



## SASVic feedback on the Draft National Plan to End Violence Against Women and Children

### Introduction

SASVic welcomes the opportunity to provide feedback on the Draft National Plan to End Violence Against Women and Children (Draft National Plan). We recognise the contribution the fourth action plan made to preventing and responding to violence against women and children at the national level, including sexual assault. We acknowledge the significant increases in public exposure and community understanding of violence against women and children in recent years, including, in our state of Victoria, historic investment in work to prevent and respond to family violence. We welcome these changes.

We note previous work to address sexual assault, such as the Commonwealth Royal Commission into Institutional Responses to Child Sexual Abuse, and in terms of sexual assault in the context of family violence, the Victorian Royal Commission into Family Violence. We support the recommendations of these royal commissions, and note the ongoing work needed to prevent these forms of violence, hold perpetrators to account and promote recognition, recovery and restitution for victim survivors.

The next National Plan can build on this foundational work by better acknowledging and responding to sexual assault, in all settings, whether familial, institutional or other, and in all forms, including sexual harassment and rape. The next National Plan must also reflect the urgent need for strategies and investment to address increased demand for sexual violence-related support services and subsequent pressures on the specialist workforce. The continuing national dialogue relating to sexual assault and lived experience of sexual abuse, and the impact of COVID-19 lockdowns, has had a significant impact on case complexity and the demand for sexual assault services. Public exposure of current and historic sexual abuse leads to increased request for support from our services: the unprecedented increase in reporting of sexual abuse in recent years has led to a significant increase in demand for our services. Funding increases have not kept pace with increased demand, compromising our ability to provide a service to all those seeking one.

There is a need for increased and longer-term investment in specialist sexual assault services across states and territories. Governments at both state and federal levels need to invest to ensure services are adequately resourced and able to respond immediately when a victim takes the step of seeking support.



## About SASVic

Sexual Assault Services Victoria (SASVic) is the newly incorporated and expanded peak body for specialist sexual assault and harmful sexual behaviour services in Victoria. Our purpose is to promote the rights and recovery of all victim-survivors of sexual assault and address harmful sexual behaviours in children and young people. We seek to achieve this by working collectively to address the attitudes, systems and structures that enable abuse to occur or negatively impact victim-survivors.

SASVic members provide support to all victims of sexual assault and sexual violence, including women, children, young people, men, and people who identify as gender diverse. Members of SASVic include:

- Australian Childhood Foundation
- Ballarat Centre Against Sexual Assault (CASA)
- CASA Central Victoria
- CASA House
- Centre Against Violence – Ovens and Murray CASA
- Eastern CASA
- Gatehouse Centre
- Gippsland CASA
- Goulburn Valley CASA
- Kids First
- Mallee Sexual Assault Unit/Mallee Domestic Violence Service
- Northern CASA
- Sexual Assault Crisis Line
- South Eastern Centre Against Sexual Assault
- South Western CASA
- The Sexual Assault and Family Violence Centre
- West CASA

## Acknowledgment of Country

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.

## Explanation of the prevalence, drivers, and different forms of gender-based violence in Australia within the Draft National Plan

The Draft National Plan provides a wealth of data and evidence regarding the prevalence of various forms of VAW and gender-based violence. However, the way the document is structured, and its length, make it hard to navigate and distinguish between content describing the ‘problem’ and proposed actions, investments, accountability and outcomes. Overall, the Draft National Plan should be refocused on describing clear actions, targets and accountability rather than re-stating prevalence data.

Data in relation to family violence and sexual violence is notoriously complex. In part, this reflects the many terms used to denote and define various interrelated forms of gender-based violence, including sexual violence (family violence, intimate partner violence, sexual assault, sexual harassment, child sexual abuse, sexual abuse that occurs in institutional as opposed to the family context, etc). This complexity is unfortunately reflected in the varying terms and definitions used in the Draft National Plan. Gender-based violence and violence against women are used interchangeably, children and LGBTIQ+ are included inconsistently. For example:

‘Our vision is for a country where all *women and children* live free from fear and violence, thrive and reach their full potential, and where *women and children and LGBTIQ+ people of all genders* are safe at home, at work, at school, in the community and online.’<sup>1</sup>

SASVic supports the Foundational Principles provided in the plan, but endorses *Safe and Equal’s* recommendation that additional principles of *Children and young people as victims in their own right, Perpetrator Accountability* and *Family and Domestic and Sexual Violence Specialisation* be included.

### **Inclusion of sexual violence**

SASVic welcomes the acknowledgement in the Draft National Plan that ‘while sexual assault and other forms of sexual violence can occur in the context of domestic and family violence, it can also be perpetrated by other people known or unknown to the victim-survivor.’<sup>2</sup> We agree that in order to be effective, it is critical that efforts to prevent, address, and respond to sexual violence recognise both the intersections and clear points of difference between domestic and family violence and sexual violence.’<sup>3</sup>

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<sup>1</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P6.

<sup>2</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P12.

<sup>3</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P12.

However, as previously mentioned, we believe there is opportunity to strengthen the way the document is structured, and its length, which make it hard to navigate and distinguish between content describing the ‘problem’ of sexual violence (in its various interrelated forms) and proposed solutions such as actions, investment and/or accountability towards outcomes. Overall, the Draft National Plan should be refocused on describing clear actions, targets and accountability. In particular, SASVic would like to see a clear breakdown of proposed investment and initiatives under each pillar that pertain to preventing and addressing sexual violence in the final National Plan.

### Definitions

SASVic recommends that the National Plan develop a comprehensive definition of sexual abuse, assault and violence that covers the continuum of sexual violence and promote shared use of this definition. This definition should include in its scope:

A range of behaviours including uninvited sexual behaviour that makes the recipient feel uncomfortable, harassed, or afraid; stalking; unwanted touching or remarks; sexual harassment; coerced sexual activity; sexual slavery; rape with physical violence and threats to life.

Greater attention to sexual harassment and other forms of sexual violence in both public places such as streets and institutional settings including workplaces, schools, aged care and disability, mental health.

Harmful and problem sexual behaviour, that is, sexual harm caused by children. Reflecting the developmental capacity of children and young people, it is important to distinguish between acts by children and adults. Experts distinguish between perpetration of sexual violence by adults and problematic or harmful sexual behaviour by children aged under 18 years. Under Victorian law, children under 10 are not criminally responsible for their behaviour.<sup>4</sup>

### The National Pillars

As stated in SASVic’s previous submission regarding the Draft National Plan, we believe the four *National Pillars* in the draft National Plan have the potential to support an appropriate holistic approach to identifying and responding to gender-based violence. We note, however, that the ability to translate this potential to meaningful progress is dependent on the investment, targets and accountability supporting each pillar.

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<sup>4</sup> Kelly, L. (2016). [‘The conducive context of violence against women and girls’](#), Discovery Society.



SASVic would like to see a clear breakdown of proposed investment and initiatives under each pillar that pertain to preventing and addressing sexual violence in the final National Plan.

### Prevention and the need for structural change

In relation to prevention, we strongly urge that the Draft National Plan aligns more comprehensively with the evidence, analysis and frameworks contained within Change the Story and related national prevention frameworks produced by OurWatch (such as Changing the Landscape). This should include a clear and consistent explanation of gender inequality as the underlying driver of gender-based violence, including all forms of violence against women.

As noted by Safe + Equal, 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 describe how these responsibilities intersect and interact. Currently, the focus areas in the draft Plan are disproportionately weighted towards those where states and territories hold primary responsibility for action, including the criminal justice system and policing, child protection, service integration and workforce capability building.

In relation to the prevention pillar, SASVic supports Safe + Equals calls that the National Plan should identify and prioritise key areas for structural reform aimed at helping to prevent and address violence against women and sexual violence.

The National Plan should clearly 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 and associated action plans must include commitments to addressing these levers, including:

- 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.

- Implementing the recommendations from the multiple inquiries into the Family Law system to reduce systems abuse via the Family Law system.
- 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 Support Package program that gives victims survivors across the country equitable access to resources that support them to escape family violence.
- Establishing a common, evidence-based 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.
- Working with victim-survivors with disabilities to address the interface between the NDIS, access to housing and access to family violence services.<sup>5</sup>

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. For example, we strongly recommend that the national plan recognise the impact of gendered issues such as lack of affordable childcare and housing and the gender pay gap on women's status and the link to violence against women and children.

SASVic echoes 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.

### Prevention of sexual violence

Sexual violence, although preventable, is pervasive and persistent; despite more than three decades of social policy and programs in Victoria and nationally seeking to lessen sexual violence, prevalence levels are not significantly decreasing. There is an urgent need to strengthen government action to address sexual violence.

Sexual violence causes deep and lasting damage, including trauma. For individual victim survivors, sexual violence can result in developmental, cultural, financial, psychological, physical and social

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<sup>5</sup> This list has been drawn from [Safe+Equal's](#) draft submission prepared in response to the Draft National Plan.

harm, be a causal factor in mental and physical illness, substance dependence and gambling harm, and negatively impact on survivors' cultural, economic, political and social participation. The criminalisation of people affected by unaddressed trauma is an additional impact.

Sexual violence occurring along a continuum<sup>6</sup>, - highlighting the links between common types of violence, that are often minimised and trivialised, and less common types, that are treated as aberrant acts, committed by individuals who are outside society. Recognition of the continuum of sexual violence provides an important foundation for combatting sexual violence, showing the enabling link between 'normal' types of violence, including street based sexual harassment and sexual violence seen as extreme but rare. For example, girls and young women's experience of sexual harassment in public places often teaches them that men's violence will not be taken seriously, undermining their confidence that they can seek justice when other forms of violence are perpetrated against them. Recognising the continuum of violence highlights the importance of responding to all sexual violence, not just criminal acts, as non-criminal forms of violence have a chilling effect on women and girls' participation in society as well as enabling escalating violence by demonstrating to both victims and perpetrators that perpetrators can act with impunity. For this reason, it is important that the strategy is not dominated by criminal justice responses to sexual violence, as these will not adequately address the full continuum of violence, and so will have limited preventive value.

One way to think about settings is the concept of conducive contexts, that is, contexts that include elements that make sexual violence more likely.<sup>7</sup> Some conducive contexts include the family, institutions (such as childcare, schools, university, sporting clubs), conflict and transition, public spaces and online environments. In the state context, institutions such as out-of-home care, in particular residential care, aged care, prisons and educational institutions are key institutions that can be conducive to sexual violence. Additionally, widespread accessing of pornography creates a context conducive to sexual violence.

Additional consideration should be given in the National Plan to the factors that contribute to sexual violence, both within and separate to the family violence context. For example, it is clear from recent community attitude surveys that an unacceptable percentage of young men, in particular, do not understand what non-consensual sexual activity looks like and how to be aware in their interactions with intimate partners that they are receiving specific and enthusiastic consent. Young men, more than any other group, are more likely to lack clarity about what constitutes abuse in an intimate relationship, including coercive control and tactics that cause fear and dehumanise a partner.

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<sup>6</sup> Kelly, L., (2012). 'Standing the test of time? Reflections on the concept of the continuum of violence', in Brown, JM & Walklate, SL (eds) 2012, Handbook on Sexual Violence, Taylor and Francis Group, London.

<sup>7</sup> Kelly, L. (2016). ['The conducive context of violence against women and girls'](#), Discovery Society.

We recommend that the National Plan address the issue of pornography more comprehensively and include strategies for developing this work in more detail. Future research in this area should also consider children under the age of 14. SASVic would also like to see more targeted education in education and early years settings about consent and abuse in relationships, delivered from early years and run by individuals who have the expertise.

SASVic supports the call for a national gender equality strategy, and the inclusion of sexual violence within its scope.

### National law reform priorities

SASVic is broadly supportive of promoting greater legal consistency across all states and territories in terms of laws, justice responses and support offered to victim-survivors when interacting with the justice and court systems.<sup>8</sup> The exception to this is cases where Victorian law is more effective or supersedes the national standard. SASVic has identified the following areas of national law reform in relation to sexual violence which we would like to be included in the National Plan.

- **Strategies to address the criminalisation of victim survivors.** Sexual violence is a driver of criminalisation. We note that a disproportionately high number of survivors of sexual violence are incarcerated or otherwise involved with the criminal justice system as offenders. Many criminalised survivors have not had sexual violence against them acknowledged or appropriately responded to. Many consequently experience high levels of trauma, which may be expressed in ways that can be criminalised. While there is a community expectation that the criminal justice system provides victims of sexual violence access to justice and restitution, patterns in Victoria and nationally indicate that the criminal justice system is more likely to treat survivors as offenders than as victims. Access to specialist sexual assault services is a core element in addressing incarceration and recidivism.
- **A national definition of affirmative sexual consent** would underpin criminal justice responses to sexual assault across the country and improve the experiences of victims seeking justice through the courts. It would also help shape prevention efforts. Affirmative consent should be consistently enshrined in law. As noted in the Inquiry into family, domestic and sexual violence, there is ‘a lack of consistency and coordinated responses to all forms of violence against women and their children across states and territories’ [and] This is manifested through policy and legislation (for instance, there is a need to harmonise legislation on sexual assaults across states and territories).<sup>9</sup>

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<sup>8</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P37.

<sup>9</sup> [Inquiry into family, domestic and sexual violence House of Representatives Standing Committee on Social Policy and Legal Affairs](#) (Report, 2021).



- **Law reform addressing crimes committed against multiple victim-survivors by the same offender/s**, including exploration of the potential for legal cases covering multiple victims to be held jointly rather than each case being heard individually.
- **Implementation of the *Respect@Work: Sexual Harassment National Inquiry Report* recommendations.** SASVic strongly supports the implementation of the *Respect@Work* recommendations through the *Roadmap for Respect*. Addressing workplace sexual harassment is key to improving women's safety and economic security.<sup>10</sup>

### Recovery

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

### Role of specialists

Victim survivors require ready access to information, advice, safety, specialist support and counselling, justice, recovery and redress. Given the significant barriers to reporting cited by victim survivors, it is vital that they are able to access specialist sexual assault counselling and support before they are asked to make decisions about proceeding with legal options. With adequate support and information, more victims may choose to report.

Specialist sexual assault services also provide specialist responses to problem and harmful sexual behaviour that aims to secure the safety of all children involved, with a particular focus on children who have been exposed to problem or harmful sexual behaviours and to reduce the inappropriate behaviours by the child exhibiting PSB or HSB. Children and young people have many referral pathways into this program including family, schools, Child Protection and Police.

The continuing national dialogue relating to sexual assault and lived experience of sexual abuse, and the impact of COVID-19 lockdowns, has had a significant impact on case complexity and the demand for sexual assault services. For example, in a six-month period last year, SAS Victoria member services experienced an increase in demand of between 35-75%. Access to specialist sexual assault services for children and adults is now between 1 to 6 months across the state. Public exposure of current and historic sexual abuse leads to increased requests for support from our

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<sup>10</sup> Women's Economic Security Statement 2020; 2021-22 Women's Budget Statement. Cited in Draft National Plan to End Violence Against Women and Children 2022-2032.P17.



services: the unprecedented increase in reporting of sexual abuse in recent years has led to a significant increase in demand for our services. Funding increases have not kept pace with increased demand, compromising our ability to provide a service to all those seeking one.

There is a need for increased and longer-term investment in specialist sexual assault services across states and territories. Governments at both state and federal levels need to invest to ensure services are adequately resourced and able to respond immediately when a victim takes the step of seeking support. The sexual violence and family violence sectors are the settings which have historically had the greatest understanding of and expertise in recognising the links between women's inequality and sexual violence and have particularly expertise to inform and lead the development, implementation and monitoring of the national plan.

SASVic supports the development of a National Workforce Recruitment and Retention Strategy for the Specialist Sectors in the next iteration of the National Plan, reflecting current workforce pressures including increased demand.

SASVic strongly recommends that federal and state funding for specialist sexual assault services be increased to address heightened need for services. We note that the federal House of Representatives Standing Committee on Social Policy and Legal Affairs on the *Inquiry into Family, Domestic and Sexual Violence*, recommended not only an increase to core funding for specialist family violence and sexual assault services but also that Federal and State / Territory governments 'continue to provide increased funding for frontline family, domestic and sexual violence services in the COVID-19 pandemic'.<sup>11</sup>

## **1800RESPECT**

It is essential that 1800RESPECT, the national sexual assault, domestic and family violence counselling service, is provided by specialist sexual assault and family violence service providers and staffed by specialist counselling and support staff. Provider/s of 1800RESPECT must have proven collaborative partnerships with state and territory specialist sexual assault and family violence service providers across all jurisdictions. This is critical in ensuring that victim survivors receive support that is specialised, trauma informed, assists their access to safety and justice, and makes a difference to their journey of recovery following their experience of violence.

We note that under the new tender arrangements, 1800RESECT will now include sexual harassment within its scope of services. SASVic is interested in ascertaining the implications for this in the services state-based specialist sexual assault services are funded to provide. Otherwise calls will be

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<sup>11</sup> Recommendation 13: [Inquiry into family, domestic and sexual violence House of Representatives Standing Committee on Social Policy and Legal Affairs](#) (Report, 2021).



referred from 1800RESPECT at the national level, into a gap in the state-based support system. We recommend that state specialist sexual assault services be funded to fill this gap.

### **Support in rural, regional and remote areas**

There is a need for increased investment, information and access to justice and support services is particularly acute in regional, rural and remote areas. Access to service is a significant issue for victims, not just in terms of being able to access a service physically but also in small communities in terms of professionals knowing the victim or the abuser.

Our member agencies located in regional centres offer outreach services in smaller regional towns and rural settings. They also offer clients support to access services by providing fuel cards and taxi vouchers. Funding to regional and rural sexual assault agencies is not calibrated to take into account the distances and time required to access services for the client and to deliver outreach services across the service area covered.

### **Experiences of different cohorts**

SASVic supports the 'in principle' emphasis on centring lived experience within the Draft National Plan's implementation. However, we are concerned at the lack of detail or accountability regarding how this will be ensured. The current draft states only that 'Mechanisms for ongoing engagement and consultation with victim-survivors will be established to support implementation of the National Plan and its Action Plans.'<sup>12</sup>

In regard to how well the Draft National Plan represents and addresses the needs and experiences of diverse communities and individuals, SASVic refers to the feedback provided by specialist agencies such as Djirra, Women with Disabilities Victoria, Seniors Rights Victoria and Switchboard. Our impression is that, as in regard to sexual violence, ability to translate descriptions of prevalence & dynamics for specific cohorts into meaningful and measurable progress is dependent on the investment and targets developed. SASVic would like to see a clear breakdown of proposed investment and initiatives under each pillar that pertain to preventing and addressing sexual violence in the final National Plan.

For example, there are no actions to address the structural enablers and contributors to violence against women, girls and LGBTIQ+ people with a disability, such as through work in relation to the NDIS. Furthermore, different types of family violence such as elder abuse and adolescent family violence in the home are not reflected consistently throughout the Pillars and focus areas. SASVic also recommends the development of mechanisms to provide residents of aged care and disability settings with clear information and safe avenues for lodging complaints and accessing specialist sexual assault services.

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<sup>12</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P25.

## Children and young people

SASVic welcomes the ongoing recognition that the 'The National Plan acknowledges children as victims of gender-based violence in their own right and targets actions towards preventing and addressing violence against children under each of the four National Pillars. Increasing education and prevention efforts for children as well as supporting recovery from childhood trauma, are important strategies for breaking the cycle of violence against women and children.'<sup>13</sup> We note that experiences of child abuse are addressed concurrently through *Safe & Supported: the National Framework for Protecting Australia's Children 2021 – 2031*. Child sexual abuse is addressed through the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030*.

Children and young people who have been sexually abused, as well as those using harmful sexual behaviours and their families, require integrated and multi-disciplinary supports and responses. Integrated and holistic trauma informed-responses - inclusive of Aboriginal services, health, housing and education systems; and Child Protection, police and justice agencies - are central to preventing further child exploitation and abuse and future harm. Direct access points for young people are essential – they need access to free and confidential 24/7 specialist sexual assault counselling services that are youth focused. Mainstream 24/7 services are not adequate.

SASVic recommends that services for children and young people include outreach services, mentoring and community-based supports as well as specialist therapeutic services. Such services should be inclusive of support for parents/carers, both in assisting them to support the recovery of the children and young people, but to also be supported to recover from the impact on them of discovering the sexual abuse of a child or young person in their family. We recommend that federal and state government prioritise research on working with child and youth victim survivors as victims in their own right and improving responses that facilitate recovery from sexual abuse.

As noted previously, SASVic endorses the recommendation that additional principles of *Children and young people as victims in their own right* be included as one of the Draft National Plan's Foundational Principles.

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<sup>13</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P13.



### Outcomes, evidence, and measurements

SASVic acknowledges as Action Plans are developed under each of the four National Pillars, measurable and ambitious targets will be finalised following consultation with stakeholders, including non-government organisations, experts, and victim-survivors.<sup>14</sup> This makes it difficult to comment in detail on targets and measures at this stage.

SASVic notes that according to the Draft National Plan, targets will include measures of community attitudes towards violence, community prevalence of various forms of violence including physical, sexual and emotional violence. Targets will also be developed around the provision of services and the effectiveness of supports received by victim-survivors. The expertise and inclusion of sexual violence specialists including peak bodies such as SASVic will be a critical part of this process.

SASVic agrees that progress towards achieving these targets should be informed by a range of robust national, survey and administrative data sources including those specified in the Draft Outcomes Framework.<sup>15</sup> Furthermore, all monitoring of progress as part of the National Plan should report on indicators by key demographic characteristics, such as gender, age, country of birth, language spoken at home, health status, disability status, cultural identity, geographic location, visa and residency status, student status.

Sexual violence is under-reported at an even higher rate and also occurs outside of the family context. It is therefore critical that a 'specialist sexual violence lens' is applied to the development of the Outcomes Framework. This includes potential to include more attitudinal indicator data from NCAS measuring adherence to myths specifically relating to sexual violence, such as victim-survivor believability, an over-emphasis on evidence of physical injury or harm and/or prompt reporting.

SASVic acknowledges and welcomes the inclusion of indicators related to sexual harassment, safety in public spaces and experience of sexual violence in the past 12 months. However, we suggest consideration be given to including additional indicators and outcomes in relation to workforce capacity building and wellbeing, and waitlists and access, specifically related to support for victim-survivors of sexual violence. We refer to the National Women's Safety Alliance's feedback on the Draft Outcomes Framework for further information and feedback.

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<sup>14</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P49.

<sup>15</sup> Draft National Plan to End Violence Against Women and Children 2022-2032. P49.