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27 July 2026

The Hon Tanya Plibersek MP
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Strawberry Hills, NSW, 2012
Secondactionplan@dss.gov.au | Minister.Plibersek@dss.gov.au

RE: Consultation on the Second Action Plan under the National Plan to End Violence against Women and Children 2022–2032

Dear Minister,

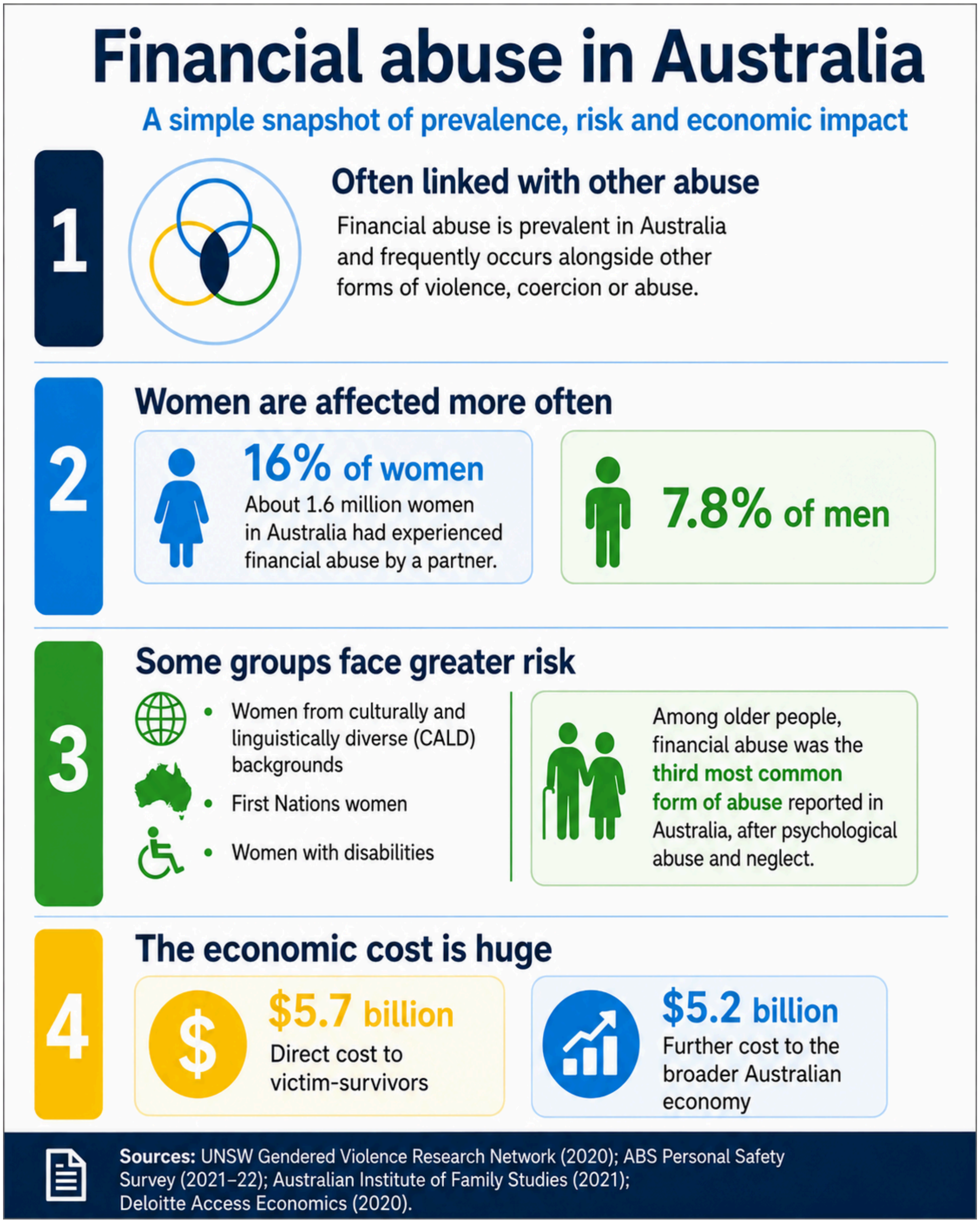
Super Consumers Australia appreciates the opportunity to provide feedback on the Second Action Plan under the National Plan to End Violence against Women and Children 2022–2032. The consultation is timely. Rapid developments in artificial intelligence and other technologies, alongside growing privacy risks are changing how domestic, family and sexual violence (DFSV) is perpetrated. These developments are creating new and compounding forms of harm for victim-survivors, their children and the broader Australian community.

We welcome the Second Action Plan's focus on coercive control and technology-facilitated abuse. However, it must also explicitly recognise and address financial abuse as a form of DFSV. Coercion is central to financial abuse, while emerging technologies allow perpetrators to extend this abuse across financial products, services and platforms. Financial abuse can make it harder for someone to leave an unsafe relationship and can have lifelong consequences for victim-survivors and intergenerational consequences for their children (Kun J, 2025).

The 2024 Parliamentary Joint Committee (PJC) on Corporations and Financial Services Inquiry into Financial Abuse: an insidious form of domestic violence, elevated the issue to the national agenda. It recognised financial abuse as "a systemic issue that is often absent from mainstream discussions of domestic violence" (page xxi). This recognition was reflected in the Government's 2025 election commitment to address financial abuse, particularly within government systems. Omitting financial abuse from the Second Action Plan would be a step backwards in ending gender-based violence. It would also be inconsistent with the Government's commitments and undermine the Plan's objectives of supporting victim-survivors' access to safety, support, justice and recovery.

Super Consumers Australia recommend that the Second Action Plan:

1. Recognise financial abuse as a form of DFSV and make addressing it an explicit priority
2. Incorporate the relevant recommendations from the 2024 PJC Inquiry into Financial Abuse.
3. Recognise the importance of financial security, including superannuation, for the safety, justice and recovery of victim-survivors and their children.



Background

Super Consumers Australia is the advocate for people on low and middle incomes in Australia's superannuation system. We were founded to fight for an accountable and fair super system that delivers great service and great financial outcomes in retirement. Formed in 2013, we are an independent, not-for-profit organisation and a leading voice for consumers of superannuation products and services.

Super Consumers Australia is a member of the national Economic Abuse Reference Group (EARG) and endorses their submission to this consultation. Our advocacy on financial abuse in superannuation aims to:

- Strengthen understanding of the issue across the DFSV sector, superannuation industry and the Government and regulators.
- Improve safeguards and accountability to prevent, identify and address financial abuse in superannuation, including safe, trauma-informed support for people impacted by DFSV and financial abuse.
- Ensure the lived experiences of victim-survivors and the expertise of the DFSV sector inform the design of a safer superannuation system.

We work in partnership with the EARG, its member organisations and other community organisations working in the DFSV and elder abuse sectors. This submission draws on the insights gained through these partnerships, our superannuation expertise and issues raised in our recent joint submissions on : Preventing perpetrators of domestic and family violence from receiving the superannuation death benefits of victims (April, 2026); and Combatting financial abuse perpetrated through coerced directorships (December, 2025).

Recommendations

1. Recognise financial abuse as a prevalent form of DFSV

Financial abuse is prevalent in Australia and frequently occurs with other forms of violence, coercion or abuse (UNSW Gendered Violence Research Network, 2020). The 2021/22 ABS Personal Safety Survey found that 16% of women in Australia, approximately 1.6 million women, had experienced financial abuse by a partner, compared with 7.8% of men. Women from culturally and linguistically diverse (CALD) backgrounds, First Nations communities, and women with disabilities face greater risks than the general population. Among older people, financial abuse was the third most common form of abuse reported in Australia, after psychological abuse and neglect (Australian Institute of Family Studies, 2021). Deloitte Access Economics estimated that in 2020, financial abuse directly cost victim-survivors $5.7 billion and imposed a further $5.2 billion in costs on the broader Australian economy.

Financial abuse can also be a driver of other forms of DFSV. Perpetrators may use physical and emotional abuse, coercive control and threats of violence to obtain or control money and assets (UNSW Gendered Violence Research Network, 2020). The consequences for victim-survivors and their children can be life-long, impacting employment, housing, mental health and long-term financial security (Kun J, 2025). Financial abuse can also continue after separation, allowing perpetrators to prolong their control and harm victim-survivors and their children (DV Alert, 2025). Omitting financial abuse from the Second Action Plan would fail to capture the full nature of DFSV in Australia and the experiences of people affected by it.

2. Incorporate relevant recommendations from the 2024 Parliamentary Joint Committee Inquiry

The 2024 PJC Inquiry highlighted how financial abuse can occur across government, taxation (including the child support system), business and financial systems, including superannuation. The 61 recommendations provide a set of comprehensive reforms to address financial abuse, not just in financial services but in government services and other industries. This systems-based approach aligns strongly with Priority 5 of the Second Action Plan, which focuses on systems integration and workforce capability.

Superannuation was designed to build and protect people's retirement savings. It is central to women's long-term economic resilience and wellbeing. However, financial abuse involving superannuation can deepen and prolong the impact of DFSV. It creates a 'double penalty' for victim-survivors and their children - immediate financial hardship and a greater risk of poverty later in life. The Inquiry identified several ways superannuation can be exploited and weaponised, including:

- coercing victim-survivors to access their super early or move their super into a SMSF where perpetrators can directly control the funds;
- superannuation death benefits of deceased victim-survivors being paid to perpetrators;
- concealing superannuation during family law proceedings; or
- Using self-managed super funds (SMSFs) to bind victim-survivors as trustees or corporate directors of the fund (coerced directorship).

For older people, where funds are more accessible in the retirement phase of super compared to the accumulation phase, financial abuse can include:

- coercing the older person to make lump sum withdrawals from their retirement accounts;
- restricting the older person's income from their retirement account to preserve funds for inheritance; or
- misusing powers of attorney to make decisions about an older person's superannuation for the perpetrator's benefit.

The inquiry's recommendations respond to these systemic problems and draw on evidence from victim-survivors, community organisations, industry and government agencies. Incorporating the relevant recommendations would strengthen the Second Action Plan's approach to prevention, early intervention, response and recovery.

3. Recognise financial security, including superannuation, as essential to safety and recovery

The Royal Commission into Family Violence identified financial insecurity as a major barrier to safety and recovery for victim-survivors. Financial abuse severely erodes a victim-survivor's ability to establish and maintain financial security, particularly when the abuse involves their superannuation.

Superannuation can support long-term financial security, but perpetrators can also weaponise the system. It is one of the few major financial assets generally held in an individual's name. Apart from arrangements involving self-managed super funds, people cannot hold joint superannuation accounts. Effective early intervention and support can help victim-survivors protect their super and strengthen their financial security during separation, throughout recovery and in retirement. This can also improve outcomes for their children. Conversely, losing super through financial abuse can contribute to lifelong financial insecurity. This can make it harder for victim-survivors to leave unsafe relationships and increase their risk of housing insecurity and homelessness, and further exposure to DFSV (Australia's National Research Organisation for Women's Safety, 2022).

Recognising financial abuse and prioritising financial security in the Second Action Plan would:

- Deliver safer, more secure outcomes for victim-survivors and children, including through early intervention.
- Support a more coherent and integrated response that recognises the full experience of DFSV and addresses immediate safety, long-term recovery and financial security.
- Reduce the long-term costs of financial abuse for victim-survivors and the broader Australian economy.

Yours Sincerely,

Lily Jiang
Director of Advocacy