

SAFE+EQUAL

Standing strong
against family
violence

SUBMISSION TO SOUTH

AUSTRALIA'S ROYAL COMMISSION

INTO FAMILY VIOLENCE

September 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 acknowledges 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.

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.

Our work prioritises the safety of all people experiencing, recovering from or at risk of family and gender-based violence. While we know that most family violence is perpetrated by men against women and children, we recognise that family violence impacts people across a diversity of gender identities, social and cultural contexts, and within various intimate, family and other relationships. We apply an intersectional feminist lens in our work to address the gendered drivers of violence, and how these overlap and intersect with additional forms of violence, oppression and inequality.

We believe in and work towards a world where people are not only safe and free from family and gender-based violence, but are respected for who they are and thriving in their lives.

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Introduction

We welcome the opportunity to make a submission to South Australia's Royal Commission into Family Violence.

The Victorian Royal Commission into Family Violence (VRCFV), and the subsequent reforms, have produced a significant shift in how our society and community service systems recognise and respond to family and gender-based violence, with every part of the family violence sector and broader service system across continuum affected in some way.

Eight years post the VRCFV handing down its report, the Victorian Government has stated the 227 Recommendations have been acquitted. However, many of the family violence reforms remain a work in progress and the true level of family violence experienced in our community continues to be unknown and under-reported.

The Victorian reforms have clearly demonstrated that improving outcomes for victim survivors of family violence and ending gender-based violence requires a long-term effort dedicated to dismantling the drivers of family violence and reshaping the sector and system to help victim survivors establish safety and recover from family violence so the effects of family violence across our community are reduced and not passed on to future generations.

This submission is focused on the learnings from the Victorian experience and noting this for consideration by the South Australian commission, government and family violence sector, from the perspective of the Victorian specialist family violence sector including prevention practitioners.

This submission is structured in two parts. The first section discusses what we consider have been the most instrumental enablers of success in the family violence reform. While aspects of the enablers have not been without challenges, we consider them to be positive developments that we recommend other jurisdictions consider whether and how these could be successfully applied within their specific contexts.

The second section of this submission discusses parts of the reform that have been less successful. We believe the Victorian experience can provide some valuable learning that could help other jurisdictions avoid similar challenges.

Instrumental Enablers

Multi Agency Risk Assessment Management (MARAM) Framework

The development of the MARAM Framework¹ has been a core enabler of the Victorian family violence reforms. It is a family violence, systemwide response that establishes the architecture for shared responsibility and accountability mechanisms for responding to family violence risk across multiple workforces. In order to support a cohesive and consistent system-wide response to family violence, the legislative instrument² describes:

- The four pillars
 - Shared understanding of Family Violence
 - Consistent and Collaborative Practice
 - Responsibilities for Risk Assessment and Management
 - Systems Outcomes and Continuous Improvement
- Requirement for alignment
- The guiding principles
- Responsibilities for practice
- Evidence-based risk factors

Critically, MARAM is embedded in policy and legislation which requires prescribed organisations to progressively align their policies, procedures, practice and tools with the framework. The legislative responsibilities for compliance with the MARAM framework were rolled out progressively, commencing with the specialist family violence and related workforces and over time included the broader service sector, including health and education.

The MARAM framework provides structured guidance for the service sectors, from organisational governance to individual practitioner practice guidance. It clearly outlines the different expectations for organisations and workforces in responding to family violence, within the differing core responsibilities of workplaces and roles.

The dynamic nature of community services workforces, including new staff entering the workforce, means that it has proven essential to support the MARAM framework with ongoing education and training. Ongoing implementation also requires other tools to support alignment at the organisational and practitioner level including policy support roles located in peak bodies/ government departments, communities of practice and tailored resources to ensure consistency of application across and between sectors.

¹ MARAM Framework on a page. (n.d.). Available at: https://www.vgls.vic.gov.au/client/en_AU/search/asset/1304288/0 [Accessed 12 Sep. 2024].

² Victoria Government Gazette. (n.d.). Available at: <https://www.gazette.vic.gov.au/gazette/Gazettes2018/GG2018S445.pdf> [Accessed 12 Sep. 2024].

The family violence workforce alone cannot identify, manage and mitigate all family violence risk. As Michaela Cronin, Commissioner for Domestic, Family and Sexual Violence identified in her First Annual Report to Parliament³ the national specialist family violence workforce is less than 9000, in comparison to:

- the national police workforce (nearly 80 000);
- over 115 000 medical professionals; and
- nearly 690 000 allied health workers.

The establishment of a robust legislated risk assessment and management framework continues to provide unprecedented clarity and consistency for responding to family violence risk, across a range of service systems and associated workforces.

Information Sharing

Information sharing has also been a critical enabler of the family violence reforms. The VRCFV found that information sharing about family violence risk within and between organisations is crucial to keeping victim survivors safe and consequently, made a number of key recommendations⁴ related to information sharing.

In response to these recommendations the Victorian Government developed the Family Violence Information Sharing Schemes:

- The Family Violence Information Scheme (FVISS)
- The Child Information Sharing Scheme (CISS)

Critically, the information sharing schemes are also legislated through amendments to the Family Violence Protection Act 2008 and Victorian privacy legislation, requiring prescribed sectors to align.

The FVISS provides a framework for sharing information related to family violence risk and is specifically designed to:

- Keep perpetrators in view and accountable
- Promote the safety of victim survivors of family violence

The Information Sharing Schemes (Schemes) do not override existing legislation such as privacy or child protection legislation, but they do allow, and in some cases require, information to be shared to reduce serious threat to someone's life, health, safety or welfare. Organisations

³ Domestic, Family and Sexual Violence Commission (2024) Yearly Report to Parliament, Domestic, Family and Sexual Violence Commission, Australian Government

⁴ Theall, M. and Keller, J.M. (2017). Royal Commission into Family Violence: Summary and Recommendations. New Directions for Teaching and Learning, [online] 2017(152), pp.109–112. doi:<https://doi.org/10.1002/tl.20273>.

that are prescribed under MARAM are required to respond to requests to share information relevant to assessing and manage a victim survivor's safety or wellbeing (CISS only).

The Schemes have been essential in the effective operation of programs such as Risk Assessment and Management Panels (RAMPs), where multiple agencies meet to assess the risk to people at high risk of serious harm from family violence, where that risk cannot adequately be managed within the usual service system.

As client confidentiality has long been a cornerstone of professional practice in many professions, information sharing has been challenging to implement in practice. In addition, the assistance seeking of victim survivors compared to perpetrators means that organisations often hold significantly more information about victim survivors than perpetrators. As with the MARAM framework, a broad range of strategies are required to support implementation to ensure information sharing remains focused on increasing visibility of, and accountability for, perpetrators and manages victim survivor safety while protecting their privacy. This is especially important for the Schemes, where client information is being shared not only between organisations, but between organisations in different sectors.

Central Information Point

The authorising environment provided by the Schemes and the shared understanding of family violence promoted by MARAM has enabled 370,000 workers across more than 6,000 organisations and multiple service sectors to participate systematically in the production and dissemination of family violence risk-relevant information. Either shared on request or proactively under FVISS, data from these different organisations and workforces inform the day-to-day work of managing risks faced by victim survivors and keeping perpetrators in view.

The Central Information Point (CIP) has contributed significantly to compiling and sharing risk related data in a timely manner, by pulling together extensive data from statutory agencies as Child Protection, Victoria Police, Corrections, Magistrates' Court of Victoria (MCV), the Department of Families, Fairness and Housing (DFFH), and the courts. To date access to the CIP reports is limited to practitioners working at The Orange Door (TOD), although there are calls to broaden access to practitioners in other settings.

While the CIP has been a positive development, more needs to be done to maximise the potential of the Schemes, specifically on the frontline of direct service provision. Currently, the CIP team and frontline services operate with limited resources and rely on manual data extraction and processing. This can be extremely time-consuming and delays provision of crucial family violence risk assessment and management information to services.

To maximise the impact of the CIP, there needs to be investment in automation so data from different sources can be collated and then analysed for risk. Frontline services also need to be supported to make sense of the data. Currently, even when the wider service systems have been able to gather large volumes of potentially useful information, frontline practitioners are

responsible for ‘connecting the dots’ of patterns of behaviour by perpetrators, which is vitally important for managing family violence risk.

Increased resourcing for family violence

The increase in resourcing for frontline specialist family violence services in Victoria has been critical for victim survivors. Increased funding since the VRCFV has improved access to risk assessment and intake, case management, and post-crisis therapeutic responses. The value of this increased resourcing cannot be underestimated, noting that increasing demand has continued to rise during the implementation phase of the reforms resulting in demand outpacing increased resourcing.

In addition to funding for services to increase access to family violence risk assessment, safety planning and case management, funding for client brokerage has also been significantly increased. The ability that brokerage funding has created for the service system to tailor support to individual client need has been a significant and positive reform outcome.

The brokerage initiatives include the expansion of the Personal Safety Initiative, (PSI) Family Violence Crisis Brokerage (FVCB), and Flexible Support Packages (FSP). They have been useful tools and resources to manage risk and increase safety and recovery for victim survivors.

The 2022 report “The Choice: Violence or Poverty”⁵ notes that according to the 2016 Personal Safety Survey, 15 per cent of the women who reported they left their violent partner returned because they had no money and nowhere to go.

The PSI program was developed to support victim survivors to remain safely in their homes, through the implementation of security responses, supported by brokerage funding. Victim survivors can be referred for a professional safety and security assessment of the home, which then identifies appropriate security measures that can be installed. This may include security doors, CCTV, technology sweeps of devices, bug sweeps of homes and cars, dash cameras, additional locks, and personal safety devices. Brokerage to fund the installation of these security items can be provided through the FSP program.

FVCB supports victim survivors by providing immediate, flexible, person-centred support during a crisis. This is primarily used to address the victim-survivors’ immediate needs, such as food, clothing, medication and accommodation.

FSP can be used for longer term support needs, such as assistance with bond and rent, uniforms or other requirements needed to keep children in school or social activities, funds to continue or engage in study or even start-up expenses involved with establishing a home business. These funds support the family’s longer-term recovery goals.

⁵ Summers, Anne (2022) *The Choice: Violence or Poverty – Domestic violence and its consequences in Australia today*. <https://www.violenceorpoverty.com/>.

The establishment and/or expansion of specialist family violence response in critical parts of the service system

The VRCFV identified several instances of best practice in responding to family violence across the wider family violence system. These aspects of the system have since been expanded more fully across the state and built upon.

The Risk Assessment and Management Panels (RAMPs) have performed a unique and vital function in integrating information, personnel, and other resources across agencies and service systems to manage and mitigate the most serious, imminent, and high-risk family violence cases, including intimate partner homicide, and suicide. The establishment of RAMPs in 2016 and statewide rollout since the VRCFV have created a much-needed comprehensive and collaborative platform to tackle the most serious, complex and dynamic family violence presentations.

The expansion of Family Violence Command at Victoria Police (VicPol) has improved the agency's institutional capacity in understanding, investigating, and responding to family violence. Family Violence Investigation Units (FVIUs) have been trained and mobilised to be the home of specialist family violence expertise, building on the training enhancements delivered by the newly established Family Violence Centre of Learning.

Specialist Family Violence Courts (SFVCs) have been established in 13 locations across the state. SFVCs bring family violence-related matters into one court before a Magistrate with family violence specific training and expertise. Although sufficient resourcing for legal support services continues to be a challenge, the model is intended to provide wrap-around support responses for victim survivors of family violence, as well as to initiate legal and behaviour change interventions for perpetrators. Each SFVC has a specialist Family Violence Registrar responsible for coordinating the listing of matters and ensuring these are heard in a timely manner. Specialist applicant (victim survivor) and respondent (perpetrator) practitioners provide bespoke non-legal advice and support, including risk assessments, safety plans, and onward referrals to other services. The physical layout of SFVCs also help ensure a safer environment for clients through separate entrances, safe waiting areas, remote witness technology and private interview rooms.

Expanding family violence core and cluster refuges

Prior to the VRCFV, the majority of family violence refuges in Victoria were communal. The VRCFV heard extensive evidence about the inaccessibility of these refuges for many victim survivors, including those with disabilities, victim survivors from different cultural backgrounds, those with several children, victim survivors with substance use or mental health issues and those from the LGBTIQ community, particularly trans women.

At the time of the VRCFV, several refuges already operated in what is now known as a 'core and cluster model' which allowed each victim-survivor household to have their own private, self-

contained unit but also had support onsite for victim survivors to access. This model was identified as best practice and all family violence refuges in Victoria have since been converted, or are in the process of being converted, to a core and cluster model.

The conversion of communal refuges to core and cluster refuges has not substantially increased the number of households able to be accommodated in family violence refuge across the system. Due to the limited capacity within the refuge system compared to the number of victim survivors reaching out for support for family violence, it can still be challenging for victim survivors to access a refuge. The move to core and cluster refuges has meant that diverse victim survivors can access family violence refuge, meaning that victim survivors who are often systemically marginalised are not facing additional barriers to access family violence refuge in an already resource constrained environment.

Engaging Victim Survivors

Partnering with people with lived experience of family violence and service system engagement is essential to ensuring our work and decisions are informed by the best available evidence, and is imperative for the system's credibility, impact and accountability to victim survivors. Ensuring the voice of lived experience is embedded in the reforms from the beginning is essential in keeping the goal of the reforms – ensuring that victim survivors are safer and that perpetrators are held to account for their use of violence – front of mind. We consider the efforts to embed lived experience in the family violence reform to be a strength of the Victorian reforms.

The establishment of the Victim Survivor Advisory Council (VSAC) within the Victorian Government was a flagship of the Victorian reforms and continues to be an important and visible engagement mechanism for the family violence system that has embedded the voice of lived experience at the governmental level. VSAC is only one mechanism and is not accessible to other parts of the family violence system, which would all benefit from meaningful engagement with lived experience.

Embedding lived experience throughout service system governance, design and delivery would be further strengthened if it was supported and resourced across all levels of the system. Specialist family violence services remain under-resourced to engage survivor advocates in planning and quality improvement efforts, which requires skilled coordination and support as well as appropriate compensation. Several organisations have established victim survivor advisory groups, including the Expert Advisory Panel at Safe and Equal, however these groups are typically under-resourced, if they receive any external funding at all. As a result, victim survivor engagement at a service level remains limited and ad hoc.

Lived experience can be engaged to inform system design through a range of avenues, as highlighted in our 2022 issues paper *Sources of Lived Experience in the Family Violence*

Sector⁶. A high proportion of the family violence workforce has lived experience of family violence. The combination of lived experience and system expertise could be better drawn up to improve system design in conjunction with the expertise from victim survivors and survivor advocates.

The lived experience of clients, or service users, is a valuable asset for services to learn from and helps paint a collective picture of many different experiences and journeys through the system. Client voice is a distinct form of lived experience engagement, alongside lived experience in the workforce and engagement with survivor advocates – people who apply lived experience to formal activities to influence policy development, service planning and practice, and contribute to broader systems reform, social change and community awareness. Engaging survivor advocates in projects of any scope and size can have significant and invaluable impact and can contribute to the identification of systemic gaps and service improvements.

In addition to considering the establishment of a victim survivor advocacy mechanism for government, we suggest that resourcing services to meaningfully and sustainably structure lived experience into their own service design, delivery and evaluation mechanisms be considered.

Investment in Primary Prevention

Victoria has a proud history of community-level primary prevention activity and activism. Since the VRCFV delivered its report in 2016, this history has been built upon and primary prevention has become further established through dedicated funding and policy frameworks, and integrated government action plans across prevention and response.

Significant investment was made in primary prevention programs run by Women's Health Services, as well as Respectful Relationships Education in schools, work being driven by local councils and primary prevention activity in local sporting clubs. Primary prevention work being led by and for specific communities has also grown, including Aboriginal community-led work, work in multicultural and faith communities, the LGBTIQ+ community and among people with disabilities. These programs have been, and continue to be vital, in addressing the complex drivers of family and gender-based violence.

As part of the increased focus on primary prevention, the diversity, breadth and depth of the primary prevention workforce in Victoria has also begun to be better understood and recognised. As a result, a better understanding of the common skills, capabilities and supports that this distinct specialist workforce needs to be as effective as possible has emerged. This is incredibly important as many family violence response and community-based organisations have historically self-funded primary prevention work, knowing that this work is critical if family

⁶ Wark, A (2022) Sources of lived experience in the family violence sector: Issues Paper. Safe and Equal. https://safeandequal.org.au/wp-content/uploads/PAP_Sources-of-Lived-Experience-Issues-Paper_FINAL.pdf

violence is ever to be eradicated. However, the lack of systemic funding and support for the workforce has left individual workers isolated and unable to coordinate activity to achieve maximum impact.

Challenges in the Victorian context

Working in partnership with the specialist family violence sector and building on existing system infrastructure

The reforms were an incredibly complex, once-in-a-generation opportunity to reshape how the family violence sector and wider system responds to victim survivors and holds perpetrators to account for their use of violence. The commitment from the Victorian Government to implement the recommendations was expressed at all levels of government, as was the commitment to partner with the family violence sector. However, the degree to which the Victorian Government has partnered with the family violence sector in the design and implementation of the reforms has varied over time and across different aspects of the reforms.

Successful examples of how the Victorian Government has engaged with the sector as a partner is through embedding Safe and Equal as the family violence peak in the governance structures of the reform and the Victorian Family Violence Research Agenda and associated research grants which gave priority to sector and victim survivor-led research that was directly relevant to frontline practice.

The first report from the Family Violence Reform Implementation Monitor (FVRIM)⁷ speaks extensively about the pace of initial reforms and the failure to take the time to fully plan a systemic approach to sequencing the reform for maximal effectiveness, in favour of focusing on acquitting individual recommendations.

The FVRIM report reflects our experience as the peak body and that of our members. While the sector was engaged in the design of the reforms through various mechanisms and some resources were provided to enable services to engage, much of the early reform design and decisions were made within government, in part due to the sheer scale of the reform and the need to have whole of government buy in. As a result, the specialist family violence sector and relevant peaks were often consulted late in the design process and there was little transparency about how much influence the sector had or how the information they provided was used.

⁷ Report of the Family Violence Reform Implementation Monitor (2017) <https://tinyurl.com/yrt636zf>

This was a missed opportunity to draw deeply from the significant expertise within the specialist sector, to build on existing sector infrastructure and expand established ways of working within and between agencies that demonstrated best practice.

Significant time and investment was directed into establishing new system functions and pathways including a new intake point. There has been some positive service innovation from these initiatives however overall, a new intake point has been one of the most complex and challenging elements of the Victorian family violence reforms.

We strongly encourage the South Australian Government to invest significantly and directly into the specialist family violence sector in the state and work with the individuals and services who have been doing this work for a long time. Any redesign of a family violence system requires a considered, stepped approach that allows services to test how changes to the system manifest on the ground to ensure the intent of the reforms are realised. Any resourcing to engage and drive this redesign needs to be in addition to increased resources provided for frontline service delivery.

Specialisation

Family violence primary prevention, early intervention, response and recovery are all areas of specialist expertise. Broadening the scope of family violence recognition and awareness so that it becomes “everyone’s business” should not detract from the importance of maintaining specialist family violence roles and functions across the spectrum from primary prevention, early intervention, crisis response and post-response recovery. The system needs to be specialist informed and efforts to improve awareness and “family violence literacy” should highlight the complementary expertise, knowledge, and skills of family violence specialists working alongside allied/adjacent workforces.

The MARAM Collaborative Practice training⁸ and models of multidisciplinary practice and co-location offer good examples of how specialist expertise within different parts of the community services sector can be drawn upon to strengthen collaborative practice and deliver holistic, wrap around responses to victim survivors.⁹ By contrast, our members have consistently reported that attempts to create integrated workforces that work across, rather than recognise, specialisations has created significant confusion for practitioners, by diluting specialisation.

The evolving family violence knowledge base – which has accumulated over several decades from the lived experience and insights of victim survivors and frontline workers supporting them – holds a unique value-add to policy, systems, and practice development in government-initiated efforts to build and refine service systems, from housing and welfare provision to law

⁸ <https://www.vic.gov.au/training-for-information-sharing-and-maram>

⁹ Safe and Equal, Centre for Excellence in Child and Family Welfare, No to Violence, Sexual Assault Services Victoria (August 2023) *Multidisciplinary/Integrated Practice Research Project*. Unpublished manuscript.

enforcement. Concretely, valuing specialisation requires that policy processes are amenable to meaningful participation of lived experience advocates, family violence specialist researchers, frontline agencies and practitioners, as well as the peak body organisations that perform a core function in synthesising these policy inputs.

Minimum qualifications for the family violence workforce

The VRCFV recommended that minimum qualifications be introduced for the Victorian family violence workforce. While the principle of ensuring that the specialist family violence workforce is highly qualified is commendable, this can have unintended consequences.

A sole focus on qualifications, rather than the skills and knowledge required to undertake the required roles can unnecessarily excluded people from the workforce, particularly people who face structural barriers to engaging in higher education, such as people from migrant and refugee communities, Aboriginal people, and people with a disability and undermine efforts to diversify the workforce to more accurately reflect the range of clients seeking services.

Services have also reported that the need to hire people with minimum qualifications, or equivalent, has compounded workforce shortages and made recruitment more challenging. The onus on services to demonstrate that staff have equivalent qualifications has proven time consuming and administratively burdensome. Finally, the financial and time burden of obtaining a university degree (the minimum qualification required) compared to the pay, conditions and job security offered in the family violence sector can impact the attractiveness of working in the sector.

Increasing the skills and capability of the workforce should be a priority for any family violence reform. Minimum qualifications are only part of that puzzle and need to be considered alongside a range of other initiatives that support building a diverse workforce.

Sequencing of reforms

As with any major reform, the sequencing of the reforms needs to be carefully considered, planned and implemented. This is very challenging in an environment where there are many areas to address, and multiple actions that could be implemented.

One of the largest sequencing challenges of the Victorian family violence reforms was workforce planning. A significant financial investment was made into frontline specialist family violence services to respond to the increasing demand for family violence support. However, frontline services quickly discovered that the workforce to recruit simply did not exist.

The Victorian Government has also invested strongly in recruitment and training initiatives to build the family violence workforce. It is important to have a planned, deliberate, and strategic approach to recruiting, developing, and supporting the specialist workforce across the spectrum of the family violence continuum from primary prevention to recovery to ensure a

timely, effective response to victim survivors and a broader system to prevent violence in the first place.

Governments and services must engage with universities, TAFEs, and professional accreditation bodies in collaborative planning, curriculum design, and workforce strategy development to build a sustainable workforce pipeline that can adequately respond to increasing service demand. Particular attention needs to be given to developing the workforce required to respond to and support children and young people, to provide them with a suitable, tailored response addressing their own needs as victims' survivors, not as an extension of their parents.

Workforce planning also needs to integrate ongoing workforce supports such as access to training, clinical supervision, family violence informed EAP services and flexible working options to mitigate the effects of vicarious trauma as well as chronic burnout, as well as strategies to encourage wider participation of men in the specialist family violence workforce.

Thought also needs to be given to the sequencing of legislation, regulatory frameworks, practice implications, necessary training and practice guidance and the workforce required to align to the reforms, including support staff, trainers, policy writers, and human resources, quality assurance and governance professionals. Prior to new legislation becoming law it is essential that the legislation and its implications are understood by Government and organisations, that practice guidelines have been written into policies and procedures, and that there are staff available who understand the legislation and are able to train others in its application to day-to-day practice. As an example, in Victoria, MARAM legislation came into effect before the full suite of practice guidance and tools had been developed, resulting in partial implementation approaches while additional guidance is developed.

Another consideration is the impact of change fatigue on the workforce. Constant change in the realm of a small and potentially growing workforce can cause disillusion, stress and burnout, resulting in the loss of the very workers required to implement the reforms.

System change required to respond to children and young people

It has become widely accepted that children and young people are 'victim survivors of family violence in their own right.' However, there is not a common understanding of what this means in practice, children and young people are inconsistently counted and recorded in service targets, and family violence services have received little to no additional funding to work with children and young people as distinct clients. Consequently, there remain very few services specifically tailored to support them.

There is a need for tailored response-orientated case management services for children and young people, as well as therapeutic and recovery-based services, to help them understand and move on from what they have seen and experienced. Specifically, there needs to be case management support and housing responses for children and young people who have had to leave the family home to support their own safety. Otherwise, children and young people will

continue to fall through the cracks in the service systems, and opportunities to break the intergenerational transmission of family violence will continue to be missed.

Recent research is showing that existing service models are not relevant or easily accessible to young people, so whether as victim survivors or perpetrators of family violence, they are largely invisible to service systems unless they experience serious risk. Family violence informed programs need to be embedded in service settings where young people are more likely to engage.

In addition, specialist family violence services need to be supported to develop a service model specific to children and young people that is funded. Further, frontline service models such as Young Luv that focus on young people's experience of dating and romantic relationships and draw from lessons learned in primary prevention initiatives such as Respectful Relationships Education and early intervention initiatives that focus on preventing intergenerational transmission of family violence must be expanded.

Intersections with related systems

The VRCFV took a whole-of-system approach to family violence reform, recognising that people working in multiple sections of the service sector come into contact with victim survivors of family violence. This was a positive aspect of the reforms, however even with investment in related sectors to increase family violence capability through reforms such as MARAM, capacity limitations in adjacent sectors have limited specialist family violence services' ability to provide timely, holistic wrap around support to victim survivors. The impacts of limited capacity in adjacent sectors is evident across the board, from mental health to alcohol and other drugs, we want to draw particular attention to the below sectors.

Sexual Assault Sector

The sexual assault sector has considerable overlap with the specialist family violence sector. The Australian Child Maltreatment Study¹⁰ found that 39.6% of Australian children experienced exposure to family violence, and 28.5% of children experienced sexual abuse. Overall, more than 1 in 3 girls and nearly 1 in 5 boys experience childhood sexual abuse. While the sexual assault service sector has been included in the MARAM framework, they have not benefited from the level of additional funding for frontline services that has been provided to the family violence sector.

¹⁰ The Australian Child Maltreatment Study (ACMS). (n.d.). *Findings*. [online] Available at: <https://www.acms.au/findings/>.

As Sexual Assault Services Victoria stated in their submission to the Family Violence Reform Rolling Action Plan 2024–26, “sexual violence against adults and children is a common, though often overlooked or under-addressed component of family violence.”¹¹

The report also points out that there is not a dedicated sexual violence strategy and that subsuming sexual violence under family violence overlooks the significance of sexual violence as a specific form of violence, as well as the specialist expertise of the sexual assault services workforce.

Justice Sector

Misidentification remains an ongoing issue in systems. Misidentification is still much too common, and it is extremely difficult to rectify misidentification across police, court, child protection and other services’ records once it has occurred.

The court system also remains challenging to navigate, confusing, intimidating and confrontational for victim survivors. Lack of communication between state-based Magistrate’s Courts and the Federal Circuit and Family Court of Australia (FCFCOA) continues and can significantly disadvantage victim survivors of family violence, through information about intervention orders, breaches and family violence matters not being presented to, or considered by, FCFCOA. This frequently results in parenting orders that the protective parent does not feel are safe, forcing a choice to either compromise their children’s safety or breach the parenting order.

Justice system responses could be strengthened through increasing capacity in the Women’s and Community Legal Sectors to provide all victim survivors with legal support including mitigating the impacts of misidentification and other forms of systems abuse. For example, in Victoria the SFVC’s have been established across the state, however community legal services have not been resourced to deliver the model as originally conceived.

Access to legal support at multiple stages of a victim-survivor’s journey is a critical early intervention, response and recovery strategy that can greatly minimise the long-term effects of family violence. It is critical that funding for these services is included in any family violence reforms to make the system more family violence informed and build in mechanisms to identify cases of misidentification as quickly as possible.

Housing Sector

Access to safe, appropriate housing, whether remaining in their own home or seeking alternative accommodation, is a significant protective factor for victim survivors experiencing family violence.

¹¹ SAS Vic (2024) Submission to the Family Violence Reform Rolling Action Plan 2024 –2026.
<https://tinyurl.com/4jzuvwk6>

Lack of access to crisis accommodation and lack of long-term affordable housing are two of the many barriers faced by victim survivors trying to leave family violence situations and be safe. The lack of appropriate, affordable housing options means that there are no pathways for victim survivors in crisis accommodation to transition into safe housing. This results in people staying in crisis accommodation far longer than they would if suitable accommodation was available, limiting crisis options for other victim survivors experiencing family violence, placing considerable financial strain on family violence service providers and, most importantly, delaying the recovery of victim survivors.

Due to the lack of appropriate crisis accommodation many victim survivors are being placed in motels. Motels are not fit-for-purpose for crisis accommodation, and usually have limited facilities and access to specialist family violence support. This increases the chances of a victim survivor returning to the perpetrator rather than the ongoing uncertainty of being in time-limited crisis accommodation with the risk of becoming homeless.

The lack of access to long-term, affordable and sustainable housing options has frequently been cited by frontline services providers and advocates as a critical intersecting barrier that is impacting the family violence reforms' ability to improve outcomes of victim survivors. Failure to address the housing affordability crisis, will impede the success of any family violence reform.

Investment across the continuum: Prevention, early intervention and recovery

The family violence system in Victoria, as elsewhere in the country, is underpinned by an evidence-based, public health approach to family violence that stresses the importance of responses to family and gender-based violence across the continuum from primary prevention through to early intervention, response and recovery. An enormous amount of resourcing has been invested in response services, which continues to be needed. Less resourcing has been made available across the continuum.

We know that to end family violence, we need significant investment across all stages of the continuum. While investment in key primary prevention programs has increased and establishing Respect Victoria embedded critical primary prevention infrastructure in Victoria, investment in primary prevention initiatives continue to fall short of what the evidence base suggests is needed to successfully shift the drivers of gender-based violence. Primary prevention work in local community-based organisations and family violence response services continues to be under recognised and under-funded. This work needs long-term, sustainable investment.

Similarly, work in early intervention and recovery initiatives and services, including those that work with people showing early signs of using violence, has not been commensurate with the need. Consequently, the Victorian system is skewed towards responding to family violence

crisis, with little ability to undertake early intervention work or offer victim-survivors long term recovery support. This means that victim survivors are often left waiting for services until their family violence risk escalates to crisis. It also means that without long-term recovery support, they are more likely to experience family violence again, leading to a revolving door of service delivery.

System monitoring

The FVRIM performed a critical function in providing system level oversight and accountability for the family violence reforms. This system function continues to be needed; to provide systems oversight and accountability as efforts to realise the intent of the Royal Commissions and improve the family violence system will not be complete by the end *Victoria's 10-year plan for change*.

Despite significant investment, the reforms did not produce a systems picture of data that can speak to family violence related outcomes. In the absence of the FVRIM, Victoria currently has no mechanism to ensure independent oversight, transparency and accountability at a systems level for how the family violence system is functioning and if outcomes for victim-survivors are improving.

For the Victorian context, we are calling for, as a minimum, a regulatory requirement to publicly publish a range of data sets relevant to family violence outcomes, including data on The Orange Door 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.

We also have yet to move to an outcomes-based funding framework that truly drives and supports client centred practice. We recommend the South Australian government explore options for data, targets and ongoing system monitoring, as appropriate for the South Australian context.

Conclusion: Recommended principles for reform implementation

This submission reflects Safe and Equal's reflections about what has worked well and what has been less successful in the Victorian context following the VRCFV. Noting that each jurisdiction is unique, we hope that lessons from the Victorian experience can be used to inform family violence reform in other jurisdictions where appropriate.

Due to the varied nature of jurisdictions, we offer the following underpinning principles as our recommendations:

- 1) Take the time to focus on process; this includes carefully considering sequencing and sustainability of resource allocation, particularly for new initiatives. Utilise a whole of systems lens and assess how shifts in parts of the system may affect another part.
- 2) Work with the specialist family violence sector and survivor advocates to design, implement and test the reforms. Ensure specialist knowledge and expertise is centred and adjust design and implementation according to what services on the ground and victim survivors are saying.
- 3) Build the ability to measure and monitor progress against the implementation of the reform recommendations from the beginning. This includes:
 - a. A set of clear and measurable targets
 - b. Robust data collection, from various points across the service system that is regularly and publicly published and refined over time as understandings of what data is most meaningful to collect
 - c. Ongoing, independent monitoring of the effectiveness of reform implementation, with public reporting to the relevant parliamentary body
- 4) Ensure resources are allocated to all parts of the family violence sector across the continuum, with particular attention to:
 - a. Programs to hold perpetrators to account, and in view
 - b. Programs focussed on the needs and recovery of children and young people
 - c. Prevention, early intervention and recovery
- 5) Consider how legislation can be used to embed a common understanding of family violence risk and how to apply that to practice across a range of community services who regularly come into contact with victim survivors of family violence.
- 6) Invest in knowledge translation. There is a significant amount of new and emerging evidence across the world regarding affective programs and responses for adult and child victim survivors. Ensure that the reforms are built on evidence-based practice.