The Uniting Church in Australia
QUEENSLAND SYNOD

Uniting Church in Australia
SYNOD OF VICTORIA AND TASMANIA

Submission from the Queensland Synod and the Synod of Victoria and Tasmania, Uniting Church in Australia, to the "Consultation Paper in support of the National Plan to End Violence against Women and Children 2022-2032

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The Queensland Synod and the Synod of Victoria and Tasmania, Uniting Church in Australia, welcome this opportunity to provide a submission to the "Consultation Paper in support of the National Plan to End Violence against Women and Children 2022-2032".

The Uniting Church in Australia is supportive of measures that seek to eliminate family, domestic and sexual violence. In the New Testament, God's love is expressed for Creation, especially humanity. In these ways, the love of God is both something that God does and part of who God is. A second element of God's love in scripture is the frequent references to responsiveness to God's love: Because God is Love, God's people are called to love others in relationships and justice.

Theologically, love and justice are framed not in terms of rights but in terms of shared humanity. We acknowledge the whole of humanity and the equality of women, children, and men before God. In the light of full and common humanity, there is no room for abuse of power, control or the use of violence.

In 1991, the Uniting Church National Assembly meeting of delegates from across Australia adopted a resolution stating that previous sexual violence should be deplored as a sin against God and humanity. It confessed the prevalence of sexual violence in the Uniting Church community. It committed the Uniting Church to hearing the voices of those who are victims of sexual violence. It called on the church community to become part of a "network of prevention" in the area of sexual violence.

In 2017, the meeting of Uniting Church delegates from across Victoria and Tasmania passed two resolutions on family, domestic and sexual violence. The resolutions stated that the response to family violence requires action by the community and all levels of government. They called on the Commonwealth Government to introduce several reforms recommended by the Victorian Royal Commission into Family Violence. The resolutions also acknowledged the role the Christian community had played in facilitating family violence and rejected theologies that give support to family violence.

Priority Area 1: Violence against women and other forms of gender-based violence

What service or system responses would make the biggest difference to victim-survivors' safety, wellbeing, healing and recovery?

Specific priority area on violence and abuse directed at older women

Violence and abuse directed at older women is a significant and under-recognised form of gender-based violence. A specific priority area on violence and abuse directed at older women should be included in the Second Action Plan. This aligns with a life-course approach as articulated in the

National Plan to End Violence against Women and Children 2022-2032, which recognised that gender-based violence includes forms of elder abuse, intimate partner violence, economic abuse and control perpetrated by an adult child or another family member. [1]

Including violence and abuse directed at older women as a priority would also complement and strengthen efforts in the *National Plan to End the Abuse and Mistreatment of Older People 2026-2036*. It would also establish a specific priority area, which would also ensure that older women are visible within national efforts to end violence, as a timely response to the growing scale and complexity of violence and abuse against older women as Australia's population ages.

The Second Action Plan provides an important opportunity to include a dedicated focus on older women, which will improve prevention, early intervention and responses, and ensure that this growing cohort is not left behind.

The need for dedicated service and system responses for older women

Violence and abuse directed at older women requires targeted and coordinated policy responses that reflect its distinct dynamics, including the role of family relationships and caregiving, economic abuse, and barriers to disclosure. Older women experience distinct patterns of violence and abuse, including: [2]

- a higher prevalence of economic and financial abuse,
- abuse by both intimate partners and adult children,
- under-recognition of violence and abuse as domestic and family violence,
- perpetrators are more evenly distributed by gender,
- violence and abuse may be perpetrated by non-family members such as carers,
- low rates of help-seeking by victims, contributing to under-reporting and a "hidden" nature of the issue,

[1] Commonwealth of Australia (2022). National Plan to End Violence against Women and Children 2022-2032. Available at: dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf

[2] Education, Arts and Communities Committee (2025). Inquiry into elder abuse in Queensland. Available at: https://www.parliament.qld.gov.au/Work-of-the-Assembly/Tabled-Papers/docs/5825t2014/5825t2014.pdf ; Commonwealth of Australia (2022). National Plan to End Violence against Women and Children 2022-2032. Available at: dss.gov.au/system/files/resources/national-plan-end-violence-against-women-and-children-2022-2032.pdf; L Qu et. al., (2021). National elder abuse prevalence study final report. Australian Institute of Family Studies. Available at: https://aifs.gov.au/sites/default/files/publication-documents/2021_national_elder_abuse_prevalence_study_final_report_0.pdf; Council of Attorneys General (2026). National Plan to End the Abuse and Mistreatment of Older People 2026-2036. Available at: https://www.ag.gov.au/rights-and-protections/publications/national-plan-end-abuse-and-mistreatment-older-people-2026-2036; Australian Bureau of Statistics (2024). Recorded crime – Victims. Available at: https://www.abs.gov.au/statistics/people/crime-and-justice/recorded-crime-victims/latest-release#data-downloads; Gillbard, A. (2024). Elder abuse statistics in Queensland: Year in review 2023–24. Elder Abuse Prevention Unit, UnitingCare. Available at: https://eapu.com.au/wp-content/uploads/2024/12/UC-Elder-Abuse-Statistics-in-QLD-Year-in-Review-2024.pdf; Queensland Treasury Queensland Government Statistician's Office (2023). Insights into the abuse of older Queenslanders. Available at: https://www.qgso.qld.gov.au/issues/12786/insights-abuse-older-qlders.pdf; Lyons, K. (27 January 2025). Older women allegedly killed by family members a 'silent crisis', experts say. Available at: https://www.theguardian.com/global/2025/jan/27/older-women-killed-by-family-members-a-silent-crisis-no-one-is-talking-about-experts-say-ntwnfb?CMP=Share_iOSApp_Other

- perpetrators may weaponise health conditions, mobility limitations, and cognitive changes,
- reports of sexual abuse are often indirect, with frontline workers (rather than victims) most commonly identifying violence and abuse, and
- gaps in guardianship and administration frameworks can exacerbate harm because there are insufficient legal safeguards in these systems.

Violence against older women intersects across multiple systems, including elder abuse, domestic and family violence, and sexual violence systems. Therefore, violence and abuse directed at older women requires targeted, system-wide responses that recognise its distinct dynamics and intersection across elder abuse, domestic and family violence, and sexual violence frameworks.

Dedicated service and system responses for older women should be established, including the following:

1. Implementing adult safeguarding mechanisms, with integrated models of care

System reform should include the establishment of formal adult safeguarding mechanisms, with powers to:

- investigate suspected abuse,
- coordinate legal, health and social supports,
- facilitate multi-agency responses, and
- intervene where there is a serious risk of harm.

Adult safeguarding mechanisms could also coordinate support services for perpetrators. Supporting the perpetrator by providing support and access to services such as housing and accommodation, alcohol and other drugs treatment, and mental health services will reduce the risk of further violence and abuse and increase the likelihood of victims being willing to seek and accept support. Adult safeguarding mechanisms could also provide mediation services or referrals to mediation services as an alternative to a criminal justice response to elder abuse.

Recently, the Coroners Court of Victoria made a recommendation that pilot programs of integrated response models of care specifically for both victim survivors and perpetrators of elder abuse be established, given the barriers to engagement with support for this type of domestic and family violence.[3]

Stronger interagency information-sharing guidelines and responding to violence and abuse against older women are needed to implement adult safeguarding mechanisms, similar to those used in child protection and domestic and family violence systems.

The establishment of local adult safeguarding networks should be facilitated, enabling coordinated responses between health, housing, legal and community services, including generalist domestic and family violence services. Similar networks with accompanying information-sharing arrangements already exist in Australian states and territories for addressing child abuse. Existing models, such as regional elder abuse response panels, demonstrate the value of integrated approaches. The Gold

[3] Coroners Court of Victoria, Melbourne (2025). Finding into death without inquest. Available at: https://www.coronerscourt.vic.gov.au/sites/default/files/COR%202023%20000213%20Form%2038%20-%20Finding%20into%20Death%20without%20Inquest.pdf

Coast Elder Abuse Response Panel is an example of an existing adult safeguarding network, which brings together government and community representatives to respond to complex elder abuse cases.

2. Expanding workforce capability and prevention & early intervention efforts

Workers across health, community, financial and legal sectors require targeted training to identify and respond to violence and abuse of older women. Training should:

- be co-designed with people with lived experience,
- include recognition of less visible forms of abuse (e.g. coercive control, financial abuse, sexual abuse, social abuse),
- include risks such as misuse of enduring powers of attorney as a form of coercive control, and
- be targeted to workers in locations with high concentrations of older people.

The Gold Coast Centre Against Sexual Violence has developed a training package that is targeted at staff who work with older people, "Recognising and Responding to Elder Sexual Abuse". The Older Persons Advocacy Network's (OPAN) "Ready to Listen Project" training also focuses on the sexual abuse of older people. OPAN also has free online training on abuse of an older person, including the topic of coercive control, and how to respond, "Abuse of the Older Person".

3. Increasing community awareness around violence and abuse and how to respond

Community education on how to respond should target workers as well as general community members, at key touchpoints in the community for older women, such as general practitioners, hospitals, pharmacists, community service organisations, neighbourhood centres, churches, retirement facilities, manufactured home and caravan parks, retail services, and seniors' organisations.

The *Southern Downs Safe and Savvy Seniors Roadshow - Elder Abuse Awareness for Service Providers* is an example of a roadshow convened by the Southern Downs Regional Council. It shares information through free information sessions about recognising, responding and referring when supporting an older person experiencing abuse.

Education and awareness-raising efforts may benefit from highlighting existing responses that the general public and workers in a range of services that investigate and provide support relating to violence and abuse, that they may not be aware of. For example, state-based agencies that investigate abuse by Enduring Power of Attorney and elder abuse helplines.

4. Expanding response options beyond criminal justice responses

Many older women are reluctant to engage with formal systems to seek support that may criminalise family members, particularly adult children. In addition, anxiety about who would provide care for them if they rely on the perpetrator for daily needs, such as the provision of food and assistance with personal care, may prevent help-seeking by older women. Expanding non-punitive responses is critical to increasing support for older women experiencing violence and abuse, including:

- mediation and supported family interventions,
- integrated service responses for both victim-survivors and perpetrators, and
- increased support for carers, including respite and mental health services.

These approaches can improve safety for older women while, where appropriate, maintaining relationships and supporting earlier engagement with services. Providing alternatives to criminal justice responses, such as mediation and integrated support services, can reduce barriers to disclosure and engagement.

5. Improve accessibility to services through outreach

Older women may disclose abuse gradually. Services that prioritise trust-building, continuity of care, and culturally appropriate responses are critical to enabling disclosure. Outreach models should be significantly expanded to address barriers such as mobility limitations, transport access and social isolation. Generalist services (e.g. domestic and family violence services, sexual assault services, community legal services, and financial counselling services) should build capacity to provide outreach and respond effectively to elder abuse.

6. Strengthen early identification, assessment, and early intervention

Evidence-based "red flags" for violence and abuse of older women (such as social isolation, cessation of medical care and declining health) should inform risk assessment tools used across social service sectors. Increasing access for older women to free legal and financial advice should be undertaken to prevent abuse, particularly in relation to financial decision-making and asset transfers.

What helps people access support earlier, and what barriers prevent people from seeking help or engaging with systems and services?

Barriers to disclosure, reporting and help-seeking

Older women face significant and distinct barriers to disclosure, reporting and help-seeking, including:

- a desire to protect the perpetrator and preserve family relationships,
- shame, stigma and fear of retaliation (particularly when the perpetrator provides daily care),
- financial dependence,
- housing insecurity, and
- social isolation.

In many cases, victims seek support not to end relationships, but to stop the abuse while maintaining family connections. This creates additional complexity in system responses.

Social abuse plays a critical role in isolating victims and inhibiting and preventing help-seeking, and identification of social abuse should be prioritised in prevention and early intervention efforts.

Improving early access to support

To support earlier intervention:

- community and workforce education should be strengthened,
- awareness of available support services and legal options should be increased, and
- decision-support tools (similar to child protection guides) should be developed to assist professionals and the public in identifying and responding to elder abuse.

Improving early access to support requires:

1. Increased awareness and education

Community-wide education can reduce stigma, improve recognition of abuse, and clarify available supports. Education should also target professionals across key sectors to build confidence in identifying and responding to abuse.

2. Improved visibility of support pathways

Many individuals—including professionals—are unclear about where to report or refer cases of elder abuse. Clear, accessible information on available services, legal remedies, and reporting pathways is essential for workers and the general community.

3. Development of decision-support tools

Decision-support tools for professionals and the public, similar to child protection guides, would help identify abuse and determine appropriate responses or referrals.

A decision-support tool that could be provided online should be developed, such as the existing online Queensland Child Protection Guide (CPG) that exists for suspected child abuse, provided by the Department of Child Safety, Youth and Women. [4] The CPG helps professionals decide whether to report to the Department of Child Safety, Youth and Women or refer to other service providers, to help families receive appropriate supports and services promptly. The CPG consists of decision trees to guide users through a range of questions in order to provide recommendations on whether and how to report and/or refer. Development of such an online decision-support tool for violence and abuse of older women could also be guided by existing tools such as the Elder Abuse Suspicion Index© (EASI). The EASI was developed to help family physicians detect those in their practices who are victims of elder abuse. EASI is available in multiple languages. [5]

What current or emerging issues should the Second Action Plan address, including in relation to coercive control and technology-facilitated abuse?

The National Action Plan to End Violence against Women and Children 2022-2032 made one reference to the possible use of artificial intelligence (AI) to facilitate technology-based abuse. Given the pace of AI development and deployment, it warrants greater attention in the National Action Plan. There should be a focus on AI developers to design their tools to minimise the risks they can be used to facilitate VAWC.

As noted by the Queensland Centre for Domestic and Family Violence Research:[6]

> *Artificial intelligence technologies are being integrated into digital systems at a pace that exceeds the development of regulatory and social safeguards. Generative tools present significant risks to the vulnerable and may magnify risks to those already subjected to abuse.*

They pointed out that generative and agentic tools will enable new forms of exploitation. These tools can automate surveillance, generate realistic content, and lower barriers to creating harm,

[4] Department of Child Safety, Youth and Women (2025).Online child protection guide. Available at: https://secure.communities.qld.gov.au/cpguide/engine.aspx

[5] Department of Child Safety, Youth and Women (2025).Online child protection guide. Available at: https://secure.communities.qld.gov.au/cpguide/engine.aspx

[6] Michael D'Rosario (2026), Artificial Intelligence, Coercive Control and Foreseeable Risk in Domestic and Family Violence Contexts, Queensland Centre for Domestic and Family Violence Research, Available at: https://noviolence.org.au/wp-content/uploads/2026/01/AI-Coercive-Control-Forseeable-Risks-in-DFV-Contexts.pdf

thereby mirroring mechanisms already identified in the literature on technology-facilitated abuse. Smart and assistive technologies, including socially interactive robots and AI assistants, can be subverted within abusive relationships, transforming tools intended to support daily living into mechanisms for control.

UN Women has recommended that regulators should be empowered to audit platform practices, involving survivors and experts, and impose sanctions for failing to take reasonable steps to prevent technology-facilitated VAWC.[7] They also recommend that governments create safe, trauma-informed, multilingual platforms for victims and survivors to report corporate failures, request reviews and challenge responses. Further, there should be focal points within relevant regulatory bodies to monitor technology-facilitated VAWC, ensure compliance and provide guidance. They note that the eSafety Commissioner already fulfils some of these functions.[8]

In March 2026, the UN expressed concern that deepfake abuse is part of a much broader pattern of digital violence targeting women and girls. They pointed out that sexual deepfake videos make up 98% of all deepfake videos online, and 99% of them depict girls or women.

UNICEF expressed concern that too many AI models are not being developed with adequate safeguards.

Online platform corporations should have a duty of care to proactively detect and remove deepfake material, backed by independent compliance audits and penalties for systemic non-compliance.

Priority Area 2: Prevention and early intervention

How can existing efforts to prevent violence be strengthened or built upon at the individual, community, organisational, institutional and societal level?

We are concerned about the prevalence of serious financial abuse and that not enough is being done to prevent it. For example, there are tax practitioners, accountants, lawyers and corporate service providers who are setting up companies and legal structures that facilitate financial abuse. The National Action Plan should include actions requiring such professionals to have a duty of care not to facilitate financial abuse and to report suspected attempts at financial abuse to the appropriate law enforcement agencies. Companies are being set up where the victim of the financial abuse is made the director of the company. The perpetrator can then borrow money and run up debts related to the company, benefiting from them while the victim is liable for the debts. Even with the current Director ID system, there are no independent witness requirements. Signatures to make a person a director of a company can be provided without any neutral third party verifying the signatory's identity or understanding of what they are signing. No mechanism requires a professional service to verify that a signatory understands their director responsibilities before becoming a company director.

Many victim survivors do not realise they have been appointed the director of a company controlled by the perpetrator until they check their credit reports, a creditor obtains a judgement against them or seeks to make them bankrupt, or the ATO pursues them for unpaid tax liabilities attached to the business.

[7] UN Women (2025), Model Framework for Legislation on Technology-Facilitated Violence Against Women and Girls, 6.
[8] Ibid., 6.

Too often, accountants and tax practitioners see their professional duties only applying to the person they are dealing with. Thus, if the perpetrator is the client the professional is dealing with and the perpetrator sets up a company in which the spouse is the sole director, the professional fails to identify the spouse as a client they have professional duties to.

Each Financial Counselling had a person they assisted who discovered she was the director of five companies after she was served with bankruptcy and default notices, after her separation. She was a stay-at-home mum, a victim-survivor of physical and emotional abuse. Her husband ran several businesses and controlled the family's finances, including their bank accounts and personal spending. He had engaged and directed accountants to complete all company and personal tax returns over five years without her knowledge. His actions resulted in $12 million of financial abuse against her, including $9.8 million in director loan guarantees, leading to trading whilst insolvent claims by liquidators.

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