



**SUBMISSION RE: THE
NATIONAL PLAN TO END
VIOLENCE AGAINST
WOMEN AND CHILDREN
SECOND ACTION PLAN
AUGUST 2026**

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Acknowledgements

Acknowledgement of Country

Wesnet would like to acknowledge and pay respects to all First Nations people, as the Traditional and only Custodians of this country we call Australia. We recognise First Nations peoples' culture, wisdom, and connection to this land and pay our respects to Elders, past, present and future. We recognise the loss of land and culture, acknowledging the consequences of dispossession and colonisation on First Nations peoples. We acknowledge that sovereignty over this land was never ceded. This land always was and always will be Aboriginal land. First Nations women have multiple roles and identities relating to their culture, community, age, ability, sexual orientation and gender identity. Wesnet works tirelessly for an inclusive future free from violence. We acknowledge the strength and resilience of First Nations women, particularly those who have experienced domestic and family violence, and those who support and advocate for survivors of domestic and family violence. We pay our deepest respects to those who have lost loved ones as a result of domestic and family violence. Wesnet will actively work to be informed by the experiences and advocacy of First Nations women, and to support First Nations women in their quest for safety and equality.

Acknowledgement of survivors

Wesnet also takes this opportunity to acknowledge all survivors of gender-based violence. We pay respect to those who did not survive and to their family members and friends.

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About Wesnet

We are the Peak body for Specialist Women's Domestic and Family Violence Services in Australia. Our vision is a future where all women and children live free of domestic and family violence and its consequences.

With almost 400 eligible members across Australia, Wesnet represents a range of organisations, the core business of which is supporting survivors of DFV, including women's refuges and supported accommodation services, crisis response and case management services, counselling, recovery and information and referral services.

Harnessing its large national network of members and associate members, Wesnet plays an important role in identifying unmet needs, canvassing new and emerging issues, facilitating policy and sector debate and providing advice to government to provide improved responses to the problem of domestic and family violence. We do this within our communities, and in partnership with non-government stakeholders.

Wesnet works within a feminist framework which promotes understanding domestic and family violence as gendered violence, and that women's and children's experiences are also intrinsically shaped by their ethnicity, culture, ability, age, gender identity and class.

Executive summary

It is crucial that the next phase of action planning under the National Plan to End Violence against Women and Children 2022–2032 (National Plan) and the Second Action Plan work to articulate and map the pathways to safety for survivors of violence on a national scale. Once survivors of domestic and family violence have made the decision to seek support wherever they are in Australia, the pathway through the service system and towards safety should be clear and coordinated. The system should not pose additional barriers to seeking assistance or place survivors at greater risk of violence or returning to the person using violence. With this in mind, effective service systems are defined by clearly articulated roles and responsibilities, as well as coordinated relationships and accountabilities between the sectors working together to keep survivors safe. An essential step towards this goal is to define and map the specialist DFV sector alongside other key sectors and points of contact that are “complementary yet distinct” in their work to respond to survivors.

As the national peak body for specialist domestic and family violence services responding to victim-survivors in Australia, it is Wesnet's priority to elevate and articulate the complex, nuanced and lifesaving work of our members as an essential step towards building our national service system. Our member services are at the frontline of responding to survivors at risk of violence and seeking support, and specialist DFV practitioners hold the highest level of risk and responsibility for DFV risk assessment, safety planning and risk management of any sector in the broader service system.

The work to achieve a coordinated and integrated national domestic and family violence system will be lengthy and be taken carefully and sequentially. To this end, Wesnet proposes some foundational steps to be taken as a matter of priority. There are:

- collaboratively develop shared national definitions for domestic and family violence and specialist DFV service delivery as well as a shared set of evidence-based practice standards
- On the strength of a shared national understanding of specialist DFV practice and service delivery, a national approach to supporting, training and retaining a strong specialist workforce is required.
- Next, we must work towards a coordinated national strategy for data collection and expenditure reporting.
- Finally, we need funding and support for coordination and the secretariat role for the National Alliance of Domestic and Family Violence Service Sector (NADFVSS) to ensure the specialist DFV sector has a trusted and representative voice.

Wesnet also advocates for the Second Action Plan to have dedicated focus on addressing structural barriers for survivors of domestic and family violence in

other key service sectors. We reflect on the need to ensure that there are strengthened housing pathways and increased stock across crisis, transitional and long-term housing available to specialist DFV and homelessness services for survivors. This submission also presents recommendations in relation to improving safety and outcomes in the Federal Circuit and Family Court of Australia (FCFCOA).

We know that the work to design a national DFV system that meets the needs of people and communities, and which aims to address and dismantle both interpersonal and structural violence cannot be done by imagining survivors as homogenous. This submission reflects on the right for tailored, place-based and trauma-informed service delivery for every person and community wherever they are across the country. This submission makes recommendations in improving service delivery and responsiveness, and safety for First Nations survivors, children and young people, survivors living in rural, regional, remote and very remote (RRRR) communities, survivors with disabilities, and LGBTQIA+ survivors of domestic and family violence.

Technology Facilitated Abuse (TFA) is now part of domestic and family violence. Almost all specialist DFV practitioners (99.7%) are seeing TFA when supporting survivors. Furthermore, 51.6 per cent of practitioners now see TFA more frequently than non-TFA tactics while another third (31%) see it equally frequently. Addressing TFA is therefore imperative to ending gender-based violence (GBV) in one generation. Given its omnipresence, we have written a section specifically on TFA in the context of DFV. The section identifies four key areas that the Second Action Plan can focus on.

Firstly, there is a critical need to upskill the DFV workforce to respond to the evolving nature of technology-facilitated abuse. The submission proposes a national TFA workforce development strategy featuring a tiered, modular training program and a national capability framework managed by Wesnet to ensure consistent, expert responses across all states and territories.

Second, there is a need to sustaining and expanding two key federal initiatives beyond 2027 to ensure survivor safety:

- The Safer Technology for Women (Safe Connections) Program, a nationwide program that annually provides approximately 7,500 survivors with smartphones alongside tech-safety planning to their caseworkers. Despite high satisfaction rates, there is significant unmet demand, with over 300 agencies currently on a waitlist.
- Keeping Women Safe in their Homes (KWSITH) which provides security audits and home improvements to help survivors stay safe in their own homes and avoid homelessness.

Third, Regulating Private Security and "Rogue Actors": While 77% of practitioners use tech-sweep services, the sector is currently plagued by "rogue actors" who

lack trauma-informed training and engage in price gouging. A tiered regulatory approach is recommended, comprising:

- National guidelines and a quality assurance program to help practitioners evaluate the suitability of private security services.
- The establishment of a National Coordinating Body to oversee the industry, manage a public provider register, and enforce a DFV-specific code of practice.

Fourth, the section concludes by emphasising the need to bridge the gap between general technology policy and gender-based violence policy, ensuring that the voices of those with lived experience of TFGBV (Technology-Facilitated Gender-Based Violence) are embedded into future safety strategies.

The submission then moves on to Technology Facilitated Abuse more broadly in Section 6.

Technology-facilitated gender-based violence (TFGBV) is a complex issue that spans the jurisdictional boundaries of multiple regulatory agencies, including eSafety, the ACCC, OAIC, and ACMA. Currently, the eSafety Commissioner is the only agency actively engaged on TFGBV, but the scale of the problem requires a shared responsibility across government. The report recommends establishing a cross-agency TFGBV Regulatory Task Force coordinated by the Department of the Prime Minister and Cabinet to strengthen enforcement, coordinate law reform, and convene "fusion cells" to address specific risks like spyware and connected cars.

A primary policy gap exists in the proposed "Digital Duty of Care" within the Online Safety Act, which currently lacks a specific gender-based violence lens. While the duty of care aims to prevent foreseeable online harms, it does not yet adequately cover coercive control or systemic risks related to gender inequality. The submission advocates for:

- Adopting models from the EU and UK that treat TFGBV as a platform governance issue, requiring services to mitigate systemic risks like harassment and extreme misogyny.
- Developing a Violence Against Women and Girls (VaWG)-specific Code of Practice informed by lived experience and specialist DFV sector consultations.
- Broadening "Class 1" unlawful material definitions to include violent and injurious practices, such as sexual choking/strangulation, which is a high-risk factor in intimate partner homicide.

Digital environments are increasingly influenced by the "manosphere"—online communities that normalise violence against women and promote male supremacy. Algorithms often amplify this misogynistic content, delivering it to male-identified accounts within minutes. Furthermore, mainstream or "patriarchal pornography" reinforces rigid gender stereotypes and objectification,

with research linking its use to intimate partner sexual violence, including non-fatal strangulation and tech-facilitated sexual abuse. There is an urgent need for national education campaigns regarding the harms of strangulation and the necessity of sexual consent.

Artificial Intelligence (AI) presents a "double-edged sword" for domestic and family violence:

- AI is being weaponised for chatbot-simulated abuse, sexualised deepfakes, and automated stalking or impersonation tools.
- Many AI systems exhibit gender and racial bias, often deprioritising women in recruitment or failing to identify women of colour in surveillance.
- Meanwhile, AI can be used to identify survivors years before they seek support by analysing clinical notes or detecting abuse in digital payment descriptions.

We call for a GBV lens in all national AI policy decisions, including the National AI Plan and the AI Safety Institute, to ensure emerging technologies do not exacerbate existing inequalities

Summary of Recommendations

- ★ Recommendation 1: The specialist DFV sector must be resourced to collaboratively develop the following: (a) a nationally agreed definition for domestic and family violence; (b) a nationally agreed definition for specialist domestic and family violence services and service delivery; and (c) a nationally recognised and implemented Code of Practice for specialist domestic and family violence service delivery.
- ★ Recommendation 2: The specialist DFV sector must be resourced to develop a comprehensive national workforce development strategy for the specialist domestic and family violence workforce, which would align with existing State and Territory-based strategies and complement the broader national workforce development efforts.
- ★ Recommendation 3: The federal government should collaborate with the specialist DFV sector to design a national data collection framework expanding the existing work of the Safety Measures project.
- Recommendation 4: In line with recommendations made by the DFSV Commissioner in the 2025 report, the federal government should work with states and territories and in partnership with the Commission's Lived Experience Advisory Council to develop a national funding mapping framework to enable visibility and reporting of DFSV funding and expenditure nationally to inform and guide ongoing Action planning. The framework needs to: (a) establish agreed definitions of DFSV funding, (b) create consistent categories for recording DFSV funding to enable services to report on DFSV work undertaken in other funding streams (e.g. homelessness, Aboriginal community-controlled organisations, health) that contributed to improved outcomes for people experiencing DFSV, (c) embed reporting requirements into bilateral agreements under Federation Funding Agreements, and (d) capture actual expenditure for reporting.
- ★ Recommendation 5: Wesnet to receive dedicated funding to convene, coordinate and provide secretariat functions for the National Alliance of DFV Specialist Services, ensuring that the Government has access to timely, evidence-based advice from the national DFV Specialist Services sector, and providing an instrument with which to implement the work of the DFSV Commissioner and the National Plan.
- ★ Recommendation 6: Extend the Housing Australia Future Fund (HAFF) Crisis and Transitional Accommodation Program, including ongoing funding of \$40 million per year until 2036 (Cost of leaving recommendation)

- ★ Recommendation 7: Establish priority social housing pathways for victim-survivors across Australia, with equity of focus on metro and rural, regional, remote and very remote areas.
- ★ Recommendation 8: The federal government should initiate targeted audits into how DFSV perpetrators are weaponising government systems, particularly the family law system
- ★ Recommendation 9: Provide funding for First Nations domestic, family and sexual violence peaks at jurisdictional levels to support the work of the national peak, Our Ways Strong Together.
- ★ Recommendation 10: Ensure alignment between the Second Action Plan and Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036.
- ★ Recommendation 11: Provide long-term funding of Aboriginal and Torres Strait Islander community-controlled specialist family safety services, Aboriginal governance and decision-making, and culturally grounded healing and prevention.
- ★ Recommendation 12: Provide dedicated, core funding to ensure children and young people have their own specialist practitioners and case plans, including in refuges.
- ★ Recommendations 13: Consider systemic changes to ensure that children and young people can receive specialist support when the perpetrator doesn't provide consent.
- ★ Recommendation 14: Amend the age-related eligibility criteria for the Leaving Violence Payment to include young people who are between 15 and 17 years old.
- ★ Recommendation 15: The Second Action Plan needs a distinct focus and dedicated actions to address inequality in access to safety and support for women and children living in regional, rural, remote and very remote areas of Australia.
- ★ Recommendation 16: Allocation of funding should be based on unmet need, rather than density of population and a per capita basis.
- ★ Recommendation 17: The Second Action Plan incorporates the key asks contained in the third Blueprint for Reform released by the National Advocacy Group for Women on Temporary Visas Experiencing Violence

- ★ Recommendation 18: In line with recommendations made by WWDA, the Second Action Plan must identify where current legal, policy and data definitions fail to recognise disability-specific violence and rectify
- ★ Recommendation 19: Work with DFV experts and disability experts to address structural drivers that invisibilise and escalate the risk of violence against people with disability.
- ★ Recommendation 20: Work with DFV experts and LGBTQIA+ experts to address structural drivers that invisibilise and escalate the risk of violence against the LGBTQIA+ communities.
- ★ Recommendation 21: Wesnet is resourced to establish a national good practice guidelines and capability framework for specialist DFV services that integrate responses to TFA with existing State and Territory practice frameworks and the forthcoming national risk assessment and management framework.
- ★ Recommendation 22: That the Federal Government continue to fund Wesnet's *Safe Connections (Safer Technology for Women)* program beyond 2027 as part of the Second Action Plan and expand the program to address unmet demand.
- ★ Recommendation 23: That the Federal Government continue to fund the *Keeping Women Safe in their Homes* program beyond 2027 as part of the Second Action Plan.
- ★ Recommendation 24: At a minimum, develop national guidelines for specialist domestic and family violence response services that outline their roles and responsibilities, including an integrated practice response to identifying and responding to TFA. The guidelines would be integrated into existing national and State and Territory frameworks, and include tools to support practitioners to assess when to use and how to evaluate the suitability of private security services.
- ★ Recommendation 25: At a minimum, the national guidelines for an integrated TFA response for domestic and family violence specialist services is implemented and underpinned by a workforce development and quality assurance program developed for and by the specialist DFV sector.
- ★ Recommendation 26: Implement a National Coordinating body that oversees and regulates private security services to deliver consistent, trauma-informed, culturally responsive and technically competent DFV responses. The body should include specialist DFV services, police, governments and the legal sector with three key roles: (a) advise specialist DFV services about the strengths and trustworthiness of services, (b) hold

private security services accountable, and (c) continue ongoing discussions about managing the private security sector. There could be an opportunity to establish a DFV-specific, industry-led code of practice that defines minimum technical, ethical, and trauma-informed standards for private security services, and to support certification and registration through a public provider register.

- ★ Recommendation 27: Establish and manage a TFGBV lived and living experience panel to inform practice and policy responses to DFV and GBV.
- ★ Recommendation 28: Establish a cross-agency TFGBV Regulatory Task Force coordinated by Prime Minister and Cabinet to lead three pillars of effort (a) Strengthen enforcement of existing regulations to address TFGBV; (b) Coordinate law reform efforts across agencies to close gaps in protections; and (c) Convene cross-sector fusion cells between government, industry, specialist DFV services and peak bodies, including Wesnet.
- ★ Recommendation 29: That the Federal Government amend and implement the Digital Duty of Care to include a gender-based violence lens.
- ★ Recommendation 30: That the Digital Duty of Care requires that development of Codes is informed by lived experience and consultations with the DFSV Commissioner and specialist DFV sector.
- ★ Recommendation 31: New Class 1 definitions and thresholds in the Unlawful Material Codes should clearly focus on illegal and seriously harmful material and directly correspond to the Criminal Code where appropriate. Sexually explicit material that includes violent and seriously injurious practices, such as choking, should sit under Class 1.
- ★ Recommendation 32: Develop and deliver comprehensive national education about consent and harms around strangulation.
- ★ Recommendation 33: That the Federal Government implement AI policies with a gender-based violence lens.
- ★ Recommendation 34: That the Federal Government implement the recommendations pertaining to AI oversight and regulation, and AI and women's employment outlined by Working with Women Alliance.

Submission to the National Plan to end Violence against Women and Children Second Action Plan

1. Introduction

Wesnet welcomes the opportunity to provide a submission to the Department of Social Services on the *National Plan to end Violence against Women and Children Second Action Plan*. We are acutely aware of the importance of the Second Action Plan in identifying and addressing areas of progress that are blocked due to structural barriers or lack of focus.

This submission presents recommendations around four distinct themes. The first of these is the pressing need to focus on the mapping and design of a coordinated and integrated national domestic and family violence system, with particular focus on the role of the specialist domestic and family violence service sector. The second theme looks at other key levers in the service system which are integral to improving the safety and experiences of survivors of domestic and family violence, including the homelessness and justice systems. The third theme considers the need for the Second Action Plan to explicitly recognise and reflect the distinct and diverse experiences of violence, and to partner with and resource communities to deliver tailored and community-led support to survivors. Finally, this submission discusses the significant impact and evolution of technology-facilitated abuse (TFA), and the ubiquity of its use in family and domestic violence contexts.

Thank you for the opportunity to be a part of the consultations and submission process for the development of the Second Action Plan. We are available to expand on or clarify elements within our submission.

2. A coordinated and integrated national domestic and family violence system

It is crucial that the next phase of action planning works to articulate and map the pathways to safety for survivors of violence on a national scale.

Once survivors of domestic and family violence have made the decision to seek support in Australia, the pathway through the service system and towards safety should be clear and coordinated. The system should not pose additional barriers to seeking assistance or place survivors at greater risk of violence or returning to the person using violence. With this in mind, effective service systems are defined by clearly articulated roles and responsibilities, as well as well-coordinated relationships and accountabilities between the sectors working together to keep survivors safe.

While there has been considerable growth and change across the country under the National Plan and First Action Plan, we are a significant distance from achieving key points of national integration and harmonisation that will facilitate a coordinated national service system, which we believe is essential to achieve if we are to end gender based violence in a generation. An essential step towards this goal is to define and map the specialist DFV sector alongside the other key sectors and points of contact which are “complementary yet distinct”¹ in their work to respond to survivors.

There are examples of evidence-based good practice at the state-level that define and map a coordinated systemic response to DFV, one being the The Family Violence Multi-Agency Risk Assessment and Management (MARAM) Framework in Victoria². The MARAM framework works to clearly delineate the distinct roles and responsibilities for practitioners and sectors according to their role in the service system and responsibility in responding to survivors, thereby enabling capability mapping, dedicated training and ultimately workforce development strategising. It is now time to look at how such frameworks can be implemented at the national level as part of a drive to improve the integration and coordination of services so that survivor journeys are less difficult and more effective.

As the national peak body for specialist domestic and family violence services responding to victim-survivors in Australia, it is Wesnet’s priority to elevate and articulate the complex, nuanced and life saving work of our members as an essential step towards building our national service system. Our member services are at the frontline of responding to survivors at risk of violence and seeking support. Specialist DFV practitioners hold the highest level of risk and responsibility for DFV risk assessment, safety planning and risk management of

¹ Safe and Equal Code of Practice p.7

² <https://www.vic.gov.au/family-violence-multi-agency-risk-assessment-and-management>

any sector in the broader service system. Despite the pivotal role of our sector, we do not have a nationally recognised definition for specialist domestic and family violence practice and service delivery.

The work to achieve a coordinated and integrated national domestic and family violence system will be lengthy and be taken carefully and sequentially. To this end, Wesnet proposes some foundational steps to be taken as a matter of priority. The first of these tasks is to collaboratively develop shared national definitions for domestic and family violence and specialist DFV service delivery, as well as a shared set of evidence-based practice standards. Secondly, on the strength of a shared national understanding of specialist DFV practice and service delivery, a national approach to supporting, training and retaining a strong specialist workforce is required. Finally, we must work towards a coordinated national strategy for data collection and expenditure reporting.

These foundational pieces of work **must** be led by the specialist DFV sector, and need to be developed nationally, adequately funded and supported by the federal government to ensure that the deep expertise, wisdom and experience of our services is faithfully represented. There was a precedent for funding a national peak body to undertake similar work when the Federal Government funded the National Association of Services against Sexual Violence develop a (Third Edition) of the National Standards of Practice Manual for Services Against Sexual Violence.³

National definitions and frameworks

While specialist domestic and family violence practice and service delivery is always responsive to the individual, context and community, there are specific principles, standards and practice frameworks and approaches that inform this work. We are aware of a number of pieces of work underway at the national level which are working to improve survivor safety, perpetrator accountability and cross-jurisdictional consistency of service delivery. In particular, we note ANROW's work towards the refresh of the National Risk Assessment Principles for domestic and family violence⁴, designed to guide states and territories in developing, revising or evaluating risk assessment frameworks, tools and practices and the active work towards National best-practice family and domestic violence risk

³ National Association of Services against Sexual Violence (NASASV) (2021) *National Standards of Practice Manual for Services* (Mildura: NASASV).
<https://www.nasasv.org.au/nationalstandards>.

⁴ Toivonen, C., & Backhouse, C. (2018). *National Risk Assessment Principles for domestic and family violence* (ANROWS Insights 07/2018). Sydney, NSW: ANROWS.

assessment principles and National Risk Assessment Framework being undertaken by the Department of Social Services (DSS).⁵

While this work is important and valuable, we believe that there are some key foundational pieces missing, and without which, the vision of the National Plan is compromised. A coordinated and integrated systemic response to DFV in Australia is contingent on a shared understanding and definition of not only DFV itself, but also DFV risk assessment and management approaches, and the roles, responsibilities and practice models that constitute the specialist DFV workforce. The lack of nationally recognised and shared definitions for specialist DFV practice and service delivery hamper not only the effectiveness of our sector, but also our capacity to map service system pathways, demand and capacity, and undermine the capacity of the sector to provide consistent responses that meet community need. This essential work is yet to be done on a national level, and will enable stronger foundations to be built under a coordinated and integrated national DFV service system.

We must nationally define domestic and family violence: A nationally recognised definition for domestic and family violence is foundational to the work of building a coordinated and integrated national service system. This definition must be comprehensive and reflect the experiences of First Nations communities, people with disability, LGBTQIA+, rural, regional remote and very remote (RRRR) communities and culturally and linguistically diverse (CALD) communities.

We must nationally define specialist domestic and family violence practice and service delivery: The highest priority and primary responsibility of this workforce is to provide risk assessment, safety planning and risk management in partnership with victim-survivors of domestic and family violence. It is also the responsibility of this workforce to advocate for survivors' safety and rights in the context of the broader service system.

We need a nationally recognised and implemented Code of Practice for specialist domestic and family violence service delivery: A nationally recognised Code of Practice for the specialist domestic and family violence sector would build on the existing work developed by ANROWS on the National Risk Assessment Principles for domestic and family violence. A Code of Practice is necessary because it articulates the principles, ethics and frameworks that guide and define the approach to working alongside survivors.

⁵ <https://www.dss.gov.au/national-plan-end-violence-against-women-and-children/progress/first-action-plan-progress/first-action-plan-activities-addendum/national-best-practice-family-and-domestic-violence-risk-assessment-principles-and-national-risk-assessment-framework>

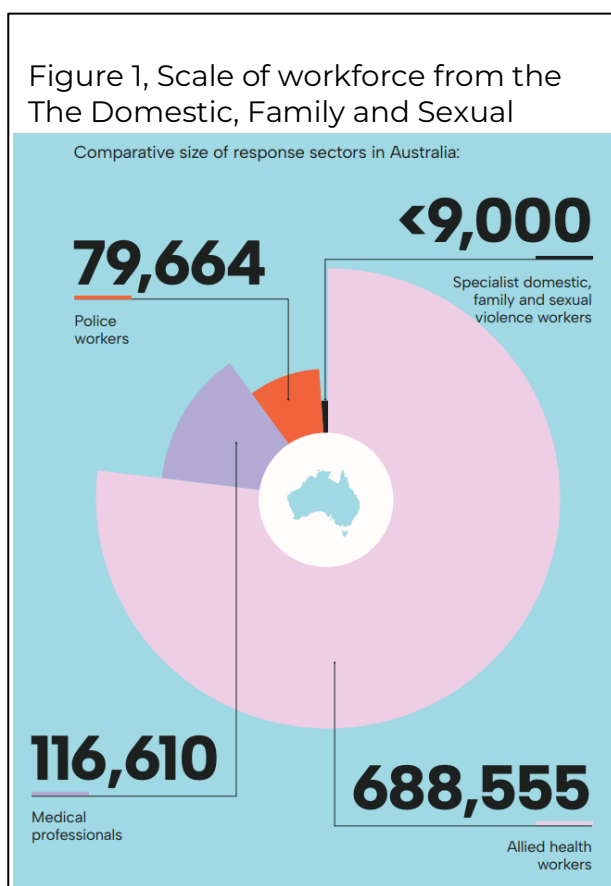
- ★ **Recommendation 1: The specialist DFV sector must be resourced to collaboratively develop the following: (a) a nationally agreed definition for domestic and family violence; (b) a nationally agreed definition for specialist domestic and family violence services and service delivery; and (c) a nationally recognised and implemented Code of Practice for specialist domestic and family violence service delivery.**

Workforce development

The national definitions, practice principles and frameworks outlined above are necessary in order to begin the work of developing a national workforce development approach and strategy for the specialist DFV workforce.

It is more important than ever that we invest in the specialist skills, sustainability and wellbeing of our practitioners. We remain a relatively small workforce in comparison to the broader service system (see Fig 1). For this reason, the demand on our sector to support the upskilling of the broader service sector to respond to domestic and family violence risk is high and only increasing.

Later in this submission, we explore the urgent need for the specialist DFV workforce to be trained and upskilled in responding to tech-facilitated abuse (TFA) given the overwhelming evidence that TFA is being observed in the vast majority of domestic and family violence cases being responded to by our workforce.⁶ The nature of domestic and family violence perpetration, and by extension the practice and system responses needed to support survivors have changed immeasurably already in the face of technological advances, and will continue to evolve as technology does. It is recommended that practitioners are provided with training and accessible practice guidance on TFA that is sector-led and integrated into existing practice frameworks for risk and safety and case



⁶ Forthcoming publication. Wesnet et al (2026) Third National Survey of Technology and Domestic Violence in Australia (Canberra: Wesnet).

management, and within the context of the comprehensive national workforce development strategy for the specialist domestic and family violence workforce. See section 5 for further details and recommendations on this issue.

Understanding the needs of the specialist DFV workforce

Despite the size and stretched capacity of our services, our members carry high levels of risk, responsibility and expectation of specialisation of skill is incredibly high. Effective workforce development and capability building is contingent on a clear understanding of the distinct roles and responsibilities across the service system, and as noted above this system and workforce mapping has not yet been done at a national level.

We are aware of the work being undertaken by the Social Research Centre, in partnership with The Australian Centre for Social Innovation, on the 2026 National Family and Domestic Violence and Sexual Violence Workforce Survey and look forward to the forthcoming report and insights. We are concerned however, that this survey was too broad in its approach to defining the domestic and family violence practice and workforce, and for this reason it may be challenging to draw practical and granular conclusions about workforce development needs from the collected data.

The workforce who has primary responsibility for providing a specialist response to survivors of domestic and family violence has unique workforce development, supervision and support needs. It is essential that embedded within the broader national efforts to develop workforce development strategy for DFV, that there is a dedicated stream or standalone plan that is specifically for the specialist DFV response sector. As noted above, clear categorisation to define our own workforce is essential to developing targeted and dedicated workforce development initiatives.

- ★ **Recommendation 2: The specialist DFV sector must be resourced to develop a comprehensive national workforce development strategy for the specialist domestic and family violence workforce, which would align with existing State and Territory-based strategies and complement the broader national workforce development efforts.**

Supporting sustainable growth of the specialist DFV sector

Our members across the country continue to report that they are operating in a context of escalating demand and stretched resources. Effective planning, projection and budgetary allocation to the response sector requires a national commitment to coordinated national data collection as well as clear expenditure reporting. These two crucial elements are necessary if we are to build a detailed picture of demand, service capacity and shortfall, and the impact of budget allocation and spending. Without this data, we cannot hope to ensure that the

specialist domestic and family violence response sector is resourced to meet demand.

A national approach to data collection

The objectives and recommendations above outline the need to map and define the roles and responsibilities of the specialist DFV sector alongside the broader service system and are fundamental to the task of building a national domestic and family violence data collection framework. We recommend the work of Safety Measures, a partnership between six organisations who are working together to build a stronger evidence base for demand, capacity and impact in specialist domestic and family violence services.⁷

Drawing on currently available data in each jurisdiction and existing expertise and pilot models for collecting service delivery data, it is imperative that we work to design a national data collection framework that helps to build a picture of demand, unmet need and waitlisting, and service infrastructure across Australia. It is important that data collection should reflect and collect outcomes defined by specialist DFV services and victim survivors. The design of the overall framework should be designed and fit for purpose for the specialist DFV sector and victim-survivors, and align with Indigenous data sovereignty principles.

- ★ **Recommendation 3: The federal government should collaborate with the specialist DFV sector to design a national data collection framework expanding the existing work of the Safety Measures project.**

Transparent public reporting on DFV expenditure

Coordinated expenditure reporting across both federal and state governments is essential to effective implementation of The National Plan to end violence against women and children First Action Plan 2023–2027 (National Plan). The Second Action plan presents a unique opportunity to review and address the current challenge of mapping and reporting on the multiple and complex funding streams and disaggregated data on expenditure under various agreements (such as the National Agreement on Social Housing and Homelessness (NASHH) and National Partnership Agreement on Family, Domestic and Sexual Violence Responses (National Partnership)).

As noted in our submission to the Australian National Audit Organisation (ANAO) on public reporting on domestic, family and sexual violence expenditure, we believe that there are key details in relation to the government funding associated which directly supports the specialist domestic and family violence sector which remain difficult to find. These include:

⁷ <https://www.safetymeasures.org.au/>

- Records to indicate whether Federal and/or state government departments are responsible for funding
- Clear indication on the relevant National Agreements under which specialist domestic and family violence services are funded (e.g. National Agreement on Social Housing and Homelessness (NASSH), National Partnership Agreement on Family, Domestic and Sexual Violence Responses (National Partnership), National Access to Justice Partnership 2025-30)
- Which state agencies are responsible for funding services
- Which specialist domestic and family violence services or programs are funded and for how much.

It is vital that we have access to complete, detailed and coordinated expenditure data and reporting to ensure that our services are adequately funded, plan for service and sector growth and ultimately ensure that every person has equitable access to domestic and family violence support when they need it. We note a recent media release from Ending Violence Against Women Queensland (EVAWQ) in May 2024, where alarm was raised that in their analysis of the Queensland Government's investment into preventing domestic and family violence against women and children, it was found that "only 15% of the investment for implementing the recommendations of the Hear Her Voice – Report One was clearly allocated to non-government frontline DFSV services."⁸

⁸ https://www.evawq.org/_files/ugd/ab48af_d64755de96a847648cc656438b0058e1.pdf

- **Recommendation 4:** In line with recommendations made by the DFSV Commissioner in the 2025 report, the federal government should work with states and territories and in partnership with the Commission's Lived Experience Advisory Council to develop a national funding mapping framework to enable visibility and reporting of DFSV funding and expenditure nationally to inform and guide ongoing Action planning. The framework needs to: (a) establish agreed definitions of DFSV funding, (b) create consistent categories for recording DFSV funding to enable services to report on DFSV work undertaken in other funding streams (e.g. homelessness, Aboriginal community-controlled organisations, health) that contributed to improved outcomes for people experiencing DFSV, (c) embed reporting requirements into bilateral agreements under Federation Funding Agreements, and (d) capture actual expenditure for reporting.

National Alliance funding for coordination and Secretariat role

As noted in our latest pre-budget submission, Wesnet has recently taken up the Secretariat responsibility for the National Alliance of Domestic and Family Violence Service Sector (NADFFVSS), while continuing to offer member support, information dissemination, and sector training. We know that the NADFFVSS is a trusted expert voice representing the specialist DFV sector, and the last couple of years has seen demand for advice and facilitated connection to the sector that we represent risen significantly. We regularly receive requests for meetings, consultation and briefings from Federal Ministers and government, the DFSV Commissioner's office, academics and industry.

Most recently, the NADFFVSS was consulted over an extended period in the lead up to the national testing of the new AusAlert system. Both the secretariat and the Alliance were regularly in contact with the National Emergency Management Agency (NEMA) providing both incidental advice and more extensive written feedback on public communications to the community, survivors of violence and the specialist DFV sector.

The NADFFVSS can play a key role in the implementation of the Second Action Plan, from information sharing, providing advice from the frontline and also as an independent layer of information for accountability.

- ★ **Recommendation 5: Wesnet to receive dedicated funding to convene, coordinate and provide secretariat functions for the National Alliance of DFV Specialist Services, ensuring that the Government has access to timely, evidence-based advice from the national DFV Specialist Services sector, and providing an instrument with which to implement the work of the DFSV Commissioner and the National Plan.**

3. Other key levers in the system

Access to safe housing

Primary prevention and early intervention efforts are ineffective if women and children cannot practically flee unsafe situations. NADSVSS (2026)

Having a safe, affordable and accessible housing alternative is one of the most important enablers for survivors of violence to be able to choose to leave. As noted in the recent *Cost of Leaving* report (2026), Australia is currently in the midst of the “combined effects of a domestic and family violence crisis, a housing crisis, and a cost-of-living crisis”.⁹ The Second Action Plan must create a dedicated focus on strengthening housing pathways and increasing stock across crisis, transitional, and long-term housing available to specialist DFV and homelessness services for survivors. Appropriate refuge options and housing pathways for survivors and families fleeing DFV mean that children can stay with mum or protective parent, minimising disruption to relationships and remain connected to education where possible.

We also know that in many cases, survivors of domestic and family violence may first present to homelessness services seeking support. In 2024-25, 40% of all people accessing specialist homelessness services (SHS) were experiencing domestic and family violence, and 75% of those people were women.¹⁰ The Second Action Plan also has the opportunity to work on service system integration and pathways between SHS and the specialist DFV sector and aims to establish priority social housing pathways for survivors of DFV.¹¹

Where survivors of domestic and family violence do come directly to specialist DFV services for support and do need immediate crisis accommodation, there is no guarantee of appropriate and safe options which our members have referred to as a ‘postcode lottery’. Waitlists and lack of availability of crisis accommodation significantly increase the risk of returning to the person using violence. Factors such as needing to access accommodation far enough away from the person using violence, appropriate for children and young people and options that accept pets are all considered by specialist DFV services and survivors.

⁹ Tyndale, I., Anderson, P., Anglicare, (2026) *The cost of leaving* (Anglicare), <https://assets.anglicare.org.au/asset/52433ada-8ada-4ee4-b0bc-73a5c3d2bc9a/cost-of-leaving-report-2026.pdf>, p.9.

¹⁰ Australian Institute of Health and Welfare (2026), FDSV Summary, <https://www.aihw.gov.au/family-domestic-and-sexual-violence/resources/fdsv-summary#services>

¹¹ Tyndale, I., Anderson, P., Anglicare, (2026) *The cost of leaving* <https://assets.anglicare.org.au/asset/52433ada-8ada-4ee4-b0bc-73a5c3d2bc9a/cost-of-leaving-report-2026.pdf>, p.9.

- ★ **Recommendation 6: Extend the Housing Australia Future Fund (HAFF) Crisis and Transitional Accommodation Program, including ongoing funding of \$40 million per year until 2036 (Cost of leaving recommendation)**
- ★ **Recommendation 7: Establish priority social housing pathways for victim-survivors across Australia, with equity of focus on metro and rural, regional, remote and very remote areas.**

Family Circuit and Family Court of Australia

The legal system, and in particular the Federal Circuit and Family Court of Australia (FCFCOA) must be considered a critical element of the domestic and family violence and safety service system. We know that the vast majority of cases heard in the FCFCOA contain allegations of domestic and family violence, and that, additionally, survivors' level of risk of lethality from violence is heightened at the point of separation and the perpetrator's sense of loss of control. Our members consistently reflect on the high rates of systems abuse perpetrated through and alongside family law processes, including "repetitive litigation, unnecessary applications, excessive legal correspondence, non-compliance with financial disclosure orders, repeated requests for adjournments and attempts to isolate them from legal and support services".¹² We support recommendations made in the *Rapid Review of Prevention Approaches* that there is an urgent need for audits to be completed into how DFSV perpetrators are weaponising government systems, particularly the family law system, but also Child Protection proceedings, child support and immigration systems.

We acknowledge the critical work being done through the Lighthouse risk screening and risk assessment model in the FCFCOA¹³, and fully support the continued investment in this initiative. In addition to further investment, we join others' calls to expand the initiative to regional court settings, as well as property matters, to ensure that survivors have access to and adequate support in these contexts.

We also note key takeaway from the Children and Young People Roundtable hosted by The Domestic, Family and Sexual Violence Commission (DFSV Commission) in collaboration with ANROWS, where young advocates with lived experience of domestic, family and sexual violence made it clear that "they need

¹² Women's Legal Service Australia (2026) *Second Action Plan Submission*, p.18

¹³ Federal Circuit and Family Court of Australia, 'Annual Report 2024-25' (2025), p.46.

and want to be empowered to participate in family court and the justice system, and for their voices and experiences to be heard and considered".¹⁴

Wesnet would like to direct the reader to Women's Legal Services Australia's (WLSA) submission on the Second Action Plan, particularly its comprehensive recommendations on improving the FCFCOA and ensuring the family law system prevents abuse rather than facilitates it.

- ★ **Recommendation 8: The federal government should initiate targeted audits into how DFSV perpetrators are weaponising government systems, particularly the family law system**

¹⁴ DFSV Commission (2025), *Children and Young People Roundtable Report*, <https://www.dfsvc.gov.au/sites/default/files/2026-06/20260602-DFSVC-CYP-RoundtableReport.pdf>, p.2.

4. Services designed by and for communities

We know the work to design a national DFV system which will meet the needs of people and communities, and which aims to address and dismantle both interpersonal and structural violence cannot be done by treating survivors as homogeneous. Every survivor of domestic and family violence in Australia deserves to access safe, trauma-informed and accessible support when they seek it. With this in mind, the Second Action Plan must recognise and plan for dedicated, tailored responses for individuals and communities.

Aboriginal and Torres Strait Islander survivors

The development of the Second Action Plan comes at a critical juncture, as it will sit alongside the newly released Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036. It is critical to prioritise ensuring the two plans are aligned, and that the Second Action Plan supports and enables the Aboriginal and Torres Strait Islander Plan. As noted in the Second Action Plan submission by the First Nations Advocates Against Family Violence (FNAAFV), this will require the Second Action Plan to adopt the language and vision of the Our Ways National Plan, and ensure that the Aboriginal family violence service sector is adequately and sustainably resourced to deliver services across Australia.¹⁵

Wesnet, along with many of our members and sister peak bodies, holds serious concerns about the lack of consultation and swiftness with which amendments were made to the Care and Protection of Children Act in the Northern Territory in July of this year. We understand that the amendments will cause erosion of Aboriginal and Torres Strait Islander Child Placement Principle across child protection practices. The Second Action Plan must consider how it can influence and set good practice standards across states and territories, to uplift the vision and principles of Our Ways Strong Ways and most importantly to protect the rights of First Nations children and families to remain together and safe.

¹⁵ First Nations Advocates Against Family Violence (2026), *Submission to the Second Action Plan*, p.13.

- ★ **Recommendation 9: Provide funding for First Nations domestic, family and sexual violence peaks at jurisdictional levels to support the work of the national peak, Our Ways Strong Together.**
- ★ **Recommendation 10: Ensure alignment between the Second Action Plan and Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036.**
- ★ **Recommendation 11: Provide long-term funding of Aboriginal and Torres Strait Islander community-controlled specialist family safety services, Aboriginal governance and decision-making, and culturally grounded healing and prevention.**

Wesnet refers the reader to the submission by the First Nations Advocates Against Family Violence (FNAAFV), which contains a comprehensive set of recommendations and which we endorse.

Children and young people

Children and young people experience unique and elevated risks in the context of domestic and family violence and have the right to tailored and specialist support that recognises them as survivors in their own right.

We know that the existing systems and service pathways are not designed to be accessible or age-appropriate for the needs of children and young people. Whether a young person is receiving support as part of a broader family unit or requiring support independently of an adult guardian, they have a right to receive safe and dedicated support. Our members have reflected on the need for dedicated core funding to ensure young people have their own specialist practitioners, risk assessments, case management and case plans. There is also an urgent need to ensure that when young people under the age of eighteen are no longer able to live at home due to domestic and family violence and seek support independently, there are age-appropriate crisis and refuge options available. There must also be immediate work done to consider the ways in which young people can receive support when the person using violence is refusing to provide consent. Requiring parent or guardian consent in the context of seeking support for domestic and family violence currently represents a significant barrier to safety for many young people.¹⁶

¹⁶ DFSV Commission (2025), *Children and Young People Roundtable Report*, <https://www.dfsvc.gov.au/sites/default/files/2026-06/20260602-DFSVC-CYP-RoundtableReport.pdf>.

As in our Pre-Budget Submission (2025-26), Wesnet recommended that the Federal government review and amend the age-related eligibility criteria for the Leaving Violence Payment to include young people who are between 15 and 17 years old. We know that survivors of violence in this age bracket who are seeking help independently of a parent/carer (sometimes due to this person perpetrating violence), are often woefully under-supported due to systemic gaps in available supports. We know that young people experiencing violence perpetrated by a parent or carer, but who are unable to support themselves to leave home and prove 'independence' are ineligible for Centrelink's *Youth Allowance Unreasonable to Live at Home* payment.¹⁷ Extending the eligibility of the Leaving Violence Payment would be a small but critical step towards supporting young survivors of violence to access independence and safety.

- ★ **Recommendation 12: Provide dedicated, core funding to ensure children and young people have their own specialist practitioners and case plans, including in refuges.**
- ★ **Recommendations 13: Consider systemic changes to ensure that children and young people can receive specialist support when the perpetrator doesn't provide consent.**
- ★ **Recommendation 14: Amend the age-related eligibility criteria for the Leaving Violence Payment to include young people who are between 15 and 17 years old.**

Unique and distinct barriers to survivors accessing support in RRRR communities

Rates of domestic and family violence in RRRR communities are disproportionately higher than in metropolitan centres. For example, DVNSW reported that remote and very remote regions in NSW experienced incidents at rates 7.45 times higher than major cities.¹⁸ We also know that these deeply concerning statistics stem from social and structural inequalities, including lack of affordable housing, cost of living and social and digital isolation. Geographical location and isolation impact survivors' access to emergency services, hospitals, and domestic and family violence services, critically impacting risk levels in a myriad of ways. In addition to limited access to critical services, survivors are often known to those working in key points of emergency support and safety, which greatly impacts their ability to seek help confidentially.

¹⁷ Corrie, T & Moore, S (2021), *Amplify: Turning up the Volume on Young People and Family Violence* (Research Report), p.39.

¹⁸ DVNSW (2024)

Our members continue to raise concerns about the accessibility and equity of support for survivors of domestic and family violence in regional, rural, remote and very remote areas (RRRR), and the devastating reality of increasing demand and the need to operate at significantly over capacity. In the development of the Second Action Plan, we must keep these barriers to safety and support in mind for survivors living in RRRR areas and directly plan to mitigate the resulting risk by explicitly naming and planning to improve access to services and safety in RRRR areas.

Funding and operational needs for DFV services in RRRR areas

The Second Action Plan must also acknowledge the unique operational and additional funding requirements for specialist domestic and family violence services in RRRR areas. We know that survivors may live significant distances from DFV services (hundreds and thousands of kilometres in some cases), resulting in increased outreach demand, larger geographical catchments and more complex service delivery requirements. It is also worth noting that recruitment, training, support and retention of specialist DFV workforce is also often more complex and challenging in RRRR communities.

Dedicated data collection and consideration must be given to improving equity of access to specialist DFV services in RRRR communities. Our members have reflected on frustration that the experiences of survivors in RRRR communities are often cited to advocate for increased and sustainable funding for the DFV sector, yet often the resulting funding does not reach these communities. There must be targeted analysis of unmet need and a commitment to funding allocations on this basis rather than solely on a per capita basis to address this problem.

- ★ **Recommendation 15: The Second Action Plan needs a distinct focus and dedicated actions to address inequality in access to safety and support for women and children living in regional, rural, remote and very remote areas of Australia.**
- ★ **Recommendation 16: Allocation of funding should be based on unmet need, rather than density of population and a per capita basis.**

Women on temporary visas - Blueprint for Reform

Wesnet advocates for the Second Action Plan to reflect and implement the key asks contained in the third *Blueprint for Reform* released by the National Advocacy Group for Women on Temporary Visas Experiencing Violence¹⁹. These include:

¹⁹ downloaded from <https://wesnet.org.au/blueprint>

1. Amend the migration system so that all women and children on temporary visas who experience domestic, family and sexual violence can access safety.
2. Address economic insecurity and financial barriers to enable access to pathways to safety for temporary visa holders experiencing violence.
3. Ensure equal access to emergency, refuge and long-term housing regardless of visa status.
4. Invest in long-term and sustainable funding for legal and specialist services that support women on temporary visa who are experiencing domestic, family and sexual violence.
5. Create a formal intergovernmental collaboration to advance action to protect temporary visa holders.

★ **Recommendation 17: The Second Action Plan incorporates the key asks contained in the third Blueprint for Reform released by the National Advocacy Group for Women on Temporary Visas Experiencing Violence**

Survivors of domestic and family violence with disability

Wesnet supports all calls for the Second Action Plan to recognise the experiences of violence on survivors with disability in all facets of planning, in addition to the nationally recognised definition of domestic and family violence. As noted by Women With Disability Australia (WWDA), this means we must recognise “violence perpetrated in support relationships, service settings, institutions, group homes, respite centres, boarding houses and other domestic or care-related settings”.²⁰

It is also important that the next phase of planning recognises access to safe, affordable and accessible housing, financial independence, personal independence including accessible transport, and accessible information and advocacy. These are all essential to preventing domestic and family violence, as well as facilitating people with disability being able to leave violent situations when they need and choose to.

²⁰ Women With Disability Australia (2026), Making Disability-Specific Violence Visible: Disability Responsive Implementation of the Second Action Plan, p.7

- ★ **Recommendation 18: In line with recommendations made by WWDA, the Second Action Plan must identify where current legal, policy and data definitions fail to recognise disability-specific violence and rectify**
- ★ **Recommendation 19: Work with DFV experts and disability experts to address structural drivers that invisibilise and escalate the risk of violence against people with disability.**

Wesnet endorses WWDA's submission on developing the Second Action Plan, titled Making Disability-Specific Violence Visible: Disability Responsive Implementation of the Second Action Plan.²¹

LGBTQIA+ survivors

As noted in the National Community Attitudes Survey report (2021), it is only relatively recently that there has been any prevalence data available on domestic, family and sexual violence against lesbian, gay, bisexual, trans, queer and questioning, and other gender- and sexuality-diverse (LGBTQ+) people.²² This is in part due to data collection frameworks failing to provide response options in sexuality and diverse gender identity options in health services data and population research, although we welcome the most recent National Census including this data for the first time in 2026.

It is essential to consider that heteronormative and cisgendered definitions and narratives about domestic and family violence not only make it more difficult for people in the LGBTQIA+ community to identify domestic and family violence, but also to feel confident and safe to disclose to services and police when they need support. Additionally, LGBTQIA+ people are at elevated risk of distinct forms of violence including non-consensual outing, homophobia and transphobia, denial and abuse due to a person's sexuality or gender identity and violence intended to change a person's sexuality or gender identity.

It noted in several sections in this paper, the Second Action Plan must work to represent and reflect the distinct experiences of violence and risk in system design, policy and service delivery, including the LGBTQIA+ community.

²¹ Women With Disability Australia (2026), Making Disability-Specific Violence Visible: Disability Responsive Implementation of the Second Action Plan, <https://assets.wwda.org.au/uploads/2026/08/WWDA-2AP-Submission-FinalVersion.pdf>.

²² Coumarelos, C., Weeks, N., Bernstein, S., Roberts, N., Honey, N., Minter, K., & Carlisle, E. (2023). Attitudes matter: The 2021 National Community Attitudes towards Violence against Women Survey (NCAS), Findings for Australia. (Research report 02/2023). ANROWS

- ★ **Recommendation 20: Work with DFV experts and LGBTQIA+ experts to address structural drivers that invisibilise and escalate the risk of violence against the LGBTQIA+ communities.**

5. Technology-facilitated abuse in the context of domestic and family violence

This section discusses tech-facilitated abuse (TFA) in the context of DFV. We do so by drawing on our own knowledge and key pieces of research, one of which is the most recent survey of specialist DFV practitioners' experience of responding to tech-facilitated abuse in the context of domestic and family violence. In 2025, Wesnet, supported by the University of New South Wales and Curtin University, conducted the *Third National Survey of Technology Abuse and Domestic Violence in Australia* (Third National Survey). This survey builds on two earlier surveys in 2015 and 2020.²³

Specialist DFV practitioners are universally seeing TFA impacting their clients, with an overwhelming majority of respondents (99.7%) reporting that they had supported clients who had been abused, stalked or threatened via technology. 51.5% of respondents now see TFA more frequently than non-TFA tactics and another third (31%) see it equally frequently.²⁴ These findings highlight the increasing integration of technological tools into the arsenals of people using violence.

Perpetrators' intimate knowledge of survivors means that they can employ violent and threatening tactics against survivors using information that may seem innocuous to others. Combined with the omnipresence of technology, this can lead survivors to feel that there is "no escape," even after they have left the relationship. Addressing TFA is therefore imperative to ending gender-based violence in one generation.

The Second Action Plan presents opportunities to address TFA in the context of DFV. This section reflects on five key areas for consideration, each of which proposes recommendations:

- 1) Building a TFA-ready Specialist DFV Workforce: Capability Frameworks and Practice Guidance
- 2) Continued resourcing for effective programs that address TFA in the context of DFV

²³ The first national survey was led by what was then Domestic Violence Resource Centre Victoria (now Safe and Equal). Safe and Equal is the peak body for specialist family violence services that provide support to victim survivors in Victoria. Wesnet conducted the second survey in 2020. Delanie Woodlock, Karen Bentley, K., Darcee Schulze, Natasha Mahoney, Donna Chung, and Amy Pracilio, *Second National Survey of Technology Abuse and Domestic Violence in Australia* (Wesnet, 2020), <https://wesnet.org.au/2ndnatsurvey>. The findings from the third national survey are forthcoming.

²⁴ Wesnet et al (2026) Third National Survey of Technology and Domestic Violence in Australia, p.17.

- 3) Addressing rogue actors undertaking technology sweeps and digital safety audits in DFV response
- 4) Bridging the gap between tech policy and gender-based violence policy
- 5) Embedding lived and living experience of TFCBV.

Building a TFA-ready Specialist DFV Workforce: Capability Frameworks and Practice Guidance

Over the past 10 years, there has been a fundamental shift in the breadth of work that Specialist DFV practitioners need to undertake to support DFV survivors.

There is a continuing urgent need for the specialist DFV workforce to be trained and upskilled in responding to tech-facilitated abuse (TFA) given the overwhelming evidence that TFA is being observed in the vast majority of domestic and family violence cases being responded to by our workforce.²⁵ The nature of domestic and family violence perpetration, and by extension the practice and system responses needed to support survivors, have changed immeasurably already in the face of technological advances, and will continue to evolve as technology does. It is recommended that practitioners receive training and accessible practice guidance on TFA that is sector-led, integrated into existing practice frameworks for risk and safety and case management, and aligned with the comprehensive national workforce development strategy for the specialist domestic and family violence workforce.

The Third National Survey highlights the need for a specialist DFV workforce with strong foundations in understanding TFA embedded into existing practice frameworks, supported by ongoing training, access to specialist resources, and practitioners with the confidence to translate that knowledge into effective risk and safety planning. It recommends providing practitioners with sector-led training and accessible practice guidance on TFA that is integrated into existing practice frameworks for risk and safety and case management. Further, that training should include practical information for practitioners and survivors about the types of evidence that may be relevant to breaches of protection orders and other domestic and family violence-related matters.

We propose a national TFA workforce development strategy for specialist DFV practitioners²⁶. The strategy should be embedded into the sector's existing practice models and Capability Frameworks in each State and Territory to support a nationally consistent response to TFA in the context of DFV. Wesnet

²⁵ Forthcoming publication. Wesnet et al (2026) Third National Survey of Technology and Domestic Violence in Australia (Canberra: Wesnet).

²⁶ It is noted that eSafety has a series of e-learning modules available on TFA and frontline practitioners are one of a range of target workforces, however the proposed approach would be designed to integrate with existing DFV practice frameworks.

proposes a structured training program made of multiple modules with tools and resources and a train-the-trainer model for leadership and practitioners. The program would be tiered for entry to expert practitioners and be supported with communities of practice to sustain and strengthen practice and support for leadership.

- ★ **Recommendation 21: Wesnet is resourced to establish a national good practice guidelines and capability framework for specialist DFV services that integrate responses to TFA with existing State and Territory practice frameworks and the forthcoming national risk assessment and management framework.**

Continue resourcing effective programs that address TFA in the context of DFV

There have been a wide range of successful measures introduced and funded by the Australian Government. These include the establishment of the eSafety Commissioner role, introduction of legislation on issues such as Image-based abuse and other reporting mechanisms, all of which should continue. Under the First Action Plan funding was also provided for Technology safety initiatives and these also need to be continued as they form a vital part of safety planning for thousands of survivors each year.

Safe Connections program

Perpetrators often damage or control survivors' phones or devices as part of DFV. This can look like monitoring everyday movements on their phones, such as tracking their location and who they are with from social media posts, or damaging their phone to prevent them contacting support. It shrinks the survivor's world so they become isolated and more dependent on the perpetrator. It also means that survivors cannot perform everyday tasks, such as internet banking, or safely access support and community.

Wesnet's *Safe Connections* program is the only nationwide program providing new smartphones to survivors via practitioners who are trained to identify TFA and undertake technology safety planning with survivors when providing phones.²⁷ The Safe Connections program distributes around 7,500 smartphones annually to survivors through Wesnet's network of 315 specialist DFV services across the country.

²⁷ Wesnet. "Smartphones for survivors. Technology and safety support for frontline workers." Wesnet (no date), wesnet.org.au/ourwork/telstra/.

The program provides essential access to safe technology for survivors (i.e. a new smartphone device, prepaid credit and data, optional ID exemption, and technology safety information and planning). Its strengths include:

- The provision of new smartphones, Telstra pre-paid and data credit, and optional ID exemption.
- Devices are provided by practitioners in DFV services in the context of a broader service response, providing a suite of DFV targeted assistance (e.g. risk assessment and management, psycho-social support, expert information, advocacy and safety planning) designed to reduce DFV risk.
- Safe Connections provides training to its agencies' practitioners that enables the provision of the devices alongside technology safety information and planning that builds the capability of survivors.

The Third National Survey found that practitioners had high uptake of the program with 88.4% of respondents having used it and most (94.9%) indicating that the program was 'Helpful' or 'Very Helpful', indicating high levels of satisfaction.

Unmet demand for the Safe Connections program

There are over 300 agencies on the wait list for the program, as well as geographic and community-specific gaps in coverage.

The current funding agreement is through *Safer Technology for Women* as part of the First Action Plan (IAP), and its continuation beyond June 2027 is contingent on 2AP planning. As the program allows survivors to reclaim their sense of agency and independence from perpetrators and stay connected with support and community, it is imperative that funding persists as part of the Second Action Plan.

- ★ **Recommendation 22: That the Federal Government continue to fund Wesnet's Safe Connections (Safer Technology for Women) program beyond 2027 as part of the Second Action Plan and expand the program to address unmet demand.**

Keeping Women Safe in their Homes (KWSITH)

As articulated in Section 3 on housing, survivors are often faced with the choice of staying in a violent relationship or leaving an unsafe relationship into homelessness and poverty. *Keeping Women Safe in their Homes (KWSITH)* is an initiative under the National Plan that supports women's safety in their homes.²⁸ It does so through the provision of risk assessment and management, home

²⁸ Australian Government. "Keeping Women Safe in their Homes" published on September 24, 2025, <https://www.dss.gov.au/safety-programs-prevention-and-evidence/keeping-women-safe-their-homes>.

security audits and improvements, and case management. Research shows that supporting survivors to stay safe at home can 'enhance women's sense of safety, support housing stability, and reduce the financial burden of leaving a violent partner'.²⁹ Similar to *Safe Connections*, the continuation of KWSITH beyond June 2027 is up for consideration as part of the Second Action Plan. Sustained investment in KWSITH is necessary to reduce the risk of DFV and homelessness.

★ **Recommendation 23: That the Federal Government continue to fund the *Keeping Women Safe in their Homes* program beyond 2027 as part of the Second Action Plan.**

Address rogue actors undertaking technology sweeps and digital safety audits in DFV response

Private security services

The Third National survey found around 77% of respondents had used Tech Sweep services, and of these 96% found them a useful tool. However, it is critical to address the issue of rogue actors, mostly private security services that are capitalising on a 'new market' involved in providing technology sweeps and digital safety audits to DFV services and survivors as part of a DFV case response.³⁰ The services provided include physical security measures, such as home security upgrades, and technical countermeasure sweeps of homes and cars, through to digital safety audits, including device audits, account security assessments and adjustments, and technology safety planning. These can sometimes be part of a KWSITH program, and other times just bought with brokerage funds, or individually paid for by survivors themselves.

Three key ways that technology and private security services engage with survivors in Australia include:

1. private security services partnering with specialist DFV services.
2. security technology companies partnering with specialist DFV services. For instance, tech companies providing personal safety devices for the Personal Safety Initiative in Victoria.
3. security technology companies securing government contracts to deliver security for victims. For instance, a tech company secured a Queensland

²⁹ Breckenridge, J., Lyons, G., & Suchting, M. (2026). "Safe at Home Responses in Australia: Addressing Homelessness and Economic Insecurity for Women and Children Experiencing Intimate Partner Violence" *Social Sciences* 15(4), <https://doi.org/10.3390/socsci15040260>.

³⁰ Harkin, D., & Fitz-Gibbon, K. (2017) "Private security companies and domestic violence: A welcome new development?" *Criminology and Criminal Justice* 17(4) 433-449, <https://doi.org/10.1177/1748895816673881>.

government contract to deliver a personal safety device to survivors without the involvement of specialist DFV services.³¹

Third National Survey findings show that a large majority of practitioners (94.6 percent) who use digital or technology safety audits perceive them as helpful. private security services can offer practical support in securing prosecutions against perpetrators, increase levels of safety and have a positive psychological impact on survivors.³²

Absence of regulatory and good practice frameworks

However, the absence of regulatory and good practice frameworks for private security services in the context of DFV can pose significant risks for survivors. Unpublished research commissioned by Wesnet examined barriers, regulatory gaps, and opportunities to strengthen the delivery of private security services responding to TFA within the specialist DFV sector. The research highlights the absence of DFV-specific technical standards and quality assurance mechanisms: 'frameworks (for example, the *National Private Security Act*) do not specifically address the specialised competencies, ethical considerations, or safety protocols required for trauma-informed private security services in DFV contexts.'³³ Similarly, certifications by the Australian Computer Society that are recognised within the Information, Communications and Technology sector do not mandate training tailored to the DFV context.

Price gouging

Specialist DFV services also express concerns about private security services taking advantage of survivors, including price gouging. In these cases, survivors who are already under immense financial pressure may be charged exorbitant prices for security responses or specialist DFV brokerage such as KWSITH is wasted to implement tech safety solutions. This can be problematic for complex cases involving multiple compromised devices. 'Even when subsidised, expenses can rise sharply as the scope of a survivor's situation becomes clearer, with some families requiring extensive technical assistance across multiple homes.'³⁴ These concerns must be considered alongside economic abuse of survivors that impact

³¹ Harkin, D. (2019a) "Regulating private sector security provision for victims of domestic violence" *Theoretical Criminology* 23(3) 415-432, <https://doi.org/10.1177/1362480617737760>.

³² Harkin, D. (2019b) Private security and domestic violence: The risks and benefits of private security companies working with victims of domestic violence (Routledge), <https://dx.doi.org/10.4324/9781315148267>.

³³ Wesnet commissioned research

³⁴ Ibid.

their financial security and independence,³⁵ and in a context of the housing and affordability crises.

Challenges for specialist DFV services

Specialist DFV services describe engaging or referring survivors to private security services as 'complicated, fraught with challenges, and with unpredictable outcomes.'³⁶ Services may fail to deliver proposed services or lack trauma-informed approaches, leaving clients feeling rushed, uninformed, or less safe. There are also challenges arising from the relationship between security services and DFV practitioners.³⁷ 'Introducing a technological device [or service] into a survivor's safety planning that requires a commercial party to support its functionality adds a further layer of complexity for domestic violence services in strategising the safety of clients and also creates new relationships that need to be mediated'.³⁸ After tech safety assessments, practitioners often receive detailed technical reports containing complex instructions to re-establish client connectivity and device security. Many practitioners feel overwhelmed and lack confidence in implementing these recommendations. This creates a critical gap in which technical expertise is delivered without adequate support for translation into practice. This compounds challenges for the DFV sector, as many services lack administrative resources to coordinate third-party interventions, follow up on service delivery, or evaluate outcomes and services.³⁹

Without regulatory standards, practitioners and survivors must assess provider competence without standardised credentials, quality benchmarks, or complaints mechanisms designed for DFV-specific contexts. Reliance on informal networks and peer recommendations increases uncertainty and risk, leaving both providers and survivors vulnerable.⁴⁰

Wesnet proposes three recommendations ranging from minimum requirements to good practice.

At a minimum, there should be national guidelines for specialist DFV services that outline their roles and responsibilities in identifying and responding to TFA. National guidelines would support practitioners to undertake basic tech security audits and identify when it is appropriate to engage private security services. It would be integrated into existing State and Territory practice and Capability

³⁵ Glenn, R., & Kutin, J. (2021) *Economic abuse in Australia: Perceptions and experience*. (Sydney: Centre for Women's Economic Safety), <https://cwes.org.au/wp-content/uploads/2022/09/EA-in-Australia-2021.pdf>.

³⁶ Wesnet commissioned research

³⁷ Ibid.

³⁸ Harkin. (2019a) "Regulating private sector security provision for victims of domestic violence".

³⁹ Wesnet commissioned research

⁴⁰ Ibid.

Frameworks, as well the national Risk Assessment Principles. Guidelines would also include assessment and evaluation tools to support practitioners to ask about when selecting appropriate private security services to support survivors.

Also as a minimum requirement to support the implementation of the national guidelines, there should be a national training and quality assurance program to support the DFV sector to meet the guidelines. This would support data collection whereby specialist family violence services can share insights about private security services to reduce the risk of relying on informal networks and peer recommendations.

The national guidelines and the training and quality assurance program should be co-designed with the specialist DFV services, survivors and private security services.

- ★ **Recommendation 24: At a minimum, develop national guidelines for specialist domestic and family violence response services that outline their roles and responsibilities, including an integrated practice response to identifying and responding to TFA. The guidelines would be integrated into existing national and State and Territory frameworks, and include tools to support practitioners to assess when to use and how to evaluate the suitability of private security services.**
- ★ **Recommendation 25: At a minimum, the national guidelines for an integrated TFA response for domestic and family violence specialist services is implemented and underpinned by a workforce development and quality assurance program developed for and by the specialist DFV sector.**

Our recommendation for good practice to address the issue of private security services in DFV response is to implement a national coordinating body. This 'third party' or 'civil regulation' model would support cross-jurisdictional collaboration and ethical private security services engagement with survivors and the specialist DFV sector.⁴¹ The model should include specialist DFV services, police, governments and the legal sector with three key roles:

1. to advise specialist DFV services about the strengths and trustworthiness of services,
2. hold private security services accountable and

⁴¹ Harkin, D. (2019a) "Regulating private sector security provision for victims of domestic violence" and (2019b) Private security and domestic violence: The risks and benefits of private security companies working with victims of domestic violence.

3. continue ongoing discussions about managing the private security sector.⁴²

There could also be the opportunity to establish a DFV-specific, industry-led code of practice that defines minimum technical, ethical and trauma-informed standards for private security services. The national coordinating body could support certification and registration through a public provider register to enhance transparency and trust, and oversee a centralised data infrastructure, enabling consistent collection, reporting, and analysis of prevalence, methods, and outcomes, thereby informing continuous improvement in service delivery.⁴³

★ **Recommendation 26: Implement a National Coordinating body that oversees and regulates private security services to deliver consistent, trauma-informed, culturally responsive and technically competent DFV responses. The body should include specialist DFV services, police, governments and the legal sector with three key roles: (a) advise specialist DFV services about the strengths and trustworthiness of services, (b) hold private security services accountable, and (c) continue ongoing discussions about managing the private security sector. There could be an opportunity to establish a DFV-specific, industry-led code of practice that defines minimum technical, ethical, and trauma-informed standards for private security services, and to support certification and registration through a public provider register.**

Embedding lived and living experience of TFGBV

TFGBV lived and living experience panel

There is currently no TFGBV lived and living experience panel, despite the importance of embedding lived experience in policy and practice design, development and delivery. As the DFSV Commissioner puts it in the *Monitoring and Reporting Framework* for the National Plan, 'Lived experience is the heart of accountability in our response to domestic, family and sexual violence'.⁴⁴ Given the prevalence of TFA in the context of DFV, Wesnet proposes the importance of a TFGBV lived experience panel that would inform workforce development, practice, research and policy. From our experience including lived experience

⁴² Harkin, D. (2019a) "Regulating private sector security provision for victims of domestic violence" and (2019b) Private security and domestic violence: The risks and benefits of private security companies working with victims of domestic violence.

⁴³ Wesnet commissioned research

⁴⁴ DFSV Commission. (2026) *Monitoring and Reporting Framework: National Plan to End Violence against Women and Children 2022-2032* (Canberra, Australian Government), <https://www.dfsvc.gov.au/sites/default/files/2026-07/DFSVCommission-Monitoring%26ReportingFramework-May2026.pdf>, p.7.

representation during our annual conferences, the value of having a mechanism cannot be underestimated. Dedicated funding would be required to establish such a mechanism.

- ★ **Recommendation 27: Establish and manage a TFGBV lived and living experience panel to inform practice and policy responses to DFV and GBV.**

6. Technology-Facilitated Gender-Based Violence in the broader digital context

National coordination and response of tech-facilitated abuse in the context of domestic and family violence

TFGBV regulatory taskforce

Policy researcher, Carina Stone, partnered with Wesnet as part of her Masters in Public Policy at Harvard Kennedy School to address the question of how to hold businesses responsible for foreseeable cyberstalking risks involving the misuse of their products. Importantly, the research finds that

'The technologies weaponized for domestic violence cyberstalking extend across the jurisdictional boundaries of many regulatory agencies, including but not limited to the eSafety Commissioner ('eSafety'), the Australian Consumer and Competition Commission ('ACCC'), the Office of the Australian Information commissioner ('OAIC'), the Department of Home Affairs cybersecurity functions ('Home Affairs'), the Australian Communications and Media Authority ('ACMA'), the Australian Securities and Investments Commission ('ASIC'). However, currently the only regulatory agency actively engaged on TFGBV is eSafety.'⁴⁵

Wesnet strongly support the important and necessary work of the eSafety Commissioner, but addressing TFGBV should be a shared responsibility with all regulators. A key recommendation from the report is to establish a cross-agency Cyberstalking Regulatory Task Force coordinated by Prime Minister and Cabinet to lead three pillars of effort:

1. Strengthen enforcement of existing regulations to address cyberstalking.
2. Coordinate law reform efforts across agencies to close gaps in protections
3. Convene cross-sector fusion cells between government, industry, and civil society. Early fusion cells could focus on spy cameras and listening devices, spyware and parental monitoring software, and connected cars.⁴⁶

While the report focuses on cyberstalking, there is potential for the Regulatory Task Force to broaden its scope to TFGBV. The notion of fusion cells in particular would be the Rickard report vision of fusion cells as multi-stakeholder groups that analyse issues, such as end-to-end encryption to combat CSAM, and GBV, to develop coordinated solutions.

⁴⁵ Stone, C. (2026) *Falling through the cracks: Closing gaps in Australian Technology Regulation to Combat Domestic Violence Cyberstalking* (Policy Analysis Exercise submitted for partial requirements for Masters in Public Policy, Harvard Kennedy School).

⁴⁶ *ibid*

Fusion cells are particularly effective when they are time limited and can harness those with the greatest expertise and have particular access to intelligence and data to understand the core drivers of an issue and potential solutions. In the case of technology-facilitated abuse, this could involve, in addition to regulators and law enforcement, representatives of the technology sector, women's safety groups, and industry.⁴⁷

Fusion cells could focus on issues such as cyberstalking, online misogyny and end-to-end encryption.

- ★ **Recommendation 28: Establish a cross-agency TFGVB Regulatory Task Force coordinated by Prime Minister and Cabinet to lead three pillars of effort (a) Strengthen enforcement of existing regulations to address TFGVB; (b) Coordinate law reform efforts across agencies to close gaps in protections; and (c) Convene cross-sector fusion cells between government, industry, specialist DFV services and peak bodies, including Wesnet.**

Bridge the gap between tech policy and gender-based violence policy

Digital Duty of Care

A key opportunity to bridge the gap between tech policy and GBV policy is to implement the Digital Duty of Care with a gender-based violence lens. The Statutory Review of the Online Safety Act (the OSA Review) states that the Digital Duty of Care and associated reforms 'would provide the most substantial and immediate online safety protections for Australians' (recommendation 65).⁴⁸ It rightly places responsibility on service providers to prevent foreseeable online harms. However, addressing gender-based violence is noticeably absent in the proposed Digital Duty of Care policy. For instance, the OSA Review recommends that the Digital Duty of Care should at a minimum address the following harm: harms to young people, including child sexual exploitation and abuse (including grooming), and harms to mental and physical wellbeing, (including threats to harm or kill, or attacks based on a person or group of people's protected characteristics, such as sex, gender, sexual orientation, race, ethnicity, disability, age or religion).

⁴⁷ Rickard, (2024) Report of the statutory review of the Online Safety Act 2021, 2021 (Canberra: Commonwealth of Australia), <https://www.infrastructure.gov.au/departments/media/publications/report-statutory-review-online-safety-act-2021>, p.113.

⁴⁸ *ibid*, p.185.

Wesnet submits that while these are important harms to address, it would not adequately cover all forms of gender-based violence, including coercive control. Additionally, the issues paper that the Federal Government released in May 2026 mentions that applicable content and activity includes 'that which is illegal or harmful to young people'.⁴⁹ While illegal or harmful content and activity to young people covers child sexual exploitation material, harassing communications, stalking and image-based abuse, international jurisdictions set a precedent to strengthen current Digital Duty of Care proposals.

The approaches in the European Union (EU) and United Kingdom should be considered. The EU *Digital Services Act* (DSA) prescribes that providers of very large online platforms and of very large online search engines address 'any actual or foreseeable negative effects in relation to gender-based violence'.⁵⁰ The DSA also mandates that services meaningfully engage with stakeholders, such as users, civil society organisations and researchers, to assess and mitigate risk.⁵¹ The DSA Observatory states: 'the DSA's systemic risk framework treats TFGBV as a question of platform governance. Its object of regulation is not harmful content itself but the systems, governance structures and design choices that make such harms foreseeable and scalable'.⁵² Gender-Based Violence harms captured under the DSA include harassment and gendered hate and extreme misogyny content.⁵³ The DSA presents a potential model to replicate for the Australian context in identifying and mitigating systemic risks related to gender-based violence.

⁴⁹ Australian Government (2026) A Digital Duty of Care for Australia—Developing a duty of care framework for online services used by Australians (Canberra: Australian Government), <https://www.infrastructure.gov.au/departments/media/publications/digital-duty-care-australia-developing-duty-care-framework-online-services-used-australians>, p.5.

⁵⁰ European Union, "Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) (Text with EEA relevance)" *EUR-Lex* published on October 19, 2022, <https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>.

⁵¹ European Board for Digital Services and the European Commission. (2026) *Second report on systemic risks on very large online platforms and search engines under the Digital Services Act* (European Board for Digital Services and the European Commission), <https://digital-strategy.ec.europa.eu/en/library/second-report-systemic-risks-very-large-online-platforms-and-search-engines-under-digital-services>.

⁵² Józwiak, M., & Ohnesorge, J, "Platform Governance and Technology-Facilitated Gender-Based Violence: Positioning the DSA in the EU's Legal Framework" *DSA Observatory* published on July 13, 2026, <https://dsa-observatory.eu/2026/07/13/platform-governance-and-technology-facilitated-gender-based-violence-positioning-the-dsa-in-the-eus-legal-framework/>.

⁵³ European Board for Digital Services and the European Commission. (2026) *Second report on systemic risks on very large online platforms and search engines under the Digital Services Act* .

In the United Kingdom, the *Online Safety Act 2023* was welcomed by local specialist DFV services and the Domestic Abuse Commissioner.⁵⁴ Under that Act, coercive control is considered a priority offence, which places the onus on service providers to prevent and remove such content.⁵⁵ More recently, an amendment was made to include 'possession or publication of pornographic images of strangulation or suffocation' as a priority offence.⁵⁶

The EU and United Kingdom legislative approaches have set a precedent for online services to design gender-based violence out of systems. Australia would benefit from adopting a similar approach.

Addressing online 'misogynist radicalisation'

Incorporating GBV within scope of the Digital Duty of Care is critical, given the prevalence of online 'misogynist radicalisation' via the manosphere.⁵⁷ The manosphere consists of online spaces and communities that centre on male grievances and empowerment and what it means to be a man. Key beliefs include misogyny and male supremacy that emphasise traditional rigid gender roles: violence against girls and women can be normalised as part of being a "real man".⁵⁸ This translates into in-person impacts and behaviours, such as girls and young women feeling unsafe at schools and women teachers experiencing GBV ranging from verbal comments and harassment like 'make me a sandwich', implying women's place is in the kitchen, or making sexually suggestive comments.⁵⁹

⁵⁴ Eagleton, J., "The Online Safety Bill – what does it mean for women and girls?," *Refuge UK* (no date), <https://refuge.org.uk/news/the-online-safety-bill-what-does-it-mean-for-women-and-girls/> and Domestic Abuse Commissioner, *We must build on the Online Safety Act to ensure all victims are protected from online abuse* published on December 19, 2023, <https://www.domesticabusecommissioner.uk/we-must-build-on-the-online-safety-act-to-ensure-all-victims-are-protected-from-online-abuse/>.

⁵⁵ UK Government. *Guidance Online Safety Act: explainer*, updated on April 24, 2025, www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer#how-the-act-protects-women-and-girls.

⁵⁶ UK Government. "Crime and Policing Act 2026: Section 104 Pornographic images of strangulation or suffocation: England and Wales and Northern Ireland," <https://www.legislation.gov.uk/ukpga/2026/20/section/104/enacted>.

⁵⁷ Roberts, S., & Wescott, S. "We research online 'misogynist radicalisation'. Here's what parents of boys should know" *Monash University Lens*, published on July 1, 2024, <https://lens.monash.edu/we-research-online-misogynist-radicalisation-heres-what-parents-of-boys-should-know/>.

⁵⁸ Pfitzner, N., McCook, S., Phelan, A., Wescott, S., Roberts, S. & Scott, B. (2026). *An Introductory Guide to the Manosphere and the Impacts for Young People, Teachers and Schools* (ANROWS Insights 01/2026). ANROWS, p.10. <https://doi.org/10.71940/h2k-x058>.

⁵⁹ Pfitzner et al. (2026) *An Introductory Guide to the Manosphere and the Impacts for Young People, Teachers and Schools* and Wescott, S. & Roberts, S. "From violence to sexism, the manosphere is doing real-world harm" *The Conversation* published

There are also links between key beliefs promoted in the manosphere and hate crimes, particularly against LGBTIQ+ communities and migrant and refugee communities.⁶⁰ A current Victorian Inquiry is examining how the manosphere is contributing to homophobic and biphobic attacks on gay and bisexual men.⁶¹

While sexism is not new, the manosphere amplifies disrespect towards girls and women by boys and men. An Australian study shows that almost two-thirds of the young men surveyed were regularly engaging with men and masculinity influencers. The same study finds that regular engagement with such content was linked with more negative and limiting attitudes towards women and their roles in relationships.⁶² In addition, these ideas are promoted via algorithms. It takes an average of 23 minutes for male-identified accounts to receive misogynist content.⁶³ This is even more problematic as such content is embedded into innocuous content like self-improvement and lifestyle and health.⁶⁴

Online pornography services and Big Porn

Wesnet notes that the Digital Duty of Care will apply to many online pornography services and reiterates the need for GBV to be within scope. Wesnet recognises the range of pornography and how it can represent diverse bodies, sexualities and sexual practices.⁶⁵ While pornography is not designed to be relationships and

December 11, 2025, <https://theconversation.com/from-violence-to-sexism-the-manosphere-is-doing-real-world-harm-262205>.

⁶⁰ Pfitzner et al. (2026) An Introductory Guide to the Manosphere and the Impacts for Young People, Teachers and Schools, p.7.

⁶¹ Parliament of Victoria (2026) *inquiry into anti-LGBTIQ+ hate crimes in Victoria*, <https://www.parliament.vic.gov.au/antilgbtqiahatecrimes>, Kolovos, B., "Role of far-right manosphere in homophobic attacks on men to be investigated in Victoria" *The Guardian* published February 18, 2026, <https://www.theguardian.com/australia-news/2026/feb/18/far-right-influencers-homophobic-attacks-dating-apps-investigation-ntwnfb>, and Kolovos, B., "Gay students extorted with threat of being 'outed' in home countries, Victorian hate crime inquiry hears" *The Guardian* published June 24, 2026, <https://www.theguardian.com/australia-news/2026/jun/24/gay-international-students-extorted-threat-of-being-outed-victoria-hate-inquiry-ntwnfb>.

⁶² Fisher, K., Rice, S., & Seidler, Z. (2025) *Young men's health in a digital world*. (Melbourne: Movember Institute of Men's Health), <https://au.movember.com/movember-institute/masculinities-report>.

⁶³ Baker, C., Ging, D., & Andreasen, M.B. (2024) *The role of algorithmic recommender functions on YouTube Shorts and TikTok in promoting male supremacist influencers* (Dublin: Dublin City University Anti-Bullying Centre), <https://www.dcu.ie/antibullyingcentre/recommending-toxicity>.

⁶⁴ Fisher, K., Benakovic, R., O'Gorman, K., Rice, S., Tierney, K., Miller-Idriss, C., Dashtgard, P., & Seidler, Z. (2026) "Development and application of the Masculinity Content Classification Framework" *Telematics and Informatics* 107, <https://doi.org/10.1016/j.tele.2026.102402>.

⁶⁵ Parliament of New South Wales (2025) *Impacts of harmful pornography on mental, emotional, and physical health* (Sydney: Parliament of New South Wales),

sexuality education, many people, including LGBTQIA+ young people and young people with disability, use pornography as part of sexual development and exploration.⁶⁶ Our comments are limited to mainstream pornography or Big Porn, which is freely accessible 'patriarchal porn' found easily on social media and websites, such as Porn Hub.⁶⁷ This type of pornography targets heterosexual men and reinforces rigid gender stereotypes. Men are portrayed as dominant and aggressive while women are commonly objectified, humiliated and subjected to violence, 'All of this reinforces the social status of women as inferior and existing for the pleasure of men, eroticising gender inequality'.⁶⁸ Mainstream pornography also reinforces intersecting forms of inequality, such as ableism, transphobia and racism. For example, trans women are often seen as victims of aggressive sexual acts, including rape, and trans men are rarely featured.⁶⁹

There are also links between pornography use and intimate partner sexual violence.⁷⁰ Australian research with survivors finds three key ways that pornography contributes to intimate partner sexual violence. The themes are 1) pornography as a sex manual, 2) centring the male partner's pleasure, and 3) feeling dehumanized and devalued. These themes are also reflected in the experiences of specialist sexual assault services in Victoria that see:

- Increasing reports of non-fatal strangulation
- Increasing reports of tech-facilitated sexual violence, including image-based sexual abuse
- Influence on children and young people, such as harmful sexual behaviours

<https://www.parliament.nsw.gov.au/parliamentary-business/committees/inquiry-details?committeeInquiryId=3067>.

⁶⁶ Byron, P., McKee, A., Warson, A., Litsou, K & Ingham, R. (2021) "Reading for Realness: Porn Literacies, Digital Media, and Young People" *Sexuality & Culture* 25, 786–805, <https://link.springer.com/article/10.1007/s12119-020-09794-6>, eSafety Commissioner (2023) *Accidental, unsolicited and in your face: Young people's encounters with online pornography: a matter of platform responsibility, education and choice*. (Canberra: Australian Government), <https://www.esafety.gov.au/sites/default/files/2023-08/Accidental-unsolicited-and-in-your-face.pdf>, Parliament of New South Wales (2025) *Impacts of harmful pornography on mental, emotional, and physical health*.

⁶⁷ McGlynn, C. (2026), *Exposed: The Rise of Extreme Porn and How We Fight Back* (OneWorld Publications), p.4.

⁶⁸ McGlynn, C. (2026), *Exposed*, p.4.

⁶⁹ Sexual Assault Services Victoria (SASVic) (2024) *Responding to the new normal: exploring the impacts of pornography. Review of the literature and experiences of the specialist sexual assault sector* (Melbourne: SASVic), <https://workdrive.zohopublic.com.au/external/2fa819e2dc84707241d86db06df1789eb083bb31c0ee0452ffd82fdal188dee9>.

⁷⁰ Tarzia, L., & Tyler, M. (2020) "Recognizing Connections Between Intimate Partner Sexual Violence and Pornography" *Violence against women* 27(14), <https://doi.org/10.1177/1077801220971352>.

- Its use as a form of sexual coercion in intimate partner relationships.⁷¹

Lessons from implementation of the EU *Digital Services Act* can inform how pornography services can prevent and address GBV. For instance, the EU *Digital Services Act* does not have a definition of GBV, despite it being a systemic risk that services are supposed to assess and mitigate.⁷² This translates to a lack of understanding that GBV is a cross-cutting risk. Some pornography platforms interpret some forms like non-consensual intimate images as illegal content only rather than a form of GBV, which undermines risk assessment mitigation strategies, including how GBV reinforces gender and intersecting forms of inequality.⁷³ Wesnet reiterates the need to include GBV within scope of the Digital Duty of Care, given it will apply to many online pornography services. The definition of GBV must recognise the cross-cutting nature of risk.

★ **Recommendation 29: That the Federal Government amend and implement the Digital Duty of Care to include a gender-based violence lens.**

The United Kingdom *Online Safety Act 2023* also mandates that the regulator consults with the Domestic Abuse Commissioner and Victim's Commissioner in developing Codes of Practice,⁷⁴ and has to publish guidance for service providers to improve online safety for girls and women.⁷⁵ We note that the specialist family violence sector in the United Kingdom advocated for a violence against women and girls-specific Code of Practice,⁷⁶ as guidance has less legal standing.

Australia can learn from the implementation of the United Kingdom *Online Safety Act 2023*, particularly in developing a Code of Practice for those covered by

⁷¹ SASVic. (2024) Responding to the new normal, p.5.

⁷² Seck, M., & Klotsonis, D. "How Pornographic Platforms Address Gender-Based Violence Under the DSA" *TechPolicy.Press* published December 17, 2025, <https://www.techpolicy.press/how-pornographic-platforms-address-genderbased-violence/> and Seck, M., & Klotsonis, D. (2025) *Gender-Based Violence on Pornographic Platforms: A Gendered Reading of DSA Risk Assessments Reports* (Centre for Democracy and Technology Europe), <https://cdt.org/wp-content/uploads/2025/12/Brief-on-Porn-Platforms-RA.pdf>.

⁷³ Seck, M., & Klotsonis, D. "How Pornographic Platforms Address Gender-Based Violence Under the DSA" and Seck, M., & Klotsonis, D. (2025) *Gender-Based Violence on Pornographic Platforms*.

⁷⁴ UK Government. Guidance Online Safety Act: explainer.

⁷⁵ Ofcom. (2025) *Statement and Guidance: A safer life online for women and girls* (London: Ofcom), <https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/a-safer-life-online-for-women-and-girls>.

⁷⁶ Domestic Abuse Commissioner, We must build on the Online Safety Act to ensure all victims are protected from online abuse published on December 19, 2023.

the legislation. While there is existing Industry guidance on safety by design,⁷⁷ there should be preference for developing a VaWG-specific Code of Practice. The Digital Duty of Care (DDoC) should require that the development of Codes is informed by lived experience and consultations with the DFSV Commissioner and specialist DFV sector. Legislation alone, however, cannot be a standalone solution. A later section discusses the need for a nationally coordinated approach to address TFA.

- ★ **Recommendation 30: That the Digital Duty of Care requires that development of Codes is informed by lived experience and consultations with the DFSV Commissioner and specialist DFV sector.**

Unlawful Material Codes

Due to the consultation timeframe for the review of the *Unlawful Material Codes*, Wesnet did not have capacity to respond. However, we submit remarks pertaining to the *Unlawful Material Codes* as they will have implications for the Digital Duty of Care. The scope of the current Digital Duty of Care proposal includes illegal content and activity (Class 1) such as Child Sexual Abuse Material (CSAM). Wesnet recommends the scope for Class 1 can be broadened to include violent and seriously injurious practices, such as strangulation. This is aligned with the OSA Review recommendation 30 that 'New Class 1 definitions and thresholds should clearly focus on illegal and seriously harmful material and directly correspond to the Criminal Code where appropriate. Sexually explicit material that includes violent and seriously injurious practices, such as choking, should sit under Class 1.' Strangulation is a risk factor in intimate partner violence and 'one of the most lethal forms'.⁷⁸ Women whose partners tried to strangle them were over seven times more likely than other women survivors to be killed.⁷⁹ Non-lethal strangulation can leave little physical evidence, and lead to serious injury, acquired brain injury or death.⁸⁰

⁷⁷ eSafety Commissioner (2024) *Technology, gendered violence and Safety by Design* (eSafety Commissioner), <https://www.esafety.gov.au/sites/default/files/2024-09/SafetyByDesign-technology-facilitated-gender-based-violence-industry-guide.pdf?v=1786603903734>.

⁷⁸ Toivonen, & Backhouse (2018). *National Risk Assessment Principles for domestic and family violence*, p.13.

⁷⁹ *ibid*

⁸⁰ Women's Health NSW. *It left no marks* published in 2024, <https://www.itleftnomarks.com.au/>.

- ★ **Recommendation 31: New Class 1 definitions and thresholds in the Unlawful Material Codes should clearly focus on illegal and seriously harmful material and directly correspond to the Criminal Code where appropriate. Sexually explicit material that includes violent and seriously injurious practices, such as choking, should sit under Class 1.**

Pornography may play a key role in introducing Australians to sexual choking, which is now a common sexual practice.⁸¹ More than half of men, women, and trans and gender diverse people aged 18–35 engage in sexual choking, viewing it as safe, positive and expected, with many assuming that consent is provided once.⁸² This points to the need for sexual health education around consent and the harms of strangulation. The *It left no marks* community education campaign is one example.

- ★ **Recommendation 32: Develop and deliver comprehensive national education about consent and harms around strangulation.**

Artificial Intelligence and gender-based violence

Artificial Intelligence (AI) poses challenges to address DFV. Perpetrator misuse of AI includes:

- Chatbot-simulated abuse such as roleplaying incest and child sexual abuse,⁸³
- Chatbot-enabled abuse like providing guidance on DFV, such as stalking,⁸⁴
- Sexualised deepfake abuse⁸⁵
- Synthetic Child Sexual Abuse Material (CSAM).⁸⁶

⁸¹ Sharman, L., Fitzgerald, R., & Douglas, H. (2025) "Prevalence of Sexual Strangulation/Choking Among Australian 18–35 Year-Olds" *Archives of Sexual Behaviour* 54:465–480, <https://link.springer.com/article/10.1007/s10508-024-02937-y>.

⁸² Sharman, L., Fitzgerald, R., & Douglas, H. (2025) "Prevalence of Sexual Strangulation/Choking Among Australian 18–35 Year-Olds".

⁸³ McGlynn, C., McDermott, Y., Macdonald, S., Toparlak, R.T., Tarrant, F., & Treacy, S. (2026) *Invisible no more: How AI Chatbots are reshaping violence against women and girls* (Durham University, Swansea University & UK Research & Innovation), <https://www.durham.ac.uk/research/current/research-news/2026/03/ai-chatbots/>.

⁸⁴ McGlynn, C., McDermott, Y., Macdonald, S., Toparlak, R.T., Tarrant, F., & Treacy, S. (2026) *Invisible no more*.

⁸⁵ Flynn, A., Powell, A., Eaton, A., & Scott, A.J. (2025) "Sexualized Deepfake Abuse: Perpetrator and Victim Perspectives on the Motivations and Forms of Non-Consensually Created and Shared Sexualized Deepfake Imagery" *Journal of Interpersonal Violence* <https://journals.sagepub.com/doi/10.1177/08862605251368834>.

⁸⁶ Wolbers, H., Cubitt, T., and Cahill, M.J. (2025) Artificial intelligence and child sexual abuse: A rapid evidence assessment (Canberra: Australian Institute of Criminology), https://www.aic.gov.au/sites/default/files/2025-01/ti711_artificial_intelligence_and_child_sexual_abuse.pdf.

The Third National Survey also found that three-quarters of practitioners surveyed reported seeing perpetrators use AI-generated threats and impersonation tools.

AI also poses opportunities to address DFV through data collection and monitoring, early intervention and response. AI is used to track GBV in low- and middle-income countries where data is limited. It can analyse large sets of unstructured data as well as real-time online harmful content across digital platforms.⁸⁷ However, caution must be exercised when using AI, particularly Generative AI, for research on GBV.⁸⁸ In the United States, a multimodal machine-learning approach uses clinical notes, including radiological notes, and data from electronic medical records to identify patients at risk of intimate partner violence in clinical settings.⁸⁹ The research shows promising results for early intervention as it can identify survivors years before they seek support. In Australia, the Commonwealth Bank uses AI to identify TFA in digital payment descriptions, suspending perpetrators from online banking services or refusing their transactions when DFV is detected.⁹⁰ Survivors are also using AI such as chatbots to access information and support for their experiences.⁹¹ This is important as survivors are unlikely to disclose their experiences to services.

However, the privacy of survivors must be taken into account. Wesnet's sister organisation, the National Network to End Domestic Violence (NNEDV) based in the United States, details privacy risks of AI tools, particularly general purpose AI, such as data exposure and third-party access. This includes concerns about data storage, where user inputs are often stored on third-party servers, data logging

⁸⁷ DeGraw, E. "Using AI to Track Gender-Based Violence" *Think Global Health* published on May 29, 2025, <https://www.thinkglobalhealth.org/article/using-ai-track-gender-based-violence>.

⁸⁸ Amazon-Brown, I., Tsui, Q., & Raftree, L., the MERL Tech Initiative (MTI) and Dartnall, E., Sexual Violence Research Initiative (SVRI), *Using AI responsibly for research on violence against women* (MTI & SVRI), https://www.svri.org/wp-content/uploads/2025/03/SVRI_C_012_AI_IN_RESEARCH_LAYOUTV5_WEB.pdf.

⁸⁹ Gu, J., Villalobos Carballo, K., Ma, Y., Bertsimas, D., & Khurana, B. (2026) "Leveraging multimodal machine learning for accurate risk identification of intimate partner violence" *npj Women's Health* 4(15), doi.org/10.1038/s44294-025-00126-3.

⁹⁰ Brooks, E.J. "How AI is helping Australia's biggest bank stop domestic violence perpetrators" *Future Women* published on January 15, 2026, <https://www.futurewomen.com/equity/artificial-intelligence-domestic-violence/>.

⁹¹ Poveda, J., Lanter, A., Antoniuk, I., Mazurek, M.L., Freed, D. (2026) "CHAT WITH ME below as if I were a human": Insights from Auditing AI Chatbots for Survivors of Domestic Violence" *FACCT '26: The 2026 ACM Conference on Fairness, Accountability, and Transparency* 1398 - 1423, <https://doi.org/10.1145/3805689.3812260>, Hui, V., Tian, L., Feng, X., Chen, Q., Wong, AKC., Bloom, TL. (2026) "Perspectives and preferences of domestic violence survivors regarding digital platform and AI chatbot for help-seeking: A qualitative study." *PLoS One* 21(2): e0342453, <https://doi.org/10.1371/journal.pone.0342453>, and Mielismäki, H., & Husso, M. (2025) "Ethical Implications of AI-Driven Chatbots in Domestic Violence Support" *Social Inclusion* 13, <https://doi.org/10.17645/si.9998>.

where conversations are logged for analytics or quality assurance, no true consent mechanisms and emergency protocols.⁹²

Despite overwhelming misuse of AI to perpetrate abuse and the risks that AI poses to victim-survivor privacy and safety, it is concerning that national policy decisions, such as the National AI Plan and AI Safety Institute have not implemented a gendered or gender-based violence lens. This is evident in the National AI Plan, AI guidance, the AI Safety Institute and the Office of AI. Without a GBV lens, policy decisions about AI are unable to address the harms experienced by many women, gender-non-conforming communities and children and young people. Wesnet recommends that Government AI policy decisions and frameworks are implemented with a gender-based violence lens.

★ **Recommendation 33: That the Federal Government implement AI policies with a gender-based violence lens.**

AI is also reinforced by and contributes to inequality. A study of 133 AI systems finds that 44 per cent show gender bias and 26 per cent show gender and racial bias.⁹³ This can look like women's job applications being deprioritised by AI recruitment tools and women of colour being mistakenly identified by AI surveillance technologies.⁹⁴ If AI generates information based on its users then the bias is reinforced because those with low levels of digital inclusion are absent. In Australia, there is a digital inclusion gap between First Nations and other communities, and users outside of capital cities.⁹⁵ Design bias can also be reflected by the lack of women in technology. Women constitute only 22 percent of AI professionals globally.⁹⁶ This is despite the fact that AI use in Australia is

⁹² NNEDV (2025) Artificial Intelligence and Victim Services: A Comprehensive Guide for Advocates (NNEDV), <https://www.techsafety.org/artificial-intelligence-and-victim-services>.

⁹³ Smith, G., & Rustangi, I. "When Good Algorithms Go Sexist: Why and How to Advance AI Gender Equity" *Stanford Social Innovation Review* published on March 31, 2021, https://ssir.org/articles/entry/when_good_algorithms_go_sexist_why_and_how_to_advance_ai_gender_equity.

⁹⁴ UN Women. "How AI reinforces gender bias—and what we can do about it" *UN Women* published on February 5, 2025, <https://unwomen.org.au/how-ai-reinforces-gender-bias-and-what-we-can-do-about-it/> and Wilson, C., & Burns, A. "Privacy concerns raised over Australian-first live AI police face scanning trial" *ABC News* published on July 11, 2026, <https://www.abc.net.au/news/2026-08-11/ai-police-face-screening-trial-sparks-privacy-concern/107009644>.

⁹⁵ Australian Digital Inclusion Index (2026) "Measuring Australia's digital divide," <https://digitalinclusionindex.org.au/>.

⁹⁶ Vijayarasa, M. "Most AI assistants are feminine – and it's fuelling dangerous stereotypes and abuse" *The Conversation* published on January 27, 2026, <https://theconversation.com/most-ai-assistants-are-feminine-and-its-fuelling-dangerous-stereotypes-and-abuse-272335>.

more likely to affect women's jobs.⁹⁷ Given that the growing use of AI will impact women, particularly those from marginalised communities, more than men, thereby exacerbating inequality, AI policy should have an intersectional gender-sensitive lens.

We therefore refer the Federal Government to the recommendations pertaining to AI oversight and regulation and AI and women's employment outlined by Working with Women Alliance.⁹⁸ Recommendations include ensuring that all government AI strategies, frameworks, regulations and action plans include a gender impact statement and funding gender-sensitive and paid training pathways for women to develop the requisite AI skills to transition their careers sustainably.

- ★ **Recommendation 34: That the Federal Government implement the recommendations pertaining to AI oversight and regulation, and AI and women's employment outlined by Working with Women Alliance.**

⁹⁷ Office of the Chief Economist. (2026) *AI and employment in Australia* (Canberra: Australian Government), <https://www.dewr.gov.au/workplace-relations/resources/ai-and-employment-australia>.

⁹⁸ Working with Women Alliance (2026) *Policy brief: AI, gender and economic equality* (Working with Women Alliance), <https://www.wa.org.au/wp-content/uploads/2026/01/2WwWA-Policy-Brief-AI-Gender-and-Economic-Equality.pdf>.