

Safe Steps feedback on the Consultation Draft for the National Plan to End Violence against Women and Children

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About Safe Steps

Our vision

Safety, support and respect for all victim-survivors of domestic and family violence.

Our mission

Provide evidence-based responses for victim-survivors of domestic and family violence by creating pathways to safety through collaborative partnerships.

About us

Safe Steps is the only 24/7, family violence response centre in Victoria, providing a state-wide entry point for victim-survivors of domestic and family violence.

Services include information and referral, crisis response, specialist family violence risk assessment, safety planning, and access to supported crisis accommodation. We also provide specialist counselling nationally, through 1800RESPECT.

Our practice is trauma and violence informed and guided by evidence. We provide services to all victim-survivors and recognise that most of our work is dedicated to the needs of women and children which reflects the gendered nature of domestic and family violence.

Our research and advocacy is informed by our practice and promotes the collective voices and diverse experiences of victim-survivors in family violence crisis. We value diversity and inclusivity and are committed to an intersectional approach. We advocate to create systemic change and effective pathways for victim survivors from crisis to safety and recovery.

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Overview

Thank you for the opportunity to provide feedback on the draft National Plan to End Violence Against Women and Children (the Plan).

Our response to the draft Plan:

- Cross references recommendations made in our Submission to the National Plan for the Elimination of Violence Against Women and Children (appendix one)
- Provides feedback on language and definitions
- Provides feedback on the Pillars and Focus Areas of the Plan
- Summarises additional considerations for inclusion into the final Plan

We appreciate some of these additions or feedback may be more adequately addressed in the subsequent Action Plans and have as best as possible kept feedback limited to identifying challenges and priorities rather than specific actions.

Cross reference to Safe Steps recommendations

Please find below a cross-reference of the recommendations made by Safe Steps in our submission to the National Plan to End Violence Against Women and Children and the draft Plan.

Recommendation	Status	Comments
<p>Recommendation 1: The National Action Plan ensures that access to safe and affordable housing, from crisis accommodation to long-term affordable housing, is included as a critical underpinning of a functional family violence system.</p>	Covered in part	<p>The housing focus is good and Safe Steps is pleased to see that the issue has been given attention.</p> <p>We are concerned that the focus is on enhancing linkages between emergency accommodation, transitional housing and long-term housing, which is not the main issue. The key concern is one of supply.</p> <p>There is also no reference to refuges which are a much needed crisis accommodation option. These too require a significant investment to meet current demand.</p> <p>While we also support the reference to improving options in the private rental market, as noted in the Plan, 48 per cent of women who had experienced violence said it had reduced their attendance at work. This means many victim-survivors we work with who are escaping violence rely on Centrelink income, which is insufficient at present to access private rental. Increasing this rate, or the rate of rental assistance, is the only practical way to support this.</p> <p>Rather than recognise the particular housing challenges faced by women with disability, LGBTIQ+ communities, and migrant</p>

Recommendation	Status	Comments
		communities, we need to address them through investment into affordable housing stock.
<p>Recommendation 2: The Australian Government works with the states and territories through the National Partnership Agreement on Housing to increase the supply of crisis accommodation and long-term affordable housing for victim-survivors of family violence.</p>	Not covered	<p>There is no commitment or mention of an increase to the supply of crisis and affordable housing, or in working with the states to increase access and/or supply to social and community housing for victim-survivors of family violence.</p> <p>While we appreciate that a plan cannot articulate a quantum, lack of supply is a key issue that should be articulated.</p>
<p>Recommendation 3: The Australian Government includes operational funding as well as capital funding for projects and programs that enable affordable housing options, including the Safe Places project</p>	Not covered	There is no commitment to or mention of operational funding for capital programs.
<p>Recommendation 4: The Australian Government adopts a national risk assessment and management framework and common practice for services that intersect with family violence, modelled</p>	Mostly covered	We are pleased to see reference in the Plan to improved risk management processes and a consistency in definitions and risk factors for family violence. As noted further when discussing language, Safe Steps proposes that the definition of family violence be broadened to include violence perpetrated or experienced by carers, family-like relationships, and siblings.

Recommendation	Status	Comments
on the evidence based Victorian Multi Agency Risk Assessment and Management (MARAM) framework.		
Recommendation 5: The Australian Government continues to develop the National Framework for Information Sharing between the Family Law, Family Violence and Child Protection Systems using the Victorian MARAM framework as its basis.	Mostly covered	<p>We are pleased to see a continued commitment to improving information sharing between the Family Law, Child Protection and State-based courts to support the safety of women and children.</p> <p>The existing Victorian MARAM framework model a solid example of a framework in action, and could usefully inform the development of a National Framework.</p>
Recommendations 6: The Australian Government uses the MARAM framework as the basis for increasing perpetrator accountability for their use of violence, to ensure uniformity across jurisdictions.	Mostly covered	<p>There is a strong focus in the Plan on perpetrator accountability and increasing access to programs which address the violent attitudes and behaviours.</p> <p>This focus should be strengthened by including a commitment to stronger reform in the Family Court given the current system of ‘equal shared parental responsibility’ with a presumption of ‘joint decision-making about major long-term issues’ often undermines perpetrator accountability.</p>
Recommendation 7: Federally funded services and organisations (including Centrelink, Child Support Agency) are trained in family violence and trauma informed practice when working with	Not covered	<p>The report references that an astonishing 48 per cent of women who had experienced violence said it had reduced their attendance at work. This gives further weight to this recommendation. The Plan does not yet make any reference to improving Centrelink’s trauma-informed response; to any access to improved financial supports; and any reference to the social security system.</p>

Recommendation	Status	Comments
victim survivors of family violence.		
<p>Recommendation 8: Income Support Payments be raised to a liveable rate given the recovery needs of victim-survivors of family violence, or the grants programs be extended to include income replacement while victim-survivors recover. This would also reduce the number of women seeking early release of their superannuation, which leads to further economic inequality for women as they age.</p>	Not covered	
<p>Recommendation 9: The Australian Government prioritises reform in the Family Court and in Family Law to ensure a safety-first approach, to improve consistency between state-based and federal jurisdictions, and to ensure a trauma-informed response to family violence.</p>	Covered in part	Reference is made to the family law system without any commitment to reform outside of improving information sharing and increasing access to support through programs within the court. Fundamental changes to the Court are needed to improve women’s safety as per our submission including presumptive rights to equal parenting, and safety first approaches.
<p>Recommendation 10: The Family Law Act should be amended to replace the presumption of</p>	Not covered	

Recommendation	Status	Comments
‘equal shared parental responsibility’ with a presumption of ‘joint decision-making about major long-term issues’ as recommended by the Australian Law Reform Commission.		
Recommendation 11: The Australian Government works with all states and territories through the National Partnership Agreement on Legal Services to increase the access to legal supports and advice for victim-survivors of family violence.	Mostly covered	Improved access to legal supports is referenced as a priority when discussing improved responses to victim-survivors.
Recommendation 12: The Australian Government reviews cyber governance, practices and laws in Australia to prevent cybercrime and stalking of victim survivors, with reference to the Privacy Act, the Crimes Act, and the Telecommunications Interception and Access Act.	Mostly covered	There is a strong focus on dealing with cyber governance in the Plan given the proliferation of technology-facilitated abuse. The priorities need to expand the area on technology facilitated abuse to include better dealing with the use of technology for stalking and harassment.
Recommendation 13: Include support for women on temporary visas as a	Not covered	While there is reference to refugee and migrant women, and to the fact that visa status can be a barrier to support and a form of violence used against refugee and migrant women, no

Recommendation	Status	Comments
priority in the National Action Plan.		reference is made to supporting women on temporary visas who are experiencing family violence.
<p>Recommendation 14: Improve the migration system so that all women on temporary visas who experience domestic, family and sexual violence, and their dependants, can access protections, services and justice including the rights to work, Centrelink payments and healthcare.</p>	Not covered	<p>This is of deep concern given that temporary visa status makes a person more vulnerable to abuse and increases the barriers to seeking support.</p> <p>While there is some support offered through brokerage and programs for this particular cohort, the program requirements are such that too many victim-survivors who access our service are excluded.</p> <p>These programs also do not address the policy setting that create this vulnerability, as outlined in this recommendation.</p>
<p>Recommendation 15: Ensure eligibility and access to services and government support are based on women’s needs for safety and recovery, regardless of their migration status.</p>	Mostly covered	<p>When discussing support for refugee and migrant women in recovery, which is in the Plan, it needs to be explicit that support is available regardless of migration and visa status.</p> <p>As mentioned previously, program requirements for specialist support through Trafficked Persons programs should be broadened to include a wider range of victim-survivors on temporary visas experiencing abuse.</p>
<p>Recommendation 16: The Australian Government continues funding for family violence services through the National Partnership agreement over the forward estimates, beyond the two years allocated in the most recent Budget announcement.</p>	Covered in part	<p>The Plan references continued collaboration with the states. The commitment of this beyond the two years as it currently stands will ideally be covered in Federal Budget.</p>

Recommendation	Status	Comments
<p>Recommendation 17: Specialist family violence crisis services, including Safe Steps, be resourced to provide specialist, child-focused support for children in family violence crisis.</p>	<p>Covered in part</p>	<p>The need to support children as victim-survivors in their own right is articulated in the Plan. However, rather than improving linkages between specialist family violence services and specialist children’s services – which is critical – these services also need to be resourced to provide this support.</p>
<p>Recommendation 18: The needs of young people as distinct from children be recognised and subsequent program responses developed for targeted / dedicated crisis responses and extended support.</p>	<p>Not covered</p>	<p>Children and young people are referred to jointly in the Plan, and we agree it is critical that early intervention programs are available to prevent potential offending or victimisation.</p> <p>However, the needs of young people must be separately identified from those of children for the purposes of the Plan.</p>

Definitions and language

Gender

Gender inequality is outlined as a key driver of violence against women but is often prefaced by an acknowledgement that it is not the only driver, and that other forms of discrimination are a factor. While this is true, it can come across as minimising the impact of gender inequality.

Intimate partner violence needs to be included in the definition of gender-based violence as it is the most prevalent form of violence against women.

When discussing gender inequality, it is important to recognise the structures and practices that limit women’s participation in the workforce and perpetuate the pay gap. We note that the pay gap is also driven by attitudes that devalue roles which are considered ‘women’s work’ including care, social work, and community services.

Children and young people

In the Plan, children as victim-survivors are separated and treated differently from children who witness violence. It is recognised in state laws that children who bear witness to violence are also experiencing a form of violence. This should be reflected in the document.

The needs of children should also be separately identified from the needs of young people given the differences as outlined above.

Family violence

The definition of family violence needs to include family-like relationships such as carers and kin. The current definition also ignores violence against children and young people from parents or carers, and violence by siblings against other siblings.

Sexual violence

The definition could be simplified by replacing 'sexual activity that happens where consent is not freely given or obtained' with 'non-consensual sexual acts'.

The Plan also highlights the intersections, and separation, of sexual violence and family violence. While it is of course true that sexual assault can be perpetrated by someone unknown to the victim-survivor outside of a family context, the fact is that in the vast majority of cases, the perpetrator is known. This is important to highlight as it challenges misconceptions of sexual assault.

Early and forced marriage

Early marriage is 'forced marriage' by definition and should be articulated in the Plan.

Recovery

'Recovery' is a loaded term for many victim-survivors, that it is about learning to live with the impacts rather than recovering from them.

While the Plan does mention that recovery can be a life-long process, this should be made more explicit early on. The term 'recovery' needs to be better defined through consultation with victim-survivors.

Coercive control

When talking about coercive control, the Plan needs to include the risks of misidentification, particularly for Aboriginal women, women with mental illnesses and women with disability.

Lived experience

Lived experience needs to do more than inform, and victim-survivor expertise should be central and built in systemically. It also needs to recognise people's skills outside of their lived experience that they can and do bring to the table.

Including people with lived experience in the design and delivery of policy and services also needs the appropriate funding allocations to ensure it is done meaningfully.

Focus areas/Pillars

Prevention

- It should be clearer that this section is referring to Primary Prevention.
- When discussing the nature of family violence and violence against women, the Plan makes reference to a “towards zero” approach in which social, political and economic aspects are considered and dealt with. It is also critically important to address the cultural drivers of family violence and its policy underpinnings that also need to be addressed.
- More emphasis should be on building women’s financial capability and economic independence as protective factors.

Early intervention

- There needs to be more explicit reference that young people using violence are often victim-survivors themselves and may be using violence in defence.
- As well as encouraging men and boys to change their behaviours when they are violent or sexist, more work needs to be done in helping understand what these behaviours look like.
- Enabling greater early identification at high-risk life stages is good, however this needs to be met with a resourced system to refer to. At the moment, there really is little as the specialist system is so crisis driven.

Response

- It is important to articulate the difference between an immediate crisis response, which is measured in hours and days, and ongoing case management which typically takes place over many months.
- While both involve many of the same elements, crisis responses require access to immediate supports including crisis accommodation, material aid and transport.

Recovery

- We are pleased to see that this section does not pathologise trauma but recognises it as a normal response to what someone has been through.
- The definition of ‘recovery’ needs to be further explored to ensure it meets the needs of victim-survivors.

Summary of suggested inclusions

1. That reference be made to housing supply and operational funding as a challenge in supporting victim-survivors to access safe housing.
2. The definition of family violence be expanded to include violence perpetrated or experienced by carers, family-like relationships, and siblings.
3. Inclusion of Recommendations 2, 3, 7, 8, 10, 13, 14 and 18 from Safe Steps Submission to the National Plan to End Violence Against Women and Children
4. The needs of young people to be decoupled from those of children for the purposes of the Plan.
5. Simplify the definition of sexual assault by replacing ‘sexual activity that happens where consent is not freely given or obtained’ with ‘non-consensual sexual acts’.
6. Workshop and make more explicit the meaning of ‘Recovery’ in the context of family violence.

7. Clearly articulate the difference between crisis response, response, and recovery.
8. Lived experience be built in systemically in the development and implementation of the Plan.

Conclusion

Thank you for the opportunity to provide feedback to the draft Plan. We are pleased that much of what was raised in the consultations and through submissions has been included in the Plan, and look forward to contributing to the subsequent Action Plans as a way of operationalising the priorities as outlined.