



Department of Social Services

7 August 2026

Submitted via: <https://engage.dss.gov.au/second-action-plan/formal-submission-survey/>

To the Department of Social Services,

Thank you for the opportunity to provide input into the Second Action Plan for the National Plan to End Violence against Women and Children 2022–2032.

Formed in 1989, Scarlet Alliance is the national peak body representing sex workers and sex worker organisations across uncensored Australia. We advocate for equality, justice and the highest level of health for past and present workers across Australia's sex industry. Through our work and the work of our member organisations and projects, we have the highest level of contact with sex workers and access to sex industry workplaces.

Our work includes policy analysis, research collaborations and sex worker representation on government and non-government committees and advisory mechanisms. We have a detailed understanding of how laws and regulations shape sex workers' daily lives, informed by our member organisations, outreach trends, direct engagement with sex workers, and our own lived experience.

Our recent advocacy has highlighted that sex workers attempting to access specialist family, domestic and sexual violence (FDSV) services are often denied recognition as victims, and instead face heightened scrutiny, victim-blaming, and exclusion from services' client criteria.

Sex worker peer organisations already hold long-term, trusted relationships with a community facing a higher risk of violence due to criminalisation, stigma and discrimination, and operate a peer education and community development model with a demonstrated record of population-level change. Our organisations are funded almost exclusively for blood-borne virus and sexually transmissible infection prevention, and operate across legal environments that criminalise sex workers and our safety strategies.

The Second Action Plan consultation proposes five priority areas, including victim-survivors, prevention and early intervention, children and young people, and system integration and workforce. Drawing on Scarlet Alliance's briefing papers [Sex Workers and Family, Domestic and Sexual Violence](#) (June 2025) and [Sex Workers are Partners in Ending Gender-based Violence](#) (April 2026), we respond to consultation questions in these priority areas.

Yours sincerely,

Mish Pony

Chief Executive Officer

Recommendations Summary

Scarlet Alliance makes the following recommendations to inform the development of the Second Action Plan:

1. Include sex workers as a priority population and key stakeholders in the Second Action Plan, empowering us to develop, expand and deliver appropriate and effective FDSV services within our communities.
2. Decriminalise sex work and introduce comprehensive and accessible civil anti-discrimination and anti-vilification protections at the federal level, and in all states and territories. FDSV policy responses must recognise decriminalisation as a structural violence prevention measure in its own right.
3. Resource national, state and territory peer sex worker organisations to deliver dedicated, targeted and culturally-appropriate FDSV responses, moving beyond the current model of sporadic project funding.
4. Address the structural barriers faced by sex workers in accessing police, the criminal legal system, housing and support services as victim-survivors of FDSV, including through targeted workforce training, and funding for community legal centres to provide tailored assistance to sex workers navigating justice processes.
5. Recognise the impacts of Australia's migration law, policy and enforcement approaches on victim-survivors of gender-based violence, and advocate for solutions that enable access to reporting, justice and support services regardless of visa status.
6. Address digital and financial discrimination towards sex workers through an economic security lens, including responses to technology-facilitated abuse, platform-based deactivation, payment processor discrimination, and the use of digital tools as mechanisms of coercive control, including by ensuring that online safety regulatory frameworks do not increase sex workers' exposure to harm.
7. Incorporate sex worker-inclusive practice competencies into FDSV workforce training frameworks, co-designed and co-delivered with peer sex worker organisations. These should include recognition of sex work stigma, knowledge of referral pathways to peer organisations, and practice standards for non-judgmental engagement with sex worker clients.

Background - Recognising Sex Workers as Key Stakeholders

While the National Plan to End Violence Against Women and Children 2022-2032 recognises that sex workers 'face significant barriers in reporting, accessing services and getting justice if they experience violence,'¹ the First Action Plan included no measures to address these barriers.²

The consultation paper acknowledges that Aboriginal and Torres Strait Islander peoples, LGBTIQ+ people, migrant, refugee and CALD communities, people with disability, people in institutional and carceral settings, and

¹ Australian Government Department of Social Services, *National Plan to End Violence against Women and Children 2022-2032* (Report, 17 October 2022) 47
<https://www.dss.gov.au/national-plan-end-violence-against-women-and-children/resource/national-plan-end-violence-against-women-and-children-2022-2032>.

² The First Action Plan only mentions of sex work and sex workers were that forced sex work is a form of sexual violence, and that sex workers experience unique barriers when reporting sexual assault: Australian Government Department of Social Services, *First Action Plan 2023-2027 Under the National Plan to End Violence Against Women and Children 2022-2032* (16 August 2023) 43-4
<https://www.dss.gov.au/national-plan-end-violence-against-women-and-children/resource/first-action-plan-2023-2027>.



people experiencing housing instability are all under-represented in family, domestic and sexual violence (FDSV) research, data and policy, and face access barriers not addressed by mainstream responses.

Sex workers share these characteristics. We experience stigma and discrimination that increase access barriers to reporting and support services. Our community includes Aboriginal and Torres Strait Islander sex workers, refugee, migrant and CALD sex workers, LGBTIQ+ sex workers, criminalised sex workers and disabled sex workers who experience intersectional stigma and discrimination, compounding marginalisation.

The omission of sex workers from the First Action Plan shaped funding allocation and service design decisions, entrenching the exclusion of sex worker organisations and sex worker-specific responses from the FDSV system.

The Second Action Plan must recognise sex workers as a specific stakeholder group and priority population, empowering us to develop, expand and deliver appropriate and effective FDSV services within our communities (see recommendation 1).

Priority Area 1 - Victim-Survivors

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

The barriers sex workers face in accessing FDSV support are structural, and operate at multiple levels simultaneously.

Criminalisation

Criminalisation creates direct barriers to police engagement. Research documents that sex workers report extreme reluctance to contact police even when experiencing serious violence, driven by fear of prosecution, fear of occupation disclosure, and distrust from past negative experiences.³

The Victorian Royal Commission into Family Violence heard accounts of 'police physically and verbally abusing and sexually harassing workers in the sex industry who reported family violence,' with many sex workers saying that they would not report to police again. The Commission also found that police responses varied significantly depending on which station sex workers attended or which officer assisted them, meaning that sex workers cannot rely on a safe or predictable response.⁴

These findings are consistent with international research. A 2018 global meta-analysis found that sex workers exposed to repressive policing had approximately three times the odds of experiencing sexual or physical violence, alongside documented arbitrary arrest, extortion, and police violence.⁵ Where police are experienced as a source of risk rather than protection, early help-seeking does not occur.

³ Zahra Stardust et al, 'I Wouldn't Call the Cops if I was Being Bashed to Death': Sex Work, Whore Stigma and the Criminal Legal System' (2021) 10(3) *International Journal for Crime, Justice and Social Democracy* 142 <https://doi.org/10.5204/ijcsd.1894>.

⁴ *Royal Commission into Family Violence* (Final Report, 2016) vol V ('Women Working in the Sex Industry') 254 <http://rcfv.archive.royalcommission.vic.gov.au/Report-Recommendations.html>.

⁵ Lucy Platt et al, 'Associations between Sex Work Laws and Sex Workers' Health: A Systematic Review and Meta-Analysis of Quantitative and Qualitative Studies' (2018) 15(12) *PLOS Medicine* e1002680 <https://doi.org/10.1371/journal.pmed.1002680>.



Criminal offences relating to sex work remain in place in South Australia,⁶ Western Australia,⁷ Tasmania,⁸ Victoria⁹, the Australian Capital Territory,¹⁰ and New South Wales.¹¹ Retaining these offences directly undermines reporting, since engaging with police risks self-incrimination and further scrutiny of our work.

The Second Action Plan must recognise the decriminalisation of sex work in all states and territories as a fundamental structural reform and a violence prevention measure in its own right (see recommendation 2).

Stigma and discrimination

Stigma within FDSV services compounds the barriers created by criminalisation. Where a victim-survivor might otherwise seek support from a specialist FDSV service before engaging police, sex workers frequently encounter the same disbelief and victim-blaming in service settings.

Access to crisis accommodation and housing is an additional barrier. The Victorian Royal Commission heard that sex workers experiencing family violence can face additional challenges obtaining housing, including in refuges, because of their employment status.¹² These barriers are compounded further for sex workers experiencing intersecting marginalisation, including Aboriginal and Torres Strait Islander sex workers, migrant and CALD sex workers, LGBTIQ+ sex workers, sex workers who use drugs, and disabled sex workers.

The Second Action Plan must recognise these intersecting marginalisations and recommend the introduction of comprehensive anti-discrimination and anti-vilification protections (see recommendation 2) and mainstream workforce training (see recommendation 7).

Migration status

For migrant sex workers, immigration enforcement and anti-trafficking activities create further barriers to accessing support. Responses driven by raids, surveillance, detention, and deportation increase fear of authorities, reduce trust in services, and push migrant sex workers further underground rather than making them safer. These approaches cause significant harms, including loss of income, confinement, coercion, and rights violations, while doing little to address exploitation itself.¹³

⁶ [Summary Offences Act 1953 \(SA\) pt 6 - brothels.](#)

⁷ [Prostitution Act 2000 \(WA\) ss 6-12;](#)
[Criminal Code Act Compilation Act 1913 \(WA\) ss 190-191.](#)

⁸ [Sex Industry Offences Act 2005 \(Tas\) ss 4, 8, 11, 12.](#)

⁹ [Summary Offences Act 1966 \(Vic\) s 38B.](#)

¹⁰ [Sex Work Act 1992 \(ACT\) ss 18, 19, 23, 27.](#)

¹¹ [Summary Offences Act 1988 \(NSW\) pt 3 - prostitution.](#)

¹² *Royal Commission into Family Violence* (n 4) 255.

¹³ Global Alliance Against Traffic in Women, 'Beyond Borders: Exploring Links between Trafficking and Gender' (Working Paper, GAATW Working Papers Series, 2010) https://gaatw.org/publications/WP_on_Gender.pdf;

Elene Lam, *Behind the Rescue: How Anti-Trafficking Investigations and Policies Harm Migrant Sex Workers* (Report, Butterfly: Asian and Migrant Sex Workers Support Network, 2018) https://www.nswp.org/sites/default/files/behind_the_rescue_june_2_butterfly.pdf; Empower Foundation, *Hit and Run: The Impact of Anti-Trafficking Policy and Practice on Sex Workers' Human Rights in Thailand* (Report, 2012) <https://www.nswp.org/sites/default/files/Hit%20and%20Run%20%20RATSW%20Eng%20online.pdf>;

Judy Fudge et al, *Caught in the Carceral Web: Anti-Trafficking Laws and Policies and Their Impact on Migrant Sex Workers* (Report, Butterfly: Asian and Migrant Sex Workers Support Network, HIV Legal Network and McMaster University School of Labour Studies, 25 October 2021) <https://doi.org/10.2139/ssrn.6271000>.



The Second Action Plan must recognise the impacts of Australian migration law, policy and enforcement¹⁴ as a barrier to migrant workers reporting violence and seeking support (see recommendation 5).

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

Across Australia, sex worker organisations report a consistent failure of specialist FDSV services to recognise sex workers as legitimate victim-survivors deserving of support.

Sex workers attempting to access FDSV services report being subjected to higher levels of scrutiny and questioning than other clients, being treated as having been responsible for our own experiences of violence, as less deserving of support, or as untrustworthy, and being told that our circumstances do not fit the service's client criteria. These attitudes are especially compounded for sex workers who are also subject to other forms of stigma and marginalisation, including sex workers who use drugs, criminalised sex workers, and sex workers with disability.

The Victorian Royal Commission into Family Violence heard consistent evidence of these dynamics, finding that 'inadequate responses and poor attitudes on the part of police and family violence services prevent women who work in the industry from obtaining these services,' and that sex workers often feel 'invisible or overlooked in the broader family violence system in terms of both prevention and response.'¹⁵ Similarly, the South Australian Royal Commission into Domestic, Family and Sexual Violence found that 'people who work in the sex industry, and who are experiencing domestic, family and sexual violence, often feel dehumanised and judged when seeking support.'¹⁶

These responses are more than individual practitioner failure. They reflect a decades-old belief, still held in parts of the anti-violence sector, that sex work is itself a form of violence against women. Where that belief shapes how services operate, sex workers are excluded from the remit of support.

To address these service gaps, sex worker organisations are already functioning as first responders to FDSV. The work of our organisations often includes:

- receiving disclosures, attending scenes of violence and transporting victim-survivors to hospital
- delivering peer support and brokerage services and referrals for emergency accommodation and other crisis supports
- peer navigation for police reporting and court processes
- facilitating access to community legal centres and partnering to deliver dedicated legal support for sex workers¹⁷

¹⁴ Scarlet Alliance, *Policing of Asian Migrant Sex Workers* (Briefing Paper, 30 June 2025)

<https://scarletalliance.org.au/library/briefing-paper-policing-of-asian-migrant-sex-workers/>;

Scarlet Alliance, *Asian Migrant Sex Workers Experiences of Border Force Raids* (Briefing Paper, 9 December 2025)

<https://scarletalliance.org.au/library/asian-migrant-sex-worker-experiences-of-border-force-raids/>;

¹⁵ *Royal Commission into Family Violence* (n 4) 251.

¹⁶ *Royal Commission into Domestic, Family and Sexual Violence: With Courage: South Australia's Vision Beyond Violence* (Final Report, August 2025) 644 <https://www.royalcommissiondfsv.sa.gov.au/publications/With-Courage>.

¹⁷ Respect Inc, 'Crimson Legal Clinic for Sex Workers' (Web Page, 2024) <https://respectqld.org.au/legal-advice-for-sex-workers-in-qld/>;
Southside Justice 'Sex Worker Legal Program' (Web Page, 2025) <https://southsidejustice.org.au/our-work/sex-worker-legal-program/>;



- supporting self-collection of early forensic samples. For example, in 2022–2023 SWOP NT partnered with the Sexual Assault Referral Centre (SARC) to deliver Peer-to-Peer Forensic Training, equipping 21 sex workers to self-collect or supervise collection of forensic samples under strict chain-of-custody requirements.¹⁸

These are vital functions, filling a gap that exists because mainstream services are frequently inaccessible to sex workers. Currently, sex worker organisations are funded almost exclusively for STI and BBV prevention, so this work is carried out largely without dedicated resourcing.

Resourced peer organisations are well placed to scale up victim-survivor wellbeing initiatives, including community development initiatives, counselling and peer support services.

The Second Action Plan must recognise sex worker peer organisations as legitimate and integral components of the FDSV service system, and resource our organisations to deliver FDSV responses (see recommendation 3).

Sex worker stigma, combined with the potential for criminal liability and the complexity of FDSV legal processes, creates barriers to justice that specialist legal support can help navigate. Sex workers also report being retraumatised by participating in the criminal legal system.

The Second Action Plan must promote and resource partnerships between sex worker peer organisations and community legal systems to deliver tailored legal assistance to sex worker victim-survivors and advocate for survivor-centred reforms (see recommendation 4).

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

Coercive control

Qualitative research with sex workers in England and Wales documents 'identity abuse', where perpetrators threaten to expose a person's sex work status to family, employers, immigration authorities, police, child protection services or courts as a mechanism of control. The research found that outing, or threatening to out, a sex worker was 'wielded as a weapon' in intimate and family relationships and was used 'as a way of deliberately controlling, isolating and shaming the victim/survivor'.¹⁹

Criminalisation amplifies this leverage. In jurisdictions with sex work criminal offences, the threat of police involvement or exposure to child protection authorities carries real legal and family consequences, giving abusive partners a distinct form of control. The Second Action Plan should address this dynamic explicitly, alongside prioritising the full decriminalisation of sex work as the first step in addressing this form of coercive control (see recommendation 2).

Inner City Legal Service 'Sex Worker Legal Service (Web Page, 2024) <https://iclc.org.au/sex-worker-help/>.

¹⁸ Northern Territory AIDS and Hepatitis Council (NTAHC), *Annual Report 2023-2024* 1 https://irp.cdn-website.com/7a46c311/files/uploaded/NTAHC_ANNUAL_REPORT_2023_-_2024_final.pdf.

¹⁹ Victoria Holt, 'It's Still a Form of Violence': Sex Workers' Experiences of Domestic and Familial Abuse' (PhD Thesis, University of Roehampton, 28 May 2024) 173 <https://pure.roehampton.ac.uk/portal/en/studentTheses/its-still-a-form-of-violence/>.



Technology-facilitated violence

Sex workers face specific risks of technology-facilitated violence that are largely unaddressed in current FDSV frameworks. Sex workers may experience non-consensual recording (e.g. covert photography or recording via 'smart glasses'),²⁰ as well as the sharing of identifying information or work-related content by abusive partners or others.²¹ This can lead to doxxing that exposes us to violence, family estrangement, loss of employment, discrimination from educational institutions and loss of housing.²²

Technology is also a vector for financial harm. Platforms deactivating accounts, payment processors refusing service, and the non-consensual distribution of content all carry economic consequences, undermining financial independence and increasing dependence on abusive partners.

Despite these significant impacts, sex workers consistently report negative and unhelpful responses from the eSafety Commissioner when reporting technology-facilitated violence. The consultation paper's commitment to developing fast and effective responses must encompass accessible, sensitive and effective pathways for sex workers to report and address technology-facilitated violence (see recommendation 6).

What gaps remain in addressing the needs of diverse communities, including Aboriginal and Torres Strait Islander people?

The absence of data on sex workers' FDSV experiences reflects the same stigma that shapes service responses. Many sex workers conceal their occupation when accessing services out of fear of further discrimination, meaning that service-level data systematically fails to capture our experiences. National data collection such as the Personal Safety Survey is not designed to reach sex workers as a distinct population — rendering us invisible in the evidence base and in policy design.

However, we do not need more research into problems that are already well documented. Stigma and discrimination in services, barriers to police and justice engagement, lack of safe housing pathways, and compounding intersecting marginalisation are well understood. What is required is a national policy and service response that explicitly addresses these barriers.

These barriers are compounded for sex workers experiencing intersecting forms of marginalisation. Aboriginal and Torres Strait Islander sex workers face racism within FDSV systems alongside the specific harms associated with the over-policing of Aboriginal and Torres Strait Islander communities. Migrant sex workers face immigration vulnerability and language barriers in addition to sex work stigma. LGBTIQ+ sex workers and disabled sex workers face further discrimination in service settings.

²⁰ Katie Harris, 'Auckland engineer who tried to film sex worker with smart glasses granted name suppression', *New Zealand Herald* (27 June 2026)

<https://www.nzherald.co.nz/nz/auckland-engineer-who-tried-to-film-sex-worker-with-smart-glasses-granted-name-suppression/IHT3TA5UVVHTZL4C4HLHKZFXA/>.

²¹ Scarlett Redman and Camille Waring, *Visual Violence: Sex Worker Experiences of Image-Based Abuses* (Report, National Ugly Mugs, 2021)

<https://nationaluglymugs.org/2022/02/10/visual-violence-sex-workers-experiences-of-image-based-abuses/>.

²² Ibid 28-30.



The Second Action Plan must commit to policy and service responses that are explicitly designed to serve our diverse communities, developed in partnership with peer sex worker organisations that already hold the trust and knowledge necessary to do so (see recommendations 3, 4 and 7).

Priority Area 2: Prevention and Early Intervention

What would make the biggest difference in preventing and ultimately ending violence?

Stigma and criminalisation are the most significant systemic forces preventing sex workers from accessing safety and support in the context of FDSV. Criminalisation restricts sex workers' ability to take safety precautions, limits our capacity to report violence, and creates conditions in which violence against sex workers is less likely to be recognised, reported, or sanctioned. International evidence documents a correlation between anti-sex work rhetoric and increases in violence against sex workers. Public discourse that positions sex workers as outside the protection of the law creates conditions in which violence against our community goes unrecognised and unsanctioned.²³

The evidence against client and third-party criminalisation, variously described as the 'Nordic', 'Swedish' or 'equality' model, is equally clear, and the Second Action Plan should not entertain it. Evaluations from Norway, France and Ireland following client criminalisation document falling incomes, reduced capacity to screen clients, displacement to isolated locations, pressure to accept risky clients, and rising reports of violence.²⁴

The full decriminalisation of sex work across all Australian states and territories, accompanied by comprehensive anti-discrimination and anti-vilification protections, is therefore a foundational structural reform and a violence prevention measure in its own right (see recommendation 2).

Sex workers view decriminalisation as the vital first step in dismantling the systemic conditions that generate access barriers, strengthening our capacity to report violence and access justice, and removing the coercive leverage that stigma and criminalisation provide to abusive perpetrators.

How can governments, communities, schools, workplaces, online platforms and others better support people to recognise and respond to harmful attitudes and behaviours?

The consultation paper identifies the manosphere and online misogyny as drivers of harmful attitudes that normalise violence against women. Scarlet Alliance agrees, and would add anti-sex work rhetoric to this analysis.

²³ John Lowman, 'Violence and the Outlaw Status of (Street) Prostitution in Canada' (2000) 6(9) *Violence Against Women* 987 <https://doi.org/10.1177/10778010022182245>;

Rebecca Campbell et al, 'Not Collateral Damage: Trends in Violence and Hate Crimes Experienced by Sex Workers in the Republic of Ireland' (2020) 28(3) *Irish Journal of Sociology* 280 <https://doi.org/10.1177/0791603520939794>.

²⁴ Amnesty International, *The Human Cost of 'Crushing' the Market: Criminalization of Sex Work in Norway* (Report No EUR 36/4034/2016, 2016) <https://www.amnesty.org/en/documents/eur36/4034/2016/en/>;

Hélène Le Bail, Calogero Giametta and Noémie Rassouw, *What Do Sex Workers Think about the French Prostitution Act? A Study on the Impact of the Law from 13 April 2016 against the 'Prostitution System' in France* (Report, Médecins du Monde, 2018) <https://hal.science/hal-02115877>; Campbell et al (n 22).



This rhetoric frames violence towards sex workers as an expected or deserved consequence of our occupation,²⁵ and creates a social environment in which that violence is less likely to be recognised, reported, or sanctioned.

Efforts to challenge harmful attitudes must therefore also challenge the stigma and dehumanisation directed at sex workers, including within the FDSV sector itself, where the ideological legacy of second-wave feminist anti-sex work positions has produced service cultures that reproduce rather than challenge our marginalisation.

Prevention and early intervention frameworks must also resist scapegoating pornography and online sexual content as drivers of gender-based violence. This framing is not supported by evidence. Meta-analyses have found no relationship between mainstream pornography consumption and sexually aggressive behaviour, and no correlation with attitudes toward consent.²⁶ Treating online sexual content as a primary cause of violence against women pulls attention and resources away from what actually drives that harm, including the stigma and criminalisation that push sex workers out of the services meant to protect us.

Respectful relationships education and media literacy delivered through a moral panic or abstinence-based lens compounds this problem, reproducing stigma towards diverse sexualities and excluding sex workers from contributing our expertise to sexuality education. Sex workers have expertise grounded in years of practice in negotiating consent and communicating about sexual boundaries that relationships and sexuality education programs could benefit from directly.²⁷

Regulatory responses to online content present similar concerns. As noted above, sex workers report being dismissed and ignored when attempting to report technology-facilitated violence through the eSafety Commissioner, in large part due to the regulatory framework positioning sex workers as *perpetrators*, rather than victim-survivors, of online harms.

Further, the *Online Safety Act 2021* (Cth) and its associated regulatory frameworks themselves generate a chilling effect on sex worker autonomy and safety. Sex worker advertising platforms and community resources face filtering or removal, driving away clients, reducing income, and undermining the safety strategies that sex workers use to manage risk, including client pre-screening and the sharing of health and safety information.

The Second Action Plan's prevention framework must not endorse or amplify regulatory approaches that increase sex workers' marginalisation and exposure to harm under the guise of protecting women and children (see recommendation 6).

Priority Area 3 - Children and Young People in Their Own Right

What would make the biggest difference to improving safety, recovery and wellbeing

²⁵ See, e.g., Lauren Rosewarne, 'One woman's worth: society's double standard', *ABC News* (30 July 2013)

<https://www.abc.net.au/news/2013-07-30/rosewarne-one-womans-worth/4852056>.

²⁶ Alan McKee, Katerina Litsou, Paul Byron and Roger Ingham, 'The Relationship between Consumption of Pornography and Consensual Sexual Practice: Results of a Mixed Method Systematic Review' (2021) 30(3) *Canadian Journal of Human Sexuality*

<https://doi.org/10.3138/cjhs.2021-0010>;

Alan McKee et al, *What Do We Know About the Effects of Pornography After Fifty Years of Academic Research?* (Routledge, 2022)

<https://doi.org/10.4324/9781003232032>;

Connor J Ferguson and Richard D Hartley, 'Pornography and Sexual Aggression: Can Meta-Analysis Find a Link?' (2022) 23(1) *Trauma, Violence & Abuse* 278 <https://doi.org/10.1177/1524838020942754>.

²⁷ See, e.g. Beyond Today, 'Where Should We Learn About Sex?' (Podcast, BBC, 26 February 2019) <https://www.bbc.com/audio/play/p0720lyq>;

Kath Albury and Natalie Hendry, 'Information, Influence, Ritual, Participation: Defining Digital Sexual Health' (2023) 59(3) *Journal of Sociology* 144078332211365 <https://doi.org/10.1177/14407833221136579>.



outcomes for children and young people affected by this violence?

A significant number of sex workers are parents, with sex work offering flexible hours compatible with caring responsibilities. Laws and policy settings that treat sex work as a criminal offence or a child protection concern make sex workers' children less safe, not safer.

Fear of child removal is a well-documented deterrent to reporting family violence. This same dynamic operates for many sex worker parents. Where a parent believes that disclosing or reporting violence will result in their child's removal because of their occupation, that parent is prevented from seeking support and justice. The Second Action Plan should ensure that child protection and family law responses developed under it, and under the action plans for *Safe and Supported*, do not treat sex work as a risk factor in its own right, and that practice guidelines make this explicit. This is consistent with the consultation paper's own recognition that children and young people are victim-survivors in their own right, whose safety depends on system responses that reflect their actual circumstances rather than assumptions about a parent's occupation.

The use of a parent's sex work as leverage in parenting disputes, or through threats to notify child protection authorities, should be recognised within coercive control frameworks as a form of abuse, consistent with the Second Action Plan's own priority of improving how coercive control is recognised, understood and addressed as a common pattern in family violence, including its impacts on victim-survivors, children, help-seeking and system responses.

Priority Area 5: System Integration and Workforce

What would make the biggest difference in creating a more coordinated and connected system response?

The most significant system integration gap for sex workers is the absence of formal recognition of peer sex worker organisations within the FDSV service system. Sex worker organisations are already performing first-responder and ongoing support functions, triage, referral, navigation, peer support and legal assistance coordination, without resourcing, recognition or connection to mainstream services that reflects this reality.

A coordinated response requires sustainable funding for sex worker organisations to deliver frontline FDSV services, referral pathways between peer organisations and mainstream services and community legal centres, and recognition of peer organisations as legitimate partners in coordinated care.

Evidence shows that community empowerment models, where sex workers are supported to act collectively to identify risks, share safety information, and respond to incidents of violence, are among the most effective



approaches for reducing violence.²⁸ These models are currently implemented almost exclusively within STI and BBV prevention mandates. Expanding their resourcing and mandate to encompass FDSV prevention and response would represent an evidence-based investment in community-led violence prevention.

What supports do specialist and universal services need to provide inclusive, accessible and responsive services?

The FDSV workforce needs dedicated training on sex worker stigma and its effects on service delivery. The behaviours documented by sex worker organisations and by the Victorian Royal Commission into Family Violence, including denial of victim status, heightened scrutiny, victim-blaming, and exclusion on the basis of employment status, reflect a specific form of stigma that is not adequately addressed within current trauma-informed care training.

Specialist FDSV services need guidance and minimum care standards that promote sex worker inclusion. Current system responses depend entirely on the attitudes of individual workers and organisations, producing inconsistent and often harmful outcomes for sex worker victim-survivors.

Scarlet Alliance recommends that competency in sex worker-inclusive practice be incorporated into FDSV workforce training frameworks, including initial training and continuing professional development (see recommendation 7). This training must be co-designed and co-delivered with sex worker peer organisations, and encompass understanding of sex work stigma and its operation in service contexts, knowledge of peer sex worker organisations and referral pathways, and practice standards for non-judgmental engagement with sex worker clients. The employment of sex worker peer workers, within or alongside mainstream FDSV services, should also be explored as a model for improving access and quality of care.

What evidence, workforce or system gaps should the Second Action Plan prioritise to strengthen implementation and improve outcomes over time?

Scarlet Alliance notes the significant system gaps raised in Working with Women Alliance's submission to this consultation in terms of housing security and crisis accommodation support. Housing insecurity remains a significant driver of gender-based violence, with current emergency supports frequently reported as being inadequate or inaccessible by sex worker victim-survivors.

We also note the lack of clear support pathways for sex workers and other victim-survivors of stalking offending that takes place outside of family violence contexts. Victim-survivors of stalking offending in relation to their home and/or workplace must have clear access to emergency accommodation and other crisis supports. Scarlet

²⁸ World Health Organization, United Nations Population Fund, Joint United Nations Programme on HIV/AIDS, Global Network of Sex Work Projects and The World Bank, *Implementing Comprehensive HIV/STI Programmes with Sex Workers: Practical Approaches from Collaborative Interventions* (WHO, 2013) <https://www.who.int/publications/i/item/9789241506182>;

Kathleen N Deering et al, 'A Systematic Review of the Correlates of Violence against Sex Workers' (2014) 104(5) *American Journal of Public Health* e42 <https://doi.org/10.2105/AJPH.2014.301909>;

World Health Organization, *Violence Against Sex Workers: What Does the Evidence Say and What Are the International Human Rights Standards That Inform WHO Normative Standards* (WHO, 2024)

<https://www.ohchr.org/sites/default/files/documents/issues/women/sr/call56hrc/subm-sr-violenceagainst-un-enti-world-health-organization.pdf>.



Alliance endorses the recommendations made in chapters 2 and 3 of Working with Women Alliance's submission in relation to financial supports and housing stability.

