



Submission to the Australian Government,
Department of Social Services

Consultation to inform the
Second Action Plan under
the National Plan to end
Violence Against Women
and Children 2022-2032

August 2026

Embolden SA Inc.

embolden.org.au

Level 1, 229 Greenhill Road, Dulwich SA 5065

ABN 29 064 737 849

CONTENTS

Acknowledgement of Country	2
About Embolden SA.....	2
Executive summary	3
Summary of recommendations	6
Overarching: Strengthen conditions for impact.....	14
National leadership and coordination must remain central.....	14
Strengthen accountability, rigour and independent oversight	15
Embed shared decision-making with the specialist sector and lived expertise	16
Improve transparency of investment, service capacity & system performance	17
Priority area 1: Victim-survivors	18
Specialist DFSV system and funding that reflects victim-survivors' realities	18
System and investment that reflects the realities of recovery and healing	19
Scale community-led approaches as models for system reform.....	20
Accessibility through system capability and community leadership.....	21
Prevent and respond to sexual violence, including child sexual abuse	22
Provide victim-survivors of sexual abuse with access to justice.....	23
Expand sexual violence reporting pathways and survivor-led justice options.....	24
Consider national roll-out of the Domestic Violence Disclosure Scheme	25
Technology-facilitated abuse must be recognised as a national priority	25
Strengthen implementation and monitoring of coercive control offences.....	26
Priority area 2: Prevention and early intervention	28
Review and modernise Australia's prevention framework.....	28
Build prevention capability across systems and communities.....	29
Strengthen community-led and targeted prevention approaches	29
Expand holistic early intervention responses	30
Strengthen community capacity to recognise and respond to violence	31
Priority area 3: Children and young people	32
Tailored, violence-informed and developmentally appropriate supports	32
Children & young people's needs in their own right and relational contexts	33
Adequately resource specialist, holistic responses to sexual abuse	34
Children and young people must be recognised as partners in system reform	34
Part 1: Lived experience leadership	34
Part 2: National practice standards	35
Address the barriers to specialist support and therapeutic services	35
Sustained prevention and early intervention	36
Priority area 4: People who use violence	37
Earlier recognition of and response to the use of violence.....	37
Strengthen behaviour change programs and practice	38
Invest in community-led and culturally responsive approaches.....	39
Strengthen family and community supports.....	39
Priority area 5: System integration and workforce	41
Invest to build specialist sector capacity	41
Invest in specialist workforce development.....	42
Responding to DFSV in an integrated response system	44
References	46

Acknowledgement of Country

Embolden is based on Kaurna Country. We acknowledge Aboriginal and Torres Strait Islander people as the traditional and ongoing custodians of the lands on which we live and work, and we pay respect to Elders past and present. We acknowledge that sovereignty has never been ceded. It always was and always will be Aboriginal land.

We acknowledge Aboriginal peoples' spiritual relationship with Country and the ongoing importance of their cultural and heritage beliefs, languages and laws. We acknowledge Aboriginal peoples' rights to self-determination and continuing connections to land, waters and community.

About Embolden SA

Embolden is the statewide peak body for organisations in South Australia that work to prevent and respond to domestic, family and sexual violence. Embolden members are services that specialise in supporting people experiencing violence to be safe, recover and thrive, and programs that work towards the elimination of gender-based violence. We recognise that domestic, family and sexual violence is most often perpetrated by men against women and children, and that gender-based violence impacts people across diverse gender identities, social and cultural contexts, and within various types of intimate and family relationships. Embolden represents providers of specialist services in South Australia's domestic, family and sexual violence sector, including Aboriginal specialist services and services that work with men who use violence.

Act for Kids	Good Shepherd Australia New Zealand	Relationships Australia (SA)
Anglicare SA	Kornar Winmil Yunti Aboriginal Cooperation	Riverland Domestic Violence Service, Centacare Catholic Community Services
Australian Refugee Association	Lutheran Care	Sanctuary House, The Salvation Army
Cedar Health Service, SA Health	Mt Gambier and Limestone Coast Domestic Violence Service, Centacare Catholic Community Services	SHINE SA
Ceduna Regional Domestic Violence and Aboriginal Family Violence Services, Centacare Catholic Country Services	Murray Mallee and Adelaide Hills Domestic Violence Service, Centacare Catholic Community Services	The Yellow Gate
Coober Pedy Regional Domestic Violence and Aboriginal Family Violence Service, Uniting Country SA	No to Violence	Thorne Harbour Health
Family Violence Legal Service Aboriginal Corporation	NPY Women's Council Domestic and Family Violence Service	Whyalla Regional Domestic Violence Service, Centacare Catholic Community Services
54 Reasons	OARS Community Transitions	Women's Legal Service SA
First Nations Healing	Port Augusta Regional Domestic Violence and Aboriginal Family Violence Service, Uniting Country SA	Women's Safety Services SA
Fleurieu and KI Domestic Violence Service, Junction SA		Yarredi Services
		Yarrow Place, SA Health
		Yorke and Mid North Domestic Violence Service, Uniting Country SA
		Zahra Foundation Australia

Executive summary

Embolden welcomes the opportunity to contribute to the development of the Second Action Plan under the National Plan to End Violence Against Women and Children 2022–2032.

Embolden members are specialist domestic, family and sexual violence services in South Australia, working across the continuum of prevention, early intervention, crisis response, and recovery and healing. Embolden members are wholeheartedly committed to the National Plan's vision of ending violence against women, children and all people within a generation.

This submission is informed by frontline practice, engagement in policy and systems reform, and the experiences and insights of specialist DFSV services working every day with victim-survivors, children and young people, people who use violence and communities across South Australia. While informed by the substantial body of evidence developed nationally and internationally, our contribution is primarily intended to bring a frontline perspective to the development of the Second Action Plan.

We foreground the context in which Embolden makes this submission. Following the South Australian Royal Commission into domestic, family and sexual violence in 2025, the South Australian Government has committed to a reform program that holds potential to resolve many of the problems discussed. Embolden members are fully committed to its success. However, in making this submission, Embolden can only speak to the current reality.

In recent years, Australia has undertaken an unprecedented level of inquiry and reform activity in relation to domestic, family and sexual violence. The Rapid Review of Prevention Approaches, the work of the Domestic, Family and Sexual Violence Commission, state and territory inquiries and commissions, including South Australia's Royal Commission, have collectively produced a substantial and expert-informed body of evidence, recommendations and reform priorities.

Embolden strongly supports the recommendations emerging from these processes and acknowledges the leadership, expertise and rigour that have informed them. Together, they provide a clear and compelling roadmap for reform.

At this midpoint of the National Plan, the challenge is no longer one of identifying problems or generating solutions. Australia has invested decades in understanding the drivers and impacts of domestic, family and sexual violence, building evidence, strengthening practice, developing policy frameworks and producing reform recommendations. The foundations for meaningful progress are stronger than at any point in Australia's history.

Despite progress in some areas, violence remains prevalent. Victim-survivors continue to encounter system failures, barriers to safety and support, unmet need and inconsistent responses. Many communities continue to experience disproportionate impacts of violence

and significant barriers to service access. Progress remains uneven across jurisdictions, and too often commitments are not matched by transparent implementation, accountability or measurable outcomes.

The Second Action Plan provides a critical opportunity to address these challenges. In Embolden's view, the next phase of reform must focus on creating the conditions necessary for known solutions to be implemented consistently, effectively and at scale.

Central to this task is stronger national leadership and accountability. The achievement of the National Plan's objective of a substantial and sustained reduction in gender-based violence by 2032 will depend on coordinated action across all Australian governments. National Cabinet should continue to play a central leadership role in driving consistency, accountability and shared responsibility for outcomes.

The Second Action Plan should focus on:

- strengthening accountability for implementation and outcomes across all jurisdictions
- modernising and strengthening the application of key national frameworks to better reflect contemporary evidence, lived realities and practice contexts
- establishing governance arrangements that embed shared decision-making with the specialist DFSV sector and people with lived experience
- strengthening transparency of reform progress, investment and outcomes
- investing in specialist DFSV systems, services, leadership and workforce capability
- building nationally consistent, integrated and victim-survivor-centred service systems
- expanding community-led, place-based and culturally grounded models of service delivery
- strengthening prevention, early intervention, recovery and healing responses across the full continuum of need
- improving system responses to people who use violence and strengthening accountability for violence
- ensuring children and young people are recognised and supported as victim-survivors in their own right

A consistent theme throughout this submission is that specialist domestic, family and sexual violence services are fundamental to achieving the objectives of the National Plan. Specialist services provide expertise, practice leadership and system knowledge that underpin effective prevention, early intervention, crisis response, recovery and perpetrator accountability efforts. The challenge is not a lack of commitment or innovation within the sector, but the ongoing misalignment between what is known to work, what victim-survivors need and the systems, funding models and governance arrangements designed to support that work.

For victim-survivors, communities and specialist services, progress is not measured by the existence of strategies, plans or reform commitments. Progress is measured by whether

victim-survivors are safer, whether people who use violence are held accountable, whether barriers to support are removed, whether recovery and healing are achievable, and ultimately whether the prevalence and impacts of violence are reduced.

The Second Action Plan must be firmly focused on delivering that change. It should build on the foundations established through the First Action Plan, address the gaps and limitations that have become apparent, and strengthen the systems, accountabilities and partnerships necessary to achieve the National Plan's vision of ending gender-based violence.

A handwritten signature in black ink, appearing to read 'Maria Hagias'.

Maria Hagias
Embolden Board Co-chair

A handwritten signature in blue ink, appearing to read 'Susie Smith'.

Susie Smith
Embolden Board Co-chair

A handwritten signature in blue ink, appearing to read 'Mary Leaker'.

Mary Leaker
Embolden CEO

Summary of recommendations

Overarching: Strengthen conditions for impact

1. Ongoing leadership by National Cabinet and cross-jurisdictional collaboration to drive coherence, consistency and reform, including:
 - a) Reaffirm that domestic, family and sexual violence is a standing national priority.
 - b) Strengthen the mechanisms through which governments work collectively to identify gaps, share lessons, drive consistency and address areas of unmet need.
2. Ensure commitments are implemented consistently, progress is measured rigorously and all governments are held accountable for outcomes, including:
 - a) Greater emphasis on implementation quality and continuous improvement.
 - b) Independent monitoring arrangements at the national and state and territory levels.
 - c) Strengthen the powers of the Domestic, Family and Sexual Violence Commission, including information-gathering functions.
 - d) Strengthen participation of all jurisdictions in agreed national mechanisms designed to improve understanding of violence and system performance.
3. Share decision-making with the specialist sector and lived expertise and resource these contributions as a core component of effective system design, including:
 - a) Formal lived experience advisory structures, specialist sector advisory mechanisms and stronger representation of specialist peak bodies in governance, implementation and oversight arrangements.
 - b) Inviting the DFSV Commissioner to consider, in collaboration with the Lived Experience Advisory Council, the introduction of a national lived experience engagement community of practice.
4. Improve transparency of service system investment, capacity and performance, including:
 - a) A comprehensive nation-wide needs analyses to identify unmet need and demand across early intervention, crisis response, recovery and healing services and establish pathways for governments to address identified shortfalls.
 - b) Mapping of DFSV service activities and expenditure across jurisdictions using nationally consistent methodology.
 - c) Enhanced data capability, consistent monitoring frameworks and public reporting of funding, activities and outcomes across jurisdictions.

Priority area 1: Victim-survivors

5. Strengthen the specialist DFSV service system through funding and commissioning models that reflect the realities of victim-survivors' lives and the realities of specialist practice, including:

- a) Sustainable funding and flexible service models that allow services to respond across the full continuum of need.
 - b) Increased investment in specialist crisis accommodation and wraparound support models.
6. **Dedicated investment and intentional service system design that reflects the long-term lived reality of recovery and healing**, including:
- a) Recovery pathways and access to DFSV-informed therapeutic, legal, financial, housing, parenting and employment supports within an integrated service system; designed in partnership with victim-survivors, specialist DFSV services, Aboriginal Community Controlled Organisations, and community-led service providers.
 - b) A dedicated focus on preventing DFSV-related suicide, including commitments to strengthen understanding of the prevalence and drivers of DFSV-related suicide and prevention initiatives across all priority areas, informed by the findings of the Parliamentary Standing Committee's 2026 inquiry.
 - c) Prioritise prevention of systems abuse, and investment in specialist legal assistance, case management and advocacy supports that can respond to complex, protracted forms of post-separation abuse.
7. **Scale community-led, place-based approaches to service design and delivery**, including:
- a) Sustained investment in Aboriginal Community Controlled Organisations and genuine commitment to self-determination, consistent with Our Ways – Strong Ways – Our Voices.
 - b) Sustained investment in services delivered by and for multicultural, migrant and refugee communities.
 - c) Sustained investment in community-led services delivered by and for LGBTIQ+ communities.
8. **Embed responsiveness to diversity within the foundations of service design, practice and system reform**, including:
- a) Build intersectional practice across all services, with investment in community-led workforce development, practice tools and organisational capability.
 - b) Strengthen cultural safety across all service settings.
 - c) Build services' capacity to recognise and respond to migration-related abuse.
 - d) Improve access to qualified interpreters in all service settings.
 - e) Resource LGBTIQ+ community leadership to build capability system-wide.
 - f) Resource disability community leadership to build capability system-wide.
9. **Greater priority to preventing and responding to sexual violence, including child sexual abuse**, including:
- a) Sustained resourcing for specialist sexual violence services and funding models that recognise the scale and long-term impacts of sexual violence.

- b) Greater investment in long-term therapeutic support for victim-survivors of sexual violence, including children and young people.
 - c) Investment in targeted programs for population groups who face heightened risk of sexual violence and additional barriers to support and recovery services.
 - d) Strengthen system-wide workforce capability to recognise and respond to sexual violence.
10. **Provide victim-survivors of sexual abuse with access to justice**, including:
- a) Implementation of the full suite of relevant ALRC recommendations, supported by corresponding investment in legal assistance, advocacy and victim support services.
 - b) Increased investment in legal assistance and specialist support services that help victim-survivors navigate reporting, investigations and court processes.
 - c) Consideration of professionally facilitated peer support programs for victim-survivors over 16 who are involved in criminal justice processes.
11. **Expand sexual violence reporting pathways for sexual offences and victim-survivor-led justice options**, including:
- a) National harmonisation and implementation of anonymous reporting mechanisms for sexual violence across all jurisdictions.
 - b) Consideration of restorative justice approaches as an option within a broader suite of justice responses to sexual violence, where participation is voluntary, victim-survivor-led and supported by appropriate safeguards.
12. **Consideration of the Domestic Violence Disclosure Scheme by other states and territories**, as a system measure to reduce opportunities for future victimisation by individuals who perpetrate violence against multiple victims.
13. **Strengthen national responses to technology-facilitated abuse through sustained investment in specialist leadership, prevention initiatives, online safety regulation and support for victim-survivors**, including:
- a) Support specialist national leadership on technology-facilitated abuse, including sustained investment in WESNET's national leadership in building specialist workforce capability and practical responses to technology-facilitated abuse.
 - b) Ongoing Commonwealth funding for WESNET's Safe Connections program.
 - c) Consider banning people convicted of serious domestic, family and sexual violence offences from dating apps.
14. **Strengthen implementation and monitoring of coercive control offences**, including:
- a) Greater rigour in aligning new offences with the National Principles to Address Coercive Control, so that new offences reflect agreed principles and introduction is accompanied by broader system, service and practice reforms to maximise victim-survivor safety and minimise unintended harms.

- b) Establish a national monitoring framework to examine the impacts of coercive control offences.

Priority area 2: Prevention and early intervention

15. Review and modernise the national prevention framework to reflect emerging evidence and contemporary understandings of violence prevention, including:
 - a) Attention to reinforcing factors to address the wider contexts in which violence occurs.
 - b) Reflect gender diversity in the foundations of the framework.
 - c) Improve the accessibility and utility of the national prevention framework for a broader range of audiences, including frontline practitioners, community organisations, local governments and service systems.
 - d) Funding and service models that recognise and support the role of crisis response, recovery and early intervention services in preventing future violence.
16. Build prevention capability across systems and communities, including:
 - a) Sustained investment to build prevention capability in addressing the drivers of gender-based violence at the individual, community, organisational, institutional and societal levels.
 - b) Prioritise prevention workforce development in jurisdictions where capacity and capability are limited.
 - c) Establishment of a Prevention Innovation Fund, as recommended by the Rapid Review.
17. Invest in community-led prevention and early intervention initiatives that are culturally relevant, locally responsive and grounded in community strengths, including:
 - a) Culturally grounded healing approaches for Aboriginal and Torres Strait Islander men and boys that are led by Aboriginal Community Controlled Organisations, community leaders and Elders.
 - b) Strengthening the role of settlement services to support earlier identification of abuse, improve access to help, and ensure culturally responsive information reaches communities that may face heightened risks and barriers to support.
18. Expand holistic early intervention responses with greater investment in family-centred approaches, including:
 - a) Strengthening the role of child and family services in working holistically with families to identify and address emerging safety concerns.
 - b) Improve engagement with men and boys.
 - c) Greater support for cultural healing initiatives.
 - d) Equipping services with resources and capability to respond flexibly to complex family circumstances.

19. Strengthen communities' capacity to recognise and respond to violence, including:
- a) Initiatives that build the confidence and capability of natural responders to recognise violence, respond safely and connect people with appropriate support.
 - b) Targeted campaigns that increase awareness of the nature and impacts of DFSV and empower people to respond appropriately, co-designed with Aboriginal communities, multicultural, migrant and refugee communities, LGBTIQ+ communities, people with disability, older people, and children and young people.
 - c) Investment in programs that engage community leaders, faith leaders and other trusted sources of community support, to strengthen help-seeking and communities' capacity to respond earlier when violence occurs.

Priority area 3: Children and young people

20. Improve service system capacity to provide tailored, trauma- and violence-informed and developmentally appropriate support for children and young people that responds to the complexity of their experiences, including:
- a) Responding to current/recent experiences of domestic, family and sexual violence as well as historical experiences of abuse, including sexual abuse, and ongoing trauma, and impacts of structural disadvantage and marginalisation.
 - b) Sustained investment in specialised services capable of responding to the diverse experiences of children and young people, including Aboriginal and Torres Strait Islander children, children with disability, culturally and linguistically diverse children and young people, and LGBTIQ+ children and young people.
21. Meet the needs of children and young people as victim-survivors in their own right, as well as within their relational contexts, including:
- a) Ensure improved identification of DFSV is accompanied by improved child protection recognition and responsiveness to the dynamics of domestic and family violence.
 - b) Continuing to strengthen the focus on perpetrator visibility and accountability in child protection systems.
22. Investment in specialist responses to ensure services are adequately resourced to respond to the complex realities and needs of children and young people affected by sexual abuse.
23. Recognise children and young people as partners in designing system reforms to meet their needs, including:
- a) National mechanisms for meaningful lived experience engagement with children and young people to inform policy development, service design and evaluation on an ongoing basis.
 - b) Development of national practice standards for working with children and young people, co-designed with input from children and young people, that establish clear expectations for developmentally appropriate, trauma- and violence-informed

responses across prevention, early intervention, crisis response, recovery and healing.

24. **Address the barriers faced by children and young people to accessing specialist support and therapeutic services**, including:

- a) Accessible support regardless of where children and young people live and whether a protective parent is engaged with services.

25. **Sustained investment in prevention activities that engages children and young people early and supports development of respectful, equitable and non-violent attitudes and behaviours**, including:

- a) Investment in nationally coordinated approaches to prevention in early childhood education and care settings.
- b) Respectful relationship education must continue to be supported and strengthened, and should be delivered within whole-of-school approaches that address not only classroom learning but also school culture, leadership, policies and systems.
- c) Prioritise online safety as an increasingly important violence prevention issue for children and young people.
- d) Ensure the eSafety Commission is adequately empowered and resourced to meet its mandate to minimise online harm and improve online safety.
- e) Ensure broader prevention efforts keep pace with the rapidly evolving digital environments in which children and young people live, learn and socialise.

Priority area 4: People who use violence

26. **Develop and implement a national strategy focussed on people who use violence** that:

- a) Aligns prevention, early intervention and response efforts;
- b) Is supported by shared accountability, consistent practice standards and evidence-informed interventions;
- c) Is developed using a multidisciplinary co-design process, and draws on expertise across family violence, health, education, justice, child and family services, technology and research sectors; and
- d) Spans primary prevention, early intervention, behaviour change, justice and community-based responses.

27. **Strengthen the capacity of mainstream and targeted services to identify and respond earlier to people at risk of/using violence**, including:

- a) Investment in workforce capability across multiple systems.
- b) Evidence-based tools, screening approaches and referral pathways.
- c) A focus on accountability and behaviour change while responding to intersecting issues.

- d) Strengthening supports for young parents, including targeted engagement with young men.
 - e) Expansion of abuse prevention programs to reach LGBTIQ+ people who use violence and women who use violence.
 - f) Investment to improve responses within youth justice, remand and correctional settings.
28. Strengthen behaviour change programs and practice, as part of a broader ecosystem of services, programs and accountability mechanisms that prioritise victim-survivor safety, including:
- a) Significant investment, coordinated effort and ongoing sector support to ensure the intended impacts of the national behaviour change program standards and quality assurance framework are realised.
 - b) Investment in corresponding partner contact programs.
 - c) Accommodation-based responses for people using violence.
29. Invest in community-led and culturally responsive approaches to people who use violence, including:
- a) Greater investment in Aboriginal Community Controlled Organisations to deliver holistic supports that strengthen families, promote healing and engage with men and boys in culturally informed ways.
 - b) Investment to improve service system accessibility and responsiveness to the needs of culturally and linguistically diverse communities, LGBTIQ+ communities and people with disability.
 - c) Invest in place-based service models for regional, rural and remote communities to ensure people using violence can access timely and appropriate interventions regardless of where they live.
30. Invest in family services and community-based services to strengthen capacity to identify risk earlier and respond to emerging needs.

Priority area 5: System integration and workforce

31. As an urgent priority nationally, invest in specialist services' capacity to:
- a) Meet demand for frontline services and program delivery.
 - b) Perform the range of functions that are critical contributors to evidence-informed policy responses to DFSV and build capability across broader service systems.
32. Undertake comprehensive analyses of the unmet need and demand for domestic, family and sexual violence services nationally; with particular attention to the experiences and needs of communities facing additional and compounding barriers to safety, support and recovery, and responses that are led by community for community.

33. **Strengthen the powers of the DFSV Commission to source information and monitor National Plan implementation and funding.**
34. **Map current DFSV activities, programs and investment across all jurisdictions,** using a nationally consistent methodology.
35. **Development and implementation of a national strategy for specialist and adjacent workforce development,** as recommended by the DFSV Commission, including:
 - a) Investment in specialist workforce development to improve attraction and retention, strengthen capability and resource DFSV practice leadership.
 - b) Adequate resourcing of state and territory peak bodies to support and lead specialist workforce development.
 - c) Improve the data capability of the specialist workforce as an immediate priority, including skills development in outcomes measurement and fit-for-purpose information management systems.
36. **Build capability in recognising and responding to DFSV across all services, within an integrated response system,** including:
 - a) Ongoing collaboration to strengthen risk assessment and multi-agency risk management approaches nationally.
 - b) Introduction of minimum standards requiring routine screening for DFSV across all service systems, with:
 - Implementation supported by an operational framework and workforce development
 - Inclusion of systems abuse, technology-facilitated abuse and other emerging forms of abuse.
 - c) Strengthen professional regulatory frameworks to ensure DFSV competency across relevant professions.
 - d) Embed DFSV curricula within relevant higher education and vocational training qualifications, so that graduates enter the workforce with foundational knowledge and skills.

Overarching: Strengthen conditions for impact

Embolden makes this submission in the context of South Australia's recent Royal Commission into domestic, family and sexual violence. Over 12 months, the Commission held 170 consultations involving thousands of people and made many site visits to observe different elements of the domestic, family and sexual violence system. The Commission received 381 written submissions and heard from more than 1300 people with lived and living experience. In addition, the Commission engaged Dr Kate Fitz-Gibbon to produce a report, [*Silence and Inaction*](#), from interviews with children and young people who have lived experience of DFSV.

The Commission's report [*With Courage: South Australia's vision beyond violence*](#) and [*Voices*](#), a dedicated report reflecting the voices of people with lived and living experience, are richly and expertly informed. The Commission made 136 recommendations that provided a blueprint for transformative change. Of these, 84 were accepted by the South Australian government either wholly or in part, and a further 45 in principle for future consideration, as outlined in the Government's response, [*Building Safer Futures*](#).

In South Australia and nationally, the challenge is not a lack of evidence, frameworks or stated commitment.

The challenge for the Second Action Plan is to ensure that leadership, governance, accountability and investment arrangements nation-wide create the conditions for evidence-based solutions to be delivered consistently, at a scale commensurate with the problem and in partnership with the communities most affected by violence.

National leadership and coordination must remain central

Australia's ability to achieve the National Plan's objective of a substantial and sustained reduction in violence against women and children by 2032 will depend heavily on the strength of national leadership and coordination. The scale and complexity of the challenge requires ongoing leadership from National Cabinet and cross-jurisdictional collaboration to drive coherence, consistency and reform.

Despite encouraging signs of progress under the First Action Plan, rates of violence remain alarmingly high, victim-survivors continue to encounter system failures, and significant variation persists between jurisdictions in policy development, service responses and investment.

Disparate progress between jurisdictions is not merely an administrative challenge. It undermines national outcomes and results in unequal access to safety, support and justice depending on where a person lives. The Second Action Plan should therefore **reaffirm domestic, family and sexual violence as a standing national priority and establish**

stronger mechanisms through which governments work collectively to identify gaps, share lessons, drive consistency and address areas of unmet need.

Strengthen accountability, rigour and independent oversight

Achieving the ambitions of the National Plan requires more than agreement on priorities. It requires robust mechanisms to ensure commitments are implemented consistently, progress is measured rigorously and governments are held accountable for outcomes.

Obligations to demonstrate application and outcomes under the National Plan, and associated frameworks and agreements, remain limited. As a result, implementation can vary significantly between jurisdictions and there is often insufficient scrutiny of whether activities genuinely contribute to intended impacts.

Embolden is concerned that, in the absence of stronger accountability mechanisms, activities risk becoming focused on acquitting commitments rather than achieving meaningful change. The purpose of the National Plan is not to deliver a collection of discrete activities, but to reduce the prevalence and impacts of gender-based violence through coordinated and evidence-informed reform.

The Second Action Plan should place **greater emphasis on implementation quality, outcomes and continuous improvement**. Accountability mechanisms should support jurisdictions to strengthen their approaches while ensuring shared commitments are delivered consistently across Australia. Alongside stronger accountability to meet quality standards and demonstrate progress towards shared outcomes, consideration should be given to providing greater practical guidance on how the suite of frameworks, principles and tools that sit under or relate to the National Plan interact and reinforce one another. Such guidance could help address the tendency for these mechanisms to be applied in isolation, which can cause misalignment, create duplication and reduce their collective impact.

Embolden strongly advocates for independent monitoring arrangements at both the national and state and territory levels. In the South Australian context, Embolden continues to advocate for an independent monitor with powers established through legislation, as recommended by South Australia's Royal Commission as a priority reform. While the South Australian Government has accepted this recommendation in part, responsibility for monitoring and reporting remains within government. This limits the independence and transparency necessary to assess whether reforms are achieving their intended outcomes and impacts. Genuine accountability requires oversight that is independent of government and supported by clearly defined legislative powers.

In this context, the role of the Domestic, Family and Sexual Violence Commission in providing independent national oversight becomes even more important. Embolden strongly supports **enhancing the powers of the Commission, including strengthened information-gathering functions**, continued monitoring of National Plan implementation

and funding, and a more prominent national leadership role in identifying and responding to emerging issues and evidence.

Participation in agreed national processes should also be strengthened. This includes national data collections, death review processes and other mechanisms designed to improve understanding of violence and system performance.

Embed shared decision-making with the specialist sector and lived expertise

Delivering meaningful reform requires more than consultation. It requires genuine power-sharing with people who hold expertise through lived experience, specialist practice and community leadership.

The history of domestic, family and sexual violence reform in Australia demonstrates the central role played by victim-survivors, advocates and specialist service providers. Over decades, these groups have driven public awareness, improved policy responses, established services and advocated for legislative change. Their expertise remains essential to achieving the objectives of the National Plan.

Embolden is concerned by signs that engagement is increasingly occurring after key decisions have already been made. Such approaches risk reducing participation to consultation on predetermined reform directions rather than shared decision-making.

The specialist DFSV sector brings expertise that is fundamentally different from that available elsewhere in the system. Specialist services understand the dynamics of gender-based violence, victim-survivor safety, accountability for people using violence and system interactions. They also play a critical role in identifying systemic barriers and translating frontline lessons into policy solutions. The National Alliance of Domestic and Family Violence Specialist Services is a critical source of specialist expertise and insight into current ‘on the ground’ experiences for frontline services in every jurisdiction.

Similarly, people with lived experience provide unique insights into how systems function in practice and how reforms can better support safety, recovery and healing.

Stronger arrangements are required to formalise and resource these contributions. Participation should be recognised as a core component of effective system design rather than an optional or supplementary activity.

This should include **formal lived experience advisory structures, specialist sector advisory mechanisms and stronger representation of specialist peak bodies in governance, implementation and oversight arrangements**, with appropriate resourcing. In South Australia, an outcome of the Royal Commission is the establishment of lived experience advisory networks to advise Government – one of which is for adult victim-survivors and is convened by Embolden; and the second is for children and young people,

and its establishment is in progress. The **lived experience advisory network model might be considered for implementation in other jurisdictions.**

To strengthen lived experience engagement capability nationally, Embolden recommends inviting **consideration by the DFSV Commissioner, in collaboration with the Lived Experience Advisory Council, to introducing a national lived experience engagement community of practice.**

Improve transparency of investment, service capacity & system performance

Effective reform depends on understanding what services exist, where gaps remain and whether investments are achieving intended outcomes.

Despite significant investment across jurisdictions, there remains limited visibility regarding the distribution of funding, service capacity, unmet demand and system performance. This constrains evidence-based planning, impedes identification of service gaps and makes it difficult to assess progress over time.

Embolden supports calls for **comprehensive needs analyses to identify unmet need and demand across early intervention, crisis response, recovery and healing services and establish pathways for governments to address identified shortfalls.** Understanding community need and demand for services is a fundamental prerequisite for effective investment.

There is also a need for greater **national consistency in mapping domestic, family and sexual violence activities and expenditure across jurisdictions.** Improved transparency would support benchmarking, strengthen accountability and assist governments to identify areas requiring additional investment.

Building data capability across all settings should be a priority. This includes strengthening collection of disaggregated data, establishing consistent administrative datasets and improving reporting on the experiences of cohorts facing heightened risk or barriers to support. Consideration should also be given to improving national understanding of domestic, family and sexual violence-related suicides, which are not currently captured in ways that fully reflect the scale of violence-related harm.

Transparent reporting on investment, outcomes and implementation progress should be readily available to support the work of national bodies, researchers and policymakers and to strengthen public accountability.

Embolden recommends that the Second Action Plan prioritises **strengthening transparency of investment, service capacity and system performance through national needs analyses, enhanced data capability, consistent monitoring frameworks and public reporting of funding, activities and outcomes across jurisdictions.**

Priority area 1: Victim-survivors

The greatest determinant of victim-survivor safety, recovery and healing is whether systems and services can meet their needs.

At the centre of this effort is the specialist domestic, family and sexual violence sector. Specialist services provide practice leadership and direct support that underpin effective responses across the continuum from prevention to recovery and healing.

Ultimately, whether Australia achieves meaningful and sustained reductions in gender-based violence will depend on governments' willingness to invest in robust, integrated and responsive systems that support specialist expertise, enable innovation and place victim-survivors' needs at the centre of service design.

The issues of response system integration, risk assessment and management, and capability of all workforces in identifying and responding appropriately to DFSV are discussed under Priority area 5: System integration and workforce (page 41).

Specialist DFSV system and funding that reflects victim-survivors' realities

The Second Action Plan should prioritise strengthening the specialist DFSV service system through funding and commissioning models that reflect the realities of victim-survivors' lives and the realities of specialist practice.

The consultation paper recognises the wealth of expertise, innovation and commitment across the specialist sector, particularly efforts to move beyond crisis responses and support prevention, early intervention, recovery and healing. This reflects the experience of Embolden member services. Specialist services are already undertaking this work. However, they are frequently doing so despite funding arrangements, performance measures and service system expectations that remain heavily crisis-oriented. The funding shortfall extends beyond direct service delivery, with the specialist sector performing a range of critical but often invisible functions that underpin policy and practice responses to DFSV, yet it is rarely recognised or adequately resourced within funding models. This issue is expanded on under priority area 5 (page 41).

Current funding models often fail to reflect the complexity of victim-survivors' journeys. As a result, services routinely develop workarounds to meet needs that fall outside narrow program parameters. This innovation should be recognised, supported and embedded into future system design rather than relying on the goodwill and creativity of an overstretched workforce.

Investment should prioritise flexible service models and sustainable funding that allows services to respond across the full continuum of need, recognising that preventing

future harm, responding to crisis and supporting recovery are interconnected activities rather than discrete interventions.

This includes increased **investment in specialist crisis accommodation and wraparound support models**. Embolden supports recommendations that reduce systemic reliance on unsuitable emergency accommodation, such as hotels/motels, and increase access to specialist accommodation that provides integrated support services. Experience in South Australia demonstrates the limitations of hotels/motels in meeting victim-survivor needs, including those of children and young people. By contrast, specialist accommodation models have demonstrated strong outcomes in supporting transitions to secure long-term housing while delivering the practical and therapeutic supports necessary for recovery. Investment in specialist accommodation must increase close-to-home options for Australians living in regional and remote areas. Service responses that enforce distance from family, schools, community and Country can create additional barriers to safety and recovery.

It is important that governments apply a prevention lens to crisis response and recovery services. This is not only because such approaches strengthen prevention outcomes, but because they reflect what victim-survivors consistently require: support that intervenes before harm escalates, promotes safety over time and remains available throughout recovery.

Sustainable reform will require investment not only in services, but also in the people who deliver them. Investment in specialist workforce development is discussed under priority area 5 (page 41).

System and investment that reflects the realities of recovery and healing

There is growing awareness that serious risk and harm caused by domestic, family and sexual violence, including lethality, can persist long after the point at which a victim-survivor is considered 'safe' by current system definitions.

DFSV can result in chronic trauma, loss of safety and agency, psychological distress, financial hardship, housing instability, and profound forms of entrapment that continue long after a relationship ends. These ongoing impacts can leave victim-survivors feeling they will never fully escape or recover from the violence they have experienced. For many, the persistent harms and unanticipated hardships that emerge after separation are harder to navigate than the known risks they managed while living with the person using violence.

Despite these enduring impacts, chronic underfunding means victim-survivors are often exited from specialist services before they can access the sustained therapeutic support and practical assistance needed for healing and recovery. This creates a significant gap between being 'safe' in a risk-management sense and being genuinely supported to recover from the cumulative impacts of violence.

This gap has significant implications for policy and service design. If serious risks and harms continue well beyond separation and immediate crisis, then the current crisis-centred DFSV system architecture is misaligned with the lived reality of victim-survivors. The long-term recovery phase remains the least visible in data, the least recognised in system design, and the least resourced across funding models. Yet it is precisely during this period that sustained, coordinated support could reduce the risk of profound harm, including preventable suicide.

Recovery from DFSV is not achieved through short-term case management or crisis stabilisation alone. **Healing and recovery requires intentional service design, dedicated investment, and clear measures of success**, rather than being treated as implied outcomes of crisis, post-crisis, or practical support services.

Dedicated investment is required to establish recovery pathways that integrate therapeutic, legal, financial, housing, parenting and employment supports through coordinated service responses. These pathways should be designed in partnership with victim-survivors, specialist DFSV services, Aboriginal Community Controlled Organisations, and community-led service providers.

The Second Action Plan should also include a specific focus on preventing domestic, family and sexual violence-related suicide. Governments should commit to strengthening understanding of the prevalence and drivers of DFSV-related suicide and implementing coordinated prevention initiatives across prevention, early intervention, response, recovery, and healing systems, informed by the outcomes of the Parliamentary Standing Committee's 2026 inquiry into the relationship between DFSV and suicide.

Preventing systems abuse must be a focus of efforts to improve healing and recovery outcomes. All systems, institutions and processes that can be weaponised to control, undermine and harm victim-survivors should be within scope. The use of legal, administrative and statutory systems by people who use violence to maintain control can continue for many years after separation, and can profoundly affect victim-survivor wellbeing, impede healing and recovery, and erode confidence that the abuse will ever end.

Addressing systems abuse requires specialist legal assistance, case management and advocacy supports that can respond to complex, protracted forms of post-separation abuse. These needs often extend well beyond the scope and duration of responses funded under current domestic, family and sexual violence service models, highlighting the need for sustained and integrated support to enable recovery.

Scale community-led approaches as models for system reform

DFSV specialists recognise that systemic marginalisation and structural disadvantage are not secondary considerations. They fundamentally shape the perpetration of violence, the

harms experienced by victim-survivors, and the barriers to safety, recovery and long-term wellbeing.

For this reason, Embolden strongly supports a shift towards more community-led, place-based approaches to service design and delivery.

Too often these approaches are viewed as specialist responses for particular communities. The evidence increasingly suggests the opposite. Community-led and culturally grounded services often demonstrate the very characteristics that mainstream systems are seeking to achieve: trust, accountability, cultural responsiveness, flexibility, collaboration and long-term engagement.

Across regional and remote communities, services routinely adapt program models and funding requirements to respond to local realities. Aboriginal Community Controlled Organisations, multicultural, migrant and refugee services, and services designed by and for LGBTIQ+ communities have developed sophisticated responses grounded in culture, lived experience and community accountability.

The significance of these approaches extends beyond the communities they serve. They demonstrate what effective service design looks like. This strength was recognised by South Australia's Royal Commission, which recommended increased investment in specialist community-led service delivery and programs, along with accreditation frameworks co-designed with priority population groups to improve accessibility of DFSV services generally.

The next stage of reform should therefore focus not only on expanding community-led services, but on embedding their principles throughout the broader system. Funding, commissioning, governance and performance frameworks should support place-based decision-making, shared accountability, prevention, healing and long-term outcomes.

This includes **sustained investment in Aboriginal Community Controlled Organisations and genuine commitment to self-determination, consistent with Our Ways – Strong Ways – Our Voices**. It also includes strengthening **services delivered by and for multicultural, migrant and refugee communities, and LGBTIQ+ communities**.

The objective is not simply to create more specialist programs. It is to **ensure that the approaches proven effective within these models inform system reform more broadly**.

Accessibility through system capability and community leadership

Responding effectively to diversity must be embedded within the foundations of service design, practice and system reform.

An intersectional approach requires much more than acknowledging difference or disadvantage. It requires services, systems and institutions to understand how gender-based violence intersects with racism, ableism, colonialism, homophobia, transphobia,

class inequality and other forms of systemic oppression. It also requires investment in the practical capability needed to translate these principles into effective responses.

Too often, expectations regarding intersectional practice are not matched by investment in the workforce development, practice tools, specialist expertise and organisational capability necessary to operationalise this approach.

The challenge is evident for victim-survivors experiencing migration-related abuse, visa dependency, language barriers and social isolation. Responses must explicitly recognise migration-related forms of coercion and control, ensure access to services regardless of visa status and provide culturally safe pathways to support. This includes addressing longstanding shortages of qualified interpreters and strengthening interpreter access across domestic, family and sexual violence responses.

The same principle applies to responses for Aboriginal communities, LGBTIQ+ communities, people with disability, children and young people and other cohorts facing heightened risks and barriers to support. Specialist expertise developed within dedicated services should be resourced and leveraged to strengthen capability across the broader service system. Co-designed accreditation frameworks was recommended by South Australia's Royal Commission as an approach to improve services' accessibility and responsiveness to the needs of priority population groups.

Increased investment to strengthen culturally safe practice should encompass resourcing for dedicated LGBTIQ+ and disability-focused DFSV expertise and leadership roles, in line with recommendations made by South Australia's Royal Commission. These positions should not operate in isolation but should contribute to system-wide capability building, practice development and improved responses across both specialist and universal services.

The goal should not be to expect specialist services to do more with less. Rather, governments should invest in the infrastructure, workforce and systems necessary to ensure all victim-survivors can access safe, responsive and effective support.

Prevent and respond to sexual violence, including child sexual abuse

The shockingly high prevalence of sexual violence, including childhood sexual abuse, means sexual violence can no longer remain at the margins of policy and service system responses. The Second Action Plan must give **greater priority to preventing and responding to sexual violence, including child sexual abuse**. This is critical not only because of the prevalence of sexual violence, but because of its profound and enduring impacts on victim-survivors' health, wellbeing and risk of suicidality.

At a minimum, the Second Action Plan should prioritise **adequate and sustained resourcing for specialist sexual violence services. Funding models must recognise the**

scale and long-term impacts of sexual violence, including the substantial number of people living with the effects of childhood sexual abuse.

The Australian Child Maltreatment Study found that one in three women and one in five men experienced sexual abuse in childhood. Specialist sexual violence services must be properly resourced to respond to this reality. Disclosure of sexual violence, particularly childhood sexual abuse, is often delayed for years or decades. The secrecy, shame and masking behaviours frequently associated with these experiences can increase vulnerability to mental ill health and suicidality.

There is also an **urgent need for greater investment in long-term therapeutic support for victim-survivors of sexual violence, including children and young people**. This should include **targeted and culturally responsive programs for priority populations who face heightened risk of sexual violence and additional barriers** to accessing support and recovery services.

Alongside adequate resourcing for specialist services, the Second Action Plan must **strengthen system-wide capability to recognise and respond to sexual violence**. Non-specialist workforces often lack the resources, confidence and training needed to identify and respond safely to disclosures of sexual harm. As a result, sexual violence is often siloed within specialist services and treated as a ‘specialists only’ responsibility.

This approach is neither reasonable nor sustainable. Specialist sexual violence services cannot hold this level of risk in isolation. Responsibility for recognising and responding to sexual violence must be shared across health, mental health, alcohol and other drug, community services, education, justice, and domestic and family violence sectors. Building workforce capability across these systems is essential to creating an integrated response to sexual violence and reducing the risk of victim-survivors falling through service gaps, as discussed further under priority area 5 (page 41).

Provide victim-survivors of sexual abuse with access to justice

The Second Action Plan should include commitments to **implement the full suite of recommendations from the Australian Law Reform Commission inquiry into justice responses to sexual violence, supported by corresponding investment in legal assistance and victim support services**.

Embolden is concerned by the limited progress in implementing reforms recommended by the Australian Law Reform Commission regarding justice responses to sexual violence. These reforms remain essential to improving victim-survivors' access to justice, reducing retraumatisation within legal processes, and strengthening accountability for people who perpetrate sexual violence.

Persistent barriers to reporting, high attrition rates and inadequate protections for victim-survivors undermine confidence in justice systems and contribute to the under-reporting of

sexual violence. The National Plan notes that, despite increasing rates of sexual violence victimisation, most incidents remain unreported.

This concern may be particularly relevant in South Australia. While South Australia's Royal Commission noted a steady increase in reports of sexual violence over the decade to 2022, more recent crime data suggests a change in this trend. Between 2024 and 2025, reporting rates for sexual assault offences declined after accounting for population growth.¹ This is especially concerning given the heightened public awareness and discussion of sexual violence associated with the Royal Commission, which would ordinarily be expected to increase help-seeking and reporting.

The Second Action Plan should also strengthen support for victim-survivors engaging with justice processes. Embolden supports **increased investment in legal assistance and specialist support services that help victim-survivors navigate reporting, investigations and court processes.**

Embolden encourages **consideration of professionally facilitated peer support programs for victim-survivors over 16 who are involved in criminal justice processes**, as recommended by South Australia's Royal Commission. While the initiative is not being progressed by the South Australian government at this time, Embolden is of the view that it is worthy of consideration nationally.

Expand sexual violence reporting pathways and survivor-led justice options

The Second Action Plan should support the **development and evaluation of expanded reporting pathways and victim-survivor-led justice options**, including anonymous reporting mechanisms and restorative approaches where appropriate.

Embolden supports **national harmonisation and implementation of anonymous reporting mechanisms for sexual violence** across all jurisdictions. Anonymous reporting options provide victim-survivors with greater choice and control, can reduce barriers to disclosure, and contribute to improved understanding of the prevalence and patterns of sexual violence. South Australia's Royal Commission recommended that alternative reporting pathways be explored, including options for anonymous reporting. While this recommendation is not currently being progressed by the South Australian Government, it remains an important reform opportunity.

Embolden also supports **consideration of restorative justice approaches as an option** within a broader continuum of justice responses to sexual violence, where participation is voluntary, victim-survivor-led and supported by appropriate safeguards. While restorative

¹ South Australia Police crime statistics show reports to police of aggravated sexual assault increased slightly (by 6 per cent) between 2024 and 2025 (n.1486 and 1581, respectively), while reports for non-aggravated sexual assault decreased by 15 per cent in the same period (n.515 and 438, respectively). Accounting for population growth, the number of reports to police for these offences represents a decline in actual reporting rates.

justice will not be suitable for all victim-survivors, some individuals may prefer approaches that provide opportunities for acknowledgement of harm, accountability and healing outside traditional criminal justice pathways.

Providing a broader range of reporting and justice options has the potential to increase victim-survivor agency, improve engagement with support services and strengthen accountability outcomes, while recognising that no single justice pathway will meet the needs of all people who experience sexual violence.

More broadly, emerging opportunities for **alternative reporting pathways should continue to be explored**. Expanding the range of reporting options available to victim-survivors acknowledges the diverse reasons people may choose not to engage with criminal justice processes while still seeking recognition, support or accountability.

Consider national roll-out of the Domestic Violence Disclosure Scheme

Recognising the harm caused by individuals who perpetrate violence against multiple victims, **systemic measures to reduce opportunities for future victimisation** should be prioritised, including **consideration of scaling up successful schemes** for implementation in other jurisdictions.

One such example is South Australia's Domestic Violence Disclosure Scheme. The scheme is a mechanism for people to access relevant information about a current or former partner, enabling them to make more informed decisions about their safety and the wellbeing of any children involved. Delivered through a partnership between South Australia Police and specialist support services, the scheme is the only program of its kind currently operating in Australia. The South Australian Royal Commission into domestic, family and sexual violence found the scheme to be highly effective and recommended increased investment to enhance statewide accessibility and to ensure it is inclusive of all applicants. Embolden supports **consideration of the domestic violence disclosure scheme by other states and territories** as part of broader efforts to strengthen prevention and early intervention responses.

Technology-facilitated abuse must be recognised as a national priority

The Second Action Plan should strengthen national responses to technology-facilitated abuse through sustained investment in specialist leadership, prevention initiatives, online safety regulation and support for victim-survivors.

Technology-facilitated abuse is an increasingly prevalent form of domestic, family and sexual violence that continues to evolve alongside rapid technological change. Perpetrators are using digital platforms, online services and emerging technologies to monitor, control, harass, threaten and abuse victim-survivors in ways that can be difficult to detect and respond to. The Second Action Plan should recognise technology-facilitated abuse as a

cross-cutting issue requiring targeted investment, national coordination and ongoing policy attention.

The Australian Government's commitment to online safety infrastructure remains critical. The eSafety Commissioner must be adequately resourced to fulfil its mandate to prevent online harm and respond to emerging risks. South Australia's Royal Commission highlighted the growing exposure of children and young people to technology-facilitated harms, including harmful online content, pornography, algorithm-driven exposure to misogynistic and violent material, and influencer content that promotes attitudes supportive of domestic, family and sexual violence. These issues require sustained national leadership and ongoing investment in prevention and response efforts.

Alongside investment in government-led initiatives, the Second Action Plan should **support specialist national leadership on technology-facilitated abuse. This includes sustained investment in the work of WESNET, whose national leadership has played a critical role in building specialist workforce capability and practical responses to technology-facilitated abuse.** Continued investment in specialist expertise will be essential to ensuring policy, services and systems can keep pace with rapidly evolving forms of abuse, violence and coercive control.

The Second Action Plan should include ongoing Commonwealth funding for WESNET's Safe Connections program. Safe Connections is the only nationwide program that provides new smartphones to victim-survivors through a network of specialist domestic and family violence services whose practitioners are trained to identify technology-facilitated abuse and undertake technology safety planning with survivors. The program addresses both immediate safety needs and the increasingly important role of technology in maintaining safety, independence and connection to services. Continuation of this program beyond its current funding period should be prioritised within the Second Action Plan.

Embolden also suggests that **other jurisdictions consider** replicating the South Australian Government's election commitment to **ban people convicted of serious domestic, family and sexual violence offences from dating apps**, currently being progressed. The use of dating apps to perpetrate harmful gender-based harassment, abuse and violence is strikingly common. Initiatives that leverage systemic levers to make it harder for offenders to harm others must be part of our suite of prevention approaches.

Strengthen implementation and monitoring of coercive control offences

Awareness, understanding and application of the National Principles to Address Coercive Control remain limited across Australian jurisdictions despite the Principles having been developed through extensive national consultation and endorsed by governments.

This is of particular concern given the introduction of coercive control offences across multiple jurisdictions, including South Australia.

Legislative reform alone will not achieve its intended objectives. Consistent with Principle 7 of the National Principles, **coercive control criminal offences must be accompanied by broader systemic, service and practice reforms designed to maximise victim safety and minimise unintended harms.**

The Second Action Plan should include specific actions to strengthen awareness, adoption and application of the National Principles across governments, justice systems and service sectors.

Governments should also establish a national monitoring framework to examine the impacts of coercive control offences. Evaluation should extend beyond prosecution and conviction data to include victim-survivor safety, wellbeing, system responses, misidentification risks, perpetrator accountability and broader justice outcomes.

Given the significance of these reforms, ongoing national learning and evidence-sharing should be prioritised as additional jurisdictions consider introducing coercive control offences.

Priority area 2: Prevention and early intervention

Australia has made substantial progress in embedding primary prevention within efforts to end violence against women and children. The *Change the Story* framework has established a common foundation for prevention activity and underpinned some profoundly significant developments over time.

However, application of the prevention framework remains inconsistent across jurisdictions and there is significant variation in prevention capability, investment and implementation. In South Australia, prevention activity remains largely concentrated in community engagement and education initiatives focused on addressing harmful attitudes and beliefs. While these approaches are critical and evidence-informed components of prevention, they represent only one part of the broader prevention framework. Sustainable progress requires coordinated action across all prevention pillars. Without **comprehensive prevention strategies, long-term investment and stronger oversight of implementation across jurisdictions**, progress towards eliminating gender-based violence will remain constrained.

Review and modernise Australia's prevention framework

While Our Watch's *Change the Story* framework has played a critical role in advancing prevention practice nationally, there is value in **reviewing and modernising the framework to reflect emerging evidence and contemporary understandings of violence prevention**.

As highlighted in the Rapid Review of Prevention Approaches, prevention needs to address the wider contexts in which violence occurs and greater **attention should be given to reinforcing factors**. As was recommended by the Royal Commission to the South Australian government, all governments should deliver on commitments made through National Cabinet to review alcohol legislation and strengthen measures that address alcohol-related harms associated increased severity and frequency of domestic, family and sexual violence.

Importantly, the national primary prevention framework must recognise and address the outdated and exclusionary nature of the gender binary that is embedded in its foundations. The need to **reflect gender diversity in the foundations of the national primary prevention framework** is essential to its utility and long overdue.

A refreshed framework should also **improve accessibility and utility for a broader range of audiences, including frontline practitioners, community organisations, local governments and service systems** that play an important role in prevention but may not identify their work as prevention activity.

Importantly, prevention should be understood as occurring across a continuum. **Opportunities to prevent future violence exist** not only through primary prevention initiatives, but also **through crisis response, recovery and early intervention services**.

Funding and service models should recognise and support this broader prevention contribution.

Build prevention capability across systems and communities

Preventing violence against women and children requires **sustained investment in prevention capability across individual, community, organisational, institutional and societal levels.**

Evidence demonstrates that long-term and developmentally appropriate prevention programs are more effective than one-off awareness raising initiatives. Prevention efforts must be coordinated, sustained and supported by systems that reinforce prevention messages through policy, practice and culture.

Education and attitude change programs are one important component of prevention, but they are only one cog in the wheel. Community messaging cannot be expected to compensate for systems that fail to respond effectively when violence occurs. When prevention messages are inconsistent with people's lived experiences of seeking help and support, they can inadvertently undermine trust and worsen barriers to help-seeking.

Prevention and response systems should therefore be understood as mutually reinforcing. Programs to shift attitudes are strengthened when supported by effective service responses, while strong response systems create the conditions necessary for prevention activities to have lasting impact.

In South Australia, prevention efforts would benefit from a coordinated, statewide prevention plan that brings together education initiatives, community engagement activities and action on structural and system drivers of gender-based violence, including reinforcing factors, within a cohesive framework.

Consideration should be given in the Second Action Plan to **development of the prevention workforce in jurisdictions where capacity and capability are limited.** Establishing dedicated positions across large systems and institutions, such as the public sector and local government, would be a substantial contribution.

Embolden also supports recommendations arising from the Rapid Review for the **establishment of a Prevention Innovation Fund** to support emerging and promising approaches, strengthen evaluation and build the evidence base for prevention initiatives.

Strengthen community-led and targeted prevention approaches

Targeted prevention approaches are needed for Aboriginal and Torres Strait Islander communities, migrant, refugee and multicultural communities, LGBTIQ+ communities, women and children with disability, children and young people, older women and people living in rural and remote areas.

Community-led approaches ensure prevention initiatives are culturally relevant, locally responsive and grounded in community strengths. This includes greater investment in prevention initiatives and co-designed communication strategies that reflect the needs, experiences and cultural contexts of the communities they are intended to reach.

Similarly, prevention efforts involving Aboriginal and Torres Strait Islander men and boys should prioritise **culturally grounded healing approaches led by Aboriginal Community Controlled Organisations, community leaders and Elders.**

Prevention and early intervention efforts should also leverage trusted engagement points within communities. Settlement services, in particular, often represent one of the earliest and most trusted points of contact for newly arrived individuals and families. These services play an important role in providing information about Australian laws, rights and available supports, creating valuable opportunities to embed education on domestic, family and sexual violence, coercive control, healthy relationships, gender equality, parenting and family wellbeing. **Strengthening the role of settlement services within prevention and early intervention frameworks would support earlier awareness of abuse, improve access to help-seeking pathways, and ensure culturally responsive information reaches communities that may face heightened risks and barriers to support.**

Expand holistic early intervention responses

Early intervention is a critical component of violence prevention and should be strengthened through **greater investment in holistic, family-centred supports.**

Many families experience multiple and intersecting challenges before violence escalates to crisis point. Earlier access to domestic, family and sexual violence-specific supports, alongside broader family support services, can help identify risk, strengthen protective factors and prevent future harm.

Child and family services play a particularly important role in early intervention. These services work holistically with families and are often well placed to identify emerging safety concerns, including the interplay between DFSV, substance use and other complex needs. Strengthening the capacity of services to recognise and respond to multiple drivers of harm, including substance use coercion, would enable earlier intervention and may help reduce demand for more intensive statutory and crisis responses. While tertiary responses remain essential and must continue to be adequately funded, greater investment in early intervention services is needed to achieve a more balanced and preventative system response.

Investment should focus on integrated responses that support the safety and wellbeing of all family members while addressing factors that contribute to violence. This includes **strengthening pathways for engagement with men and boys, supporting cultural**

healing initiatives and ensuring services are equipped to respond flexibly to complex family circumstances.

Strengthen community capacity to recognise and respond to violence

Victim-survivors often disclose experiences of violence first to family members, friends, community leaders or faith leaders rather than specialist services. These ‘natural responders’ play a critical role in shaping whether people receive support, information and pathways to safety.

Strengthening community understanding of domestic, family and sexual violence should therefore extend beyond awareness raising campaigns to include **practical initiatives that build the confidence and capability of natural responders to recognise violence, respond safely and connect people with appropriate support.**

As recommended by South Australia’s Royal Commission, **campaigns are needed that will increase awareness of the nature and impacts of DFSV and empower people to respond.** The Commission advocated that, to be effective, such campaigns must be **targeted and co-designed** with Aboriginal communities, multicultural, migrant and refugee communities, LGBTIQA+ communities, people with disability, older people, and children and young people. Investment in **programs that engage community leaders, faith leaders and other trusted sources of support** can strengthen community capacity, improve help-seeking pathways and contribute to earlier intervention when violence occurs.

Priority area 3: Children and young people

Children and young people must be recognised as victim-survivors in their own right across policy, service and system responses to domestic, family and sexual violence. While significant progress has been made in recognising the impact of violence on children and young people, responses remain largely adult-centric and often rely on the engagement of a protective parent before support can be provided.

As highlighted in ANROWS' evidence summary, children and young people require tailored, violence-informed supports that recognise their unique developmental needs and are not dependent on a protective parent's engagement with services. A recent study commissioned by South Australia's Royal Commission found that adult-centric systems have resulted in children and young people receiving fragmented and inconsistent support, and in some instances contributed to children and young people experiencing extended periods of homelessness, housing instability or mental health crisis without effective intervention.²

Tailored, violence-informed and developmentally appropriate supports

Children and young people require access to tailored supports that are developmentally appropriate, trauma-informed and responsive to the complexity of their experiences.

Responses should extend beyond immediate safety concerns and recognise the cumulative impacts of violence across childhood and adolescence. This includes responding not only to current experiences of domestic, family and sexual violence but also historical experiences of sexual abuse, ongoing trauma, and the broader impacts of structural disadvantage and marginalisation.

Violence can be experienced differently depending on identity, culture and circumstance, and services must be equipped to respond accordingly. For example, evidence demonstrates that violence experienced by LGBTIQ+ children and young people is often directly connected to their gender identity or sexuality, while children with disability face heightened risks of abuse, neglect, violence and exploitation across multiple settings. Experiences of violence may also be compounded by racism, discrimination, exclusion and other forms of structural disadvantage.

Tailored responses should therefore be supported by sustained investment in specialised services capable of responding to the diverse experiences of children and young people, including Aboriginal and Torres Strait Islander children, children with

² [Silence and Inaction](#) reports on the findings from interviews with 53 South Australian children and young people aged 13-18 years old who have lived experience of domestic, family and sexual violence.

disability, culturally and linguistically diverse children and young people, and LGBTIQ+ children and young people.

Children & young people's needs in their own right and relational contexts

Children and young people must be recognised as victim-survivors in their own right, while also being understood within their relational contexts. While recognition of children and young people's experiences of domestic, family and sexual violence as distinct from those of adult victim-survivors is long overdue, an overly narrow "child-only" lens risks overlooking the relationships that are central to their safety, wellbeing and recovery.

Particular attention must be paid to the ways people who use violence deliberately target and undermine the relationship between children and the non-offending parent. Attacks on the mother-child relationship, and on the adult victim-survivor in their parenting role, are recognised tactics of coercion and control. Without this relational lens, service responses risk focusing on children and young people's individual needs while failing to address the damage caused to key protective relationships.

As systems improve their capacity to identify children and young people affected by violence, care must also be taken to avoid unintended consequences. Increased identification of domestic and family violence should not simply result in increased reporting to child protection authorities or greater rates of child removal, particularly for Aboriginal and Torres Strait Islander families who are already significantly over-represented in child protection systems. **Efforts to improve identification must be accompanied by reforms that ensure child protection responses are informed by the dynamics of domestic and family violence.**

A key challenge remains the ongoing invisibility of the person using violence within many child protection processes. Too often, responsibility for protecting children is implicitly shifted onto the non-offending parent, reinforcing mother-blaming and 'failure to protect' narratives. This can result in victim-survivors being held accountable for harm perpetrated against them and their children, while the actions of the person using violence receive insufficient scrutiny. **Child protection systems must continue to strengthen their focus on perpetrator accountability.**

Ultimately, children, adolescent and adult victim-survivors should not be treated as belonging to separate systems. The current divide between domestic and family violence services and child protection responses can create fragmented interventions and poorer outcomes. A more integrated approach is needed, one that recognises multiple victim-survivors within a family, protects and strengthens the relationship with the non-offending parent, and addresses the behaviour of the person using violence as central to achieving safety and wellbeing for children, young people and adults.

Adequately resource specialist, holistic responses to sexual abuse

Responding to the needs of children and young people who have experienced sexual abuse requires a specialist, holistic and adequately resourced response. While trauma-informed and developmentally informed practice is foundational, it is not sufficient on its own to address the complex realities that many children and adolescents experience. In South Australia, the resources dedicated to children and young people who have experienced sexual abuse remain inadequate relative to the level and complexity of need.

Working with children and young people affected by sexual abuse involves far more than direct therapeutic support. To provide support that reflects children's and adolescents' lived realities, practitioners must navigate their broader relational environment, including non-offending parents, siblings, carers and other important support figures, and in some cases ongoing contact with the person who caused harm. This work frequently intersects with child protection systems, legal processes and family court proceedings, while supporting children and young people experiencing challenging family dynamics and instability.

The complexity of this work is seldom reflected in funding models or system design. As a result, services are often constrained in their ability to provide the intensity, duration and breadth of support that children and young people need to recover and thrive.

Investment in specialist responses is essential to ensure services are adequately resourced to respond to the complex realities and needs of children and young people affected by sexual abuse.

Children and young people must be recognised as partners in system reform

Part 1: Lived experience leadership

The Second Action Plan should establish and support national mechanisms for meaningful lived experience engagement with children and young people.

Children and young people are experts in their own experiences and must be recognised as partners in the design, implementation and evaluation of the systems intended to support them. Their perspectives are critical to understanding how domestic, family and sexual violence affects children and young people and how services, policies and institutions can respond more effectively.

The South Australian Royal Commission into Domestic, Family and Sexual Violence demonstrated the value of engaging directly with children and young people to inform system reform. The findings of Silence and Inaction highlighted both the unique impacts of violence on children and young people and the importance of creating safe and meaningful opportunities for their voices to be heard. **The Second Action Plan should build on this approach through the establishment of national lived experience engagement**

mechanisms that enable children and young people to inform policy development, service design and evaluation on an ongoing basis.

Meaningful participation must extend beyond consultation. Children and young people should be supported to contribute to decision-making processes in ways that are developmentally appropriate, culturally safe and informed by best practice principles for participation.

Part 2: National practice standards

Embolden supports the Domestic, Family and Sexual Violence Commission's recommendation that **national practice standards be developed for working with children and young people, and that children and young people themselves are actively involved in their design.**

A consistent national approach is needed to improve the quality and effectiveness of responses to children and young people affected by domestic, family and sexual violence. Current service systems do not always recognise the ways in which experiences of violence may present in children and young people. Lived experience may frequently manifest through anxiety, depression, self-harm, suicidal ideation, disengagement from education, behavioural difficulties and other indicators of distress. Without a violence-informed understanding, children and young people can be pathologised and treated as presenting with behavioural or mental health problems, rather than being recognised as experiencing the impacts of violence.

National practice standards should **establish clear expectations for developmentally appropriate, trauma-informed and violence-informed responses across prevention, early intervention, crisis response, recovery and healing.** They should also support greater consistency across service systems and strengthen workforce capability to recognise and respond to the impacts of violence on children and young people.

By combining lived experience expertise with evidence-informed practice, national standards can help create systems that are more responsive, accessible and effective for children and young people experiencing domestic, family and sexual violence.

Address the barriers to specialist support and therapeutic services

Children and young people continue to face significant barriers when seeking help, particularly where access to services is dependent on parental engagement, consent processes or concerns regarding confidentiality. This problem was recognised by the Royal Commission in South Australia, which recommended consideration of law reform to remove parental consent as a barrier to seeking help and accessing services.

Many children and young people require support that can be accessed safely and independently, particularly where they may not wish particular information to be shared with

one or both parents. Current arrangements can create unintended obstacles to receiving therapeutic support, delaying intervention and increasing the risk of harm.

Dedicated investment is needed in specialist services for children and young people within domestic, family and sexual violence response systems. Across the sector there is growing concern that demand pressures have reduced the availability of specialist services designed specifically for children and young people, despite increasing recognition of their needs.

The Second Action Plan should prioritise **access to timely, specialist and therapeutic supports that are responsive to children's and young people's developmental stages and individual circumstances**. This includes **ensuring pathways to support are accessible regardless of where children and young people live and whether a protective parent is engaged with services**.

Sustained prevention and early intervention

Sustained investment in prevention is essential, engaging children and young people early and supporting the development of respectful, equitable and non-violent attitudes and behaviours. This includes investment in nationally coordinated approaches to prevention in early childhood education and care settings.

National curriculum around respectful relationship education **must continue to be supported and strengthened, and should be delivered within whole-of-school approaches that address not only classroom learning but also school culture, leadership, policies and systems**. Prevention efforts are most effective when messages about respect, equality and healthy relationships are reinforced consistently across all aspects of a child's environment.

The Second Action Plan should recognise **online safety as an increasingly important violence prevention issue for children and young people**. South Australia's Royal Commission highlighted the growing prevalence of technology-facilitated harms, including exposure to pornography, algorithm-driven access to harmful and misogynistic content, and online influencers promoting attitudes that normalise domestic, family and sexual violence. These harms can shape attitudes, behaviours and understandings of relationships from an early age, underscoring the need for prevention efforts to extend beyond traditional settings. Consistent with the Royal Commission's recommendation, **the Commonwealth should ensure the eSafety Commissioner is adequately empowered and resourced to meet its mandate to minimise online harm and improve online safety, while broader prevention efforts must keep pace with the rapidly evolving digital environments in which children and young people live, learn and socialise**.

Priority area 4: People who use violence

Australia cannot achieve the objectives of the National Plan without a coordinated and sustained focus on people who use violence. While important progress has been made in strengthening responses to victim-survivors, efforts to prevent, identify and respond to people using violence remain fragmented across systems, sectors and jurisdictions.

Embolden strongly supports the findings and recommendations of the Rapid Review and the South Australian Royal Commission into domestic, family and sexual violence and recommends the development and implementation of a **national strategy focussed on people who use violence**. Such a strategy should provide a coordinated framework for **aligning prevention, early intervention and response efforts, supported by shared accountability, consistent practice standards and evidence-informed interventions**.

Development of the strategy should occur through a **multidisciplinary co-design process, drawing on expertise across family violence, health, education, justice, child and family services, technology and research sectors**. The strategy should recognise and respond to the growing influence of online environments and the manosphere in shaping attitudes, beliefs and norms that support violence against women and girls. It must also be intersectional in design and implementation, particularly given emerging evidence of overlap between misogynistic ideologies and other forms of hate-based extremism.

Importantly, the strategy should not be limited to specialist domestic, family and sexual violence services. People who use violence come into contact with a broad range of services and institutions throughout their lives. **Effective responses therefore require a coordinated system that spans primary prevention, early intervention, behaviour change, justice and community-based responses**.

Earlier recognition of and response to the use of violence

A significant opportunity exists to **strengthen the capacity of mainstream and targeted services to identify and respond earlier to people at risk of, or using, violence**.

People using violence often come into contact with health services, schools, family support services, mental health services, alcohol and other drug services, housing services and community organisations long before they come to the attention of DFSV services and response systems. Yet opportunities for earlier intervention are frequently missed. As one member service observed, "Services are not routinely screening for the use of violence, even when someone presents at hospital with a hand injury."

Strengthening early intervention requires **investment in workforce capability across multiple systems**. Training and practice development should be embedded across university curricula, professional accreditation pathways and ongoing workforce development programs. Mainstream and targeted services require access to **evidence-**

based tools, screening approaches and referral pathways that enable practitioners to identify indicators of violence, engage safely with people using violence and connect them to appropriate interventions.

Earlier responses should address violence within the broader context of the person's circumstances and needs. Effective intervention must integrate a **focus on accountability and behaviour change while responding to intersecting issues** such as trauma, mental health concerns, alcohol and other drug use, housing instability and social isolation.

Particular attention should be given to key life stages and settings where opportunities for intervention are greatest. Young parenthood is a significant risk factor for intimate partner violence, yet dedicated responses for young fathers remain limited. **Strengthening supports for young parents, including targeted engagement with young men**, represents an important opportunity to prevent patterns of violence becoming entrenched while ensuring young women and children remain supported and safe.

South Australia's Royal Commission recommended the **expansion of abuse prevention programs to reach LGBTIQ+ people who use violence and women who use violence**, as well as additional **investment to improve responses within youth justice, remand and correctional settings**, where there are important opportunities to identify risk, intervene early and support behaviour change.

Strengthen behaviour change programs and practice

While behaviour change programs play a critical role in addressing men's use of violence, they are one component of a safe and effective response system. **Interventions for people using violence must operate as part of a broader ecosystem of services, programs and accountability mechanisms that prioritise victim-survivor safety and support sustainable behaviour change.**

While there has been welcome progress in increasing recognition of people using violence within service system design, there must be no drift from victim-survivor-centred practice as the core principle underpinning responses. A focus on engaging people using violence is essential, but it must be accompanied by robust measures that prioritise victim-survivor safety, strengthen accountability and support integrated risk management.

Embolden notes the importance of work that is underway to develop **national behaviour change program standards and a quality assurance framework**. This work has potential to bring greater consistency in program design, delivery and evaluation that will strengthen practice, improve accountability and build the evidence base regarding what interventions are most effective for different cohorts and contexts. Crucially, **realising the intended impacts of the standards and framework will require significant investment, coordinated effort and ongoing sector support to ensure consistent and effective implementation.**

Investment is also required in corresponding partner contact programs, recognising that maintaining contact with current and former partners is critical to risk assessment, safety planning and monitoring outcomes.

A stronger intervention system should further include **accommodation-based responses for people using violence**, including both short-term 'cool down' options and longer-term residential programs. As recognised by South Australia's Royal Commission, these responses can support accountability while reducing the need for victim-survivors and children to leave their homes to be safe.

Invest in community-led and culturally responsive approaches

Community-led responses are critical to ensuring interventions with people at risk of/using violence are effective, culturally safe and responsive to local contexts.

There is a need for **greater investment in Aboriginal Community Controlled Organisations to deliver holistic supports that strengthen families, promote healing and engage with men and boys in culturally informed ways**. Aboriginal-led approaches are best placed to respond to the impacts of intergenerational trauma while building on cultural strengths and community leadership.

Culturally grounded initiatives delivered by organisations such as KWAY Aboriginal Corporation recognise that behaviour change is most effective when it is embedded within broader responses that address connection, identity, culture and wellbeing.

Investment is also required to **improve accessibility and responsiveness for culturally and linguistically diverse communities, LGBTIQA+ communities and people with disability**. This includes supporting culturally adapted behaviour change programs, employing culturally specific workers and addressing factors that can contribute to vulnerability and isolation, including migration stress, identity displacement and social exclusion.

For regional, rural and remote communities, funding approaches must reflect the complexity of local service systems, workforce challenges and barriers to accessing support. **Flexible, place-based responses are required to ensure people using violence can access timely and appropriate interventions regardless of where they live.**

Strengthen family and community supports

Earlier and more holistic support for families should form a key component of Australia's response to people using violence. Greater investment is needed in **integrated, place-based service models that can identify risk early and respond flexibly to emerging needs**.

Such approaches should include targeted support for young parents, men within the family context, and families experiencing multiple and intersecting forms of disadvantage. Assertive engagement models can help services proactively identify and engage families before violence escalates, particularly when delivered through integrated service systems that draw on local government, community centres and community-based organisations.

Importantly, early intervention services should provide pathways not only for victim-survivors and children, but also for people who may be using violence or showing early indicators of harmful behaviour. Increasing public awareness of available services is also essential to encourage earlier help-seeking and intervention.

Priority area 5: System integration and workforce

In this section, Embolden provides comment on considerations relating to workforce development and system design to achieve consistent screening for DFSV, appropriate responses to risk and safety and recovery needs, and an integrated response system that maintains victim-survivor safety and holds people accountable for using violence.

In South Australia and nationally, the understanding of the nature and prevalence of domestic, family and sexual violence has increased across mainstream service systems over the last decade. However, in South Australia, there is no consistency in screening, inadequate and often inappropriate responses to risk and safety needs, and no system-wide referral pathways to specialist help. The absence of these essential features of a robust DFSV response system puts victim-survivors' safety and future wellbeing at risk, and enables people who use violence to exploit system gaps and failures to avoid accountability.

While expertise to inform practice and policy mechanisms to create change exist, this has not yet translated with consistency into frameworks and system design. In Embolden's view, **specialist sector capacity and broader response system capability to identify and respond to DFSV requires urgent attention nationally** and should be considered for prioritisation in the Second Action Plan. Cross-jurisdictional leadership is needed to achieve consistency nation-wide and bring DFSV response systems and funding models into alignment with policy expectations.

Invest to build specialist sector capacity

In South Australia, Embolden member services continue to manage a significant and persistent gap between current investment and the level of funding required to meet demand. Aside from a modest investment in the sector's most urgent crisis response priorities, immediately following South Australia's Royal Commission, the longstanding shortfall in funding for specialist services remains unresolved at this point in time.

The funding shortfall extends beyond direct service delivery. Specialist domestic, family and sexual violence services perform a range of critical but often invisible functions that underpin the effectiveness of the broader service system. Specialist services translate frontline experience into practice guidance, identify systemic barriers to safety and recovery and advocate for systemic solutions, and advise governments, statutory agencies and the private sector. Specialists monitor and evaluate our programs and services to generate evidence about what is and is not working, and contribute those insights to develop the expertise of the specialist workforce and to inform processes such as this consultation. These functions require specialist skills, infrastructure and sustained investment. While governments and other sectors routinely rely on the expertise of the specialist DFSV sector to inform policy, system design and workforce development, the depth of work that sits behind it is rarely recognised or adequately resourced within funding models. As a result,

many of the activities that strengthen system capability and drive long-term reform are undertaken despite funding arrangements, rather than because of them.

There are significant information gaps that make advocating for needs-based service planning and funding particularly difficult for South Australia's specialist sector. Population-level data on unmet need and demand is not available; nor is information available about DFSV expenditure across the state (as was noted through SA's Royal Commission). While service-level data and practitioner insights are critical sources of evidence on unmet need, it is necessarily limited. For the sector to make recommendations for consideration by Government about programs and investment to prevent and respond to DFSV, reliable data on need, demand, and current service and investment mapping is essential. The Royal Commission also highlighted concerns regarding the lack of transparency about the level and distribution of DFSV funding.

Such analyses are essential to informed system design, service planning and targeted investment decisions, particularly given the scale of reform required to achieve meaningful reductions in gender-based violence nationally. Without a clear understanding of unmet need, governments cannot be confident that current funding levels, service models or system responses are aligned with community demand. The requirement that from 2026 state and territory governments publicly report funding allocated to activities delivered under the National Plan is an important step towards greater transparency.

To this end, Embolden strongly supports the recommendations of both the Rapid Review Expert Panel and the Commissioner for Domestic, Family and Sexual Violence that call for **comprehensive analyses of the unmet need and demand for domestic, family and sexual violence services nationally**. Embolden further supports the Expert Panel's view that any needs analysis must **adopt an intersectional approach, with particular attention to the experiences and needs of communities facing additional and compounding barriers to safety, support and recovery, and responses that are led by community for community**.

Embolden strongly supports the recommendation made by the Rapid Review Expert Panel that the **DFSV Commission be provided with stronger powers to source information and monitor the implementation and funding** associated with implementation of the National Plan. Embolden recognises the enormous value the **mapping of current DFSV activities, programs and investment, using a nationally consistent methodology** would have for frontline service and program planning.

Invest in specialist workforce development

The specialist workforce plays a crucial role in preventing and supporting people to be safe, recover and heal from domestic, family and sexual violence. The workforce requires recognition, investment and development to ensure its strength, sustainability and effectiveness into the future.

Achieving this goal requires policy intent, long-term investment and coordinated workforce planning.

Challenges in recruitment, retention and workforce wellbeing are reported nation-wide, and South Australia is no different. Research conducted by Embolden in 2024 about the challenges facing South Australia's specialist DFSV workforce found³:

- Lack of recognition of specialist expertise and skills.
- Unsustainable workloads affecting workforce wellbeing and staff retention.
- Difficulty recruiting workers with specialist skills and experience.
- Additional recruitment challenges in regional and remote areas due to higher living costs and housing shortages.

The South Australian Government has committed to strengthen the specialist DFSV workforce, accepting the Royal Commission's recommendation to develop and implement a 10-year workforce development strategy for the DFSV sector that includes increasing workforce supply and supporting specialisation and, importantly, working in partnership with Aboriginal community-controlled organisations on actions to address colonial and cultural load as workplace psychosocial hazards.

Embolden strongly supports the DFSV Commission's recommendation for the development and implementation of **a national strategy for specialist and adjacent workforce development**. A nationally coordinated approach would strengthen alignment between activities at state and territory level and action in areas of Commonwealth responsibility, such as employment, workforce standards and professional competencies. A comprehensive strategy for the specialist DFSV workforce should address workforce capacity, capability, sustainability, wellbeing, diversity and development and leadership pathways, and nationally coordinated approaches to workforce planning, professional competencies, specialised training pathways and workforce supply, particularly in regional, rural and remote communities. A DFSV workforce strategy could also encompass a focus on supporting the development of lived experience and peer workforce models nationally.

Successful implementation requires **adequate resourcing of state and territory peak bodies**, whose leadership is critical to developing, supporting and sustaining the specialist DFSV workforce.

An immediate priority identified by South Australia's DFSV sector is **Improving the data capability of the specialist workforce**. Specialists are well positioned to contribute rich practice-based qualitative data – not simply service activity data – to state and national data collections, and contribute to outcomes measurement and impact monitoring. Further, there are workforce wellbeing benefits in making visible the contribution made by frontline specialist practitioners in supporting individuals, families and communities to live free from

³ Survey of South Australia's DFSV services, conducted to inform Embolden's submission to South Australia's Royal Commission into domestic, family and sexual violence.

violence. Embolden encourages a cross-jurisdictional approach, involving **skills development in outcomes measurement** and investment in **fit-for-purpose information management systems**.

Responding to DFSV in an integrated response system

Service systems that can effectively recognise and respond to domestic, family and sexual violence play a critical role in promoting safety and wellbeing, strengthening accountability, and preventing the misuse of legal, administrative and service systems as a form of abuse.

Consistent recognition of, and response to, DFSV across all service systems is essential to victim-survivor safety and wellbeing and to ensuring accountability for people who use violence. This requires an integrated, cross-sector approach grounded in a shared understanding of gender-based violence and risk. Conversely, when DFSV goes unrecognised and indicators of coercive control, patterns of abuse and cumulative harm are missed, service responses can inadvertently increase risk and contribute to further harm.

Risk assessment capability and practice vary significantly across sectors, settings and jurisdictions, resulting in fragmented and inconsistent identification of DFSV. These inconsistencies are particularly pronounced for communities experiencing heightened vulnerability or barriers to support, where indicators of violence, coercion and control are often not recognised outside specialist services.

Embolden strongly supports **ongoing collaboration to strengthen risk assessment and multi-agency risk management approaches nationally**, as recommended by the Rapid Review Expert Panel. A national risk management framework should set **minimum standards that require routine screening** for DFSV indicators across all service systems.

A fully integrated response system, clarity about responsibilities that are in and out of scope for non-specialist workforces, and referral pathways to specialist help are crucial to safety and efficacy.

To ensure screening obligations are effective, implementation should be **supported by an operational framework and workforce development strategy** that is:

- informed by best practice understanding of coercive control, common tactics and lived impacts
- culturally safe
- responsive to diversity in needs and experiences including Aboriginal and Torres Strait Islander people, people with disability, people from regional and remote areas, people from migrant and refugee backgrounds, LGBTIQ+ communities
- trauma-informed, person-centred and strengths-based
- tailored to role, setting and context while maintaining national consistency
- capable of identifying sexual violence, shame-based abuse and associated risks

Sustained investment is required to build workforce capability and system capacity across all settings. This includes strengthening the ability of services to **identify and respond to systems abuse, technology-facilitated abuse and other emerging forms** of perpetration, consistent with recommendations from recent reviews and inquiries.

Additionally, Embolden supports the recommendation of South Australia's Royal Commission that consideration should be given to **strengthening professional regulatory frameworks to ensure baseline domestic, family and sexual violence competency across relevant professions**. This could include embedding **DFSV awareness and response capabilities within codes of conduct, accreditation requirements and ongoing professional development obligations**, recognising that effective identification and response to violence is a core responsibility across many professional disciplines.

Workforce capability must also be strengthened through education and training pathways. The Second Action Plan should identify opportunities to embed domestic, family and sexual violence content within relevant higher education and vocational education and training qualifications, ensuring graduates enter the workforce with foundational knowledge of coercive control, risk identification, victim-survivor-centred practice, perpetrator accountability, and effective responses to sexual violence.

References

Aboriginal and Torres Strait Islander Action Plan 2023-2025 under the National Plan to End Violence against Women and Children 2022-2032, Commonwealth of Australia, Department of Social Services, 2023

Australia's Disability Strategy 2021-2031: Creating an inclusive community together. 2024 update: Building a more inclusive Australia, Commonwealth of Australia, Department of Social Services, 2024

Building Safer Futures: South Australia's whole-of-government response to the Royal Commission into Domestic, Family and Sexual Violence, Government of South Australia, 2025

Change the Story (Second edition), Our Watch, 2021

Disability Lens on the First Action Plan 2023–2027, joint initiative of the Australian, state and territory governments, published by Commonwealth Department of Social Services, 2026

Embolden's first submission to South Australia's Royal Commission into domestic, family and sexual violence, Embolden SA Inc, March 2024

Embolden's second submission to South Australia's Royal Commission into domestic, family and sexual violence, Embolden SA Inc, September 2024

Evidence Review: Addressing young men's use of intimate partner violence, No To Violence, 2026

National Plan to End Violence against Women and Children 2022-2032, Commonwealth of Australia, Department of Social Services, 2022

National Principles to Address Coercive Control in Family and Domestic Violence, Commonwealth of Australia, Attorney-General's Department, 2023

Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence, Commonwealth of Australia, Department of Social Services, 2026

Outcomes Framework 2023-2032 under the National Plan to End Violence against Women and Children 2022-2032, Commonwealth of Australia, Department of Social Services, 2023

Safe, Informed, Supported: Reforming justice responses to Sexual Violence, Australian Law Reform Commission, 2025

Sexual harassment, aggression and violence victimisation among mobile dating app and website users in Australia. Research Report no. 25., Australian Institute of Criminology: Wolbers H, Boxall H, Long C & Gunnoo A, 2022

Silence and inaction: Children and young people's experiences of violence and systemic failure in South Australia. Report prepared for the South Australian Royal Commission into Domestic, Family and Sexual Violence. Dr Kate Fitz-Gibbon, Sequire Consulting, Victoria, 2025

Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence, Rapid Review Expert Panel: Ms Elena Campbell, Dr Todd Fernando, Dr Leigh Gassner APM, Ms Jess Hill, Dr Zac Seidler & Dr Anne Summers AO, 2024

Working for Women gender equality strategy, Commonwealth of Australia, Department of Prime Minister and Cabinet, 2024

With courage: South Australia's vision beyond violence, Royal Commission into Domestic, Family and Sexual Violence Report: South Australia, 2025

Voices, Royal Commission into Domestic, Family and Sexual Violence Report: South Australia, 2025