



Response to the draft National Plan to End Violence against Women and Children 2022-2032

Dear Sir/Madam,

Thank you for the opportunity to provide a response to the draft National Plan to End Violence against Women and Children 2022-2032 (National Plan). We note that we provided input previously to the development of the National Plan and refer to this in this submission.

Our response is focused on economic abuse based on casework experience, and our knowledge of the outcomes achieved to date by industry, regulators and Victorian Government in response to economic abuse, the important role of different types of community services working together to help victim survivors achieve better outcomes and to inform industry and government responses, the need for ongoing work to embed and extend responses to economic abuse; and actions the Federal Government could take to improve outcomes in relation to economic abuse.

We are pleased to see that the plan recognises the important role that business can play in preventing and responding to abuse – both for staff and customers.

Our submission makes the following recommendations:

- Ensure economic abuse is a critical part of the national plan by including it within the focus areas within all pillars of the response.
- Support integrated legal services, financial counselling, and social work in the response to support people experiencing economic abuse
- Commit to reviewing and reforming areas of Government responsibility, in particular the social security system, to ensure Government legislation and agencies don't enable abuse
- Ensure there are shorter – at least 3 years - and more targeted national action plans to address economic abuse with tangible outcomes.

Our recent report¹ outlines EARG's work, the impact of the reforms, and our members' experiences assisting victim survivors.

¹ Carolyn Bond, Dr. Madeleine Ulbrick, Responding to Financial Abuse – Full Report. Community, Business and Government Responses to the financial impacts of family violence in Australia, 2020

Economic Abuse Reference Group

The Economic Abuse Reference Group (EARG) plays an important role, ensuring industry and government is provided with expert input to domestic and family violence (DFV) responses, particularly economic abuse.

EARG is a network of about 27 community organisations² throughout Australia, which influences government and industry responses to the financial impact of family violence. Members include family violence services, community legal services, financial counselling services and women's services.

EARG produces guidance for use by industry³ and provides regular input to industry codes, guidelines and reviews (see earg.org.au).

Economic Abuse

Economic abuse is under-recognised and under-reported as a form of family violence. It can prevent victim survivors leaving a violent relationship and prevent them from re-establishing their lives. There is an invisibility to economic abuse, not only for the people experiencing it but it is also invisible to the systems and people working with victim survivors.

Economic abuse includes coercion to sign for debts, denying access to household funds, refusing to pay for household bills, incurring fines and debts in the other person's name and hiding assets in family law disputes.⁴

Physical and economic abuse are closely linked, and lack of financial resources makes leaving a violent relationship challenging for survivors. Financial insecurity is a reason some women return to violent relationships.

The body of research and evidence about the nature, scale and prevalence of economic abuse is small and in turn the empirical evidence base is limited. What is clear however is that: women are predominantly the victim; men are predominantly the perpetrator; and

² Members include Consumer Action Law Centre, Council of the Single Mother and Her Children, CARE Financial Counselling Service and Consumer Law Centre (ACT), Centre for Women's Economic Safety, Financial Counsellors Association of NSW, Domestic Violence Victoria, Domestic Violence NSW, Financial Counselling Australia, Financial Counselling Victoria, Financial Rights Legal Centre, Good Shepherd Youth and Family Services Australia & New Zealand, Good Shepherd's Firmer Foundations Program NSW, Justice Connect, No to Violence, Northern Rivers Community Legal Centre, Redfern Community Legal Centre, Social Security Rights, Thriving Communities Partnership, Uniting Kildonan, WEstjustice, Women's Information & Referral Exchange, Women's Legal Service Victoria, Women's Legal Service NSW, Women's Legal Service QLD, Legal Aid NSW, Legal Aid QLD, Victoria Legal Aid.

³ <https://earg.org.au/good-practice-short-guides/>

⁴ T. Corrie, Economic security for survivors of domestic and family violence: Understanding and measuring the impact, Abbotsford, VIC, Good Shepherd Australia New Zealand, 2016.

between 78-99% of women presenting to family violence services, report a history of economic abuse.⁵

Economic abuse is defined in all jurisdictions in Australia apart from NSW. There is no universal definition in Australia, but this describes it well:

Financial abuse is a pattern of control, exploitation or sabotage of money and finances affecting an individual's capacity to acquire, use and maintain financial resources and threatening their financial security and self-sufficiency.⁶

A recent study of the prevalence of economic abuse in Australia between intimate partners, demonstrated that 11.5% of people had experienced it and that it was higher for women (15.7%) than for men (7.1%). The gender differences are important because it is well understood that family, domestic and sexual violence is gendered; and that women are the majority of victims and experience more severe consequences.⁷

Economic abuse must be key component of the National Plan

The EARG is pleased to see economic abuse included in the National Plan, as both a form of DFV, as well as highlighting the economic impacts it has on the victim survivor, and broader society. However, we are disappointed it is not included either as a specific focus area, or in focus areas within each of the pillars. This is important because the National Plan wishes to address economic security for women and economic abuse is a major part of domestic and family violence which is often not recognised. We note that there is reference to economic security in the response and recovery pillars, but not in the other pillars. Economic security is also critical to both prevention and early intervention of violence against women, so it should be considered within those pillars as a focus area.

Financial abuse is included within the definition of coercive control, however not all jurisdictions have addressed coercive control in law, and it is not yet well understood by the broader community, policy and judiciary and the service system. Often victim survivors are not aware they have experienced financial abuse or coercive control so more education and awareness raising of these issues is important in addressing it.

We welcome the recognition of financial abuse within the family law system but again this is not addressed as a focus area in the pillars, but for many victim survivors, financial abuse occurs both during the relationship and post separation and is not addressed adequately by the family law system. This will require both legislative and procedural change.

⁵ Jozica Kutin, Roslyn Russell & Mike Reid, 'Economic abuse between intimate partners in Australia: prevalence, health status, disability and financial stress' (2017) 41(3) Australian and New Zealand Journal of Public Health, p269.

⁶ Breckenridge, J., Singh, S., Lyons, G., Suchting, M., (2021) Understanding Economic and Financial Abuse Across Cultural Contexts. Sydney: Gendered Violence Research Network, UNSW Sydney.

⁷ Kutin, J, Russell, R and Reid, M 2017, 'Economic abuse between intimate partners in Australia: Prevalence, health status, disability and financial stress', Australian and New Zealand Journal of Public Health, vol. 41, no. 3, pp. 269-274.

There is a lack of consideration of financial security in the section on recovery. Financial insecurity increases a person's vulnerability to family violence. Measures that close the gender pay gap, such as providing a decent welfare safety net for all (including temporary visa holders) and enabling those experiencing or have experienced family violence to remain or stay in the workforce are all necessary to ensure people can recover and have financial security. It can also act as a preventative and early intervention measure as people can more easily leave abusive relationships. We recommend measures such as these be included in the section on recovery.

Social Security

The Plan should include a commitment by the Government to examine, and reform, areas within its own jurisdiction which can enable and exacerbate abuse, for example the impact of social security laws and processes on abuse (in some cases facilitating abuse). A 2021 report by National Security Rights Network⁸ found that DFV cuts across all social security payment types and there were significant issues for people experiencing domestic violence including delays in payment for people in crisis and debts, dangerous requirements that tie a victim survivor to their abuser as part of the couple rule, and an expectation that people in relationships will share income and assets ignores gendered power imbalances. The report also found that many people had difficulty in understanding a complex social security system and requirements, as well as problems dealing with Centrelink staff and not feeling comfortable to disclose family violence.

Ensure targeted, measurable outcomes for the National Plan

The draft National Plan states that it will be underpinned by five-year action plans, including dedicated five-year Aboriginal and Torres Strait Islander Action Plans. The Action Plans will detail the priority focus areas for implementation and will focus efforts and government. Whilst the inclusion of a separate Aboriginal and Torres Strait Islander Action Plan is welcomed, five-year plans are simply too long to demonstrate meaningful action by Government and to demonstrate change. In the past the National Plan has had four action plans, one every three years. The EARG recommends having more and shorter action plans which have clear tangible outcomes, with targets and indicators which can demonstrate how we are meeting the broader vision in the National Plan. We are happy to provide input on specific outcomes to address economic abuse. This would ensure there was accountability for achieving outcomes and there was a strong commitment by Government to meet those targets in a practical and measurable way.

Thank you for opportunity to contribute our expertise to the National Plan. We would welcome any opportunity to discuss our submission further. We can be contacted by email to earg@earg.org.au.

Yours Sincerely,

⁸ National Social Security Rights Network, 2021, How well does Australia's social security system support victims of family and domestic violence, Economic Justice Australia.
<https://www.ejaustralia.org.au/wp/general/how-well-does-australias-social-security-system-support-victims-of-family-and-domestic-violence/>

Economic Abuse Reference Group



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