



9 February 2022

Senator the Hon Anne Ruston  
Minister for Families and Social Services  
Minister for Women's Safety  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

**By post and email: [senator.ruston@aph.gov.au](mailto:senator.ruston@aph.gov.au)**

Dear Minister

## **RE: DRAFT NATIONAL PLAN TO END VIOLENCE AGAINST WOMEN AND CHILDREN**

We write on behalf of Women's Legal Services Australia in response to the Draft National Plan to End Violence against Women and Children. We welcome this ten-year commitment to action and look forward to contributing to developing the proposed 5-year action plans. Each centre is responding individually to the survey on the Department of Social Services website, to respond to the department's specific questions. However, we also raise the below high-level matters to strengthen the final Plan.

### **About Women's Legal Services Australia**

Women's Legal Services Australia (WLSA) is a national network of specialist, women-led accredited community legal centres, specifically developed to improve women's lives through specialist legal representation, support, and advocacy.

WLSA members seek to promote a legal system that is safe, supportive, non-discriminatory and responsive to the needs of women. Some of our centres have operated for 40 years. WLSA members approach the legal issues facing women and their experience of the legal system within a broader analysis of systemic gender inequality and women's experiences of other inequalities, including intersectional inequalities. WLSA members are committed to providing individual services whilst also working towards deeper legal and cultural change to redress power imbalances, address violence against women and children and gender and other inequalities. Individual member centres deliver legal advice, information, casework, and legal education to women. Principal areas of legal service work include family violence (family violence intervention orders), family law, child protection and crimes compensation.

### **Specialisation**

In working towards our service missions, to facilitate access to justice, we collectively assist the Commonwealth Government deliver on their commitments arising from the United Nations Convention on the Elimination of Discrimination Against Women. Women's Legal Services throughout Australia serve as a special measure under international law to assist level the playing field for women in their interface with the justice system. Accordingly, the specialisation and expertise of the wider specialist women services require recognition within the plan if the gendered drivers of violence against women are to be addressed.

## Safety

The plan's effectiveness would be strengthened by a more comprehensive and clear focus on **women's safety across all pillars**. This focus will empower victims-survivors to drive response objectives, have a greater focus on prevention and early intervention, and stop the cycle of violence for future generations.

While there is a current focus on safety in responding addresses crisis situations, a broader safety focus will empower women to recover and rebuild their own resilience after trauma with holistic supports. Safety will include not only protecting women from and responding to crisis situations and incidents of violence, but also helping them and their children build the structures and networks they need to recover long-term – including financial security, housing, and health.

## Systems

An ambitious ten-year plan is an opportunity to improve fragmentation across systems. **A more consistent, co-ordinated, systems-based approach across each of the pillars is required to achieve that ambition.**

Women who are dealing with the consequences of violence engage with a bewildering number of services and organisations. Individual services do their best to create networks and bridge gaps, but entire sectors are poorly connected. Across police, legal, health, disability, housing, mainstream and specialist services, there is not a shared understanding of effective or trauma-informed responses. Examples of specific risks include misidentification of women as perpetrators, perpetrators using the system to further victimise women and delays. Navigating systems becomes an administrative burden, and the systems become a barrier to recovery rather than an enabler.

The plan could also be more methodical in recognising the systems where violence against women occurs – for example violence arising in the family law system is a key driver of a range of both legal and non-legal issues. Please see **the Women's Legal Services Australia Safety First in Family Law Plan** at [https://www.wlsa.org.au/campaigns/safety\\_first\\_in\\_family\\_law](https://www.wlsa.org.au/campaigns/safety_first_in_family_law).

Specialist women's legal services and other specialist women's services are filling the gaps of helping women navigate these complex systems and helping them manage the risks of further harm. This is resource-intensive, taxing work, where the sustainability of the system and sector, including front-line workers, must be considered in any long-term plan.

## Solutions

Women's legal services look forward to helping you and your department develop the proposed 5-year action plans. Our centres work with women day in, day out, to provide holistic and practice solutions for long-term safety outcomes. We address individual women's specific issues so they can solve their legal and related problems to move on with their lives. We are uniquely placed to help you understand what actions and programs are effective at helping women, including Aboriginal and Torres Strait Islander Women, women with disability, women who speak languages other than English and women with complex problems to solve.

We anticipate the action plans will include concrete evidence-based objectives, an outcome and impact focus, responsibilities for delivery, and with clear evaluation and measurement frameworks and tools .

For further information, please contact WLSA spokesperson for this response Claudia Maclean, Principal Solicitor, Women's Legal Centre ACT on (02) 6257 4377 or [cmaclean@wlc.org.au](mailto:cmaclean@wlc.org.au).

Yours faithfully,



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🌐 [www.wlsa.org.au](http://www.wlsa.org.au)