



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

By

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Acknowledgement

This submission was written in Dharug land, and we would like to acknowledge the indigenous peoples, elders past and present who are the traditional custodians of the land where we live and work. We fully support the Uluru Statement of Heart. Always was, always will be.

Introduction

The Older Women's Network New South Wales (OWN NSW) is a community-based organisation that is run by older women, for older women.

Established in 1987, OWN aims to promote the rights, dignity and wellbeing of older women. It is the peak body representing 20 groups in New South Wales, including in rural, regional areas. We encourage mutual support and friendship amongst our members and work to foster a positive attitude toward ageing. Members of our organisation are older women who have a strong interest in housing affordability, ending violence against women and ensuring economic wellbeing.

We appreciate the opportunity to provide input into the Draft National Plan to End Violence Against Women and Children 2022-2032 (the Plan) and trust that our perspectives will be taken into consideration to improve and strengthen the Plan.

We have also endorsed the submission of Domestic Violence NSW; and have a joint submission with Housing for the Aged Action Group.

This submission is endorsed by Domestic Violence NSW.

What we support in the Plan

- We support the intent of the Plan to link with other national strategies and initiatives to ensure there is a coordinated and cross-sectoral approach to ending all forms of gender-based violence.
- We support the recognition that Aboriginal and Torres Strait Islander peoples must lead responses for their communities and deliver those responses through a dedicated Aboriginal and Torres Strait Islander Action Plan.
- We support the acknowledgement of children and young people as victims and survivors of violence in their own right.
- We support the centrality of the voices and experiences of victim-survivors in shaping and delivering trauma-informed services and solutions.

- We support the recognition of the intersectionality of a range of structural and systemic forms of discrimination and disadvantage – racism, ableism, homo-, bi- and transphobia, ageism, class discrimination – in perpetuating and exacerbating violence against women and children.

What is missing in the Plan

- While there is recognition of intersectionality, there is very little actual understanding of how intersectionality can exacerbate violence against women. This is therefore reflected in the limited way in which the Principles and Pillars are presented. An example of this is the fact that the voices and experiences of older women have not been meaningfully integrated into the Plan. It appears as though older women are added as an after-thought and often forgotten. Take this paragraph from the section on “Towards ZERO”:

A “towards zero” approach to violence against women and children means that we will reimagine and transform the social, political and economic aspects of our society that enable and sustain gender inequality, so that across all of Australia – in cities, regional, rural and remote communities alike – every individual’s humanity and worth is respected and valued, regardless of their gender or sexual orientation, identity, ability, race or socio-economic status.

As older women and age are not fully or meaningfully incorporated into the Plan, **age** was not even mentioned.

- The Plan completely ignores the important role and responsibilities of all levels of government in ensuring that they also take responsibility in ending violence against women and children. We strongly believe that there should be FIVE Foundations, instead of the four foundations currently outlined. The Fifth Foundation must be for “all levels of government to provide the resources necessary to ensure the success of the National Plan, as well as subject every legislation and policy to a human rights and gender lens analysis before implementation.”

In line with this, we call for a change in the "systems level outcomes" to reflect the responsibility that governments have in ensuring funding and reporting on legislation and policies which have been passed following a gender and human rights analysis.

- While there is recognition that gender inequality is a key driver of violence against women, there is no recognition that certain government policies have exacerbated violence against women and have caused greater inequality, such as the implementation of the Cashless Debit Card; and the continuing pegging of government benefits below the poverty line.
- The Plan fails to fully recognise that older women in residential aged care settings are especially vulnerable to violence, including sexual assaults. It therefore does not identify the role and responsibilities of providers of aged care to end violence against women. They are not even mentioned in the Plan, which is extraordinary, given that there are at least 50 sexual assaults taking place every week in aged care.
- There is no recognition in the Plan that specialisation of services is vital because of intersectionality. For instance, without spelling out that currently, sexual assault services, the police and providers are not at all equipped to deal with sexual assaults taking place in aged care, or even in group homes for people with disability, this will not be addressed.
- There is a total failure in the Plan to recognise the centrality of housing for women and children to escape violence and to rebuild lives. There are no targets given to increase the supply of affordable, long-term, safe housing for women and children fleeing violence which correspond to the numbers requiring this vital foundation.
- There is also a complete failure in the Plan to outline very clearly the need for governments to provide long-term, secure funding for services supporting victims of violence at a level which can meet the demand for services.
- The Plan is silent on the experience of temporary protection visa holders. This is a NATIONAL Plan, and all categories of women living in the country must be fully recognised in the Plan if we are to devise strategies to protect them from violence.

Recommendations

1

There is a need to strengthen the perspectives of intersectionality in the Plan such that all cohorts are recognised sufficiently and given prominence, including the voices and experiences of older women.

2

Inserting the roles and responsibilities of all levels of government, from local to state to Commonwealth, in addressing measures to end violence against women as the **FIFTH FOUNDATION**. This includes making it mandatory for all government policies and legislation to first be evaluated using a human rights

and gender lens to ensure that these measures will not increase inequality nor exacerbate violence against women and children; and for governments to report on this annually. The Plan must be bold and articulate the responsibilities for one of the most important stakeholders so that they can also be held accountable.

3

The Plan must outline the necessity for the Commonwealth government to ensure that all income support provided to women and children fleeing violence is pegged at a level which is above the poverty line, as well as ensure that an adequate accommodation supplement is given to enable women and children fleeing violence to live in secure, safe, long-term housing.

4

The Plan must recognise the existence of policies which exacerbates violence against women and children including the Cashless Debit Card,[1] as well as the incarceration of children which is an act of violence perpetrated by the state against minors and a contravention of the International Convention on the Rights of the Child;[2] and call for their removal.

5

The Plan must outline very clearly the need for governments to provide long-term, secure funding for services supporting victims of violence at a level which will meet the demand for these services.

6

The Plan must state the centrality of affordable, long-term, secure and safe housing as a foundation for women and children fleeing violence to rebuild their lives; and in conjunction with this, to call for a major investment by governments in building affordable and social housing at a level which will meaningfully address the waiting list for housing; and end homelessness.

7

The Plan must set a timeline for all states and territories to agree on a definition of domestic, family and sexual violence; and the harmonisation of all related laws such that all women and children are offered the best protection regardless of where they reside.

8

Under the 'Prevention' Pillar, the Plan has to go further and also include adoption of all of 'Respect@Work's and 'Set the Standards' recommendations IN FULL.

9

The Plan must recognise and state the existence of institutions as places where violence against women are perpetrated. For instance, in the explanatory paragraph under the title "What is violence against women and children?" it states:

Women can experience multiple and intersecting forms of violence, harassment and abuse across the course of their lives and across a variety of settings, including at home, in the workplace, online, or in the community.

'Institutions' must be identified as a specific place, just as workplaces are, where we can find violence against women. This must be recognised in all other relevant parts of the plan, including in the explanatory section "Violence affects women across all ages"

For older women (around 65 years and over), gender-based violence can include forms of elder abuse, violence perpetrated by family members including adult children, and violence that occurs in non-family and domestic settings.

It is imperative that "institutions such as residential aged care settings" also be listed.

The Plan must recognise the impact of sexual assaults on older women in residential aged care facilities. In the explanatory section on the impacts of sexual assault, it states:

Sexual assault is a major health and welfare issue in Australia and worldwide. For many victim survivors, the effects can be wide-ranging and lifelong. They can experience physical injuries, long-term mental health effects, and disruption to everyday activities such as eating and sleeping habits. Victim-survivors of rape or sexual assault may delay disclosing and reporting or never disclose their experiences. In fact, 83 per cent of Australian women did not report their most recent incident of sexual assault to the police. Misconceptions about sexual violence can result in victim-survivors fearing they will not be believed.

There is no recognition that older women in residential aged care facilities or women with disabilities in group homes face extra barriers to reporting, and their experience of sexual assault remains remain hidden and unspoken (as evidenced in the Plan itself.)

The invisibility of older women in residential aged care settings continue in the narrative of sexual assaults in the Plan. It is important to recognise the experience of younger women, but it is unacceptable that older women are forgotten considering their additional vulnerabilities brought on by the frailties of age when residing in aged care facilities. See below of an example from the Plan below:

The prevalence of intimate partner violence has remained relatively stable since the first National Plan was launched, and so there is still work to do to end violence in domestic settings, but we have also seen an increase in the prevalence of sexual violence in all settings. For example, rates of sexual violence among women increased between 2012 and 2016 (1.2 per cent in 2012 to 1.8 per cent in 2016). Experiences of sexual assault are higher for young women. In 2016, young women aged 15-34 accounted for more than half (53% or 11,000) of all police-recorded sexual assault victims.

Considering there are 50 sexual assaults per week in residential aged care facilities, by not listing this cohort even as a vulnerable category, it continues to invisibilize older women.

10

The Plan must outline the necessity for research bodies like ANROWS to be fully funded; while also acknowledging that research institutions have an important role to play in enriching and strengthening the evidence base to improve our responses to violence against women. Therefore, funding should also be directed to medical, allied health, social and economic research which not only examines the impacts of violence, but also in associated areas pertaining to addressing gender inequality and supporting women's wellbeing in the prevention of and recovery from trauma.

11

The Plan must call for consistent data collection across all jurisdictions, and for the data to be adequately categorised such that older women are not grouped as one indistinguishable category of 'women over the age of 55'. We require data to adequately and sensitively respond to the entire lifespan and so the data on older women should be broken down according to decades - 50s, 60s, 70s, 80s, 90s. We do not classify other age groups into categories which combine decades into one cohort - eg age 0 - 40 - yet this is exactly what is being done to older women.

12

The Plan must champion a participatory approach in realising the vision of the Plan by stating clearly that all stakeholders will be consulted in full in the design of the Outcomes Framework, the Action Plan targets and the Evaluation Plan. This includes service providers, peaks, and lived-experience advocates.

13

The Plan must highlight the importance of the role of peak bodies in improving the transparency and accountability of government policies, programs, funding and evaluation; and for the need for all levels of government to not only consult and include peak bodies in these processes, but ensure that additional funding is provided to facilitate this.

14

The Plan must recognise that older women are often excluded from the statistics of violence against women. This is not because they do not experience violence, but because they get categorised under the term 'elder abuse'. This is a term that often overlooks the gendered factor of structural violence and mitigates the seriousness of violent conduct perpetrated against older women. Due to a range of structural and systemic problems, older women are invisible and are not considered in the policy agenda to reduce violence, not only in Australia but also in the world.

15

Under the section on the Impact of COVID 19, it is imperative for the Plan to include acknowledgment of the abuse endured by thousands of older women who have been neglected, left malnourished, thirsty and without proper care due to the lack of the Commonwealth government's plan to deal with the impact of COVID 19 in aged care; as well as those who died prematurely. This is a deeply gendered phenomenon because the aged care sector workers are predominantly women who are poorly paid; and 65% of the users of aged care are women.