31 July 2026

Department of Social Services
Enid Lyons Building
71 Athllon Drive
Greenway ACT 2900

Submitted via online website: Consultation on the Second Action Plan (National Plan to End Violence against Women and Children 2022–2032) – engage.dss.gov.au

To the Department of Social Services

Re: Second Action Plan (National Plan to End Violence against Women and Children 2022–2032)

ACON welcomes the opportunity to provide input to the development of the Second Action Plan under Australia's *National Plan to End Violence against Women and Children 2022-2032* (the National Plan).

ACON is NSW's leading health organisation specialising in community health, inclusion and HIV responses for people of diverse sexualities and genders. Established in 1985, ACON works to create opportunities for people in our communities to live healthier, more connected lives.

Our work in sexual, domestic and family violence (SDFV) uniquely covers the four pillars of the National Plan: primary prevention, early intervention, response and recovery and healing. Our services include care coordination and counselling, information and referral support, survivor groups, an all-gender behaviour change program, healthy relationships program, masculinity workshops and programs addressing technology-facilitated abuse. We produce resources, contribute to research and host the national LGBTQ+ SDFV website Say It Out Loud.

We are concerned that violence against LGBTQ+ people continues to be overlooked in policy and practice, contributing to critical gaps across the service landscape. This invisibility, coupled with the experiences of discrimination, can normalise abuse and can impact the ability of LGBTQ+ people to identify violence in their own relationships and seek support. LGBTQ+ people impacted by violence deserve equitable access to safety and support. Therefore, the Second Action Plan offers a significant opportunity to embed the meaningful inclusion of LGBTQ+ people across all priority areas.

Drawing on our experience as a specialist LGBTQ+ service provider, ACON's recommendations will be centred on four key themes:

1. Investment in specialist LGBTQ+ services and community-controlled organisations
2. Embedding LGBTQ+ inclusion and capability across mainstream services and systems
3. Strengthening prevention and early intervention for LGBTQ+ communities, young people, and their families
4. Improving accountability through better data collection, evaluation, governance and long-term funding arrangements.

Reiterating SDFV experiences among LGBTQ+ communities

The National Plan acknowledges that SDFV has traditionally been understood and discussed through a cisgender and heterosexual lens but that evidence clearly demonstrates that LGBTQ+ people experience SDFV at rates that are comparable to, and in some cases higher than, those experienced by the general population.[1] [2] The National Plan also highlights that LGBTQ+ people may also experience unique forms of abuse that specifically target their sexuality, gender identity, experience and/or gender expression which can undermine a person's sense of self, autonomy, safety and connection to sources of support.

Experiences of violence are not evenly distributed across LGBTQ+ communities. For example, trans and gender diverse people, as well as bisexual+ people, report disproportionately high rates of family violence, intimate partner violence, discrimination and poor mental health outcomes.[3] This reflects the cumulative impacts of stigma, biphobia, transphobia, and social exclusion.

Experiences of violence, abuse and neglect are also compounded by barriers to seeking support, including fear of discrimination, previous negative experiences with services, concerns about confidentiality, and a lack of LGBTQ+-inclusive responses. As a result, many LGBTQ+ victim-survivors may be less likely to access support or disclose their experiences, which underscores the need for targeted prevention, early intervention and recovery responses that are LGBTQ+-inclusive.

Priority Area 1: Victim-survivors of violence against women and children and other forms of gender-based violence

ACON strongly supports the National Plan's vision of an Australia where all victim-survivors, regardless of where they live or their gender, identity or circumstances, can access safety, support, justice, and the recovery and healing services they need. Expanding and improving LGBTQ+ specific services and improving the quality of mainstream services for LGBTQ+ victim-survivors is essential to meeting this objective. Healing and recovery supports for LGBTQ+ communities increase agency, reduce isolation and support recovery from the impacts of violence by strengthening community connectedness, improving wellbeing and facilitating access to affirming support services.[4] Program evaluation and user feedback for ACON's SDFV support continues to be positive:

> *"I am truly grateful for all of your support provided by ACON, its services and programs. You have all impacted my healing to find my strength, my voice and power again."*

Core funding for specialist LGBTQ+ services responding to SDFV funding is critical. For example, while the Commonwealth Government's 500 frontline workers initiative has funded several LGBTQ+ specialist positions, it does not meet the demand, nor cover associated organisational overheads such as rent,

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[1] Hill, A. O., Bourne, A., McNair, R., Carman, M., & Lyons, A. (2020). *Private Lives 3: The health and wellbeing of LGBTIQ people in Australia* (ARCSHS Monograph Series No. 122). Melbourne, Australia: Australian Research Centre in Sex, Health and Society, La Trobe University.

[2] Hill, A. O., Lyons, A., Jones, J., McGowan, I., Carman, M., Parsons, M., Power, J., & Bourne, A. (2021). *Writing Themselves In 4: The health and wellbeing of LGBTQA+ young people in Australia* (National Report, ARCSHS Monograph Series No. 124). Melbourne, Australia: Australian Research Centre in Sex, Health and Society, La Trobe University.

[3] Carman, M., Fairchild, J., Parsons, M., Farrugia, C., Power, J., & Bourne, A. (2020). *Pride in Prevention: A guide to primary prevention of family violence experienced by LGBTIQ communities*. Melbourne, Australia: Rainbow Health Victoria.

[4] Hill et al. (2020).

management and administrative support. As a result, these roles have required ongoing subsidisation by ACON, as well as community needs exceeding the support we can provide. We recommend increased investment in specialist LGBTQ+ long-term healing and recovery supports, as well as enhanced funding for specialist crisis responses, including grassroots community organisations like Zoe Belle Gender Collective.

Though our work supporting LGBTQ+ victim-survivors, ACON has observed persistent structural gaps in the SDFV support system. These include the continued reliance on heteronormative and binary gendered service models, limited LGBTQ+ cultural competency across the SDFV sector and related sectors (e.g. justice and health and housing), and both perceived and actual risks of discrimination and outing stigma. We continue to observe unsafe practices, including the misidentification of victim-survivors and a lack of genuinely inclusive services for people of all genders and knowledge gaps about LGBTQ+ cultures and contexts.

While many LGBTQ+ people express a preference to access specialist services, some prefer to access mainstream domestic and family violence services.[5] Additionally, small populations in some areas of Australia may make LGBTQ+ specific local services unsustainable. For this reason, it is crucial that both specialist and mainstream SDFV services are funded across the country, that mainstream services are safe and inclusive and that there is an investment in partnerships between LGBTQ+ organisations and domestic and family violence services. All services could, as part of their funding agreement, engage meaningfully with LGBTQ+ communities and access training. Services should be accountable to this commitment through a reporting structure.

Sexual violence remains an area of particular concern to ACON, requiring greater investment in inclusive and specialist supports. Gay, bisexual, trans and queer (GBTQ) men can experience sexual violence in a range of stigmatised contexts, including chem-sex, violence at beats and other sex-on-premises venues, technology-facilitated abuse such as the non-consensual sharing of intimate images or videos, and coercion or assault through hook-up apps and other forms of anonymous or casual sexual encounters. These experiences often fall outside mainstream understandings of sexual violence and require tailored, community-informed prevention and response services.

ACON's experience indicates that limited access to safe and appropriate housing pathways increases vulnerability to violence and creates barriers to recovery. To improve safety outcomes, the Second Action Plan should include targeted investment in culturally safe and LGBTQ+-affirming crisis accommodation, medium-term housing and homelessness responses. This should include piloting a Core and Cluster LGBTQ+ refuge and transitional housing program in Sydney and/or Melbourne. Brokerage funding should be made available nationally to support GBTQ men and non-binary people experiencing violence to access safety and support options in the absence of crisis accommodation for men and non-binary people.

Such investment is necessary to address the significant unmet needs of LGBTQ+ communities, who continue to experience service gaps and are often required to navigate fragmented service systems and funding boundaries.

Recommendation 1.1: Increase the availability of specialist LGBTQ+ sexual, domestic and family violence services through core funding to LGBTQ+ community-controlled organisations.

[5] Gray, R., Walker, T., Hamer, J., Broady, T., Kean, J., Ling, J., & Bear, B. (2020). Developing LGBTQ programs for perpetrators and victims/survivors of domestic and family violence. Sydney: ANROWS.

Recommendation 1.2: Invest in partnerships between LGBTQ+ specialist and mainstream services to build their capacity and capability to deliver affirming, responsive, and accessible services for LGBTQ+ people.

Recommendation 1.3: Ensure sexual violence responses and prevention initiatives are prioritised and explicitly address the experiences of LGBTQ+ communities, including GBTQ men and non-binary people**.**

Recommendation 1.4: Invest in affirming, affordable and inclusive housing pathways for LGBTQ+ victim-survivors including piloting an LGBTQ+ refuge.

Priority Area 2: Prevention and early intervention

Primary prevention and early intervention are distinct but complementary approaches that must be both adequately resourced to effectively prevent violence. To date, most primary prevention and early intervention initiatives have focused on heterosexual, cisgender relationships. This has further marginalised LGBTQ+ communities by excluding them from mainstream prevention initiatives and reinforcing experiences of shame and stigma. As highlighted in *Pride In Prevention*, promoting equal and respectful LGBTQ+ relationships, identities and bodies has the potential to address many of the broader inequalities that discriminate against and disempower LGBTQ+ people.[6]

The forthcoming framework, *Changing with Pride,* will be Australia's first national violence prevention framework to connect the prevention of anti-LGBTIQA+ violence with a gender-based violence prevention approach. This will establish shared drivers, principles, and cross-sector responsibilities for preventing violence. ACON recommends that this Action Plan include dedicated funding to support implementation of the framework and investment in LGBTQ+ community-led prevention initiatives. This will help drive sustainable change and address the structural drivers of violence, including stigma, discrimination and rigid gender norms.

ACON undertakes multiple prevention and early intervention initiatives targeting LGBTQ+ people, including:

- Say It Out Loud: a national LGBTQ+ resource hub focused on sexual, domestic and family violence
- Healthy Relationships: a four-week program for LGBTQ+ people to explore values, respect, communication, boundaries, sex, consent, and healthy conflict resolution.
- Masculinity Workshops: workshops that explore rigid gender stereotypes in a way that's safe, reflective and community-building.
- Click With Care: technology-facilitated abuse workshops to help LGBTQ+ people identify harm online and build strategies for digital safety.
- Primary prevention campaigns, which can be viewed here.

All settings-based primary prevention initiatives should be inclusive of LGBTQ+ communities, for example in school, workplace, health and sport settings. This includes implementing inclusive SDFV policies, providing training that builds understanding of violence in LGBTQ+ relationships, and ensuring workplace sexual harassment prevention initiatives address the diverse experiences and needs of LGBTQ+ people.

Recommendation 2.1: Invest in new and existing initiatives to utilise the new LGBTQ+ prevention framework *Changing with Pride***.**

[6] Carman et al. (2020).

Recommendation 2.2: Scale and replicate evidence-based LGBTQ+ programs that have delivered positive outcomes in NSW across other Australian jurisdictions.

Recommendation 2.3: Implement LGBTQ+-inclusion in all settings-based primary prevention initiatives, including workplace and sport settings.

Priority Area 3: Children and young people in their own right

LGBTQ+ children and young people are particularly vulnerable to SDFV due to family rejection, bullying and discrimination, social isolation, stigma, shame and internalised hatred.[7] Therefore, the Second Action Plan should be inclusive of LGBTQ+ children and young people who deserve to be seen as victim-survivors without having their sexuality and/or gender identity pathologised, ignored or minimised.

Australian evidence demonstrates that younger generations are increasingly identifying as LGBTQ+, highlighting the importance of ensuring that primary prevention initiatives are inclusive of LGBTQ+ young people and reflect the diversity of contemporary relationships, identities and experiences.[8] The Australian Bureau of Statistics estimates that around 10% of Australians aged 16-24 identify as lesbian, gay or bisexual with younger age groups significantly more likely than older Australians to identify as part of the LGBTQ+ community.

Prevention efforts, including addressing rigid gendered stereotypes that contribute to high rates of violence, should begin in early childhood education and care settings. These efforts should focus on creating inclusive environments, supporting development of sexuality and gender identity and expression, preventing social isolation, and embedding LGBTQ+-inclusive respectful relationships that address homophobia and transphobia, consent and sex education that is age-appropriate across all levels of schooling.

Early intervention approaches should prioritise support for parents and carers of LGBTQ+ children and young people, particularly where a lack of understanding or hostility may contribute to harm, rejection or barriers to support. Efforts should promote family education and engagement, safeguard the rights and agency of young people, improve access to gender-affirming care and inclusive school environments, and recognise controlling behaviours that restrict access to affirmation or support as forms of violence, supported by safe and effective reporting and referral pathways.

Recommendation 3.1: Embed LGBTQ+-inclusive respectful relationships, consent and sex education which is age-appropriate across all levels of schooling.

Recommendation 3.2: Invest in early intervention initiatives to support parents and carers of LGBTQ+ children and young people that promote family education and engagement.

Recommendation 3.2: Improve child-centred responses and increase support for LGBTQ+ young people experiencing family violence.

Priority Area 4: People who use violence

While the majority of people who use violence are men, people who use violence can be of any sexuality or gender. Currently, there are limited opportunities for LGBTQ+ people of all genders to access tailored

[7] Hill et al. (2021).

[8] Australian Bureau of Statistics (2020). Estimates and Characteristics of LGBTI+ Populations in Australia. Retrieved from Estimates and characteristics of LGBTI+ populations in Australia, 2022 | Australian Bureau of Statistics

behaviour change interventions. Many people who use violence remain outside formal support and intervention systems, highlighting the need for greater awareness, engagement pathways and accountability mechanisms.[9]

ACON is aware of only four LGBTQ+-specific behaviour change programs currently operating in Australia: ACON's *Proud Partners* (currently unfunded*)*, Thorne Harbour Health's Behaviour Change program, *ARC Rainbow* delivered by the Lismore Men and Families Centre, and Diverse Voices' *Diverse Choices* program. Sustained investment is needed to ensure these programs remain viable and can expand to meet growing demand.

All behaviour change programs should be safe, accessible and appropriate for gay, bi, queer, trans men and men who have sex with men. National guidance is required to support the delivery of behaviour change interventions that are inclusive, evidence-based and responsive to the experiences of LGBTQ+ communities. Such guidance should address the impacts of internalised stigma, cisgenderism, heteronormativity, homophobia, biphobia and transphobia, including transmisogyny, as factors that can shape both the use and experience of violence.

Recommendation 4.1: Fund LGBTQ+ tailored behaviour change programs.

Recommendation 4.2: Develop and implement national guidance to ensure behaviour change programs are safe, effective and inclusive for LGBTQ+ participants.

Priority Area 5: System integration and workforce

LGBTQ+ communities and organisations should be explicitly recognised and included in the governance, implementation, monitoring and evaluation of the Action Plan. This commitment should be supported by transparent reporting on activities, funding allocations, outcomes and progress against commitments affecting LGBTQ+ communities. The Action Plan should invest in dedicated LGBTQ+ community-led initiatives while also requiring all funded programs and grant recipients to demonstrate how they will meaningfully include LGBTQ+ people and address their specific needs. Clear accountability mechanisms should be established to monitor and evaluate these outcomes.

All National Plan initiatives should collect, report on and evaluate outcomes for LGBTQ+ communities using nationally consistent measures. This should include the implementation of consistent data collection requirements across services, including questions on sex recorded at birth, gender identity, and sexual orientation, in line with the ABS Standard for Sex, Gender, Variations of Sex Characteristics and Sexual Orientation Variables.[10] Governments should also review national and state-based health, justice and coronial data collections to ensure they adequately capture the experiences of LGBTQ+ communities and priority populations, particularly Aboriginal and Torres Strait Islander LGBTQ+ people.[11] These requirements should be embedded across all priority areas of the National Plan, with all Second Action Plan initiatives including dedicated action and reporting on LGBTQ+ communities.

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[9] Australia's National Research Organisation for Women's Safety. (n.d.). *Perpetrator interventions*. Sydney, Australia: ANROWS. Retrieved from https://www.anrows.org.au/research-areas/perpetrator-interventions/

[10] Australian Bureau of Statistics. (2021). *Standard for sex, gender, variations of sex characteristics and sexual orientation variables, 2020*. Australian Bureau of Statistics. Retrieved from https://www.abs.gov.au/statistics/standards/standard-sex-gender-variations-sex-characteristics-and-sexual-orientation-variables/latest-release

[11] ACON. (n.d.). *Sexual, domestic & family violence*. Retrieved July 15, 2026, from https://www.acon.org.au/what-we-are-here-for/domestic-family-violence/

Longer-term funding is critical to workforce sustainability, strategic planning, evaluation, community partnerships, and continuity of care for victim-survivors. Funding certainty is particularly important for specialist LGBTQ+ services, which require sustained investment to build community trust and respond effectively to community needs. Governments should also invest in a national SDFV workforce strategy that explicitly incorporates LGBTQ+ inclusion, adopts a gender-transformative approach, and includes competency standards, training requirements, workforce development funding and LGBTQ+ capability frameworks.

ACON strongly supports increased investment in workforce capacity to ensure services can meaningfully engage with diverse and intersectional communities, particularly to support LGBTQ+ people experiencing violence. LGBTQ+ community-controlled organisations continue to face significant demand for services but are often constrained by short-term funding arrangements that do not adequately support workforce retention, service delivery, or long-term planning. Strengthening LGBTQ+ capability across the broader service system while investing in specialist community-controlled services, is therefore essential to ensuring victim-survivors can access appropriate support regardless of where they seek support.

Recommendation 5.1: Explicitly recognise LGBTQ+ people within the implementation, monitoring and evaluation of the Second Action Plan.

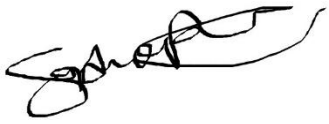
Recommendation 5.2: Standardise LGBTQ+ data collection, reporting and evaluation of LGBTQ+ outcomes across all National Plan initiatives.

Recommendation 5.3: Fund the creation of a national SDFV workforce strategy, with LGBQ+ competencies.

Recommendation 5.4: Commit to 5-year funding cycles for SDFV services, including LGBTQ+ specialist and community-led services.

We would be more than happy to engage further with you on this submission. Please do not hesitate to get in touch with me, Sophie Potter, at SPotter@acon.org.au.

Regards



Sophie Potter
Acting Chief Executive Officer, ACON