in disclosures of family violence, such as elder abuse and violence against LGBTIQ+ people and/or people with disability, being made to services with less expertise and mandate to report. Providing clarity of roles within the National Plan and building the capacity of councils under all four pillars will contribute to improving access and responses at the local level across the spectrum of intervention.

Question 15: The four National Pillars in the draft National Plan reflect the family, domestic and sexual violence service system.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

- The National Pillars reflect the spectrum of intervention
- Greater clarity on the roles of each level of government and sector stakeholders required
- Clearer Federal Government commitments needed including how other governments and stakeholders will be supported
- FDSV system should build on existing practice leadership to share learnings across all States and Territories
- Investment in [Prevention toolkit for local government](#) would support engagement

Complete response:

While the four National Pillars reflect the spectrum of intervention within the family, domestic and sexual violence service system, the draft National Plan is unclear about who is responsible for the various aspects of the system and the actions described within the Plan. The MAV calls for greater clarity on the roles of each level of government and sector stakeholders, along with

clearer commitments from the Federal Government. Where the Federal Government does not commit to directly implementing an action, the National Plan should describe who is responsible for this action and how the Federal Government will support its implementation.

The Victorian family, domestic and sexual violence service system, including the MAV and local government sector's primary prevention work, has benefitted from a genuine partnership with the Victorian Government through more than a decade of significant reform and investment. For example, progressive investment in local government through the Victorian Government's *Free from Violence Strategy*, culminating in \$3.58 million funding in 2022-2025 to support councils implement the *Local Government Guide for Preventing Family Violence and all forms of Violence Against Women*, has resulted in significant program and partnership work across the sector. Gender equity and preventing violence against women is increasingly recognised as a core part of council business to support community health and wellbeing in Victoria. Legislative reform has also strengthened the protection of children and requirements to report family violence across the state, including for specific local government workforces such as maternal and child health, early years and youth services.

The National Plan should aim to achieve a family, domestic and sexual violence service system, including a local government workforce, that values and enhances existing practice leadership so successes and learnings can be shared and tailored to suit local contexts in all States and Territories. Nationally, local government could be effectively engaged by building on Our Watch's [Prevention toolkit for local government](#), an important outcome of the first National Plan, further developing its content and promoting its use across the country.

Question 16: The draft National Plan reflects the needs and experiences of women and children.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

- Greater focus on gender equality and lived experiences of gender inequality required
- Further engagement with representatives of diverse groups strongly supported
- Increased focus on older women, women in rural and regional areas and children and young people required
- Include children and young people in design of solutions - local government can support this work
- Children's voices in victim-survivor narratives should be clearer

Complete response:

The MAV would like to see a greater focus on gender equality, and women's and gender diverse people's lived experiences of gender inequality throughout the Plan. While gender inequality is acknowledged as 'the primary driver' of violence against women and children at the beginning of Plan, there are few concrete actions outlined that will increase gender equality.

The MAV strongly supports further engagement with representatives of diverse groups of women whose needs and experiences must be reflected in and embedded throughout the National Plan to ensure it will address the needs of all women, young people and children.

The Plan would also benefit from an increased focus on the experiences of older women, particularly in relation to intergenerational abuse, women in rural and regional areas, and including the voices of children and young people.

The Plan identifies children and young people as critical populations for prevention and early intervention but does not commit to working with children and young people to design solutions and supports. A commitment to listening and acting on the voices of younger Australians will be critical to ensuring future action is relevant and effective. Local government’s role delivering services directly to children and young people and/or planning and coordinating services for their communities offers a conduit for this type of work on a local level, if properly supported.

The role and inclusion of children’s voices in victim-survivor narratives should also be made clearer. If they are to be included, this should be considered in terms of trauma experiences and the Recovery pillar of the Plan.

Question 17: The draft National Plan reflects the needs and experiences of diverse communities and individuals.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
Aboriginal and Torres Strait Islander peoples		X			
Migrant and refugee women		X			
Women with disability		X			
Children and young people		X			
LGBTQIA+ people		X			
Brotherboys and Sistergirls		X			
Women in rural, regional and remote communities		X			
Older women		X			

Key points provided in online survey:

- Further engagement with group representatives required with voices better integrated throughout the Plan
- Incorporation of Our Watch’s *Changing the Landscape* required
- Local government has capacity and systems to consult with diverse groups in local contexts including rural, regional and remote areas
- Greater consideration of women in rural, regional and remote areas and with compounding experiences of disadvantage required

Complete response:

The MAV strongly supports further engagement with representatives from each of these groups to ensure inclusion of their needs and experiences is strengthened and better integrated throughout the Plan. The MAV is not able to speak on behalf of these groups and comment comprehensively on if their needs and experiences are adequately reflected.

The MAV does note that Our Watch has released *Changing the Landscape: A national resource to prevent violence against women and girls with disabilities* since the release of the draft National Plan, the insights of which should be incorporated.

Local government has the capacity to engage the diverse groups living in their communities with processes already in place to consult and hear their voices. Local government services in rural, regional and remote communities may be some of the only services available, especially to underrepresented and under-resourced cohorts in these areas. When defining the role of local government, the National Plan should consider local government’s capacity to help reach these diverse communities at the local level.

Greater consideration to women in rural, regional, and remote communities is required in the Plan in general. Typically, when these groups are discussed in the draft Plan, it is in the context of Aboriginal and/or Torres Strait Islander peoples. This creates two issues: (1) it assumes Aboriginal and/or Torres Strait Islander peoples have little engagement with urban environments; and (2) it does not consider the specific needs of other communities living in regional and rural areas e.g. people from CALD backgrounds etc.

The needs and experiences of women who experience compounding disadvantage such as single parent families and women who are at risk of homelessness should also receive greater attention.

Question 18: The draft National Plan supports building further evidence on what works for gender based violence prevention, early intervention, response and recovery.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

- Supportive of Commission and investment in ANROWS, ABS and AIC
- Significant gaps particularly related to older women, LGBTIQ+, CALD, perpetrators, online abuse and COVID-19 pandemic
- Provide LGA level and intersectional data for national surveys and data collection to support locally contextualized, nationally consistent planning, implementation and monitoring
- Look to data collection under the Victorian Gender Equality Act (2020) for a model

Complete response:

The MAV supports new actions to support building evidence in the draft National Plan such as the establishment of the Family, Domestic and Sexual Violence Commission to oversee reporting, monitoring and evaluation, and a new ABS survey to understand Aboriginal and

Torres Strait Islander peoples’ experiences of family violence. The MAV also welcomes ongoing investment in actions established under the first National Plan such as ANROWS’ research agenda and annual national data collection through the ABS and AIC.

There remain, however, significant knowledge gaps that are not addressed in the National Plan, particularly in relation to cohorts such as older women, LGBTIQ+ people, CALD communities, and perpetrators, as well as emerging issues such as online abuse and the ongoing effects of the COVID-19 pandemic. The National Plan should seek to address these gaps using lived and professional experience to contribute to the evidence base.

The National Plan could also support a nationally consistent, locally contextualised evidence base that would support planning, implementation, and monitoring at the local level by providing local government area (LGA) and intersectional data for national surveys and data collection where appropriate. For example, providing LGA data for the National Community Attitudes Survey (NCAS) would support councils, organisations and communities identify local priority actions and better monitor the effectiveness of their interventions.

There is also an opportunity for the National Plan to look to the obligations under Victoria’s Gender Equality Act (2020), particularly intersectional reporting and data requirements, as a model that could be expanded across the country.

Question 19: The draft indicators and outcome measures provide a strong framework for measuring progress towards the next National Plan goals.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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Key points provided in online survey:

- Development of short and medium-term objectives and outcomes that align with short, medium and long-term actions across the ten-year Plan is required
- Short and medium-term objectives and outcomes should demonstrate progress towards addressing the drivers of violence
- Progress reporting should occur more regularly than described in the draft Plan and should be made publicly available

Complete response:

The Outcomes Framework outlined in the draft National Plan requires further development to articulate clear objectives and adequately support the monitoring and evaluation of short and medium-term outcomes. The inclusion of short and medium-term outcomes will assist government and sector stakeholders measure progress to achieving the long-term goals of changing community attitudes and ultimately reducing and ending violence against women and children. These short and medium-term outcome measures should be designed to demonstrate progress towards addressing the specific drivers of violence which will be evident before we can expect to see a long-term reduction in violence.

An effective framework should include short, medium and long-term objectives and outcomes that align with immediate, mid and longer term actions covering the ten-year span of the Plan.

Progress reports should be required at more regular intervals than are described in the draft National Plan and made publicly available. Without the inclusion of short and medium-term outcomes it will not be possible to see measurable progress, and understand if progress is on track. More regular reporting will also assist with understanding if modifications to the approach are required throughout the life of the National Plan.

Question 20: What would you not change about the draft National Plan?

Did not provide a response to this question as we do not have anything additional to contribute beyond what is described in body of this submission

Question 21: What would you change about the draft National Plan?

Did not provide a response to this question as we do not have anything additional to contribute beyond what is described in body of this submission

Question 22: Is there any other feedback or additional information you wish to provide?

Attachments:

[Communities Free from Violence: local government leading change](#), MAV December 2021

[Developing the next National Plan to Reduce Violence against Women and their Children](#), MAV Submission July 2021

[Evaluation of the role of local government in preventing violence against women, full report](#), NOUS Group June 2017

[Evaluation of the role of local government in preventing violence against women summary](#), NOUS Group June 2017