

FORCED MARRIAGE IN AUSTRALIA: A LITERATURE REVIEW



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Executive Summary

Since criminalisation of forced marriage in Australia in 2013, there has been little further research and policy development on the issue. While criminalisation generated awareness and avenues for reporting and/or referrals, limited qualitative and quantitative data means the experience of forced marriage in Australia is not comprehensively understood. This report aims to synthesise the relevant data and theoretical frameworks to develop a conceptual structure on which to base further research. The methodology of a literature review enables analysis between government, community and academic reports to highlight similarities and differences in approaches and standpoints to ensure critical reflection of evidence and practices. The limited research from and with ethnic community groups on forced marriage illustrates a research gap which may be addressed with the help of this report.

Beginning with a critical analysis of the definition of forced marriage, the report then illustrates the difficulties in ensuring consent and the spectrum between forced and arranged marriage. The report outlines the limited data on forced marriage and the intersection of reasons preventing people reporting or engaging authorities. Evidence suggests the need to change the way Australia approaches forced marriage in both research and responses, and to move away from a definition and referral process rooted in the criminal justice paradigm (Vidal 2016 p. 5).

The risks and indicators of forced marriage outline how the issue is an intersection of highly complex dynamics of family, culture, politics, tradition, social pressure, socio-economic status, migration and other factors. There is not one 'stereotypical' image of forced marriage and there are many settings that undermine a person's autonomy in choosing their marriage partner. Reflecting this, Australia needs a broader and more nuanced response to the issue.

The theoretical approaches and responses outlined in this report illustrate the need for approaches, both in research and policy, that address the underlying causes of forced marriage. Forced marriage is not a legal problem to be rectified but a product of deep-rooted intersectional experiences. Forced marriage can only be addressed through a combination of responses from criminal, civil and wider cultural changes.

Introduction

Forced marriage in Australia became a policy issue following the media hype of two cases in 2010 (*Kandal & Khjyatt & Ors* [2010]; *Kreet & Sampir* [2011]). In response, the Attorney-General's Department released a Discussion Paper on Forced and Service Marriage (Australian Government, Attorney-General's Department, 2010), proposing a variety of measures to combat the practice. In 2013, forced marriage became a criminal offence, accompanied by increased education and other initiatives (see Appendix A). The impact of criminalisation is relatively unknown, and more research is needed in collaboration with communities and stakeholders to determine best policy responses.

Methodology

The aim of the report is to synthesise secondary materials to inform a comprehensive research and consultation framework. Considering the high complexity, privacy and sensitivity of forced marriage, comprehensive and critical understanding is an essential first step for stakeholders. As FECCA plays a connecting role between culturally and linguistically diverse (CALD) communities and federal policy makers, this research aims to illustrate gaps and the need for CALD sensitive approaches.

The report is a literature review, drawing upon qualitative and quantitative research as well as conceptual frameworks and analysis. The report's sources include government reports, submissions to government departments, community sector reports, best practice guidelines and academic materials. The review also draws upon analysis from community groups and advocates from blogs, videos and advocacy group websites in the attempts to gauge wider community response. The report is not limited to Australian materials and includes academic research from similar jurisdictions, notably the UK and Canada.

The report attempts to critically synthesise the materials to present an accessible yet comprehensive outline of the various frameworks on forced marriage. It attempts to illustrate the nuance of the issue and outline both the significance of forced marriage and the need for sufficient care when engaging in further research. The review goes beyond previous reports on forced marriage by critically evaluating the limitations in current data collection, influence

of media and other political frameworks. Ultimately, the report aims to present a framework for future research that captures the nuance of the issue.

Limitations

A focus on forced marriage is a relatively recent phenomena following criminalisation in 2013. Australian materials have been generated for less than a decade and it is difficult to gauge the extent to which criminalisation and other initiatives has impacted forced marriage. It is also difficult to determine from desktop research the influence of criminalisation and other initiatives. In Australia, there is also little to no research on the responses from CALD communities on this issue and few studies on the experience of forced marriage from victim/survivors or those at risk. The first report is a 2018 Australian Institute of Criminology (AIC) report with interviews from 7 victim/survivor participants (Lyneham & Bricknell 2018 p vi). The limitations support the conclusion that more research needs to be undertaken in a culturally sensitive way and in partnership with communities.

Forced Marriage Definition

Legal Definition in Australia

In Australia, forced marriage was introduced into the *Criminal Code* (1995) in 2013, defined in 270.7A as:

A marriage entered into without free and full consent of one, or both of the parties involved, as a result of coercion, threat or deception. The definition applies to legally recognised marriages as well as cultural or religious ceremonies and registered relationships; regardless of age, gender or sexual orientation.

Child and Early Marriages

There is an inherent assumption in Australia and other jurisdictions that all child marriages are forced, pointing to the absence of the ability to provide free and informed consent (Vidal 2016 p. 10). The literature tends not to distinguish between child, early and forced marriage instead coupling age or maturity as an indicator of lack of consent or knowledge of the true nature of marriage (Ibid). In Australia, people have the choice to determine if they marry and to whom. The usual legal minimum age to marry is 18 years old in Australia, although people between 16-18 can marry if the parents or guardians give consent and a court order is granted (Australian Government, Attorney-General's Department, 2019). Early marriages are contentious and subject to debate over whether they should be permitted in Australia, with the literature noting the existence of early marriage as a barrier to the prevention of forced marriage (Vidal 2016 p. 22).

Consent and Element of 'Force'

The literature is not conclusive as to what constitutes 'force' in a forced marriage. The *Centre for Multicultural Youth* (2016) and *My Blue Sky* (2015) broadly understand 'force' as 'coercion, threats or deception'. The Attorney-General's Department's discussion paper on 'Forced and Service Marriage' includes an analysis of the use of force, describing a variety of practices used to implement the marriage, including 'physical, emotional or financial duress' (2010, p.

3). Other literature negatively defines 'force' as the opposite of 'consent' (Rauf et al 2017).

In *Without Consent: Forced Marriage in Australia*, Simmons and Burn argue that negatively defining force 'encourages a binary understanding' with consent on one hand and coercion on the other (2016 p. 973). Offering a nuanced viewpoint, the paper argues that forced marriage is complex and exists on a spectrum of various coercion practices, exacerbated by its existence in the private realm. Simmons and Burns argue that forced marriage is better defined as a form of gender-based violence where the pressure to fulfil certain gender-roles forces a woman or man to marry (p. 973).

Building on the broad spectrum of force, the *Right to Refuse* (McGuire, 2014) report argues that forced marriage must be identified on a case-by-case basis. The report explores consent as not an 'act of individual agency' but 'contextual and embedded within power relations' (p. 23). Quoting a submission by the UK organisation Women Living Under Muslim Laws, the report states: 'an objective test of coercion (is) difficult...especially without falling into social or cultural stereotypes having to do with victimhood and agency' (p. 23). It argues that while forced marriage is not a product of any ethnic, racial or religious affiliation, certain cultural approaches and sensitivities should be employed when identifying forced marriage.

Force as the opposite of consent is found predominantly in intersectional literature especially in situations where the concepts of force, duress or coercion may not be applicable. For example, a cognitive disability may prevent a victim/survivor from fully understanding the situation and may be tricked into a marriage (Rauf et al 2013). Force or coercion may not be necessary, as people with intellectual disability may be submissive and trust their families (Ibid). The literature also notes instances where families may coach the victim/survivor to give an impression of understanding and consent if authorities or professionals assess capacity.

Figure 1 illustrates common manifestations of force or threat that may make it difficult to obtain consent or for victim/survivor to say 'no'.

Figure:1

- Individual has an intellectual disability and is unaware of the situation
- Emotional blackmail ('Your mother will die if you don't marry him')
- Isolating the individual i.e. prevent them from seeing friends, attending school etc.
- Stalking i.e. the individual is followed when they leave their home; family and friends are surveying at school etc.
- Individual's movement is curtailed
- Individual is kicked out of the home and/or refused to be supported whether monetarily or through health care etc.
- Threats of physical violence
- Actual physical violence
- Death threat
- Murder

Source: Tahirih Justice Centre, 2009 'Understanding Arranged and Forced Marriage'
www.preventforcedmarriage.org/understanding-arranged-and-forced-marriage/

Adopting a definition that encompasses the nuanced reality of consent is crucial to ensuring appropriate policy responses. In analysing policy responses in the UK, Chantler et al (2009) critiques the definition as incentivising policy only at the point of entrance into marriage such as raising the age of sponsorship for migration or raising the age of marriage. In reality, many service providers including women's refugees and groups come into contact with forced marriage after the marriage has taken place (p. 587). Limiting the definition of forced marriage to an initial act fails to capture the importance of policy that supports people in those situations, especially enabling them to exit the marriage (p. 606).

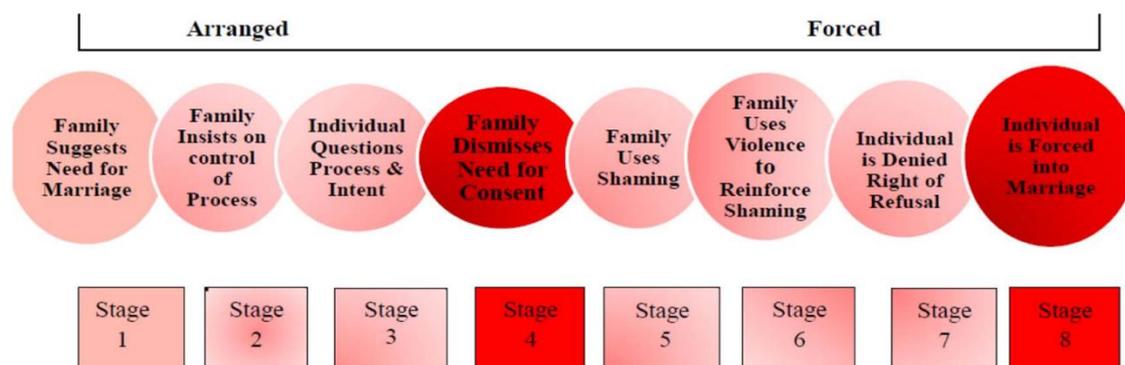
Arranged Marriage

Some reports include attempts to distinguish between forced and arranged marriage. Arranged marriage is distinct from forced marriage, being a legal and acceptable practice if it leads to a fully and freely consenting marriage (McGuire, 2014 p. 24). As explored in the Attorney-General's Department discussion paper (2010), families often take the lead role in deciding the prospective partner in arranged marriages or joining with the partner to select a

suitable spouse (p. 4). The individuals are not forced if the potential spouses maintain the right to accept or reject the partner (Rauf et al, 2013). Despite the distinction, the literature laments how the terms are often used interchangeably in forums, community groups and other settings (McGuire, 2014 p. 25), either conflating the two practices or presenting them as ‘diametric opposites’ (Millbank & Dauveragne 2010, p. 899).

In reality, arranged and forced marriage exist on a spectrum where ‘slippage’ can occur between the two practices (Gangoli & Chantler 2009, p. 269). In some cases, an arranged marriage may begin with an individual participating fully in the selection process and retaining the ability to change their mind or say no (Tahirih Justice Centre 2009). Over time however, the family may begin to disregard the individual’s questions and concerns and the situation may shift into a forced marriage, as illustrated below in Figure 2. The US-based group ‘Unchained’ provides a critique of the tendency to view arranged marriages as ‘benign’ (2017, para. 4-5). Run by a group of forced marriage survivors, ‘Unchained’ stresses a ‘fine line between consent and coercion’ (para. 3). Many may feel intense pressure from family to accept the proposal with the consequences of refusal great, such as rejection from family and the community. One UK study quoted in the *Right to Refuse* report found that eleven out of seventeen arranged marriage cases had some element of force (McGuire 2014, p. 25). This acknowledges the need for case-by-case analysis to ensure better protections, and that the dichotomy between arranged and forced marriages may be a dangerous understanding that misappropriates policy responses.

Figure 2: Shift in family’s attitudes from purely arranged marriage to forced marriage



Source: Setareh et al. 2017 ‘Intersection Forced Marriage & Human Trafficking’ [PowerPoint presentation]. *Freedom Network USA*. Available at: <https://humantraffickingsearch.org/wp-content/uploads/2019/03/FMandHT.powerpoint.pdf> (Accessed: 20 May 2019).

Prevalence of Forced Marriage in Australia

Statistics

The true extent of forced marriage in Australia is unknown as the data is not comprehensive and is limited to criminal indicators. According to a report in *The Australian*, the Australian Federal Police (AFP) has received 232 referrals of forced marriage (Schliebs 2019) since criminalisation in 2013 and just two allegations have proceeded to prosecution (Ibid). The rate of referrals has slowly grown since 2013. Between 2013-2015, the AFP investigated 34 cases, received 70 referrals in 2016-17 and 49 forced marriage referrals between July 1, 2017 and April 30, 2018 and (AFP 2017, p. 52). There are instances in each State and Territory, yet most referrals are from NSW and Victoria (Jelenic & Keeley 2013 p. 8). Referrals include potential cases of forced marriage or suspicions of forced marriage (Australian Federal Police 2018) and therefore may not represent actual instances of forced marriage.

From this limited data, it can be deduced that most victim/survivors of forced marriage are young and female. The Salvation Army stated that the primary presenting group of those referred to both criminal and other services were young women between the ages of 16 and 18 (Vidal 2016). The National Children's Youth and Law Centre found young women and girls the victim/survivor in 85% of forced marriage referrals (Choi 2013 p. 14). Of the 34 cases investigated between 2013-2015, 29 of these related to persons under 18 (Ibid). Anti-Slavery Australia told the Australian newspaper that the youngest referral they have received was 14 (Schleibs 2019). Researchers must be weary not to stereotype the victim/survivors as women however, as boys and men are also vulnerable to forced marriage although to a lesser extent (McGuire 2014).

The literature and community resources stress that forced marriage is not limited to certain cultures, religions, or ethnic groups (Australia Government, Department of Home Affairs 2019; Patton 2018). Academic literature critiques the tendency to box forced marriage as a problem within new-migrant communities (Patton 2018). For example, the 7 participants in the 2018 AIC study of victim/survivors of forced marriage were from South Asia (Pakistan, India, and Afghanistan), Africa (Somalia) and the Pacific (Fiji) and most were Australian

citizens (Lyneham & Bricknell 2018). In the UK, instances of forced marriage are similarly not specific to one country or culture, and the Forced Marriage Unit (FMU) has handled cases related to 90 countries (Home Office 2018). However, the FMU recognised four hotspot countries for the UK: Pakistan, Bangladesh, Somalia and India, reflective of the large South Asian diaspora in the UK (Ibid). These UK statistics are helpful in reiterating that prevalence is context specific.

The location of the marriage is also discussed in the literature. The marriage may occur in Australia, in the victim/survivors or spouse's country of origin or a separate country all together (Lyneham & Bricknell 2018 p. 37). There is a presumption advanced by the media (Overington 2012) and reflected in stakeholder engagement (Lyneham & Brickness 2018 p. 37) that young Australian migrant women are taken offshore by family with an ulterior motive to marry them before returning to Australia. The AIC report (2018) outlined that between 2013 and 2016, most AFP referrals involved a forced marriage occurring or at risk of occurring overseas (p. 2). This leads to a policy of prevention at the border and border policing. While this is may be a necessary element of State intervention against forced marriage, it fails to understand the broader manifestation where registration also occurs within Australia in private settings (Lyneham & Bricknell 2018 p. 37).

Ultimately, the current data suggests that the prevalence of forced marriage is either low or unknown in Australia. Despite this, media coverage of forced marriage has tended to represent the limited number of known cases as 'tip of the iceberg', representative of an 'underground phenomenon' manifesting in Australia's migrant communities (Patton 2018 p. 22). In a context with little empirical evidence of forced marriage, such representations can mould public understandings, influence public policy and shape the services available to victims/survivors (Ibid).

Limitations of Criminal Reporting and Data Collection

Criminal statistics are believed to be minimal compared to the actual prevalence (Anti-People Trafficking Interdepartmental Committee 2011). Many victim/survivors of forced marriage may not be aware of laws and services, and the victim/survivor may fail to identify forced

marriage as a serious crime (Ibid p.8). For many migrant and refugee women, an understanding of their legal rights may depend on women's rights and/or legal norms in their country of origin (InTouch 2010 p. 17). This can limit the ability of women to report and seek protection (Ibid p. 16). Similarly, some victim/survivors may be unaware of support avenues including reporting mechanisms. Additionally, a victim/survivor's young age may be a barrier to knowledge of systems and services and contribute to an inability to navigate highly complex situations. Lack of financial independence and controlled movement may also prevent victim/survivors from reporting or accessing services (Ibid).

If victim/survivors are aware of laws and services, they may still be reluctant to report their family or community members (Voulgari 2012 p. 33). This is a common occurrence for gendered crimes in the private sphere experienced by women from CALD backgrounds. Individuals may feel shame and do not want to expose 'family secrets' or think it unfaithful to report to the authorities (InTouch 2010 p. 17). Reporting to police may result in ostracism from family and community (Ibid 16). Noted as a key barrier to prosecution in forced marriage, this risk of ostracism leads to pressure not to be a witness, withdraw complaints or lie in court (Lyneham 2019 p. xiii). CALD women are more likely to experience apprehension of legal and court processes due to real or perceived racism, unfamiliarity and language barriers (InTouch 2010 p. 21). Some CALD women have expressed mistrust with authorities (Evans 2015), and that engaging authorities may lead to unforeseen, undesirable outcomes (ACT Government Community Services 2016 p. 44) or to the further vilification of already vulnerable communities (Gbla 2019).

Risks/Indicators of Forced Marriage

Figure 3: Common Risks/Indicators

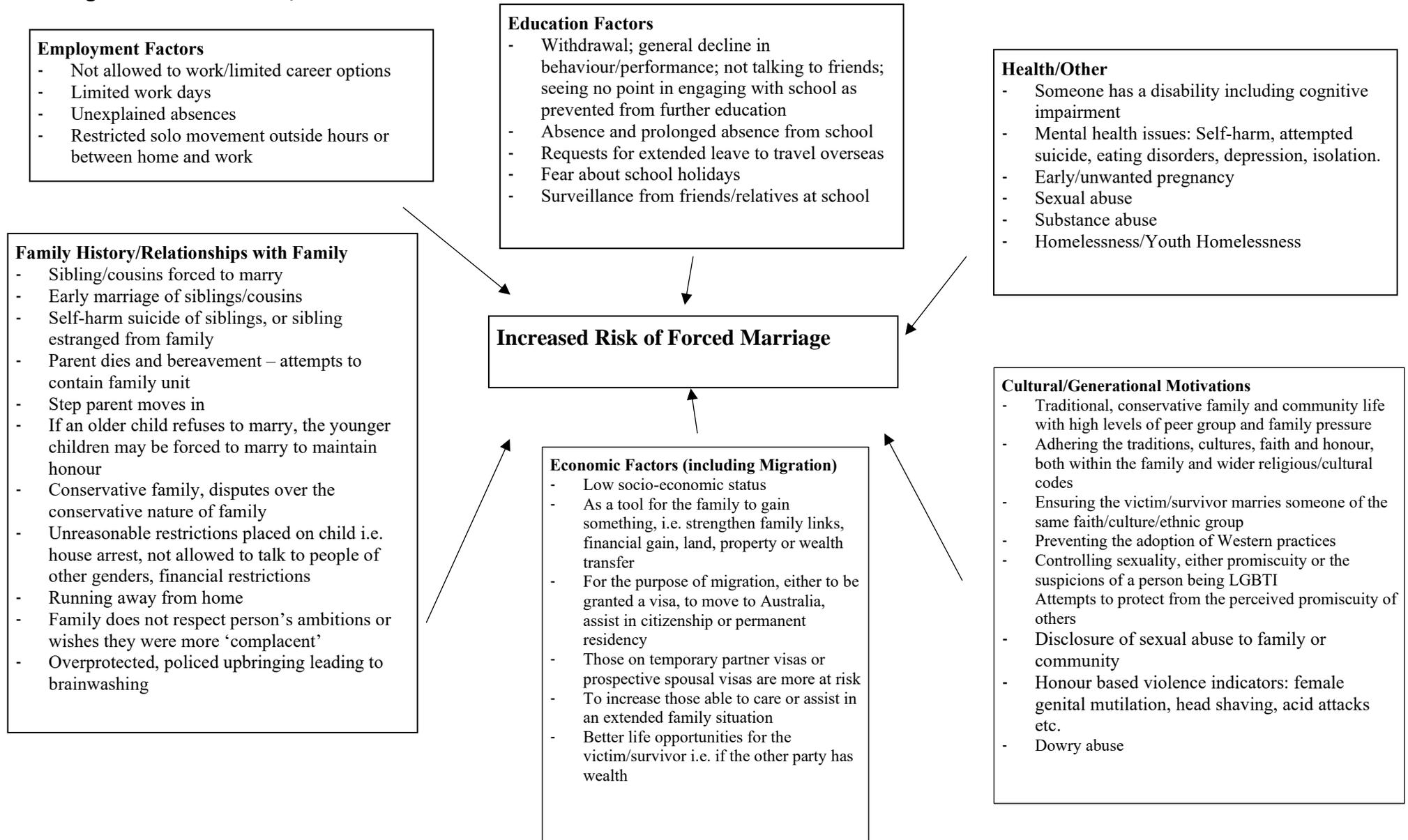


Chart Explanatory Note

The risk factors/indicators of forced marriage are presented above in Figure 3. The factors are not exhaustive, nor does an experience of these factors mean the person is at risk of or is in a forced marriage. Figure 3 attempts to show vast array of indicators that may intersect and increase a person's vulnerability to forced marriage and other abuse. Studies indicate that forced marriage may be more likely in 'conservative' communities or families. This does not limit forced marriage to certain more conservative religious or ethnic groups nor preclude forced marriage occurring in any circumstance. One UK study found that LGBTI persons in conservative 'white' families were at risk of forced marriage (Chantler, K 2019 pp. 603-604). The chart attempts to show that forced marriage may be a product of a variety of intersectional experiences not limited to certain communities and cultures.

Figure 3 Sources: HM Government, 2014 'Multi-agency practice guidelines: Handling cases of Forced Marriage' p. 15; Burn, J et al, 2012 *Hidden exploitation: women in forced labour, marriage and migration: report for Good Shephard and Anti-Slavery Australia*; Lyneham, S & Bricknell, S 2018 *When saying no is not an option: Forced marriage in Australia and New Zealand* Research Report No. 11, Canberra: Australian Institute of Criminology. <https://aic.gov.au/publications/rr/rr11>

Theoretical Approaches and Subsequent Responses

Table 1: Approaches to Forced Marriage and subsequent responses

	Gender-based/family violence	Honour Based Violence (HBV)	Vulnerabilities/intersectionality approach	Human Trafficking/Slavery
Theoretical Approaches	Forced Marriage is a manifestation of gender-based violence and family violence. The key indicators are gender and age, with the pressure to do what is expected of one's gender. This approach is an extension of feminist theory.	Forced Marriage is a product of a cultural norm of maintaining 'honour'. While linked to gender-based violence, it is linked to the desire to preserve cultural practices and values within new migrant communities. Mostly found in UK jurisdictions.	Forced Marriage is a product of various intersecting vulnerabilities deriving from 'embedded social relationships,' structural inequalities, community dynamics. Key vulnerability indicators include gender, age, migration/visa status, disability, position in the community, conservatism of family and the community etc. It requires a response based on upholding human rights.	FM is linked to human trafficking and slavery. It must be addressed through specific criminal legislation and migration provisions.
Role of the State	Push for civil reforms within the Family Law Act, such as protection orders for adults at risk of FM. Also calls for criminalisation based on domestic violence, although this is more controversial.	Somewhat interventionist – i.e. State based intervention in what are Australian values. Criminalisation is important as it clearly outlines what is not acceptable in Australia. Location of marriage may be more likely to occur in home countries and therefore requires migration services etc.	Purports criminal/interventionist approaches disempower communities and victim/survivors by putting power in the State. Civil response rather than criminal.	Criminal intervention needed to bring perpetrators to justice. Enables the engagement of wider state security apparatus – such as Airport Watch lists etc. Civil response, in that it violates the marriage code and the migration act. Civil response through the Migration Act and Migration Regulations to enable protected movement of people.

<p>Role of Service Providers</p>	<p>Focus on gender-specific providers such as Women's Legal Services and integrated women's programs/support groups in communities.</p>	<p>Provide resources for women about the law and how to access support services. Push for information on arrival on Australia's laws.</p>	<p>Focus on addressing the underlying vulnerabilities and structural disadvantages leading to FM, including limitations to accessing support. Requires a variety of providers better suited to addressing the specific vulnerabilities than the State.</p>	<p>Engage a variety of service providers, including legal, migration and settlement services. For example, the Anti-Slavery trial is run by the Red Cross.</p>
<p>Role of CALD communities</p>	<p>Recognises the difficulties of engaging/consulting with communities that may have patriarchal leadership structures.</p>	<p>Need leadership from within the community, together with deradicalization.</p>	<p>Requires change from within communities. Focused on empowerment, for victim/survivors. Encourages collaboration.</p>	<p>Referral to other agencies. CALD communities and other service providers can collaborate with police to ensure results and ensure referral to other agencies.</p>
<p>Critiques</p>	<p>Fails to account for the cases of forced marriage of men and other intersectional indicators. Focuses on female empowerment which may minimise the importance of culture, community and family when making decisions.</p>	<p>May contribute to the vilification of certain communities and cultures and limiting research/consultation to certain communities with 'honour' codes. No evidence/data that limits FM to certain communities. May pressure CALD communities to be 'perfect migrants.' Race theory: 'white knight' interventionist response.</p>	<p>Does not account for the slow process of addressing underlying circumstances which may prevent needed direct intervention. It may require a generational shift within family units and cultural change within communities to accept wider reforms. A good basis for consultations, but also should include space for State structures.</p>	<p>May be a way to further police minority communities, especially as it is linked to migration. Framework tends to stereotype the victim. Low reporting rates with no convictions since 2013 and no data to show a reduction in FM since criminalisation. CALD communities may distrust authorities and fail to report.</p>

<p>Examples from Australia (See Appendix One)</p>	<p>Understandings and actions to prevent violence against women in CALD communities; <i>My Blue Sky</i> website and resources.</p> <p>Red Cross: 'viewing women as property is violence'</p> <p>Push to include Forced Marriage in the definition of family violence to access the Family Violence Provisions (FVP) enabling permanent pathways for temporary visa holders</p>	<p>Criminalisation</p>	<p>School curriculum and outreach programs; Tool Kit/Community Pack; Training in communities.</p>	<p>National Action Plan to combat Slavery 2013-2019</p> <p>Support for Trafficked People Program: Forced Marriage Support Stream Trial</p> <p>Criminalisation in Criminal Code 1995 under Human Trafficking</p> <p>Family Violence Provisions (FVP) to include instances of forced marriage to protect those on temporary visas</p>
<p>Examples from Other Jurisdictions (See Appendix Two)</p>	<p>Forced Marriage Protection Orders (UK): Civil response, related to family violence orders etc.</p> <p>Criminalisation: Within Civil Disruption paradigm (UK).</p> <p>SALCO (Canada) advocates for recognition of the issue within family violence frameworks and for inclusion in child protection policies.</p>	<p>Criminalisation in the UK: HBV used by State institutions; Best Practice Guidelines Home Affairs and information from Crown Prosecutors.</p> <p>Raising the age from 21 to 24 for non-EU migration</p>	<p>Denmark: Family Mediation</p>	<p>Forced Marriage Unit (UK): Ability to have a coordinated response, connected to migration.</p>

<p>Literature Sources</p>	<p>(Simmons, F & Burn, J 2010); (Burn, J et al, 2012); (Simmons, F & Burn, J 2012); (McGuire, M 2014); (Latchford, L 2017); (Evans, C 2015); (Millbak, J & Dauvergne, C 2010)</p>	<p>(Chantler K, et al. 2009); (Patton, C 2018); (Latchford, L 2017); (Quek, K 2013). (Crown Prosecution Service UK 2019).</p>	<p>(Askola, H 2018); (Simmons, F & Burns, J 2010); (Gill, A & Anitha, S (eds.) 2011); (Ahmed, S 2012); (Rauf, B et al. 2013); (Gangoli, G & Chantler, K 2009)</p>	<p>(Lyneham, S 2013); (Simmons, F & Burns, J 2010); Anti-Slavery Australia; My Blue Sky; (Anti-People Trafficking Interdepartmental Committee 2011);</p>
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Discussion

Table 1 synthesises the theories and responses to the issue of forced marriage as demonstrated in the literature. Resulting from these theoretical frameworks are policy responses including civil and/or criminal interventions from the State and/or other responses from stakeholders/service providers. While the above table separates the theories, this written section explores the intersections between the approaches. Ultimately, this section attempts to provide a brief synthesis of the literature to ensure a comprehensive theoretical framework is adapted to advance further research.

Theoretical Discussion

As illustrated by the theories, forced marriage brings to the forefront key issues regarding multiculturalism and rights of women. It encompasses the tension between obscuring potential violations of women's rights in the name of cultural empowerment and autonomy and politicised attempts to use migrant women as a tool to delegitimise multiculturalism and police migration (Gill & Anitha 2011). In response, academic literature has focused on the need for governments and service providers to see the issue as a manifestation of intersectional family violence while avoiding demonising or reproducing racist attitudes towards migrant communities (Quek 2013 p. 631). For example, Patton (2018) stressed that a global rise in governmental responses to forced marriage aligned with rising anti-immigration rhetoric in Australia and other 'Western' nations in a post 9/11 world (p. 22).

Reflecting this, forced marriage in Australia has been entangled with migration through the dominant approach of criminalising the practice as part of human trafficking/slavery. The AIC outlines the role of marriage in facilitating human trafficking, where trafficking and slavery-like exploitation can be facilitated through a marriage if the spouse had no intention to honour the agreement or the marriage is genuine but the intention was to exploit the spouse i.e. domestic servitude (Lyneham & Richards 2014 p. 4). Partner and perspective marriage visas have been noted as facilitating this trafficking. The Coalition Against Trafficking in Women Australia (CATWA) has critiqued Australia's Prospection Marriage visa program as

facilitating forced marriage due to a 'lack of meaningful oversight' to ensure consent (Australian Government 2012 p. 31). There is also limited protection to those on temporary partner visas from seeking permanency in Australia if experiencing a forced marriage, as forced marriage is not legally defined as a manifestation of family violence for the purpose of accessing the Family Violence Provisions (*Migration Regulations 1994* (Cth) s 1.21). Therefore, despite establishing links between marriage, migration and trafficking, there are limited protections for those experiencing forced marriage on certain visas and a wider approach is needed.

This report advocates for the adoption of the vulnerabilities/intersectionality approach combined with a focus on family violence. This theoretical framework recognises both the diverse factors that lead to forced marriage and enables multifaceted, gendered and culturally sensitive responses (Askola 2018 p. 977). A vulnerabilities approach avoids interventionist 'white knight' (Patton p. 36) state action geared towards 'saving' young women and girls from monolithic 'cultural practices' that are at odds with the nation's values (Quek 2013 p. 631). This critiques the honour-based violence paradigm that portrays forced marriage as a 'cultural practice', where it has no basis in religious or ethnicity and is condemned by Islam. Additionally, it is racist as it reaffirms that forced marriage is a 'practice' and therefore 'norm' of certain religious/ethnicities, while violence against women in 'white' Australian societies is an exception (Patton p. 22). Ultimately, an intersectional approach accounts for contextual detail on forced marriage, leading the way to policy outcomes that better addresses nuanced causes.

Policy Responses: Criminal, Civil or Other?

As a quick response for governmental action, criminal sanctions have become an obvious policy choice. While criminalisation may seem like a just response considering the severity of the act, criminalisation alone may fail to protect victim/survivors or prevent further instances of forced marriage. A criminal framework may be inappropriate for the private crime where women are unlikely to report or give testimony against their parents or communities (InTouch 2010). Criminalisation may drive the practice future underground, and there is no data to suggest that criminalisation has reduced the number of instances or referrals of forced

marriage (Lyneham & Bricknell 2018). A focus on criminalisation might also channel funds away from specialist welfare services to privilege the pursuit of criminal prosecution rather than the safety of victim/survivors (Alanen 2016 p. 123).

There is debate in the literature on whether criminalisation is needed to communicate that forced marriage is wrong. Razack (2004) argues that criminalising an act to 'send a message' of a nation's laws is a racist attempt to use the power of the law to bring minority communities into modernity (p. 138). By contrast, Quek (2013) called the original unwillingness of UK policy makers to criminalise forced marriage a double standard based on race (p. 642). Considering the ramifications of forced marriage, including risk of ongoing domestic violence and rape, loss of education and employment and forced childbearing (HM Government 2014 p. 12), victim/survivors should be able to rely on the State for protection and intervention like any other woman experiencing family violence.

Civil protections may also be unsuitable to combat the practice if applied alone. Many victim/survivors forced to marry are often unaware until just before the act what is going to occur. In these cases, civil remedies such as an injunction or being placed on the airport watch list are inaccessible (Quek 2013 p. 641). The only avenue for remedy is rendering the marriage void for duress, as illustrated in the case of Kreet & Sampir (2011). Despite this, in 2018, the Assistant Minister for Home affairs Alex Hawke announced that the government was considering a Forced Marriage Protection Order scheme (Good Shephard 2018) like the model adopted in the UK (see Appendix B). In the 2019 election campaign, Federal Labor promised to tackle forced marriage through civil reforms and support for services and victim/survivors (Labour Government 2019). These indicate a political move towards a combination of criminal and civil responses.

Ultimately, policy needs to be tailored to the needs of the particular victim/survivor, best approached through the adoption of a vulnerabilities framework. Responses should be accessible to CALD women, viewing forced marriage as a manifestation of family violence intersected with a variety of mitigating factors (Simmons, F & Burn, J 2012). A response must centre the victim/survivor or those at risk by applying a human rights response (Gill, A & Anitha, S 2011). While criminalisation is welcomed by most government reports (Australian

Government 2010; Lyneham & Bricknell 2018), most academics and community sector reports have stressed the need for a contextual, case-by-case approach where best practices are designed with and informed by the community (Burn, J et al. 2012 p. 17; Simmons, F & Burn, J 2012).

Research Best Practice

Forced marriage is a highly secretive private experience that is often facilitated or encouraged by close family and community. It therefore requires research practices that reflect the culturally sensitive issue. Failure to adhere to strict ethical standards and consent models may put people at risk, especially as a key motivator of forced marriage is to prevent 'Westernisation' or integration. Ultimately, all research and responses must centre the safety and well-being of the person at risk (Centre for Multicultural Youth 2016 p. 10).

Best practices, in both research and responses, should be framed through community consultations (Good Shephard 2012 p. 17). Central to this is establishing informed consent with the particular community and participants, requiring specifically tailored ethical considerations and established parameters (Marshall & Batten 2004). A balance should be struck between empowering community control of the project while also enabling the researcher to implement their project subject to requirements (Ibid). One example is for the community to select leaders and consultants to the project rather than the academic demanding certain responses (Ibid). An agreement between the community and the researchers prior to beginning is essential to preventing harm.

UK best practice guidelines for responses to forced marriage has adopted the 'One Chance Rule' (HM Government 2014 p. 15). The rule outlines that researchers and other professionals may have 'one opportunity to speak to victim/survivors and one chance to address to save a life' (Ibid). Before undertaking research where people at risk may be identified, researchers must have established referral pathways and follow up procedures in place. As the researcher may be the first and only person people at risk of forced marriage confide in, researchers play an integral role in ensuring the continued safety of the victim/survivor. This indicates a need

for an integrated research team from academia, community groups, trained service providers and others.

Conclusion and Recommendations

This report has illustrated that forced marriage is a nuanced issue with a variety of different conceptual frameworks and approaches. There is no one-size fits all policy response nor way to conduct research. The prevalence and experience of victim/survivors is dependent on the particular family makeup, community and wider socio-economic context.

FECCA's recommendations are as follows:

1. Adopt a definition of forced marriage that adequately considers consent and coercion to ensure forced marriage is better identified and addressed;
2. Invest in comprehensive data collection outside of the criminal framework including ways CALD communities can report incidences/concerns;
3. Further research is needed to determine what is preventing CALD people (victim/survivors, friends, family etc) from speaking out or approaching authorities, ensuring a focus on the referral side of forced marriage;
4. When consulting, adopt a vulnerabilities/intersectionality approach that accounts for differing positions inclusive but not limited to family violence frameworks;
5. Research the success of CALD community led programs as opposed to State interventionist paradigms;
6. Assess the viability/usefulness of current projects/intervention attempts and how CALD communities and authorities can better work together.
7. Assess the validity of adopting civil protection orders like in the UK (see Appendix B);
8. Further develop, together with CALD communities and stakeholders, education programs led by members and leaders in schools and high-education institutions;
9. Use FECCA's networks with ethnic community councils across Australia to generate a dialogue about research best practices for forced marriage in Australia.

Appendix A: Australian Approaches

Criminalisation framework

Crimes Legislation Amendment (Slavery, Slavery-like Conditions and People Trafficking) Bill 2012, *Criminal Code 1995* (Cth); Came into force February 2013. Forced Marriage found under s 270.7A(1) of the Bill, with a maximum penalty of seven years imprisonment for forcing a person into marriage.

Other Australian legislation, such as the *Marriage Act 1961* (Cth), have criminal and civil provisions to prevent forced marriage including Section 23D of the Act which can declare a marriage as void if obtained by duress or fraud.

Other initiatives

My Blue Sky: Education Initiative.

Federal Government funded website with information and referral services for people facing forced marriage; Pilot program to develop and test forced marriage education in schools.

National Action Plan to Combat Human Trafficking and Slavery 2015–19 (NAP)

One of 7 key focus areas is forced marriage and refining Australian government response including the provision of support and appropriate referral pathways for people in, or at risk of forced marriage (Australian Government, Joint Committee on Law Enforcement, 2017).

Forced Marriage Community Pack

Department of Home Affairs developed an information pack for police offices, service providers, community groups, the media and the general public. The packs include

information and FAQ sheets; guides on how to prepare a forced marriage safety plan; relevant information for the media and community service providers and links to referral pathways and advice (Australian Government, Department of Home Affairs, 2018).

Support for Trafficked People Program: Forced Marriage Support Stream Trial

Trial announced on 15 February 2018 by social services minister Dan Tehan and Alex Hawke Minister for Home Affairs, including intensive support for up to 200 days for clients who are in, or at risk of, a forced marriage. This includes access to the 90 days of support already provided on the 'Assessment and Intensive Support' and 'Extended Intensive Support' streams. Clients are referred by the AFP however are not required to contribute to a criminal investigation or prosecution to access this support. Support Program include services for those impacted by forced marriage, and the length of support available to victims under the program has increased (Australian Government, Department of Social Services, 2018)

The program is delivered by the Australian Red Cross, funded by the Department of Social Services. The program provides case management and welfare support for the duration under which the individual is involved in the criminal justice process (Australia Red Cross 2019).

Federal and State governments have also hosted workshops and conferences to increase awareness and provide practice training to frontline responders including;

- *My Blue Sky* Conference at UTS (Federal)
- Just Say No! Forum; Victoria, run by the Centre for Multicultural Violence.

Appendix B: Approaches from Other Jurisdictions

UK

The UK has adopted both a civil and criminal response to forced marriage, in a national strategy attempting to coordinate intervention.

- Forced Marriage Protection Orders (FMPOs)
 - o The creation of FMPOs has led to many positive outcomes for victims, including prevention from travelling overseas, repatriation if already overseas, prevention of marriages without consent, remaining engaged with education and in some cases, opportunities to reconcile with family and community (Simmons, F & Burn, J 2012 p. 980).
- Forced Marriage Unit (FMU)
 - o A central point of coordination enables accountability across the range of agencies and individuals involved in intervention and leads an approach that ensures consistency (HM Government 2014).
- Coordinated Systems
 - o There was particular emphasis placed on leadership over a targeted national strategy, and the importance of compelling all levels of law enforcement and agencies with statutory responsibilities to respond in a coordinated way—with the result being a reduced risk of child, early and forced marriage occurring (HM Government 2014).
- Criminalisation
 - o Forced marriage is criminalised under the *Anti-Social Behaviour Act 2014* (UK);
 - o A breach of FMPO is also a criminal offence. A victim/survivor can choose to prosecute or remain in civil jurisdiction but cannot do both (Vidal 2016 p. 21).

Canada

There are similarities in the approaches between Canada and Australia, whereby criminalisation has had limited impact and has been accompanied by additional service provisions based on safety and care.

- Criminalization:
 - Canada criminalised the practice of child, early and forced marriage in 2015. It set the minimum age of marriage to 16, set legal requirements for consent and made it a criminal offence to knowingly solemnise, attend, celebrate or aid in a forced marriage (Vidal 2016 p. 52).
- Other grassroots/non-governmental service provisions:
 - Forced/Non-Consensual Marriages: A Toolkit for Service Providers by SALCO (South Asian Legal Clinic of Ontario) and funded by Department of Justice (Konanur, S et al 2016).
 - Creative education initiatives from SALCO, including videos and comic books. Comic books written and illustrated by Somya Singh (2012).
 - Covenant House; youth homeless service with a specialised service for young people experiencing human trafficking or forced marriage. Includes support for those who have left situation and now ostracised from their families and those who have returned from an overseas marriage and have also left home.

Denmark

- Cross-Cultural Mediation (Vidal 2016 p. 30)
 - Attempts to prevent long-term removal of children from families or the dominant view that one must leave their communities and integrate into mainstream Danish society.
 - It's an application of the vulnerabilities/intersectional approach that recognises different levels of power within families and in CALD communities.

- Mediator advocates for person at risk and engages with family and/or perpetrators to design and create an agreement that ensures ongoing monitoring and compliance.
 - The process can always be re-engaged.
- Note: Practice Guidelines in Australia have warned against attempts to conduct mediation without proper training or support as it may endanger the victim/survivor further and prevent them accessing help (Centre for Multicultural Youth 2016).

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