

SAFE+EQUAL

Standing strong
against family
violence

SUBMISSION TO THE THIRD FAMILY VIOLENCE ROLLING ACTION PLAN

29 February 2024

Acknowledgement of Traditional Owners

Safe and Equal acknowledges Aboriginal and Torres Strait Islander peoples as the traditional and ongoing custodians of the lands on which we live and work. We pay respects to Elders past and present. We acknowledge that sovereignty has never been ceded and recognise First Nations peoples' rights to self-determination and continuing connections to land, waters, community and culture.

Honouring Victim Survivors

Safe and Equal recognises the strength and resilience of adults, children and young people who have experienced family violence and recognises that it is essential that responses to family violence are informed by their expert knowledge and advocacy. We pay respects to those who have not survived and acknowledge the lasting impacts of this preventable violence on families and communities.

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About Safe and Equal

Safe and Equal is the peak body for Victorian organisations that specialise in family and gender-based violence across the continuum, including primary prevention, early intervention, response and recovery.

Our vision is a world where everyone is safe, respected and thriving, living free from family and gender-based violence.

Safe and Equal holds a central position in the Victorian family violence system and its strategic governance and is one of the key agencies with responsibility for providing family violence subject matter expertise to the specialist family violence sector, broader sectors, government, and other partners and stakeholders.

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Introduction

The third and final Rolling Action Plan (RAP) under *Ending family violence – Victoria’s 10-year plan for change* is an important opportunity to build on the work since the family violence reforms began and to think about ways to strengthen and embed system responses, accountability and transparency. Safe and Equal welcomes the opportunity to provide feedback on the development of this RAP.

Safe and Equal supports the priorities listed in *Strong Foundations: Building on Victoria’s work to end family violence (Strong Foundations)*, and highlights the following advice to strengthen the priorities:

1. Strengthening perpetrator accountability is a critical component of addressing family violence. We recommend rewording “*shift the focus onto people who use violence*” to “*strengthen our focus on people who use violence*”. Ensuring support is available for victim survivors of family violence should remain a core focus of our systems, in tandem with continuing to strengthen our systems focus on (rather than shift to) people who choose to use violence.
2. *Priority Three: “Strengthen Support for Victim Survivors”* should include the need to continue to improve components of the victim survivor support system, such as ensuring the specialist family violence system is adequately funded to meet demand, streamlining how people access and move through the system, increasing access to housing, improving justice responses, and achieving economic wellbeing for victim survivors. These are critical levers to sit alongside perpetrator accountability in this aspect of the RAP.
3. The workforce implications of the priorities listed in *Strong Foundations* are wide ranging and need to be considered across the RAP. We suggest the RAP should identify actions across all priorities that speak to workforce needs to ensure that the prevention and response workforces are able to meet the needs of victim survivors and work effectively towards ending violence going forward. While we understand the approach in having workforce considerations contained within Priority Three, limiting workforce considerations to this priority has the potential for workforce implications to be missed. For example, the workforce needs of the primary prevention sector are different to the needs of the specialist family violence response sector. There are also discrete workforce considerations for working with children and young people that need to be addressed if children and young people experiencing family violence are going to receive the support they need and deserve.

It is important to note that critical parts of the family violence system are held at the Commonwealth level. To improve outcomes for victim survivors and reduce family and gender-based violence, we need the Commonwealth Government to:

- enhance primary prevention expertise and representation on the National Plan Advisory Group, and/or establish a National Primary Prevention Working Group at a Commonwealth level
- reform the immigration system to protect victim survivors on temporary visas and give them access to income support payments and Medicare
- increase income support payments to a level that lifts people out of poverty
- increase investment into social housing
- develop and fund a National Family Violence Workforce Strategy that supports family violence workers across the continuum.

We need the Victorian Government's ongoing commitment to advocating at a Commonwealth level for these policies.

With the need to continue to build a systems approach to the prevention and response to family violence, and with where we are in the reform journey, the success of this RAP depends on deep and meaningful engagement and collaboration with the family violence prevention and response sectors and the people we work to serve.

The Minister for the Prevention of Family Violence and the Family Violence Reform Advisory Group (FVRAG) are important and positive governance and coordination mechanisms for the family violence system. The ministerial focus on family and gender violence prevention and response and the role of the FVRAG need to be maintained as critical governance infrastructure.

To achieve outcomes, specialist family violence response services and primary prevention organisations need to be genuinely engaged and resourced to participate and contribute to family violence related policy and program development, implementation, evaluation, and feedback processes. Resourcing and sufficient times to respond to documentation or provide written feedback, coupled with meaningful consultations with services, should be provided to truly gain insight from the sector to inform policy and program development.

Priority 1– Drive down family and sexual violence

Safe and Equal welcomes the focus on consolidating efforts to drive down family and gender-based violence. The current investment in primary prevention must be maintained, and even increased in future, to ensure the wide-reaching social change required to drive down violence.

Since the Royal Commission, primary prevention has become further established in Victoria through dedicated funding, policy frameworks, and integrated action plans across prevention and response. This has built on a proud history of community-level and place-based primary prevention activity and activism to further establish a system of organisations and initiatives with overlapping interests in working to prevent violence against women, address women's health and gender equality, and focus on family and gender-based violence prevention for all communities.

Increasingly, a broad, multi-disciplinary cohort of skilled primary prevention practitioners and organisations is coming together to lead and grow this work across a range of sectors, settings, communities and locations.

The report by the Victorian Family Violence Reform Implementation Monitor on [Primary Prevention System Architecture](#) specifically states that Victoria requires a strong and coordinated system that:

- has the appropriate infrastructure
- is clear about the roles and responsibilities of all parties
- retains a skilled prevention workforce
- is backed by sufficient and sustained funding
- is committed to ongoing, evidence-based improvement and refinement.

A key priority moving forward needs to be increasing the visibility of the diversity of work being undertaken in primary prevention in Victoria across a range of sectors that contribute collectively to addressing the gendered drivers of violence, and overlapping drivers such as racism, homophobia, transphobia, and so on. The most common sectors where primary prevention is being undertaken involve organisations working in women's health, gender equality, family violence and sexual assault, but also health and community services, and youth services. In addition, key work being undertaken in Victoria in schools and local government is important to acknowledge, and we should be seeking to build similar efforts in other settings. Community-led prevention undertaken with and for a range of communities also needs to be valued and supported.

What is needed is a stronger collective view of the entire prevention system, and where and how our efforts are best targeted. Below is a suite of actions that we believe need to be included in this RAP.

Ensure sustainable funding for key players in the primary prevention system

Long-term and sustainable funding for key players in the primary prevention system, as an investment in system infrastructure, is critical to ensuring that workforce and practice expertise are maintained and lessons from implementation can be built upon over time.

Actions to include in the RAP:

- Embed an ongoing funding commitment for key specialist organisations delivering primary prevention in Victoria, particularly the Women’s Health Services Network and the statewide infrastructure provided through the regional prevention partnerships.
- Provide ongoing funding for statewide local government initiatives coordinated through the Municipal Association of Victoria.
- Provide an ongoing uplift in core funding for Safe and Equal to represent and support its primary prevention membership, enhance connections in the work of its members across the continuum, build relationships with other peaks and partners, and contribute positively to broader system strengthening.
- Provide ongoing funding for Respectful Relationships Education, continuing the roll-out across the state in schools and in early childhood settings, as well as continued attention to professional learning to support the workforce to deliver whole-of-school programs, and deal with backlash and resistance.

Fund and sustain community-led prevention

There is a specific need to grow understanding and support for work being undertaken in community-led prevention with a range of priority communities, including Aboriginal and Torres Strait Islander communities, LGBTIQ+ communities, people living with disabilities and a range of newly arrived and multicultural communities. This is innovative work that must inform and strengthen primary prevention practice and techniques more broadly. As one example, community-led prevention necessarily has a strong focus on working with men and boys from their communities, and many organisations working in this space have extensive experience in direct participation and community mobilisation work. This is invaluable expertise that needs to be built upon.

A number of key community-led organisations statewide have a dual role in leading primary prevention activities with and for their communities, but also play a role in building the capability of organisations within the broader prevention and service system. These roles in the system need to be supported and maintained.

Actions to include in the RAP:

- Support intersectional primary prevention messaging and programs by providing ongoing funding for community-led prevention organisations such as Multicultural Centre for Women's Health, Rainbow Health Australia and Women with Disabilities Victoria.
- Ongoing funding for Aboriginal and Torres Strait Islander-led primary prevention programs (through Dhelk Dja) in line with the principles of self-determination.

Recognise and support primary prevention being undertaken by specialist family violence services

There is a substantial amount of primary prevention and early intervention work being undertaken by specialist family violence services. These services are embedded in local and regional communities and have built existing partnerships with a focus on primary prevention. This work is often unfunded or funded through small and insecure philanthropic or community grants. Recognising, valuing, and funding the primary prevention role that specialist family violence services play in their communities must be an important focus.

Actions to include in the RAP:

- Map the primary prevention and early intervention activity being undertaken by specialist family violence services and consider funding opportunities to enhance and support this work.

Prioritise programmatic prevention funding to deliver outcomes and grow capability

Program funding must be prioritised to build distinct areas of specialisation and need, and to support emerging networks that aim to grow the work in key settings and sectors. Current and future investments must be leveraged to ensure capability building for the broader sectors involved in primary prevention.

Actions to include in the RAP:

- Build on existing programs working with young people around affirmative consent, including the partnership between SASVic, YACVic and Safe and Equal, and leverage lessons from this program to support capability building across the prevention workforce for reaching adults as well as young people.
- Extend and build on existing programs working with multicultural and faith communities, looking to embed lessons and learning across the workforce.

- Provide multi-year funding to enable workforce capability in working with men and boys, leveraging existing practice undertaken by The Men's Project, and building capability across the primary prevention workforce in transformative approaches to gender and masculinity.
- Expand and support primary prevention professional networks in key settings, e.g. TAFE and universities.

Focus strategically on prevention workforce development

Safe and Equal seeks to contribute to system strengthening through a focus on workforce development and practice leadership. This includes a focus on building skills, knowledge and confidence, but also supporting collaboration and connection. The dispersed nature of the prevention workforce means that the needs of the primary prevention workforce are distinct from the needs of the family violence response workforce; and additional mechanisms are vital for primary prevention workforce wellbeing, learning through mentoring, and peer relationships.

Actions to include in the RAP:

- Commit to minimum five-year funding agreements for Safe and Equal to continue to deliver primary prevention workforce development statewide, including training, communities of practice, the Partners in Prevention network, events, resources and the PreventX conference.
- Secure funding for Safe and Equal to build on recent workforce mapping activities to advise and assist in the implementation of prevention workforce priorities and actions in the Industry Rolling Action Plan, including:
 - mapping professional development to career pathways for specialist and other prevention workforces
 - understanding and maximising entry points
 - improving workforce data collection
 - developing targeted professional development for key areas of emerging practice.
- Renew funding for Safe and Equal to continue to deliver Fast Track, as a leadership program that has an established uptake, reputation and effectiveness.
- Support Safe and Equal to take up a stronger role in practice leadership and development, with a focus on convening networks and working groups in priority areas at an advanced practitioner level in areas such as policy and advocacy; using research and knowledge translation; messaging; intersectionality in primary prevention; and responding to backlash and resistance.

Focus on prevention sector governance

As well as ensuring that family violence governance structures oversee a comprehensive and integrated family violence system across the continuum, there is a need for structures that

draw together a range of primary prevention expertise and foster understanding and leadership across a diversity of programs and approaches. There is a growing need for policy integration and coordination of funding that contributes to primary prevention through various government departments to support this work, including those concerned with family violence, women, education, health, and equality.

Actions to include in the RAP:

- Maintain the Primary Prevention Sector Reference Group as a key governance group to share and advise on primary prevention policy and initiatives, including the integration of primary prevention initiatives across government.
- Develop mechanisms to ensure coordination of legislative and policy initiatives across family violence and gender equality, including engaging with the sectors involved in implementation and roll-out of initiatives.

Priority 2– Children and Young People

The specialist family violence sector is committed to improving response to children and young people experiencing family violence. Much work to date has focused on building family violence practitioners' capability and confidence in working with children and young people. It's important to continue building understanding of what it means to "work with children and young people as victim survivors in their own right" (distinct from adult victim survivors), and to work with children and young people who have experienced family violence to understand how services can better meet their unique needs across all ages, stages and diversity of experiences.

In addition to capability and confidence building for practitioners, it is vital for the system to recognise that current funding and policy settings are inadequate for meeting present needs and changing the trajectory of children and young people experiencing family violence. These funding and policy gaps inevitably translate to shortcomings in program design, service delivery, and clinical practice. We need a system focus on children and young people experiencing family violence that brings together a range of sectors and disciplines to develop a coordinated systemic response to children and young people which upholds both their safety and agency. To truly transform our systems, we need to:

- define the unique contribution of specialist knowledge regarding working with children and young people within family violence practice
- promote the value add of specialist family violence expertise to allied services when working with children and young people who have or are experiencing family violence
- craft safe and effective interventions with the parent/carer using family violence, as distinct from the interventions with the aligned or safe parent/carer
- adapt transgenerational perspectives on children and young people's life course to fully align system efforts in family violence response, recovery, early intervention, and primary prevention.

Below are a series of actions that we believe must be included in the next RAP to operationalise the above and shift the way the family violence sector and service system works with children and young people.

Review specialist family violence services legal mandate, regulatory frameworks, funding structures, and service delivery targets to clarify system-wide expectations and support agencies' ability to work with children and young people experiencing family violence

There is a high degree of willingness within specialist family violence services to improve their practice when working with children and young people. A lack of clarity on the legislative and/or policy basis for working with children and young people in a specialist family violence

service context, particularly when they present to services independently (without a parent/carer), is a systems challenge. Frontline practitioners have long identified a serious and growing service gap for children and young people experiencing family violence who present independently – having this challenge acknowledged in *Strong Foundations* is an important first step.

It is vital to ensure clarity and consistency in communicating system-wide expectations, from government agencies to service managers, the frontline workforce, clients and the general public about what it means to ‘work with children and young people as victim survivors in their own right’ and to ensure that policy frameworks, funding and target structures support and enable these expectations.

Notwithstanding significant progress on data system development, there is at present no accurate picture of what level and types of support are being offered to children and young people or what demand for family violence services is from children and young people.

In order for the specialist family violence sector to be able to expand their work with children and young people as victim survivors in their own right, this work needs to be defined, articulated, counted and funded.

Actions to include in the RAP:

- Convene and resource a policy mechanism involving all relevant government agencies, peak bodies, subject matter experts, and lived experience advisory groups across specialist family violence services, child and family services, sexual assault services, youth services, child protection, out of home care and youth justice to align expectations and requirements for an effective response to children and young people experiencing family violence, with specific consideration for:
 - defining the practical application of “working with children and young people as victim survivors in their own right”
 - defining roles and responsibilities between sectors, including mandatory reporting
 - building cross-sector collaboration, capability, and knowledge, drawing on such multi-agency frameworks and platforms as MARAM and RAMP
 - promoting commitments to the principle of increasing child autonomy and agency
 - developing a consistent understanding of “whole-of-family responses” to include focusing on the behaviour of the parent/carer using family violence, utilising evidence-based models such as the Safe and Together Model
 - responding to the experiences of sexual violence experienced by children and young people in the context of family violence
 - ensuring a culturally safe, trauma-informed, and intersectional lens is applied to practice with children and young people
 - identifying how each sector can contribute to systems alignment to the *Yoorrook Report for Justice’s* recommendations aimed at reducing the over-representation of Aboriginal and Torres Strait Islander children and young people who have experienced family violence in child protection and youth justice sectors.

- Investigate the legislative mandate and regulatory frameworks to determine what, if any, legislative or policy change is required to enable specialist family violence services to work with independently presenting young people in the 15–18 age cohort.
- Invest in improved system-wide capacity for data collection on incidence, prevalence, and service demand from children and young people experiencing family and sexual violence.
- Work with relevant peak bodies to review, redefine, and recalculate family violence service delivery targets to accurately reflect the frontline work undertaken with children and young people and all other client cohorts.

Invest in increasing capability across the specialist family violence response sector and allied sectors to work with children and young people who are experiencing family violence

In addition to adjusting policy and practice frameworks to better support and enable services to work with children and young people, significant work is needed to bring sectors together to share expertise on how best to support children and young people experiencing family violence.

A significant amount of work has been done with children and young people across the specialist family violence and other allied sectors over the years, including through trials and pilot programs that showed promise but were not refunded or scaled. This evidence could be collated and translated to inform better practices in working with children and young people, what frontline practitioners are expected to do, and how they are supposed to engage with children and young people as victim survivors in their own right.

In addition to building on existing and previous work, MARAM, as a legislated framework, is a critical system lever to facilitate widespread capability building on working with children and young people experiencing family violence. This is due to the breadth of service sectors legislatively prescribed to align. Significant upskilling and workforce capability building will be required across the specialist family violence, allied and adjacent sectors such as education, child protection, youth justice, courts, and Victoria Police to support these sectors to fulfill their legislated responsibilities. This alignment will require sustained investment and policy attention over time to align all prescribed workforces via training and practice development, and to ongoingly support their participation and collaboration as MARAM-prescribed workforces and organisations.

The over-representation of Aboriginal and Torres Strait Islander children and young people experiencing family violence in the child protection system requires continued capability building in the specialist family violence and other sectors to work with Aboriginal and Torres Strait Islander children and young people, and their families, in anti-racist, culturally safe and

appropriate ways. In addition to strengthening culturally safe, anti-racist responses across the system, Safe and Equal notes that continued investment into Aboriginal and Torres Strait Islander community-led initiatives that work with Aboriginal and Torres Strait Islander children and young people experiencing family violence is critical.

Actions to include in the RAP:

- Support and fund ongoing implementation of the MARAM Child and Young People Framework, tools and practice guidance to embed it across specialist family violence services and allied sectors.
- Support the specialist family violence sector to gather frontline evidence and consolidate lessons learned on working with children and young people experiencing family violence, with a view to:
 - articulating benchmarks and standards for best practice, drawing from the lived experience of children and young people, the latest academic research, ongoing cross-sector collaboration, and frontline expertise from senior practitioners across the state
 - contributing to academic literature, practical improvements in program design and enhancements to workforce development.
- Fund Safe and Equal to work with the specialist family violence sector to articulate a tailored service model for children and young people experiencing family violence, in alignment with the Family Violence Case Management Program Requirements and MARAM.
- Invest in the development and long-term sustainability of targeted programs for children and young people experiencing family violence, including:
 - funding a program evaluation and scale-up of the Melbourne City Mission Specialist family violence case management service for young people aged 15–19
 - building upon learnings and work undertaken in refugees' delivery of child and youth centred practice to inform targeted programs
 - funding program evaluations and expansion of specialist family violence homelessness services for LGBTQIA+ children and young people, including a focus on support and recovery
 - developing a trial for a bespoke specialist family violence service for cis het young men aged 15–18, with deliberate focus on early intervention
 - partnering with specialist organisations delivering programs for young people experiencing sexual exploitation to understand drivers, the intersection with family violence, and effective responses.
- Systematically map the statewide footprint of children and youth-specific frontline practitioners across specialist family violence services, with a view to:
 - securing critical staff capacity and clinical knowledge in specialist family violence practice with children and young people
 - supporting senior practitioners with deep expertise in working with children and young people to share their knowledge and build capability

- fostering cross-pollination of expertise in clinical practice, service design, and policy development amongst allied sectors.
- Work with Aboriginal Community Controlled Organisations to scope and design an Aboriginal Child Protection Notification System, as recommended by the *Yoorrook for Justice* report, to reduce unnecessary removal of Aboriginal and Torres Strait Islander children and help reduce barriers for Aboriginal and Torres Strait Islander victim survivors in engaging with the justice and wider family violence systems.

Engage children and young people who have experienced family violence in developing early intervention, response and recovery initiatives

Working with children and young people in a family violence context is increasingly being recognised as a “specialism within a specialism”, as the needs of children and young people, what they consider good outcomes, and how services support their safety while balancing their autonomy and choice as victim survivors of family violence requires nuanced consideration. Children and young people need to be engaged in research, service design and evaluation and system design to ensure the family violence system is tailored to their needs.

Actions to include in the RAP:

- Encourage and fund a specific research agenda for the early intervention with and recovery of children and young people from family violence, with special consideration for:
 - building frontline practice capabilities to break the transgenerational cycle of family violence through trauma-informed, flexibly tailored, and multi-disciplinary response and early intervention efforts
 - ensuring an intersectional lens is applied to the systemic, organisational, and clinical levels to recognise and address multiple forms of oppression and disadvantage that exacerbate the experiences of gender inequality and family violence for children and young people, with particular attention to children and young people with disability and LGBTIQIA+ children and young people
 - adapting to the evolving challenges brought about by developments in the wider cultural, technological, and social context specific to children and young people.
- Utilise and continuously enhance platforms for partnering with children and young people with lived experience, highlighting their expertise in engaging with services and “surviving the system” as a vital source of knowledge and resource for advocacy.
- Ensure that the development of outcomes frameworks and the design of evaluation initiatives include children and young people with lived experience of family violence.

Priority 3 – Strengthen Support for Victim Survivors

Strengthening support for victim survivors and increasing victim survivor safety must be at the centre of this RAP. In addition to the sub-priorities listed in *Strong Foundations* under Priority Three: increasing access and inclusion, strengthening perpetrator accountability and upholding Aboriginal and Torres Strait Islander self-determination, we need a strong and sustainable family violence response sector and surrounding systems.

Despite the specialist family violence sector being under extensive pressure, nearly \$50 million within the family violence sector is due to lapse in June 2024. It is critical as part of this RAP that this lapsed funding continues and that the Victorian Government put a stop to ‘drip funding’ to ensure that services can make long-term strategic decisions about resourcing. We also need a strong, growing and healthy specialist workforce that people want to be a part of and can see clear, achievable pathways into. Once people are part of the specialist family violence workforce, we want them to have job security and be able to see a future for their career in our sector.

Everyone experiencing family violence should be able to access the support they need, when they need it. To this end, we need safer, inclusive and accessible services, as well as clear pathways into and through the family violence system that minimise how many times a victim survivor must tell their story. This requires a sustained investment in developing culturally safe and inclusive practice frameworks, an ongoing commitment to refining and streamlining intake and assessment processes and systems, and ensuring the MARAM framework continues to be implemented and embedded across the specialist and allied sectors to ensure that victim survivors receive a safe response if and when they disclose family violence risk, no matter where they present in the system.

The family violence sector does not operate in isolation. A strong sector is required to work with people using violence, as well as supporting systems and structures that can complement specialist family violence practice to achieve good outcomes for victim survivors. This includes victim survivors having access to safe and affordable housing, receiving good outcomes through the justice system, and being able to link victim survivors to other supports that can aid their journey and recovery, such as financial counselling and legal support, income security, access to employment, and access to therapeutic counselling.

To strengthen support for victim survivors of family violence, across all communities and ages, the following aspects should be included in the RAP.

Sustainable funding for the specialist family violence response sector

Approximately \$50 million in funding is due to lapse in the specialist family violence service system across case management services, family violence crisis brokerage and operational funding for refuges. This funding is essential to ensure the ongoing delivery of family violence

crisis responses to victim survivors in Victoria. Losing it will have a material impact on the specialist family violence sector's ability to support victim survivors.

Safe and Equal estimates that the equivalent of 95 case manager positions will be lost, 671 episodes of brokerage support will not be refunded, and 128 refuge workers could lose their jobs. This reduction in capacity in the family violence system comes at a time when victim survivors are already waiting too long to receive support because there are not enough case managers to meet demand, with a number of specialist family violence services using demand management strategies, such as triaging victim survivors based on risk, to manage waitlists.

While actions required to support the workforce are covered later in this submission, the pressure of wait lists and high caseloads, combined with poor job security and conditions is leading to high vacancy rates across the sector, exacerbating pressure on remaining case workers. In targeted family violence services¹ and Aboriginal Community Controlled Organisations, these pressures are further amplified by high rates of direct referrals, longer support periods, and acute shortages of staff and funding compared to community need.

Actions to include in the RAP:

- Make all uplift funding due to lapse for core case management service delivery, family violence crisis brokerage and core and cluster refuge permanent and ongoing.
- Provide longer-term funding commitments for services that put an end to 'drip funding' services and programs, to enable employment security, decrease workforce turnover, promote service continuity and align to the Victorian Government Community Services Fair Job Code which comes into effect on 1 August 2024.
- An increase in funding for targeted family violence services and specialist Aboriginal Community Controlled Organisations, to account for the added time and resources it takes these services to help clients who experience systemic marginalisation access support from structurally discriminatory institutions.

Workforce attraction, retention and development

Safe and Equal welcomed the Victorian Government's industry planning and focus on attraction and recruitment throughout the post-Royal Commission reforms. Workforce issues remain prevalent and enduring across all social services and have grown since the release of the Royal

¹ The Code of Practice for Specialist Family Violence Services defines 'targeted family violence services' as: "specialist family violence services or programs, either at the statewide or local level, that provide support for victim-survivors from specific communities." (p.19). The Victorian Government's *Everybody Matters Inclusion and Equity Statement* identifies targeted/priority communities as Aboriginal communities, culturally and linguistically diverse communities, faith communities, LGBTIQ communities, people with disability, people experiencing mental health issues, older people, women in or exiting prison or forensic institutions, people working in the sex industry, rural and regional communities, male victims, and young people aged 12 to 25.

Commission's report and recommendations. Many sectors are contending with workforce pipeline issues and are often competing for the same pool of recruits.

A key activity under this RAP will be the evaluation of Recommendation 209 and the mandatory minimum qualifications policy. Safe and Equal are supportive of equipping Victoria's specialist family violence practitioners with the support and resources to ensure victim survivors have access to high quality and culturally appropriate support. However, the introduction of mandatory minimum qualifications under Recommendation 209 has the potential to create barriers for many people who wish to work in the sector. This includes Aboriginal and Torres Strait Islander communities, migrants, LGBTIQ+ people and people living with disability, who are likely to be excluded from educational institutions due to racism and/or other systemic barriers. Individuals from these communities often have cultural knowledge, networks and expertise that would greatly benefit the sector and victim survivors. Therefore, we need to ensure there are diversified pathways into the workforce to strengthen workforce recruitment and retention.

A key foundation required to end family violence is ensuring Victoria has a strong family violence prevention and response workforce. Specific actions in primary prevention workforce development are included under Priority One. However, there is a need to consider commonalities and mutual support for the work being done by workforces in primary prevention, early intervention, response and recovery. Increasingly, we need practitioners to feel part of a family violence system that is integrated across the continuum. We also need our workforces to be filled with people who enjoy and feel supported in their jobs and can see a long-term career trajectory for themselves within the sector.

Actions to include in the RAP:

- Continued investment in workforce pipeline initiatives, workforce data and forecasting models. This should include a focus on earn-and-learn models and data that supports effective workforce planning, in addition to prioritising data integrity. To this end, government should consider Safe and Equal's role in ongoing data collection and fund a data function as part of Safe and Equal's core work.
- Maintain diversified pathways into the family violence workforce developed under Recommendation 209, including the Diploma of Community Services, to continue building workforce diversity.
- Fund targeted recruitment, professional development, and worker wellbeing initiatives for Aboriginal Community Controlled Organisations to support them to recruit, develop, and retain staff.
- Fund targeted recruitment, professional development and worker wellbeing initiatives to targeted family violence services to support them to recruit, develop, and retain staff.
- Continuation of funding for initiatives focused on improving health and wellbeing for the specialist prevention and response workforces as a priority.

- Provide an ongoing, indexed uplift to base funding for all specialist family violence services to enable organisations to provide staff with ongoing contracts and decrease workforce turnover and attrition.
- Undertake benchmarking to provide adequate remuneration and working conditions for the Victorian specialist family violence workforce.
- Recognise the impact and benefit of Safe and Equal's expanded functions in practice leadership, workforce and professional development by:
 - funding the continuation of Safe and Equal's leadership suite (Fast Track, Lead and Adapt and Leadership Network) through a sustainable subsidized model
 - resourcing Safe and Equal to continue to support implementation of key initiatives for the second rolling action plan of the 10-Year Industry Plan, including progressing workforce taxonomies and related resources for prevention and response
 - continuing funding for Safe and Equal to provide its statewide response workforce development programs (training, communities of practice, networks and resources) with a five-year funding commitment.

Increasing access and inclusion for victim survivors of family violence and improving service delivery

The Royal Commission's reforms and the resulting Victorian Government's implementation have raised awareness of, and access to, specialist family violence services. However, there are still gaps in accessibility and the inclusivity of family violence service delivery from intake to exit.

We welcome the focus on continuing to improve access for people who, for various reasons, do not access specialist family violence services, and on improving the quality of response for those who can access services. While not an exhaustive list, this RAP must address access for key minoritised communities including:

- victim survivors who live in regional and/or rural areas who have limited choices of service providers in their local areas, disproportionately low access to crisis accommodation and physically distant intake points
- victim survivors who experience structural oppression and who may face barriers to seeking support from family violence services, and/or are hesitant to engage with specialist family violence services for fear of child protection, migration authorities, police involvement or other forms of state involvement that may result in negative outcomes for them
- victim survivors who have been misidentified as perpetrators by the system, which are most often those who are marginalized
- children and young people fleeing family violence without a protective parent, particularly in the 15-18 age bracket

- victim survivors with a disability who may struggle to access the disability supports they need while engaging with family violence services
- people with experience in the sex industry and people who have experienced sexual exploitation
- victim survivors who are experiencing elder abuse, carer abuse or other forms of family violence that are not as well understood and responded to as intimate partner violence.

We know that victim survivors seek support not only from specialist family violence services but also from other parts of the community services sector. The MARAM framework provides a mechanism to ensure that victim survivors accessing a different part of the service system can still receive a safe response and/or referrals. In addition to strengthening inclusion and safety in the specialist family violence sector, MARAM needs to be well embedded across the community services system to ensure victim survivors have flexibility and choice in how they access support and can receive a safe response when they first disclose their experience.

Actions to include in the RAP:

- Increase funding for targeted family violence services and a commitment to multi-year funding agreements. This funding uplift needs to be commensurate with the additional intake and support work that these services do in response to higher levels of direct referrals, longer support periods for their clients, and high requests for secondary consultations. These services are critical as trusted providers and are often providing integrated support for mental health and other health needs.
- An increase to funding for Aboriginal Community Controlled Organisations, and a commitment to multi-year funding agreements to continue to support their holistic service delivery with Aboriginal and Torres Strait Islander clients; support self-determination under *Dhelk Dja*; and recognise the additional intake and support work that these services do in response to higher levels of direct referrals, longer support periods for their clients and high requests for secondary consultations.
- Increase the number of funded intake points for regional and/or rural areas, to support clients to be able to seek help in-person if they choose to and to respond to the increasing proportion of direct referrals services are receiving due to the 'no wrong door' approach. This will also support with large geographic catchment areas and improve access for people who live within these areas.
- Ongoing funding to embed MARAM across prescribed workforces to ensure that victim survivors of family violence can access a safe response, regardless of where they present in the system.
- Provide an uplift in funding for specialist family violence services to engage in partnership building and secondary consultation processes with allied workforces. These allied workforces should include (but not be limited to) alcohol and other drugs; mental health and disability services; settlement services; sexual assault services; and community-specific services such as targeted services and Aboriginal Community Controlled Organisations.

- Ensure there is ongoing, multi-year funding for the Disability Family Violence Crisis Response Initiative to continue supporting the immediate needs of victim survivors with disabilities in times of crisis.
- Expand the provision of Disability Practice Lead roles to every DFFH area, as they are currently only in eight DFFH areas; and ensure that their funding is ongoing so that any victim survivor with disabilities can have access to consistent and appropriate responses in their DFFH area.
- Evaluate the effectiveness of elder abuse services in The Orange Door, currently located in five areas, to build the evidence base for how to support victim survivors experiencing elder abuse and provide resources for COTA/Seniors Rights Victoria to work with the family violence sector to strengthen capability for responding to elder abuse.
- Support specialist family violence services to fulfil their role under *Dhelk Dja* as critical partners in delivering services to Aboriginal and Torres Strait Islander people experiencing family violence, by funding them to align to culturally safe and sensitive practice frameworks – both when considering client work and supporting Aboriginal and Torres Strait Islander practitioners within the sector. Recognising embedding practices and processes to support cultural responsiveness is an ongoing journey for all people and organisations – and while it will always be ongoing, it is particularly important for a sector with high turnover.
- Ongoingly fund Aboriginal Community Controlled Organisations to fulfil the expectations set out under MARAM regarding providing secondary consults and collaborative practice with specialist family violence services, to recognise the level of advocacy and capability building Aboriginal Community Controlled Organisations undertake to challenge systemic barriers experienced by Aboriginal and Torres Strait Islander people experiencing family violence.
- Provide funding to targeted family violence services to provide capability-building and secondary consultation in the specialist family violence sector, to support inclusive practice and cultural safety.
- Resourcing should be provided to specialist family violence services to support inclusion and cultural safety and responsiveness, both in their work with clients and internally in supporting diversity in their own workforces.
- Utilise the five-year MARAM review to strengthen the intersectional lens in the practice guidance and risk assessment and management tools and approaches, including appropriate assessments for older people, people with living with disabilities, and people experiencing substance coercion.

Improving specialist family violence intake processes

There has been an enormous amount of investment into rolling out The Orange Door (TOD) model across Victoria, which was intended to shift intake functions into TOD, with specialist family violence services focussing on providing longer-term case management support.

Five years into TOD rollout, specialist family violence services continue to receive significant numbers of direct referrals, reflecting a large portion of victim survivors who are choosing to engage directly with specialist family violence services. This is reflected in Safe and Equal's recent [Measuring Family Violence Demand and Capacity Report](#), which noted that 61 per cent of services reported accepting direct referrals.

We need to ensure that TOD's are working as envisioned: as a key intake point into the family violence system, while also supporting client choice, ensuring inclusion and accessibility, and ensuring that victim survivors receive a consistent and appropriate intake response, no matter where they choose to enter the system.

We also must improve our data collection and capability across the state to ensure we understand demand pressure points and how victim survivors are moving from intake to other forms of service delivery.

Actions to include in the RAP:

- Work with Safe and Equal and the family violence sector to streamline intake workflows across TOD locations, local family violence services and the statewide crisis service, Safe Steps, to facilitate timely access to family violence support for victim survivors and maximise the flow of contemporary risk relevant information across parts of the family violence system.
- Improve data collection capability across the sector, including data about TOD demand and service delivery, to better understand pressure points within current intake processes and service models and realign resourcing and funding accordingly (see more under Priority Five).
- Work with Safe and Equal and relevant organisations to develop a systemic approach to timely access to risk relevant information for serious/high risk cases through the L17 portal and Central Information Point, including a prioritisation matrix.
- Family Safety Victoria to review and synthesise evidence on how TOD is functioning as part of the family violence system, and work with the family violence, child and family services, perpetrator services, and sexual assault sectors to improve the practice and functionality of TOD.
- Provide adequate resourcing to specialist family violence services to modify their intake processes so they are responsive to people with disabilities, including resourcing for the rollout and evaluation of the Disability Responsive Intake Process (DRIP) that was created under the Designing Disability Responsive Intake Process Project (DDRIPP).

Accountability for people using violence

Safe and Equal welcomes the focus on accountability for people who use violence in *Strong Foundations*. We also welcomed Family Safety Victoria's focus on people who use violence in their family violence research agenda.

Further investment in evaluation and longitudinal research is critical for us to better understand what works in intervening and ending the use of violence, as well as what interventions can work in different communities (also discussed in Priority Five). We need to focus on diversifying interventions for people using violence, to reflect the diversity of needs and experiences and strengthen integration between specialist family violence services and services for people using violence.

Actions to include in the RAP:

- Resource and work with No to Violence and other relevant stakeholders to update and redevelop the Minimum Standards for Men's Behavioural Change Programs to include updated practice guidance for a diverse range of interventions, including one-on-one work and family safety advocacy; and develop a compliance framework for services.
- Invest and work with Safe and Equal, No to Violence, and the peaks' broader membership to collate and build upon the evidence base of effective perpetrator interventions and opportunities to strengthen integration across the sectors.
- Work with Safe and Equal, No to Violence, and their broader memberships to explore ways to increase integration between the victim survivor response sector and the people using violence intervention sector, including how family safety contact workers integrate with the victim survivor response sector.
- Develop targets for interventions for people using violence that capture and reflect the number of women/family members being supported, recognising that one person using violence may have several victim survivors attached to that case.
- Fund the roles of family safety contact officers (a.k.a. family safety advocates) within services for people using violence, according to the volume and depth of work done to support associated victim survivors. Funding interventions for people using violence must have commensurate funding to work with associated victim survivors/families.
- Invest and work with Safe and Equal, No to Violence, and their broader membership to continue to diversify interventions for people using violence and provide a minimum of five-year funding to establish and evaluate these initiatives.
- Fund targeted services and communities to continue to build an evidence base of barriers, enablers, and effective interventions, and develop a wider array of interventions that reflect the diversity of needs and experiences of people using violence, including those who are:
 - Aboriginal and Torres Strait Islander people

- part of the LGBTQIA+ communities
- fathers using violence
- from culturally specific communities
- young people either using violence in the home, perpetrating youth intimate partner violence, and/or using harmful sexual behaviour in a family violence context.

Address issues of misidentification of the predominate aggressor and create pathways for rectification

Safe and Equal welcomes the acknowledgement of the harm misidentification causes victim survivors, and asserts that prevention and rectification of misidentification must be prioritised to keep victim survivors safe and hold perpetrators to account. We know that Aboriginal and Torres Strait Islander victim survivors, alongside victim survivors from migrant and refugee communities and victim survivors with disability are more likely to be identified as the primary aggressor as a result of racism, ableism and discriminatory stereotypes of how a victim survivor should behave.

For victim survivors who are misidentified as the predominant aggressor and have children, being labelled as a person using violence can have disastrous consequences for families and a victim survivor's ability to keep their children in their care. This is a particularly salient and devastating issue for Aboriginal and Torres Strait Islander victim survivors, in the context of colonisation, the Stolen Generations, and the current vast over-representation of Aboriginal and Torres Strait Islander children and young people in care.

We need to implement system-wide reforms to ensure that misidentification is prevented, rectified when it does occur, and is measured systematically – so the scale of the problem, and where the most impactful changes can be made, are known.

Actions to include in the RAP:

- Bring Safe and Equal, Family Safety Victoria, Victoria Police, Courts, Child Protection, and other relevant sector stakeholders such as Aboriginal Community Controlled Organisations and representatives from other frequently misidentified communities together to devise an agreed whole-of-system misidentification reduction and rectification process, and update local manuals and guidelines accordingly; for example, the Victoria Police Manual on Family Violence, The Orange Door model and the Child Protection Manual), as per recommendation two of the Family Violence Reform Implementation Monitor's report *Accurate Identification of the Predominant Aggressor*.
- Review and update client data management systems and other relevant systems to be able to rectify misidentification in data systems, particularly child protection and Victoria Police records, to limit ongoing systems abuse as a result of misidentification (see more under Priority Four).

- Invest in building the capacity of the specialist family violence sector to identify misidentification and build processes for initiating system-wide rectification when misidentification has occurred, through MARAM practice guidance and training.
- Build data capability to capture instances of misidentification to better understand where and when it occurs, and for which communities, so initiatives to prevent misidentification occurring in the first place can be targeted and strengthened. These may include increased training for police but could also consider more frequent and consistent collaboration between Victoria Police and the specialist family violence sector, including expanded co-responder models.

Improving justice responses

The justice system plays an important role in keeping adult and child victim survivors safe and holding perpetrators to account. However, victim survivors can often experience the system working against them, with perpetrators taking advantages of gaps to perpetrate systems abuse. To mitigate these problems, relationships between the justice and broader family violence system need to be strengthened, with a view to embedding family violence expertise across the justice system to ensure that victim survivors receive a safe, fair and consistent response across the spectrum from Victoria Police to courts.

Actions to include in the RAP:

- Create a policy and/or governance mechanism to build relationships between the justice and broader family violence systems, to ensure there is a family violence lens across the justice system. The justice system, inclusive of Victoria Police, Magistrates and Children's Courts, should work with stakeholders, inclusive of peak bodies, on an 'involve' and 'consult' level of participation, as per the [Department of Justice and Community Safety's Engagement Framework for a just and safe Victoria](#).
- Expand the Alexis Family Violence Response model and continue evaluating the effectiveness of co-responder models to family violence-related police call-outs.
- Increase the transparency, accountability and oversight of police through a robust and independent system for effective oversight of police complaints and misconduct, as per the [Smart Justice for Women Policy Platform](#).
- Fund the legal assistance sector to a level that enables services to provide all victim survivors holistic legal support, as per the intent of the Specialist Family Violence Court legal practice model.
- Enable early intervention family violence legal support by funding community legal services to work in partnership, and/or to be co-located within family violence response services across the state.

- Invest in Aboriginal and Torres Strait Islander community-led initiatives that are aimed at reducing the over-representation of Aboriginal and Torres Strait Islander children and young people in the youth justice system, and the over-incarceration of Aboriginal and Torres Strait Islander women, as per the recommendations of the *Yoorrook for Justice* report, recognising that a significant majority of Aboriginal and Torres Strait Islander people involved with the justice system are, or have been, victim survivors of family violence.

Access to housing

We want everyone to be able to live safe and free from violence. A critical part of that for victim survivors is having access to safe and secure housing.

Victim survivors continue to remain in violent situations for fear of becoming homeless if they leave, and many victim survivors return to violent situations to avoid the risk of becoming homeless. Housing is therefore critical to early intervention in family violence, so victim survivors do not have to choose between living with violence or becoming homeless. The capacity for victim survivors to recover from family violence and move on with their lives after leaving is limited if they cannot find a safe and affordable place to live.

All adult and child victim survivors deserve to live in safe and affordable accommodation that is suitable for their needs, including immediate crisis accommodation and longer-term solutions, whether leaving or remaining in their own home. While we recognise recent commitments from the Victorian Government to increase access to affordable housing, these have not been sufficient to shift the structural barriers that prevent victim survivors from accessing housing. Initiatives included in the RAP will not be fully effective if victim survivors have to choose between homelessness or remaining in a family violence situation. This RAP must contribute towards increasing access to safe and affordable housing for all victim survivors.

Actions to include in the RAP:

- An immediate uplift to specialist family violence accommodation capacity, to ensure that at least 340 households can be supported in family violence accommodation on any given night and to reduce the reliance on motels.
- In collaboration with family violence, youth and housing services, develop and fund dedicated crisis accommodation for children and young people experiencing family violence, to keep children and young people out of motels, particularly unaccompanied young people affected by family violence.
- Dedicated family violence crisis accommodation that is accessible for people with a range of disabilities, as motels are particularly dangerous and unsuitable to the needs of victim survivors with disabilities.

- The development of at least 60,000 new social housing properties over the next ten years, to bring the amount of social housing as a proportion of all housing in Victoria up to the national average.
- Investment into initiatives that will enable and support victim survivors to remain safe in their own homes, including:
 - reducing the cost of housing in the rental market
 - increasing access to income and well-paid employment opportunities, so victim survivors can afford their rent or mortgage on one income
 - more access to legal assistance and financial counsellors, so victim survivors can remove perpetrators from leases and property titles and gain financial independence
 - initiatives that increase perpetrator accountability, so more victim survivors can feel that staying safe in their home is a viable option.

Invest and coordinate the development of early intervention initiatives

Under this RAP, we want to see increased early intervention support for victim survivors of family violence and for people using violence. Increased early intervention capacity will not only help avoid people entering family violence crisis but will also help mitigate the life impacts of family violence by helping victim survivors avoid homelessness and poverty, and limit the capacity of people using violence to enact systems abuse. Working with people using violence earlier can also help people take responsibility for their actions and address underlying causes of their use of violence to break intergenerational cycles of violence.

Current demand pressure has pushed the specialist family violence sector into almost exclusively working in family violence crisis, with very limited capacity to engage with victim survivors before their risk escalates, to provide early intervention support. Increasing the capacity of specialist family violence services to provide early intervention is a critical part of developing a coordinated early intervention system.

We urgently need a clearer picture across the state of specialist and integrated initiatives that constitute early intervention in the family violence context, to build on these in the future.

Building capacity within allied services is another critical enabler of early intervention into family violence. The implementation of MARAM is increasing capacity in allied sectors to screen and identify family violence, which is a very positive step. This increase has resulted in specialist family violence services reporting that the demand for secondary consultation from allied sectors is huge and currently beyond the capacity of the sector. Family violence capability within allied services and capacity to provide secondary consultation in specialist family violence services needs to be further strengthened and resourced to enhance a systemic early intervention response.

Inversely, allied services need to be resourced at a level that enables them to quickly engage with victim survivors who are referred to them by specialist family violence services. Many victim survivors would benefit substantially from being able to obtain legal and financial advice early in their journey to support them to plan and manage their safety. Currently, waitlists for these support services are long and not able to meet victim survivor need when first requested, which limits capacity to provide early intervention support.

Actions to include in the RAP:

- Establish a clear framework and actions to strengthen early intervention responses, building on current work being undertaken.
- Build linkages into the Early Intervention Investment Framework, with a focus on addressing housing including Safe at Home and providing comprehensive support for recovery for victim survivors as a means to avoid future cost and more complex need.
- Increase funding and availability of family violence financial counsellors, and support co-location and other collaborative models to support victim survivors to get early advice on financial risks of family violence and how to mitigate these.
- Increase funding and availability of community legal services that can provide support to victim survivors on a range of issues, including family law, child protection, civil and criminal matters.
- Increase funding and availability of programs and initiatives aimed at increasing access to education and well-paying employment opportunities for victim survivors, to help victim survivors achieve economic independence and wellbeing, and reduce gender income inequality.

Priority 4 – Respond to Change

Safe and Equal is supportive of a focus on responding to change across the family violence system. A range of social, economic and climate-related changes will impact our sector in accelerated ways in years to come. We need a family violence sector that can be responsive to this change and the corresponding evolution of family and gender-based violence.

Reliability of funding for core functions across the system is the best way to enable sector and system flexibility, innovation and adaptive practice, to meet changing needs and challenges. This must be supported through greater funding security, with additional programmatic funding to support a specific focus on key issues.

To create a sector that can respond to change, we believe the RAP must contain the following actions.

Support the sector to adapt to the influence of technology and to better utilise emerging and existing forms of technology

We are pleased to see a focus on strengthening prevention of, and responses to, technology-facilitated abuse; reducing the harms of violent pornography (particularly amongst young people); and leveraging technology to promote the reach of prevention messaging.

A range of programs and activities are currently underway across family violence primary prevention and response, sexual violence prevention and response, sexual health and health promotion, and gender equality sectors, as well as others working in services with a focus on youth and priority communities. A broad range of relevant research and interventions are also already funded in Victoria through the Department of Families, Fairness and Housing, Family Safety Victoria, the Department of Health, and nationally through the Department of Health, the Department of Social Services, Our Watch and the eSafety Commissioner. Further technological advances do not need to start from scratch but should build upon existing work.

Leveraging technology to improve service systems must also be a focus. It is important that any technological advance is integrated into wider existing systems and structures, such as (but not limited) to courts, family violence intake, and family violence risk assessment processes. The sector must be supported to collaborate on how to embed technology in existing systems and structures.

Technology can also potentially augment more conventional ways of accessing services, and options must be considered to create increased choice and flexibility for victim survivors. Technology can increase access for some people and create barriers for others. In considering options, people with lived experience from key communities should be consulted, including children and young people experiencing family violence, elderly victim survivors, newly arrived

migrant and refugee communities, people from regional and rural areas, and people with disability.

Actions to include in the RAP:

- Commission a review of relevant literature and existing interventions focused on preventing and responding to technology-facilitated abuse and using technology to improve the reach and impact of prevention, and bring stakeholders together to consolidate this evidence base and provide a platform for further innovation.
- Resource family and sexual violence services to come together to identify priority actions to inform further technological innovation in the service system and scale up existing innovation to create equity of access across different services and parts of the system.
- Provide targeted funding for prevention and response organisations to develop and integrate online interventions into existing work aimed at preventing or responding to family and gender-based violence.
- Support the specialist family violence and sexual assault sectors to work with people with lived experience from diverse backgrounds and communities to understand how shifts in the use of technology can either increase or decrease different groups and individuals ability to seek family violence and/or sexual assault support, and collaborate with these groups to design technological responses that enhance their experience of the service system.

Invest in a sexual violence strategy that addresses technological shifts that impact sexual violence

Safe and Equal commends the re-stated commitment to a Victorian sexual violence strategy to build on existing work being undertaken by the sexual assault sector and deliver funding and focus to ensure coordinated effort and impact.

We know that technology is increasing access to violent pornography and the prevalence of 'revenge porn,' image-based abuse and other forms of online abuse and sexual exploitation. These technological shifts are having an influence on the nature and prevalence of sexual violence in the community, and sexual violence within a family violence context.

The intersection between family violence and sexual violence remains an area that needs further understanding on how to better respond to victim survivors who have and are experiencing these types of violence. The government initially committed to the dedicated sexual violence strategy in 2022. We need a dedicated sexual violence strategy that will address sexual violence across the continuum, including in the context of family violence.

Actions to include in the RAP:

- Fund an up-to-date and comprehensive 10-year Victorian sexual violence strategy that will:

- encompass and address the continuum of sexual violence that survivors experience, in and outside of the family violence context, including (but not limited to) child sexual abuse, sexual harassment, image-based sexual abuse and online abuse
 - investigate strategies that address the criminalisation of survivors and disrupt the pathway that too often occurs between being a survivor of sexual violence and involvement with the criminal justice system as an offender
 - work with stakeholders to identify ways to improve experiences for survivors of sexual violence seeking justice, whether that be through civil, criminal or restorative justice processes, and resourcing for development of dedicated and ongoing 'Justice Navigator' roles
 - provide long-term funding for the specialist sexual assault sector and SASVic as the sector peak.
- Provide funding to work with SAS Vic and their members in the development of the 10-year Victorian sexual violence strategy. This sexual violence strategy should include links to experiences of sexual violence and sexual exploitation within a family violence context.

Review government policies and frameworks that can support the sector to adapt to society's increasing use of and reliance on information technology

A number of high-profile cyber security attacks across banks, telecommunications and courts has highlighted the need to ensure that client information is secure across community service sectors and services. Developing and maintaining secure and contemporary IT systems is expensive and often beyond the budget of smaller community service organisations. Equity of IT systems must be ensured across the service system.

The Family Violence and Child Information Sharing Schemes have greatly improved the family violence sector's ability to assess and mitigate family violence risk. However, these information sharing schemes are creating potentially unintended consequences for how client's personal information travels through the system – including information potentially being unnecessarily and inappropriately disclosed to child protection, the police and/or the courts. This increases the risk of systems abuse for victim survivors from overpoliced communities, or who may have a history of incarceration, experience in the sex industry, substance abuse or ill mental health, among other things.

As we move towards a greater reliance on information technology, a critical part of case managers' ability to work with clients ethically is their ability to help clients understand and navigate these information systems, so clients can give genuinely informed consent to their information being shared. To do this, practitioners need to know how the system works. This education and skills development must be resourced.

The impact of inappropriate information sharing can be particularly disastrous for victim survivors in cases when victim survivors are misidentified as a perpetrator of family violence. Under the Family Violence Information Sharing Scheme, perpetrators' information can be shared without their consent. This capability needs to be maintained; however, it means when a

victim survivor is misidentified, their information can be shared without their consent. Currently when this happens, there is no scope within current IT systems to remove this information as part of a rectification process for cases of misidentification. This scope needs to be built into current IT systems.

Actions to include in the RAP:

- Provide funding to specialist family violence services to ensure that client information systems are secure and protected against cyber security risk.
- Review information sharing legislation and relevant intersecting legislation to ensure that information and an individual's 'data footprint' is not inadvertently shared without a client's consent and that a client's right to privacy is upheld.
- Increase education for frontline practitioners and clients about how and where information may travel through the community services sector, to ensure clients can provide informed consent to their information being shared and practitioners can be confident in entering client information in a way that does not breach a client's right to privacy.
- Streamline data collection processes and improve IT systems across Victoria Police, Courts, Child Protection, and the specialist family violence sector, to ensure they can rectify records when misidentification occurs, and maintain data sovereignty for misidentified victim survivors.

Supporting victim survivors and the specialist family violence workforce during times of disaster

We are pleased to see a focus on increasing the specialist family violence sector's ability to respond to crises. However, a distinction needs to be made between 'crisis' and 'disaster' in the context of family violence. The frequency of family violence related deaths in Australia has been labelled a family violence 'crisis'. We are also living in the context of a housing and cost of living 'crisis.' These crisis environments are, unfortunately, becoming our new normal. Specialist family violence services, and all community services, need to be funded at a level that reflects the amount of demand for support services these crises generate.

The ability to respond to disaster and emergency events, such as bushfires, floods or pandemics, requires resourcing above the standard resourcing necessary to operate within ongoing crisis environments. This ability to scale up during disaster events requires adequate and reliable core funding for services, plus additional surge capacity so they are able to be flexible, innovative, and responsive at times of increased need. Surge capacity must be flexible and able to cover the cost of increased staff supports (recognising responding practitioners are often part of the disaster-affected community) and be used to meet the diverse needs of victim survivors, particularly those from marginalised communities, during disaster, post-disaster and during recovery.

We know that people from marginalised communities face particular challenges during disasters and a lack of targeted, accessible and/or culturally safe family violence services can have disproportionately negative impacts on victim survivors. Targeted statewide family violence services must also be additionally resourced to partner with local, disaster-affected family violence services, to ensure that victim survivors from marginalised communities do not fall through the gaps during times of disaster.

Research into the experiences of people affected by family violence post-disasters indicates that while family violence may immediately increase during and post-disasters, most people are not ready to engage in family violence support until other issues are addressed, such as finding housing and dealing with insurance claims. Family violence surge funding often tapers off around the time people feel they have capacity to address family violence, leaving communities without support when they are ready to seek it. This funding timing issue must be addressed.

Additional research and planning also needs to be undertaken to further understand and predict the gendered impacts of disaster, and the impacts on communities experiencing structural inequity and discrimination.

Actions to include in the RAP:

- Surge capacity to be built into funding structures for specialist family violence services that can be activated during times of disaster. This funding must be above and beyond core funding and include funding for targeted state-wide services to partner with local specialist family violence agencies to provide support to disaster affected victim survivors from marginalised communities.
- Ensure that long-term funding to support individuals and families experiencing family violence in disaster affected communities is provided to services, so they can work with people at a point in their disaster recovery when clients feel able to engage with specialist family violence services.
- Ensure the integration of gender and structural oppression in disaster planning statewide, and engage with the family violence, community and health sectors around what is needed to minimise and prevent harm in times of disaster.

Priority 5 – Understand and Demonstrate Our Impact

We strongly support a focus on data collection and analysis, evidence building and evaluation to understand and demonstrate impact.

The Family Violence Outcomes Framework (FVOF) provides a good basis from which to measure the success of the family violence reform. However, this framework currently lacks visibility and the connection with services and programs on the ground is not yet clear enough. To rectify this, Safe and Equal has recommended a range of measures to improve 'buy-in' and reporting, develop short- and medium-term measures, and ensure a synthesis of program evaluations are implemented. As a peak across the continuum, we look forward to the future improvement of this framework and its connection to the work of our members across the sector.

As part of reviewing the FVOF, there must be a focus on funding and developing data collection systems, and supporting research and evaluation that helps the sector to understand and demonstrate its impact across the continuum.

Safe and Equal commends the Victorian Government for the Family Violence Research Agenda to date. The funding attached to this research agenda has enabled the specialist family violence and allied sectors to develop research that speaks to contemporary and salient needs in our sector and the needs of victim survivors. This work should be continued and built upon.

Data collection, outcomes measurement and evaluation must have a strong focus on inclusion and improving outcomes for minoritised communities. Any data collection must be guided by principles of data sovereignty and be used to strengthen community-led initiatives, and not lead to increased surveillance and control of these minoritised and marginalised communities.

To better understand and demonstrate the impact of the family violence reforms and work across the continuum, the following actions need to be included in the RAP.

Strengthen work to measure the impact of primary prevention

Effective primary prevention requires long-term investment and the continuous delivery of comprehensive initiatives to achieve sustainable, large-scale change in attitudes to address the gendered drivers of violence. We know that particular attitudes and norms are associated with violence, so changing these will reduce violence. As Strong Foundations acknowledges, attitudes towards gender equality are shifting slowly in the right direction, but attitudes towards violence are slower to change. Some attitudes are more stubborn, and others are going backwards as a result of organised backlash and mistaken beliefs that equality has already been achieved.

We have evaluation data that tells us that programs are having an impact. But we haven't had the investment in primary prevention at a state or national level, or the time to deliver on the

full promise of primary prevention, to accelerate attitudinal change, and reduce and eventually end family and gender-based violence.

We need investment in evaluation that helps us tell the story of intermediate change and the social 'value' of this work – positive changes in attitudes, in happiness and better relationships, in healthier communities and organisations, in the reduction in everyday experiences of sexism and misogyny, in the willingness to take action to intervene, and in reducing the harm of backlash and resistance.

Actions to include in the RAP:

- Continue to invest in long-term monitoring and evaluation for all prevention funded programs, and establish regular sector forums to share reports, summaries and discuss evaluations of key investments, to ensure accountability, learning and sustainability.
- Resource the primary prevention sector to engage in the development of a clear and concise statewide monitoring, evaluation and learning (MEL) system that tells the story of impact of primary prevention work, drawing on evidence collected from within the prevention system. Resourcing for Aboriginal and Torres Strait Islander and community-led primary prevention programs and organisations to develop culturally safe and community-led MEL approaches should be prioritised.
- Establish a Primary Prevention Research Network to support engagement across government, researchers and research institutions, sector and community, to map and prioritise research, support translation in programs and policy, and assist in measuring impact.
- Commission research to establish the contemporary cost of family violence, along with the investment and workforce required to make meaningful change over time.

Invest in building data capability, data access and research for the specialist family violence response sector to respond to changing community need and monitor success

Despite the significant investment into the family violence reforms after the Royal Commission into Family Violence, we still do not have a clear data picture that can tell us if the family violence system is functioning better than before, or if victim survivors are having their needs better met.

Family violence services currently engage in an overwhelming amount of administration and reporting to reconcile funding. However, the data generated is not fit-for-purpose in measuring against desired outcomes, nor is it made available to services to use to improve service delivery.

To have the data picture we need, two aspects are required:

- 1) a clear outcomes framework that captures the outcomes victim survivors would like to achieve by engaging with family violence services
- 2) better data capability to gather data that can indicate if these outcomes are being achieved.

The FVOF is a positive start. However, outcomes measurement for family violence response services needs to be expanded from a purely systems level to include service and client-level outcomes. Helping clients achieve outcomes such as accessing housing is becoming increasingly outside family violence services' control, due to the systemic affordable housing and cost of living crises. Measuring family violence services' success against these types of outcomes consequently does not accurately or fairly capture their value. By contrast, highly personal and meaningful outcomes, such as a victim survivor understanding their level of risk more accurately, feeling heard, believed and respected, and having a greater hope and sense of agency for the future, are critical for a victim survivors recovery and wellbeing. These types of outcomes should be captured in a family violence outcomes framework alongside systemic indicators of success.

For the last several years, Safe and Equal has been building data capability within the sector, but much more needs to be done – this work needs to continue and increase. Complementary to this work, there continue to be opaque aspects of the system where systemic data collection and transparency needs to be enhanced, including (but not limited to) data from TOD and data on the misidentification of victim survivors as perpetrators of family violence.

Research into new and emerging areas of specialist family violence practice needs to be funded. Work with people using violence and work with children and young people experiencing family violence across multiple intersecting identities and experiences are areas of practice that remain highly nuanced and specialised. Continued investment in research into promising practice and the evaluation of emerging practice is necessary to continue improving responses to victim survivors of family violence and to reduce the use of violence.

Actions to include in the RAP:

- Support Safe and Equal, the family violence sector and survivor advocates to continue developing a family violence client outcomes framework to compliment the Family Violence Outcomes Framework. This framework should include outcomes specific to children and young people.
- Continue to work with Safe and Equal and the wider family violence sector to improve statewide family violence data collection, including exploring options to make current data and client information management systems (such as SHIP) more fit-for-purpose and able to collect data relevant to identified desired outcomes.
- In collaboration with community groups and targeted family violence services, build data capability to capture the experiences of children and young people and other

marginalised groups, who we know experience higher forms of family violence but are underrepresented in the specialist family violence service sector.

- Work with the family violence sector, the Commonwealth Government and the Australian Institute of Health and Welfare to upgrade information systems, to give services access to the data that they are generating through reporting requirements so services can analyse their own data and improve their service delivery.
- Provide greater access to de-identified regional service data to Family Violence Regional Integration Committees so they can better understand broader patterns and trends within their region and improve regional system responses.
- Based on improved data collection and analysis capability, continue to work with Safe and Equal and the wider sector to improve current funding and target structures, to better reflect the work of specialist family violence services and the needs of victim survivors.
- Work with the specialist family violence sector, Victoria police, courts, Aboriginal Community Controlled Organisations, and targeted family violence services who work with communities where misidentification is prevalent to implement an agreed systems approach to monitoring key indicators of misidentification over time, to ensure accountability and continuous system and services improvement.
- Regularly and consistently publicly publish The Orange Door data and outcomes of The Orange Door evaluations, to increase transparency of The Orange Door operations and support the sector to understand how service delivery can be improved for victim survivors.
- Continue to fund a Family Violence Research Agenda to support the sector to design and conduct research that meets identified sector and victim survivor need, including those of children and young people, and explores ways to improve work with people using violence.

Diversify ways lived experience expertise and feedback is incorporated into system and service design

The success of any system response is ultimately measured by the extent to which the people using the service systems in question feel they are being supported. We are supportive of *Strong Foundations* recognition of the importance of increasing opportunities for people with lived experience to improve the system.

Since the Royal Commission into Family Violence, concerted efforts to increase the voices of people with lived experience of family violence have been made, including the creation of the Victim Survivor Advisory Council (VSAC). Despite these successes, the experiences of people

with lived experience of family violence and those using the family violence system remain inconsistently represented and incorporated into policy, program and service design. This RAP needs to build upon work done so far to further strengthen the ways that people with lived experience of the family violence service system can contribute to system improvement.

Actions to include in the RAP:

- Resource Safe and Equal to continue embedding lived experience of the family violence system into system design and development through Safe and Equal's Expert by Experience Survivor Advocate Group.
- Increase the presence of children and young people's lived experience in service and system design and delivery to strengthen responses to children and young people. This could be done via working with the specialist family violence, youth and other relevant sectors to develop a children and young people engagement framework for family violence services.
- Resource front-line services to consistently embed lived experience voices in their service delivery, including (but not limited to) consistent client feedback mechanisms.

Enhance family violence system stewardship

Continuously striving to improve the family violence system will not end at the end *Victoria's 10-year plan for change*, or this third and final RAP.

The Family Violence Implementation Monitor performed a critical function in providing system level oversight and accountability for the family violence reforms. In the absence of the Family Violence Implementation Monitor, a new approach and mechanisms are required to ensure transparency and accountability at a systems level for how the family violence system is functioning.

Actions to include in the RAP:

- Create a regulatory requirement to publicly publish a range of data sets relevant to family violence outcomes, including data concerning TOD service delivery, Victoria Police and Crime Statistics Agency Data, hospital and other health related data, child protection data, family violence justice-related data, and specialist family violence service data.
- Consider how to continue with system stewardship mechanisms and functions for the family violence system that can provide high level insight and transparency into how different parts of the system are functioning, and where aspects of the system need to be adjusted to produce better outcomes for victim survivors. This includes recognising the key role Safe and Equal and other peaks play, and committing to an uplift to core funding.