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Attorney General's Department
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Consultation Paper— Family Law Amendment Bill (No. 2) 2023

We welcome the opportunity to provide feedback to the Attorney General's Department (AGD) on this consultation. We appreciate the commitment to amending the *Family Law Act 1975* (Cth) (**Family Law Act**) with a view to introducing law and procedures that prioritise safety, clarity and efficiency in family law proceedings.

Given the Economic Abuse Reference Group's (EARG) expertise in economic abuse, this submission will focus on family law property settlement matters as it relates to economic and financial abuse.

Economic Abuse Reference Group

The [Economic Abuse Reference Group](#) (EARG) is an informal group of community organisations across Australia which work collectively with government and industry to reduce the financial impact of family violence. Members include domestic and family violence (DFV) services, community legal services and financial counselling services.

Our work encapsulates the experience of our members (as lawyers, financial counsellors or DFV support workers) who assist clients who have experienced economic abuse.

Economic Abuse

Economic abuse or financial abuse is a form of family, domestic and sexual violence. It has significant and devastating impacts at an individual, community and societal level. Economic abuse in an intimate partner relationship can take various forms, including accruing debt or other liabilities in the other person's name, not contributing to joint loans, controlling all finances, not making shared financial decisions, withholding necessities, preventing someone from obtaining or remaining in employment, and stopping someone from accessing education or a means to become financially independent.

Incidence and prevalence of economic abuse

Financial abuse is a hidden epidemic in Australia. A recent report by Deloitte Access Economics found that 43 Australian women were subjected to financial abuse every hour in 2020.¹ A 2017 study into the prevalence of economic abuse between intimate partners found that 11.5% of Australians had experienced financial abuse and that women experience it at higher rates (15.7%) than men (7.1%), though the true prevalence is likely far higher given the underreporting of DFV.² These gender differences are important because it is well understood that family, domestic and sexual violence is gendered, and that women comprise the majority of victims and experience more severe consequences.³ Around 85% of women who access DFV services in Australia say that they have experienced some level of financial abuse in their relationship.⁴ Economic abuse often occurs alongside other forms of abuse such as physical and emotional abuse, and sexual violence.

¹ Deloitte Access Economics, The cost of financial abuse in Australia 2022, Deloitte Access Economics: Sydney, NSW.

<<https://www.commbank.com.au/content/dam/caas/newsroom/docs/Cost%20of%20financial%20abuse%20in%20Australia.pdf>>

² Kutin, J., Russell, R., and Reid, M., Economic abuse between intimate partners in Australia: Prevalence, health status, disability and financial stress. Australian and New Zealand Journal of Public Health, 2017. 41(3).

³ Ibid.

⁴ Australian Bureau of Statistics (ABS), Personal Safety, Australia. 2012, ABS: Canberra, Australia.

<<http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4906.0Main+Features12012?OpenDocument>>

Summary of recommendations

1. Include economic and financial abuse as a consideration under the list of current and future circumstances pursuant to section 79(4) so that the Court must consider the “effect of any economic or financial abuse to which a party to the marriage has been subjected by the other party”.
2. Include economic and financial abuse as a consideration under the list of current and future circumstances pursuant to section 90SM (4) so that the Court must consider the “effect of any economic or financial abuse to which a party to the marriage has been subjected by the other party “.
3. Include a definition of economic abuse and financial abuse in the Family Law Act with examples that do not limit the scope of the definition.
4. Commit specific funding for a handbook and ongoing education for all participants in the Family Court system on the intricacies of family violence, and its impact on victims as well as trauma informed practice.
5. Amend the Family Law Act to specify that the absence of a family violence order is not evidence of the absence of family violence and/or financial and economic abuse.
6. Establish a new division that will allow the use of less adversarial trial processes.
7. Include the disclosure rules within the provisions of the Family Law Act.
8. Insert additional considerations in proposed section 99(7) in the Exposure Draft of the Family Law Amendment Bill 2023.
9. Amend section 75(2) to provide that family violence and economic and financial abuse are considerations in spousal maintenance applications.
10. Conduct a consultation on the interaction between family law and bankruptcy legislation and the consequences for victim survivors of financial abuse.
11. Amend the Family Law Act to allow the Court to disregard section 81 when considering financial orders in circumstances of financial abuse.
12. Conduct further consultation on Family Law Act amendments to allow a Court to allocate responsibility for a debt when there is no property.

Schedule 1 – Property reforms

Consultation paper questions:

Codifying the property decision-making principles

1. Does the proposed structure of the property decision-making principles achieve a clearer legislative framework for property settlement?
2. If not, please expand on what changes you think are required and why.

Just and equitable

3. Do you agree with the proposed framing of the just and equitable requirement as an overarching consideration through the decision-making steps?
4. If not, please expand on what changes you think are required and why.

Effect of family violence

5. Do the proposed amendments achieve an appropriate balance in allowing the court to consider the relevance and economic impact of family violence as part of a family law property matter, without requiring the court to focus on issues of culpability or fault?
6. Do you agree with the proposed drafting, which requires the court to consider the effect of family violence to which one party has subjected the other?

New contributions factors

7. Do you agree with the proposed amendment to establish a new contributions factor for the effect of economic and financial abuse?
8. Do you agree with the proposed amendments to establish new separate contributions factors for wastage and debt?

We welcome the inclusion of family violence as a consideration under section 79 (4) and 90SM (4) of the Family Law Act. Both sections address the financial and non-financial contributions made by a party to the acquisition, conservation or improvement of any of the property of the parties, in addition to any homemaker and parenting contributions made to the welfare of the family. Family violence makes those contributions more onerous. The proposed legislative amendments highlight what is often a neglected consideration, and the proposed amendment is supported.

We support the removal of the spousal maintenance cross-referencing and the inclusion of a co-located, standalone list of 'current and future circumstances' within section 79 and 90SM of the Family law Act. We further support the inclusion of family violence in this list. This

section deals with the current and future financial needs of the parties. We note financial abuse has a significant impact on the current and future financial needs of a party. We recommend that this clause specifically include a reference to economic abuse.

We further support the inclusion of debt and wastage as considerations under 79(4)(c) and 90SM (4)(c), noting that the proposed amendments codify existing case law. As victims of financial abuse are burdened with significant debt, the circumstances that gave rise to the debt are important considerations in property settlement matters.

Specific comments on Exposure Draft

We welcome the amendments to Part 1 – Property framework in the exposure draft. We acknowledge the exposure draft broadly clarifies, codifies and adds to the matters the court takes into consideration when making orders in property settlement proceedings. We support the amendments, particularly the inclusion of the impact of any family violence. We support amendments that recognise financial abuse as a critical factor in the determination of a property settlement.

We are pleased to see the inclusion of economic and financial abuse in section 79(4)(c) and section 90SM (4)(c) which provides that the Court must consider *the effect of any economic or financial abuse to which a party to the marriage has been subjected by the other party (proposed sections 79(4)(c) (cb) and 90SM(c) (cb))*. In our view, it is important that the Act specifically direct the Court to consider the effect of economic and financial abuse, instead of subsuming this within the family violence consideration. In our experience the approach in past cases has been to disregard financial abuse.

Financial abuse has a direct financial impact on the financial contributions made by a party to the acquisition, conservation and improvement of the property of the parties. It also has a direct impact on the future needs of a party. Accordingly, it must be specifically addressed by a Court in its determination of a property settlement.

The proposed sections 79(5) and 90SM(5) address the stand-alone considerations relating to current and future circumstances. We recommend that the proposed list of current and future circumstances under both sections 79(5) and 90SM(5) include a provision that the Court must consider *the effect of any economic or financial abuse to which a party to the marriage has been subjected by the other party*. Such amendments will be consistent with the proposed amendments under section 79(4)(c) and section 90SM (4)(c) which list both family violence and financial abuse as relevant considerations. We are of the view this will provide clarity and consistency to the legislation in addition to acknowledging a critical factor, namely that financial abuse has far-reaching impacts on the current and future financial circumstances of its victims. We are concerned that if economic and financial abuse is not specifically listed as a consideration for future needs the court may read down the legislation. Again, we do not think it is superfluous to have a specific listing for economic and financial abuse for the same reasons we explain above in relation to contributions. In our experience this addresses the unabating impacts of financial abuse on victims which include financial and non-financial consequences. Financial abuse impacts the financial and

emotional wellbeing of its victims. There is substantial evidence that financial wellbeing and mental health are connected. Recent research commissioned by the Australian Securities Investment Commission in collaboration with Beyond Blue found that people experiencing financial challenges are twice as likely to also be experiencing mental health challenges.⁵

Definition of Economic and Financial Abuse

We recommend inserting a definition of economic and financial abuse in Part I of the Family Law Act. We prefer the following definitions from the University of New South Wales' Gendered Violence Research Network:

Economic abuse: A pattern of control, exploitation or sabotage of money, finances and economic resources which affects an individual's capacity to acquire, use and maintain economic resources and threatening their economic security and self-sufficiency.

Financial abuse: 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

Without limiting the definition, we suggest the definition should include examples of economic and financial abuse. This would follow the framework of section 4AB of the Family Law Act which provides a definition of family violence and provides a list of examples. One example we suggest is the persistent underpayment and/or non-payment of child support. Non-payment of child support is a consideration under 79(4) and 90SM(4) but this should also be included as an example in the definition of economic abuse (or added to the section 4AB examples of family violence) to recognise it as a relevant factor to determine the existence of abuse.

Ongoing education

The proposed amendments require the Court to consider family violence when making property settlement orders under sections 79(4) and 90SM (4). We acknowledge that domestic and family violence, including financial and economic abuse is a complex subject wherein perpetrators find an increasing number of ways to perpetuate abuse. It is consequently a complex and evolving field. Having regard to that complexity, we submit that all participants in the Family Court system undertake additional education on the intricacies of family violence, and its impact on victims as well as trauma informed practice. This could take several forms which may include regular and ongoing training and the provision of an easily accessible handbook to the judiciary which addresses relevant factors. Any such

⁵ Heartward Strategic (2022) Money and Mental Health Research Report.

<https://www.beyondblue.org.au/docs/default-source/about-beyond-blue/20061-money-and-mental-health-research-final-report-220804.pdf?sfvrsn=fd5d30e5_2>

⁶ Breckenridge, J., Singh, S., Lyons, G., and Suchting, M., *Understanding Economic and Financial Abuse in Intimate Partner Relationships*. 2020, GVRN and Commonwealth Bank of Australia: Sydney, Australia.

handbook would need to be reviewed bi-annually to ensure it remains current to expert research and literature.

Evidence

In our experience, in some jurisdictions it is difficult for a victim survivor to obtain an Apprehended Domestic Violence Order when the family violence relates to financial and economic abuse.⁷ Accordingly, we consider the *absence* of a state or territory family violence order to be irrelevant to the Court's determination of the evidence of financial and economic abuse in property settlement proceedings. We recommend the Family Law Act specify that the absence of a family violence order is not evidence of the absence of family violence and/or financial and economic abuse.

Recommendations:

- 1. Include economic and financial abuse as a consideration under the list of current and future circumstances pursuant to section 79(4) so that the Court must consider the "effect of any economic or financial abuse to which a party to the marriage has been subjected by the other party".**
- 2. Include economic and financial abuse as a consideration under the list of current and future circumstances pursuant to section 90SM (4) so that the Court must consider the "effect of any economic or financial abuse to which a party to the marriage has been subjected by the other party ".**
- 3. Include a definition of economic abuse and financial abuse in the Family Law Act with examples that do not limit the scope of the definition.**
- 4. Commit specific funding for a handbook and ongoing education for all participants in the Family Court system on the intricacies of family violence, and its impact on victims as well as trauma informed practice.**
- 5. Amend the Family Law Act to specify that the absence of a family violence order is not evidence of the absence of family violence and/or financial and economic abuse.**

⁷ Singh, S., Lyons, G., Breckenridge, J., Suchting, M., Opdam, J., Monastiriotis, M. and Nair, G. (2022). *Legal responses to economic and financial abuse in the context of intimate partner violence: What is the role of criminal, family and migration law?* Sydney: Gendered Violence Research Network, UNSW Sydney.

Part 2: Principles for conducting property or other non-child-related proceedings

Consultation paper questions:

9. Do you agree with the proposed approach to establish less adversarial trial processes for property or other non-child-related proceedings?

10. If not, please expand on what you do not agree with and why. What would you propose instead?

11. Do you agree with the scope of proceedings proposed to be within the meaning of 'property or other non-child-related proceedings'?

12. If not, please expand on what you do not agree with and why. Should any specific types of proceedings under the Family Law Act be excluded?

We support the creation of a new division that will allow the use of less adversarial trial processes for proceedings, that will safeguard parties against family violence and conduct the proceedings without undue delay and with little formality. We note that perpetrators of family violence use systems including the family law system to perpetuate further family violence. We welcome amendments that will minimise a perpetrator's ability to commit systems abuse.

Recommendation:

- 6. Establish a new division that will allow the use of less adversarial trial processes.**

Part 3: Duty of disclosure and arbitration

Consultation paper questions:

13. Do the amendments achieve a desirable balance between what is provided for in the Family Law Act and the Family Law Rules?

14. If not, please expand on what changes you would propose and why.

15. Do the definitions of 'property and financial matters' in proposed subsections 71B(7) and 90RI(7) capture all matters when financial information and documents should be disclosed? If not, what should be changed and why?

16. Do the proposed provisions achieve the intention of simplifying the list of matters that may be arbitrated?

17. Do you have any concerns with the proposed arbitration amendments, including with empowering a court to terminate arbitrations when there is a change in circumstances?

We support the inclusion of the disclosure rules within the provisions of the Family Law Act and consider they provide a balance between what is provided for in the Act and in the Rules.

Recommendation:

- 7. Include the disclosure rules within the provisions of the Family Law Act.**

Protecting sensitive information in family law matters

Consultation Paper Questions:

35. Should there be additional safeguards in the Family Law Act to prevent initial access to protected confidences and how would this be balanced with procedural fairness requirements?

36. Are the discretionary powers of the court in Part 6.5 of the Family Law Rules sufficient to protect confidential information, and if so what could be done to ensure litigants are aware of these powers? For example, is the advice in the 'Subpoena – Family Law' form adequate regarding the process to object to producing subpoena material?

37. Are there any other legislative or non-legislative approaches you would propose to ensure protected confidences are accessed and used appropriately in family law proceedings?

We agree with the submission from Women's Legal Services Australia (WLSA) in relation to protecting sensitive information in family law matters.

We support the protection of sensitive records ('protected confidences privilege') in family law proceedings. It is important to give victim-survivors agency to determine whether their sensitive records are admissible in family law proceedings. There is public interest in encouraging people to access counselling and other support to help in their recovery and knowing those records and processes will be confidential, particularly victim-survivors of family, domestic, and sexual violence.

We also acknowledge there are circumstances when a person's protected confidences should be adduced into evidence and are relevant in determining risk of violence or abuse. The paramount consideration in determining whether such evidence should be adduced should be the best interests of the child. There should also be consideration of whether the sensitive records belong to a victim-survivor of family, domestic, or sexual violence, and whether they consent to the records being shared with the court or the perpetrator.

Additional factors should be considered regarding the admission of evidence of a protected confidence in the proposed s99(7) that balance harm with the value of the evidence, including:

- whether the person has consented to their sensitive records being adduced into evidence
- whether the sensitive records belong to a victim-survivor of family, domestic, or sexual violence
- the probative value of the evidence
- the importance of the evidence
- the availability of other evidence

- the likely effect of adducing the evidence, including the likelihood and nature and extent of harm to the protected confident and child/children to whom the proceedings relate
- the means available to the court to limit the harm
- whether the substance of the evidence has already been disclosed by the person who made the protected communication or any other person
- the public interest in preserving confidentiality of the protected confidence

This will ensure greater safeguards and transparency around protected confidences. It is also vitally important for people to have access to legal advice and representation with respect to protected confidences.

Recommendation:

- 8. Insert additional considerations in proposed section 99(7) in the Exposure Draft of the Family Law Amendment Bill 2023.**

Additional Considerations

We raise two additional matters for consideration that are not contemplated by the Discussion Paper but, in our experience, impact victim survivors of economic abuse in property settlement. We recommend the Minister undertakes further consultation on these issues.

Spousal Maintenance

We agree with the submission from Women's Legal Services Australia that family violence is highly relevant to spousal maintenance applications in the same way that it is relevant to consideration of current and future circumstances in property settlement applications. This should be explicitly recognised in the legislation.

There is no proposal in the Exposure Draft for s75(2) to be amended to include the effect of family violence, and economic and financial abuse. We question whether this is an oversight given the proposed new s79(5) is a duplicate of s75(2), save for the subsection about family violence.

Recommendation:

- 9. Amend section 75(2) to provide that family violence and economic and financial abuse are considerations in spousal maintenance applications.**

Bankruptcy

Although the scope of the consultation does not include bankruptcy in property settlement proceedings, we request consideration be given to the inequities that arise by the interaction between bankruptcy and family law and the relevant legislation which includes the Family Law Act and the *Bankruptcy and Family Law Legislation Amendment Act 2005*.

An undischarged bankrupt is precluded from commencing or continuing family law proceedings relating to property settlements. Their claim to a property settlement vests in their bankruptcy trustee. This can have significant ramifications if the bankruptcy was a direct result of financial abuse.

Currently, a victim survivor who was made bankrupt because of liabilities that resulted from financial abuse, cannot seek a property settlement as their claim vests in the trustee. The non-bankrupt party, however, can make a claim against property that has vested in the trustee. This results in significant inequities where the perpetrator of financial abuse receives benefits as a direct result of their conduct.

We recommend amendments to legislation which would allow a victim survivor to seek orders for a property settlement.

The following case studies illustrate how forced bankruptcy can be an enduring result of financial abuse in family law and lead to inequities.

Jillian's Story

Jillian* was appointed a director of Company XYZ Constructions Pty Limited. Jillian was not involved in the business but signed paperwork in the context of experiencing significant family violence. Jillian was the primary homemaker and carer of their two children and the family's financial needs were met by her husband.

The company was made insolvent because of its liabilities and Jillian, who had signed personal guarantees, was made bankrupt. The liabilities exceeded \$600,000. Shortly before the company became insolvent, Jillian's husband withdrew all the available money from the home loan redraw account and all the money from the offset account, which was approximately \$80,000.

Jillian owned a property in her name, of which she had received one half share as an inheritance. Jillian and her husband purchased the other half share from Jillian's sister and the property was transferred into Jillian's name. The property was valued over \$1 million and there was approximately \$400,000 in equity. The mortgage had been refinanced over the years to support the husband's business.

When Jillian was made bankrupt, her equity in the property was vested in the Bankruptcy trustee. Jillian's husband commenced proceedings in the Family Court (as it was then known), joining the trustee as a party to the proceedings. He sought sixty percent of the equity in the property. There was nominal superannuation. Jillian had no standing to seek any orders from the Family Court as a bankrupt. Her husband succeeded in receiving fifty percent of the equity, with the creditors receiving the remainder. Jillian received no funds from the property settlement and her credit rating was severely impacted by the bankruptcy. Meanwhile, her husband used the funds to purchase another property in his sole name, then set up another company and began operating his business under a new name.

* Name has been changed

Louisa's story: Bankruptcy & Family Law

Louisa* was married for almost twenty years. Unbeknownst to her, her husband listed her name as a director of several companies and then proceeded to make risky investments through those companies. He held all assets in his name and left her with all the risk. Louisa signed some documents after experiencing relentless pressure and threats from her husband, not fully understanding the legal implications of what she had signed.

Louisa's husband's business dealings resulted in her becoming bankrupt. Louisa separated from her husband. Proceedings were commenced in the Family Court (as it was then known) and Louisa attempted to represent herself. As she was a bankrupt, she had no standing to seek orders for a property settlement. Her husband retained the assets in his name, which included real estate with significant equity. Louisa, as a bankrupt, received nothing.

This case shows the significant disadvantages experienced by a party who has been financially abused, and the interactions between family law and bankruptcy legislation. This is an area of law which needs reform to protect people experiencing financial abuse.

*Name has been changed

Recommendation:

10. Conduct a consultation on the interaction between family law and bankruptcy legislation and the consequences for victim survivors of financial abuse.

Adjustment of interest with respect to Property

Currently, a property settlement order can only be made under section 79 or 90SM if the value of the assets exceed the liabilities. Conversely, property settlement orders (excluding superannuation) cannot be made if the total debt of the parties exceed the value of the assets. A victim survivor of financial abuse is often left responsible for the payment of debt that was incurred because of financial abuse.

We are of the view further amendments to the Family Law Act should be made to address this issue. Amendments could allow the Court to make an order requiring one party to be responsible for payment of a liability and indemnifying the other party. Currently, section 81 of the Family law Act acts as a hurdle to this. Section 81 provides a positive duty to end the financial relationship of the parties, as far as practicable. This is a significant hurdle, as is the requirement that the court can only make an order to adjust interests with respect to property. In other words, there must be *property* for the Court to make a property settlement order.

We note this is a complex issue involving jurisdictional issues and would require significant amendments to the Act which are not within the scope of the current proposed amendments. However, we draw attention to this issue as it is a frequent hurdle faced by victim survivors of financial abuse.

The following case studies demonstrate the barrier this presents for people experiencing financial and economic abuse.

Julie's story

Julie* was in a de facto relationship for twelve years. There were three children from the relationship all aged under ten. Julie's family were residing in rental accommodation. The lease was in her partner's name. She experienced significant family violence which resulted in an eating disorder and other mental health issues.

After separation, Julie became aware that her partner had obtained a credit card and store card in her name via online applications totalling \$36,000. She became aware of these liabilities

when she received letters of demand from the creditors as both cards were significantly in arrears. After obtaining her credit report, Julie ascertained that her partner had obtained two further store cards in her name with a total debt of \$16,000. Accordingly, she had debt totalling \$52,000. Her credit report noted numerous missed payments and defaults. Julie did not receive any benefit from the debts and not aware of how the funds were expended.

The parties had an investment property that had nominal equity. A sale would have resulted in insufficient funds to pay the liabilities. The property was in her partner's name. The liabilities and notifications on her credit report impacted Julie's ability to obtain finance and secure other rental accommodation. Julie's partner was employed and earning an income exceeding \$100,000 per annum and had capacity to pay the liabilities but refused to do so. Julie successfully sought orders from the FCFCOA for the sale of the investment property but was still left with liabilities totalling \$40,000.

*Name has been changed

In Julie's case, she had no recourse to seek orders from the FCFCOA that the outstanding liabilities be paid by her partner as and when they fell due as this would have offended section 81 of the Family Law Act. This problem can be addressed if amendments are made to the Act to allow the Court to make orders requiring a party to be responsible for payment of instalments of a debt as and when they fall due (when there are no assets to satisfy the debt) notwithstanding it will offend section 81 of the Family Law Act.

Jacinta's case study below is another example of a victim survivor of financial abuse being left responsible for the repayment of significant liabilities that arose because of their partner's conduct. Under the current regime, these victim survivors cannot seek redress from the Court without assets that can be dealt with to satisfy the liability.

Jacinta's story

Jacinta was married for five years wherein she was the victim of family violence. Her husband coerced her into obtaining credit cards in her name. He then forcibly took the cards and she never saw them again. He withdrew cash from the credit cards totalling \$24,000 in numerous transactions which he transferred overseas into an account in his parents' name. Jacinta's husband made the repayments on the cards until the parties separated. At the insistence of her husband, Jacinta also contributed to the repayments. The parties had no assets other than furniture.

After separation Jacinta's husband ceased making the payments. Jacinta was left with the liability. She did not have the capacity to make the repayments on her own which impacted her credit rating. Jacinta developed depression during her marriage because of the family violence. Her depression was exacerbated after receiving numerous phone calls and letters from creditors.

*Name has been changed

These issues need to be explored further to avoid hurdles faced by victim survivors in seeking orders under the Family Law Act.

Recommendations:

- 11. Amend the Family Law Act to allow the Court to disregard section 81 when considering financial orders in circumstances of financial abuse.**
- 12. The Minister conducts further consultation on Family Law Act amendments to allow a Court to allocate responsibility for a debt when there is no property.**

Conclusion

We are supportive of the proposed amendments to the Family Law Act and agree the wording of the exposure draft broadly clarifies, codifies and adds to the matters the court takes into consideration when making orders in property settlement proceedings. We welcome the inclusion of the impact of any family violence and support the recognition of financial and economic abuse as a critical factor in the determination of a property settlement.

As experts in financial and economic abuse, our recommendations seek to refine the exposure draft and highlight opportunities for further amendments to improve the system and outcomes for victim survivors.

Thank you for the opportunity to provide feedback on this consultation. We have no objection to this submission being published. We welcome the opportunity to discuss this submission in further detail. Please contact Gayatri Nair at earg@earg.org.au.

Yours Faithfully,



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