



Draft National Plan to End Violence against Women and Children 2022-2032

Project Respect Submission

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General Comments

Project Respect is a Victorian based support and referral service for anyone who self-identifies as a woman as well as gender diverse and non-binary people in the sex industry, including those who have experienced human trafficking for sexual exploitation. We provide support to women throughout Australia, and work in collaboration with other organisations in sectors such as legal services and family violence to provide multifaceted care to service users.

We provide the following comments on the Draft National Plan to End Violence against Women and Children 2022-2032 (“the Plan”) in the context of our experience as a service provider where the voices of lived experience are elevated, in response to the lack of specific inclusion in the Plan of the community which we serve.

We support the stated Plan commitment to a long-term vision that supports and promotes gender equality, where human rights are protected and respected and patterns of discrimination, inequality and disadvantage are addressed to end the drivers of violence against women and children.

We support the four Foundation principles, which include the recognition for the need for an intersectional and evidence-informed approach that considers the complexity and diversity of people’s lived experiences.

In our submission to the National Plan consultation in July 2021, we stated our concern that women in the sex industry, including women who have experienced trafficking for sexual exploitation, continue to remain absent from the National Action Plans and violence prevention strategies. We provided evidence regarding the experience of women in the sex industry, including women who have experienced trafficking for sexual exploitation. We are disappointed that the draft Plan currently does not consider the specific risks and experiences of this diverse community group. Additionally, with changing legislation in some jurisdictions, particularly in Victoria with the move underway to decriminalise the sex industry, more focus needs to be given to the impacts this may have on the violence experienced and reported by women who work in this industry. This includes data capture, research and evidenced improvements to the design of services (specialist and general), and promoting their availability.

We submit the following comments regarding this lack of inclusion in the draft Plan.

1. An incomplete capture of what constitutes intersectionality

The draft Plan attempts to incorporate an intersectional approach to diverse groups, however, does not identify all diverse groups with increased risk of domestic, family and sexual violence.

The types of violence against women in the sex industry, as we have observed, often occur at the intersection of family, domestic, and sexual violence. We have seen women we support having to enter the sex industry in order to secure an income upon leaving a violent partner and violence being perpetrated towards women in the sex industry in targeted ways. Our findings indicate that in 2019, 75% of women in the sex industry we worked with disclosed their experience of family violence, 51% experienced sexual assault, and 40% experienced workplace violence. The gendered nature of the sex

industry, the type of work, and the combined impact of stigma, isolation and discrimination often places women at higher risk of experiencing sexual harassment, abuse and exploitation from customers, management and intimate partners. These conditions increase the likelihood of women in the sex industry to experience family violence and sexual assault, and the nature of the violence perpetrated can be different to that experienced in the broader community.

Human trafficking for sexual exploitation goes unrecognised in violence prevention action plans and policies as strictly the domain of the criminal justice system. This ignores the intersections between human trafficking and family violence, an intersecting form of violence that often goes unrecognised by police, the response service system and specialist family violence services. This leaves already vulnerable women experiencing trafficking for sexual exploitation at increased risk of harm without appropriate support.

Further, Project Respect estimates that 80% of women working in licensed brothels in Melbourne are women from migrant and culturally and linguistically diverse backgrounds, including women on temporary visas. Women in the Australian sex industry tend to experience additional barriers to help seeking and services due to language, migration status, knowledge of legal rights and what constitutes criminal forms of violence in Australia, stigma and discrimination. This additional intersectional view must be recognised in order to implement effective strategies within the Plan.

2. Connection with the National Action Plan to combat Modern Slavery

While the Plan references, in the section “Alignment to Broader Reforms”, that there are ‘parallels’ between FDSV and modern slavery (giving an example of forced marriage), there is no mention of the specific risks and experiences of women who have been subject to trafficking for sexual exploitation, nor is there mention of funding for primary prevention or services to victim survivors mentioned in the Plan. Our experience working with women who have experienced trafficking for sexual exploitation indicate that there are far wider implications for the risks of violence and access to services to women with these experiences than the word ‘parallel’ would imply. Attention needs to be given to research and services for this diverse community group to fully understand and respond to the unique requirements of and improve the outcomes for these women. The lack of educated referencing to this group within the draft Plan is an indicator of how widespread this lack of understanding may be.

3. Prioritisation of service design where lived experience voices are elevated

While the draft Plan indicates that lived experience voices are a priority, there is little mention of specialised service providers that are already using lived experience voices to design and refine programs. Given that the Plan rightly indicates that lived experience voices are key to well informed system improvement, we would encourage policy makers and funders to prioritise funding support of those services where this is already a well embedded aspect of design, delivery, and evaluation, which is supported by well-researched, quality driven program design and a skilled workforce. For example, at Project Respect we authentically engage and are advised by our Women’s Advisory Group, comprising lived experience advisors, and we recognise the diverse and nuanced views across the spectrum of women and gender diverse people who have experience in the sex industry, including those who have experienced trafficking for sexual exploitation. This provides an essential lens to our programs which are

also supported by our certification to Human Services Standards and QIP governance standards, and through delivery by our qualified service professionals.

Those specialised service providers, such as Project Respect, who service a unique cohort of the community that could not otherwise access services, should be further supported to undertake additional research and report data that informs ongoing improved service design and collaborative approaches across the service sector. Small organisations require support and recognition from Government funders to increase the capacity of their otherwise constrained internal resources to provide important research, however, are in a unique position regarding data and knowledge that may not be otherwise adequately captured and utilised.

Further, we would question the definition provided in the draft Plan for “evidence based” as having no reference to lived experience voices where this is stated to be a priority within the Plan.

4. Draft outcome measures

Building on the point above, the draft outcomes measures in the Plan, in relation to service level outcomes, fail to specifically reference the utilisation of lived experience voices in service design. There is also no measure of the ongoing implementation of service or system design continuing to reference lived experience voices.

The draft outcomes measures also do not reference a measure of success of service delivery to specifically marginalised communities, in the way that the intersectionality goal is intended, but rather uses vague language such as “Services are evidence-informed, culturally safe and accessible to meet the needs of all individuals”. A single service provider may not necessarily be able to meet the needs of all individuals, particularly if it is, by design, a specialist service – service providers should instead be specifically measured on their ability to either properly service individuals from diverse groups, engage with collaborative care teams to provide wrap around service, and/or, refer them within the service system to a service that can fulfil their needs or an aspect thereof. Without this measure, particular diverse community groups will continue to remain invisible, as data will not be captured on those users who ‘disappear’ when the initial service provider fails to engage them due to inadequate understanding of how to service diverse needs. The endemic lack of data capture about disengaged or inadequately serviced help seeking women must be addressed in order to ensure the most marginalised members of the Australian community are recognised within the services system.