

Submission – Developing the next National Plan to Reduce Violence against Women and their Children

QDN

QUEENSLANDERS WITH DISABILITY NETWORK
NOTHING ABOUT US WITHOUT US

Submitted to the Department of Social Services and Office for Women, July, 2021

About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. The organisation's motto is "nothing about us without us". QDN operates a state-wide network of over 2,000 members and supporters who provide information, feedback and views from a consumer perspective to inform systemic disability policy and disability advocacy.

More than 4.4 million people in Australia have a disability. This equates to almost one in five Australians. It is broadly acknowledged that people with disability face risks, barriers and impacts in relation to many areas of their lives. This relates not only to their health and disability needs, but is also impacted by individual and contextual factors such as age, gender, socio-economic status, family environment, where someone lives, whether they are Aboriginal or Torres Strait Islander and whether they are from culturally and linguistically diverse backgrounds.

QDN value statement

QDN believes that:

- All people with disability have a right to a place in the community and have contributions to make to community. This is as empowered, free citizens who are as valued, present, participating and welcomed as members of any dynamic and diverse society.
- The place of people with disability in the community is not just about people with disability having a house in the community. Core to this is that they are welcomed in the community as ordinary citizens where they are genuinely given opportunities to contribute and actively participate. People with disability need to be in communities where their individuality, their talents, and their lived experiences of disability are recognised and acknowledged.
- Culturally and historically, people with disability are not afforded the same value, opportunities or access to community life.
- Any inclusion in community for people with disability is conditional and vulnerable to withdrawal.
- Many people with disability in Queensland are excluded from the most basic experiences of ordinary lives.
- Current exclusionary practices are unacceptable and must be challenged.
- These issues affect not only people with disability but the whole community.
- The responsibility is shared. It lies within government (federal, state and local) and the community at large, to ensure that people with disability have a place and are resourced to belong in community.

Introduction

QDN welcomes the opportunity to make a submission to inform "Developing the next Plan to Reduce Violence against Women and their Children". This submission is informed by the lived experience of our members, all of whom have disability, which includes an online network of women with disability of 53 members from around the State. Some of our members have experienced domestic and family violence (DFV) and have lived experience of the additional barriers women with disability experience recognising violence, attempting to leave a violent relationship and finding accessible services to assist them to places

of safety. In developing this response, QDN also acknowledges and supports the work of our allies and colleagues from Women With Disabilities Australia (WWDA) Women working alongside Women with Intellectual and Learning Disabilities (WWILD) and the Red Rose Foundation.

QDN is aware women with disability who experience DFV are predominantly reliant on the perpetrator of that violence for their everyday care and support. QDN also acknowledges that women with disability generally have fewer pathways to safety with most DFV shelters lacking physical access, accessible information and the specialist knowledge of how to support a woman with disability experiencing violence.

Many women with disability are reluctant to leave a violent relationship because they fear losing custody of their children. There is an alarming over-representation of women with disability in the child protection system and high incidences of custody being granted to an abusive partner because of assumptions made by the courts about the capacity of women with disability to successfully parent their children. Women with disability are commonly aware that reports of violence will precipitate the involvement of child protection^{1 2}.

QDN believes the development of the next national plan needs to be underpinned by a contextual framework and thorough understanding of how women with disability and other marginalized, vulnerable groups of women experience violence, its causes and consequences. Furthermore there needs to be a deeper understanding of intersectionality and violence and its impacts.

QDN's submission will provide a brief contextual framework for understanding the unique experiences of women with disability experiencing DFV and highlight key messages members of QDN's Women's Network gave to disability-specific adapted questions from the discussion paper. QDN will also make recommendations on key themes the National Plan should consider to be inclusive of women with disability.

A brief contextual framework for understanding the impact of violence against women with disability

It is now well known that compared to women without disability, women with disability experience significantly higher levels of all forms of violence, more intensely and frequently. Their experiences of violence last longer³; more severe injuries result; women with disability are far less likely to receive service support to address violence; they are often not believed when reporting sexual assault and other forms of

¹ Women, disability and violence: Barriers to accessing justice. Final report/ Janemaree Maher, et al. Sydney: ANROWS, c2018. See: <https://apo.org.au/sites/default/files/resource-files/2018-04/apo-nid173826.pdf>

² Frohmader, C., Dowse, L., & Didi, A. (2015). Preventing violence against women and girls with disabilities: Integrating a human rights perspective. Retrieved 12 September from Women With Disabilities Australia website http://wwda.org.au/wp-content/uploads/2013/12/Think_Piece_Revised_Edition.pdf

³ Dowse, L., Soldatic, K., Didi, A., Frohmader, C. and van Toorn, G. (2013). Stop the Violence: Addressing Violence Against Women and Girls with Disabilities in Australia. Background Paper. Hobart: Women with Disabilities Australia. Available online at: http://wwda.org.au/wp-content/uploads/2013/12/STV_Background_Paper_FINAL.pdf

violence; they are often denied the right to legal capacity⁴ and effective access to justice⁵; and they have considerably fewer pathways to safety⁶⁷.

The legal definition of DFV varies across states and territories of Australia and most do not contain definitions which do justice to, nor encompass, the range of domestic/family settings in which women with disability may live. Women with disability often live in 'domestic' relationships that include shared living arrangements where they live with the same four people for decades without change. This needs to be considered and acknowledged as we move forward. Nor do they contain definitions which capture the range of relationships and various dimensions and experiences of DFV and GBV as experienced by people with disability, (particularly women with disability)⁸.

Research shows because women with disability's experiences of violence may not fit contemporary definitions and understandings, that violence perpetrated against them often goes unidentified, unreported, un-investigated, inadequately investigated, or results in poor outcomes for the person concerned⁹. Traditional definitions of GBV and DFV do not reflect contemporary understandings of what constitutes violence against women with disability nor the complexities and the forms it can take, and the settings in which it can occur. For example violence that occurs in group home settings can be typically reframed as 'challenging behaviour', 'abuse' or 'service incidents', and the response tends to be one of 'adopting behaviour management strategies' or 'staff disciplinary processes' rather than involving outside scrutiny of police or other services and supports typically available to women without disability¹⁰.

While for many years QDN and our members have advocated the systemic benefits to people with disability, the general community, governments and businesses of people with disability being involved in co-design of policies, programs and products from conception to evaluation stages, it is fair to say that traditionally women with disability have largely been excluded from policies, programs, services and measures to progress gender equality. There is very little data on the experience of violence, abuse, neglect and exploitation by specific groups of women and girls with disability, such as those who are Indigenous, those from culturally and linguistically diverse backgrounds, those who are migrants, refugees

⁴ United Nations General Assembly, Human Rights Council (2013) Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Juan E Méndez; 1st February 2013; UN Doc. A/HRC/22/53.

⁵ Frohmader, C. (2014). 'Gender Blind, Gender Neutral': The effectiveness of the National Disability Strategy in improving the lives of women and girls with disabilities. Prepared for Women With Disabilities Australia (WWDA), Hobart, Tasmania. ISBN: 978-0-9585268-2-1.

⁶ Dowse, et al. (2013) op.cit.; Disabled People's Organisations Australia and the National Women's Alliances, The Status of Women and Girls with Disability in Australia, op. cit., PP. 23-28. Available at: <http://wwda.org.au/wp-content/uploads/2019/12/The-Status-of-Women-and-Girls-with-Disability-Asutralia.pdf>

⁷ Women with Disabilities Australia (WWDA) (2020). 'Submission to the House Standing Committee on Social Policy and Legal Affairs' inquiry into family, domestic and sexual violence'. August 2020. WWDA: Hobart, Tasmania.

⁸ Frohmader, C. (2011). Submission to the Preparation Phase of the UN Analytical Study on Violence against Women and Girls with Disabilities, (A/HRC/RES/17/11). Prepared for Women With Disabilities Australia (WWDA). Available online at: <http://wwda.org.au/issues/viol/viol2011/>

⁹ Frohmader, C. & Swift, K. (2012). Opening minds & opening doors: Reconceptualising 'domestic violence' to be inclusive of women with disabilities in institutions. CDFVRe@der, Vol. 11, No. 2, PP. 7-8.

¹⁰ French, P., et al. (2010). Rights Denied: Towards a National Policy Agenda About Abuse, Neglect & Exploitation of Persons with Cognitive Impairment. PWD, NSW.

or asylum seekers, those who are lesbian, bisexual, non-binary, transgender or intersex, or those living in rural and remote communities¹¹

There also needs to be recognition of the more subtle types of violence often experienced by women with disability at the hands of intimate partners or service providers, such as deliberately leaving a woman's assistive technology (such as a power wheelchair) off the charger and therefore restricting her freedom of movement, abusing a woman's assistance animal, rough handling of body parts during intimate personal care, over-medicating a woman with psycho-social disability to keep her "compliant", deliberately belittling a woman with intellectual disability so she feels unsure of herself and becomes more dependent on her abuser¹². There are also service practices such as restrictive practices¹³ and arbitrary service decisions based on workplace health and safety¹⁴ that need to be further examined to fully understand the impact of domestic violence and GBV on women with disability.

Women (and men) with disability face various barriers in the legal/ criminal justice system and are often over-represented in prisons as a result. Women are often not believed when reporting sexual assault and other forms of violence. They are often denied the right to legal capacity¹⁵ and effective access to justice¹⁶. Men's behaviour change programs aren't targeted at men with intellectual disability and there are not enough accessible programs available.

Women with disability also need additional support in navigating health and hospital settings when seeking examinations for violence, sexual assault and rape, which is often a requirement for filing police charges.

What women with disability told us

What do you think are the main issues for women with disability experiencing DFV?

Members of QDN Women's Network highlighted three key issues in response to this question:

¹¹ Disabled People's Organisations Australia and the National Women's Alliances, *The Status of Women and Girls with Disability in Australia*, op. cit., PP. 23-28. Available at: <http://wwda.org.au/wp-content/uploads/2019/12/The-Status-of-Women-and-Girls-with-Disability-Asutralia.pdf>

¹² Adapted from Queenslanders with Disability Network, *Recommendations to protect people with disability experiencing Domestic Violence during COVID-19 phases*, provided to Minister Farmer Minister for Child Safety, Youth and Women and Minister for the Prevention of Domestic and Family Violence

¹³ Restrictive practices refer to a range of practices to restrict a person's movement and/ behaviour and can include containment, seclusion, physical restraint, mechanical restraint, chemical restraint and restricting access. These practices are required to be documented and used in conjunction with a behaviour support plan.

¹⁴ Workplace health and safety can often be cited as a reason for not doing a particular action. In some instances this can result in a person not having their personal care needs met or experiencing limitations of their freedom. For example, during a Disability Royal Commission Public Hearing, a witness outlined the situation of her daughter, who was not provided with support to shave her legs because the group home policy deemed it as a risk, although support workers assisted men to shave their faces. See: Disabled People's Organisations Australia and the National Women's Alliances, *The Status of Women and Girls with Disability in Australia*, op. cit., PP. 23-28. Available at: <http://wwda.org.au/wp-content/uploads/2019/12/The-Status-of-Women-and-Girls-with-Disability-Asutralia.pdf>

¹⁵ United Nations General Assembly, Human Rights Council (2013) Report of the Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Juan E Méndez; 1st February 2013; UN Doc. A/HRC/22/53.

¹⁶ Women With Disabilities Australia (WWDA) 'WWDA Position Statement 1: The Right to Freedom From All Forms of Violence'. WWDA, September 2016, Hobart, Tasmania. ISBN: 978-0-9585268-6-9

- **Lack of support with police and justice:** QDN women highlighted that in general they found police lacked the insight of how to respond appropriately to women with disability experiencing domestic and family violence. Police can often unwittingly take and believe the perspective of the perpetrator before listening to the woman, particularly when the woman has intellectual or psychosocial disability or it appears the woman is dependent on the perpetrator for physical support. QDN women highlighted the need for there to be a specialised police service, skilled in responding to women with disability experiencing violence. QDN women also highlighted the lack of access to justice as a key issue. Women (and men) with disability face various barriers in the legal/ criminal justice system and are often over-represented in prisons as a result. Women are often not believed when reporting sexual assault and other forms of violence
- **Difficult access:** QDN women say that access to effective support and access to DFV Shelters remain the biggest barriers for women experiencing DFV. But this is often not just about physical access, but a lack of accessible information, a lack of access to effective advocacy and support services to assist a woman with disability to navigate the services and supports she needs to leave a DFV situation.
- **Not being believed:** women with disability are often not believed as victims of crime and their evidence is often inadmissible due to perceptions of capacity or communication barriers. Women with disability are often not believed when speaking out about incidences of violence, sexual assault and rape in group homes and there is little outside scrutiny of these incidences as they are dismissed as service incidents.

What do you think are the major issues for services in providing support to people with disability experiencing family, domestic, and sexual violence?

The situations of women with disability experiencing DFV are many and complex. There are intersecting factors with disability supports, services and systems that can result in increased vulnerabilities for women with disability. Accessibility remains the biggest structural barrier to women with disability getting the support they need from front line responders like police, hospitals, courts and DFV and sexual assault services. Members of the QDN women's network inform us that access goes beyond the physical access to shelters (although this is essential), it also encompasses accessible information in a variety of formats, accessible and welcoming service entry points and a willingness to think differently about how DFV and sexual assault services are provided to women with disability. A key example of this is, traditionally DFV services put the onus on women to take all the necessary steps for women to leave an abusive relationship. For a woman with disability this may require thinking through what additional supports she may require to leave a violent relationship. Additional assistance may involve assistance to pack up her belongings including assistive technology related to her disability, accessible transport to get to a place of safety, additional support around personal care needs or thinking through day-to-day decisions.

It may take longer for a woman with disability to find a suitable place to live after being in a shelter because there is less availability of accessible housing. Women with disability may need extra support to link to appropriate, accessible housing and other services and supports to get their day-to-day needs met. It may be necessary to link with the National Disability Insurance Agency (NDIA) and provide the support or

appropriate referrals to services that can assist her meet eligibility for National Disability Insurance (NDIS) supports and gain independent support for her to be self-sufficient.

A major barrier for women with disability is the offender or perpetrator of the DFV being the woman's primary carer or informal support. This will often result in women with disability languishing for years in living violent relationships because they are dependent on their abuser for their everyday needs and there is no way out, no one they can turn to and no real pathways to safety. This dependence and control can often be so insidious that it can prevent a woman receiving the independent supports she needs through systems such as the NDIS because of a perception that the woman is receiving all the supports she needs. In some cases, an abusive partner may be filling out Access Request Forms in a way that indicates the woman is not in need of additional supports and therefore, she goes without fundamental needs being met and misses an opportunity to leave a violent relationship.

In some scenarios women may share some of their supports with a violent partner. This may cause a woman to stay longer in a relationship as she may fear her support needs may not be met if she leaves or she may fear taking away supports from a violent partner and the ramifications this may have for her safety or ongoing abuse from the partner or partner's family. This is another way a woman with disability can feel trapped in a violent or untenable partnership. Through the introduction of the NDIS there has been a shift in mindset from shared supports to individualised supports however, shared supports can still be an issue for people living in Supported Disability Accommodation (SDA) and there needs to be strategies in place to ensure people are protected in these environments and have appropriate pathways to safety (including reviews of their support arrangements) in incidences of violence.

What are the most important things we can do to support people with disability who are experiencing family, sexual and domestic violence?

Members of QDN Women's group had many ideas on important things that can be done to support people with disability experiencing DFV and sexual violence. This included:

- **Allowing access to services as part of a plan to leave a violent relationship:** women with disability leaving a violent relationship should be a priority target group for NDIS supports. For many women in this situation, the introduction of formal supports may be their only way to safety. For this strategy to be effective, DFV would need to work collaboratively with agencies such as the NDIA and other community organisations in this space to identify women and offer appropriate support and referral.
- **Considering the implications for the person with the disability to leave the environment where all their supports exist:** additional to dependence on the perpetrator, some women with disability are also very dependent on people in their local community such as local friends and informal supporters, formal support workers who live a short distance away, disability support services, local shopping centres and other places of business or community connection. Often the immediate solution to DFV is to take a woman out of her immediate community so that she is safe, however, for many women with disability this will be less effective and potentially more vulnerable as she may be forced to live without everyday essential supports.

- **Include women with disability in the conversation about what they need and what the changes may look like for them:** QDN's motto is "Nothing about us, without us". QDN believes that all public policy should be informed by the lived experience of people with disability. The same is true for responding to violence. Women with disability need to be included in every stage of the process, from leaving a violent relationship, seeking assistance from specialist services like shelters and planning for their future housing and support needs. Women with disability are the experts in their own lives and can often advise better than professionals what they need. Even in the case of women who need support to make decisions and think through their options, they should still be at the centre of the process and all decision-making and their feedback sought at every stage.
- **Avoid unhelpful pedagogies about women with disability and violence:** there are some unhelpful theories about how perpetrators are 'driven to violence' (and in some cases murder, often justified as 'mercy killings') because of the pressures of providing care, or that women with disability are either asexual, promiscuous and/ or do not understand what is happening to them and therefore somehow sexual violence has less of an impact on them. These schools of thought are unhelpful and speak to the lesser value placed on the lives of people with disability in society. They can also result in such violence being seen in a different lens. This can often result in women with disability missing out on receiving the services and supports they need from DFV and sexual assault services.
- **Improve access to temporary and long term affordable and accessible housing:** QDN members state that the lack of affordable, accessible housing is their number one concern. funding strategies to increase the supply of temporary and long term affordable and accessible housing is essential to ensure women with disability are able to leave violent relationships. This needs to be a joint effort between state and federal governments and the NDIA.

What specific strategies or priorities do you think the next National Plan should include to prevent family, domestic and sexual violence against people with disability?

Overwhelmingly QDN women stated that there should be special access to the NDIS for people who may be at risk of losing supports if they leave a violent relationship or the offender is removed. Ongoing support for women experiencing mental health issues as a result of DFV or GBV was also seen as an essential priority for the next National Plan. QDN women also identified training for medical practitioners, service providers and other disability services to identify abuse and how to help the person being abused as a key priority area.

Is there anything else you would like the National Plan to address?

QDN women identified the issue of coercion and control and the use of manipulation to make a woman with disability believe they have no options, nowhere to go and no support. Recently in Queensland there was a consultation about introducing legislation on coercive control. QDN believes coercive control and the elements of violence that it encompasses (emotional and psychological abuse, creating environments of dependence, asserting excessive control, to name a few), encapsulates the context in which women with disability experience DFV and GBV. Coercive control needs to be considered within the context of power and control. It is importantly recognized as a significant risk factor in assessing risk and predictive behaviours and needs to be highly weighted in assessing individual risk by all frontline workers across police, courts, domestic and family violence services, health and disability.

However, QDN believes that more work, research and consideration needs to be undertaken into this and the potential consequences on not only women and children as victims of domestic and family violence but also the systems that are in place to protect them and keep them safe. QDN supports the position that there needs to be a range of measures, research, education and awareness put in place around coercive control before it is legislated. This includes addressing the current issues, barriers and challenges experienced by women, particularly women with disability who have experienced DFV or GBV when they access policing and court systems. The “Not Now Not Ever: Putting an End to Domestic and Family Violence” report contained one recommendation specifically focused on women with disability, recommendation 10. This recommendation stated that “the Queensland Government commissions a review to address the impact of domestic and family violence on people with disabilities” has been actioned and a report was developed by People with Disability Australia including consultations with people with disability, government, non-government sector and domestic and family violence services¹⁷. QDN participated in these consultations and has actively contributed to the three projects that have received \$750,000 of total investment. However, QDN sees that these are initial actions to commence systemic work in this area and that this is just the beginning of the journey and a broad range of work and action is required to continue to drive change that will lead to changes for women with disability who experience DFV and GBV.

QDN supports that the current Domestic Violence legislation could be strengthened to include better definitions for coercive control and sees that it is important that this includes controlling behaviours that are experienced by women with disability. QDN also supports greater education and awareness around coercive control before we move to legislate. This would include education focused on risk assessments that clearly identify risk factors and predictive behaviours to identify individual risk, increased risk of domestic homicide for the frontline workers across the service systems responsible for responding to women and children.

Education and awareness around coercive control also needs to focus on women so they can identify these, and understand them in the context of domestic and family violence. Broader education and awareness is needed for the Queensland community, including children and young people around coercive control.

For women with disability, evidence demonstrates the current additional barriers to safety and justice that they experience across the different systems. It is commonly understood that many women, particularly women experiencing mental health issues or women who have intellectual disability, have not fared well in these systems. There are significant range of current criminally legislated offences that women with disability experience within domestic and family violence relationships that continue to be dealt with under civil legislation. There is often limited support to assist women through these systems and they are often not believed or seen as credible witnesses of the violence that has been perpetrated against them. In a recent online article¹⁸, Nicole Lee speaks of the vulnerability of marginalized women: *“For me, this is where gender, disability and the stigma that surrounds us collide. It is where disabled voices are dismissed,*

¹⁷ “Delivery of Recommendations | Not Now, Not Ever: Putting an End to Domestic and Family Violence in Queensland”, (2019) <https://www.publications.qld.gov.au/dataset/not-now-not-ever/resource/6f08928c-dec3-4600-add9-ef808f60e913>

¹⁸ See: <https://www.mamamia.com.au/criminalising-coercive-control/>

and complex mental health is used against us. It's not just what's expressed within community attitudes, it's also embedded within the very structures that have harmed us".

Suggested Guiding Principles of the Next National Plan to Reduce Violence against Women and their children

Underpinning the next plan with a comprehensive human rights framework

QDN is aware that women with disability have often been left out of consultation about how to address violence against women and girls. In an attempt to address this QDN believes that the next National Plan should be underpinned by a comprehensive human rights framework to ensure it is inclusive of all women. Currently the National Plan is informed by CEDAW (Convention on the Elimination of Discrimination Against Women). QDN is also aware that human rights can be siloed into different groups of marginalised people. Therefore, to be fully inclusive, QDN believes the next National Plan should be underpinned by all treaties and protocols to which Australia is a party¹⁹. Doing this will provide a framework to delineate the obligations and responsibilities of governments to comprehensively prevent and address all forms of violence against women²⁰.

Widening definitions of violence

As discussed earlier in this response, women with disability live in a wider variety of settings, come into contact with a greater number of people responsible for supporting them with intimate personal care and day-to-day decisions, have less access to robust advocacy, outside scrutiny of their living arrangements and external support, are at increased risk of violence in closed settings and often have no say in medical interventions and treatments used to control their bodies (menstrual suppression, hysterectomy as birth control) and behaviours (legislated restrictive practices) and day-to-day decisions (Guardianship). Therefore, QDN supports the long advocated assertions by WWDA that definitions of violence against women and their children used in the National Plan are in need of review and updating to include all types of violence experienced by all women.

Ensuring the principles of the Next Plan are consistent with a human rights framework

QDN supports WWDA's view that the underlying principles of the Next Plan should be consistent with upholding the human right to live free from violence and incorporate such principles as:

- Universality & Indivisibility
- Gender Equality & Gender Inequity
- Non-discrimination

¹⁹ Australia is signatory to the Convention on the Elimination of All Forms of Discrimination Against Women; Convention on the Rights of Persons with Disabilities; Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; International Covenant on Civil and Political Rights; International Covenant on Economic, Social and Cultural Rights; Convention on the Rights of the Child; International Convention on the Elimination of All Forms of Racial Discrimination and the United Nations Declaration on the Rights of Indigenous Peoples, including their Optional Protocols, General Comments and recommendations adopted by the bodies monitoring their implementation.

²⁰ WWDA feedback Draft Framework for Australia's National Plan to end violence against women and children, see: file:///C:/Users/Administrator.ASUS-N53J/Downloads/WWDA_Feedback_Draft_Framework_.pdf

- Intersectionality, with a focus on marginalised or excluded groups
- Participation in decision-making
- Accountability & Transparency
- Enforceability and Remedies
- Addressing the root causes of all forms of gender-based violence²¹

Improving the evidence base

The Evidence section of the Draft Framework, mostly relies on data from the National Personal Safety Survey (PSS). QDN aligns with WWDA's view that this could result in significant under-representation of women with disability in population-based studies on the prevalence of domestic and family violence and sexual assault²². Additionally the PSS systematically excludes people with disability living in institutional settings (i.e. not in a private home), and those who live in remote areas, where Aboriginal and Torres Strait Islander people with disability are over-represented. In September 2019, the Committee on the Rights of Persons with Disabilities adopted its Concluding Observations following its review of Australia's compliance with the Convention on the Rights of Persons with Disabilities²³. The Committee specifically recommended that Australia: *"ensure inclusion of women and girls with disability in the National Plan; ensure accessible gender and age sensitive services that are inclusive of women and girls with disability; and address the methodological restrictions in data collection instruments used to capture data on violence against women and girls with disability."*

Conclusion

QDN is pleased to have this opportunity to present a response to the next National Plan to Reduce Violence against Women and their Children. Our submission highlights the unique contexts in which women with disability experience violence and the key challenges and considerations from a disability perspective in developing an inclusive National Plan. QDN welcomes the opportunity to meet with Department of Social Services and Office for Women to discuss these and other challenges in ensuring that women with disability and their children are included in the National Plan, protected by robust legislation and have access to the specialist services they need and have accessible paths to safety from violence.

²¹ See footnote 20.

²² The Personal Safety Survey (PSS) is a national survey conducted by the Australian Bureau of Statistics (ABS). The PSS collects detailed information from men and women about the nature of violence experienced since the age of 15.

²³ 24 Committee on the Rights of Persons with Disabilities (2019) Concluding observations on the combined second and third periodic reports of Australia, adopted by the Committee at its 511th meeting (20 September 2019) of the 22nd session; UN Doc. CRPD/C/AUS/CO/2- 3.