

Joint submission to the ACT Domestic, Family and Sexual Violence Strategy

April 2024



The endorsing organisations welcome the ACT Government’s commitment to the development of a 10-year strategy to prevent and address domestic, family and sexual violence (DFSV) in the Territory.

Domestic, family and sexual violence in the ACT is an emergency that is not abating. The number of family violence related incidents reported to ACT Police has increased 25% since 2014.ⁱ Nearly a quarter of all Australian women and 5 per cent of Australian men have experienced sexual violence in their lifetime.ⁱⁱ One in three girls and one in six boys are sexually assaulted in Australia,ⁱⁱⁱ before the age of 15 years, however the real number of children sexually assaulted is much higher due to the vulnerability of children and their inability to seek help outside of the family framework.

Violence and trauma related to it can impact people’s lifelong health and wellbeing, affect their parenting, and their children’s development. The risk of complex trauma impacts are often further increased for First Nations Peoples, people with disability and the LGBTIQ+ community. Preventing and responding to violence is everybody’s business. Government, specialist family violence and sexual assault services, other healthcare and social services, business and community all have a role to play.

Domestic, family and sexual violence is a problem that can be solved. With sustained commitment and shared responsibility, we can achieve the long-term cultural change needed to eliminate gender-based violence in the ACT. The 10-year ACT Domestic, Family and Sexual

Violence Strategy (the Strategy) is an opportunity to make a Territory-wide commitment to doing so.

We appreciate the ongoing work the ACT Government is undertaking to ensure every Canberra can live safely, free from violence, including many of the actions listed in the draft Strategy. However, the structure and limited scope of the draft Strategy undermines its potential to make a strong statement. The *National Plan to End Violence Against Women and Children 2022-2032* aims to end gender-based violence in a generation. This is the level of ambition we hope to see matched in the ACT's Strategy.

The endorsing organisations call on the ACT Government to reopen a more meaningful and targeted engagement process with victim survivors and marginalised communities, to adopt more ambitious priorities for change with a clearer framework for measuring and monitoring performance, and to consider the role of all parts of government in leading and being accountable for the change that is needed.

Engage in deeper consultation with the community

The development of the Strategy has so far been a missed opportunity to deeply engage with the ACT community about a vision and plan for ending gender-based violence.

A six-week online consultation and a survey will not enable meaningful engagement from the community, and especially from marginalised communities. A genuine co-design process involves people with lived experience and those with professional expertise (including the community sector) as equal partners. There was an opportunity in this process to identify shared aspirations and values across the community, and to develop potential solutions that could be tested with the people at the centre of the system.

The Western Australian 10-year strategy to reduce family and domestic violence *Path to Safety*, involved six months of consultations, targeted visits, face to face events, focus groups, workshops and forums.^{iv}

At this stage, we recommend extending the consultation period, and developing a plan for workshops, focus groups and outreach work with marginalised communities whose voices must be represented in the Strategy.

Provide a stronger voice for people with lived experience

People who have experienced violence and abuse are best placed to shape the change and reform that is needed to end gender-based violence and strengthen system responses and pathways. In the words of the Victorian Victim Survivors Advisory Council:

The voices of lived experience are the foundation for every piece of work, every policy, every program and connects every person involved to the complexity and reality of family violence.^v

In this area, the draft falls short of what we should be striving for in the ACT.

Centring the lived experience of victim survivors is rightly included in the eight principles underlying the draft Strategy. Yet there is a failure to meaningfully incorporate lived experience in the remainder of the plan. There are no priorities around strengthening the voice of lived experience, or about mechanisms to ensure victim survivors are central in policy and program design. Women's Health Matters has been funded to develop and pilot a consultation model for

people with lived experience of DFSV, yet this is not referenced as something already underway, that will inform the system in the future.

We recommend targeted engagement with victim survivors of domestic, family and sexual violence (supported by community service organisations with specific expertise) to inform the development of the Strategy and recognising the development of consultation models with victim survivors as a priority in the draft Strategy.

Commit to more ambitious and detailed priorities

Despite having a ten-year timeframe, the draft Strategy identifies only 14 priority areas for future action, including only two priorities under the areas of recovery and healing. Many of the priorities that are included are vague and it is unclear who is responsible for progressing them.

For example, “ensuring justice responses are domestic, family and sexual violence informed, and there are alternative pathways outside the criminal justice system” potentially involves police, legal assistance services, court and judicial staff, prosecutors, restorative justice processes, school, universities and workplaces. Actions could range from training and capability building for police and court staff, funding legal assistance services for victim survivors to be represented to establishment of a sexual offences court and changes to evidentiary processes. But none of this detail is included, making the priority vague, unmeasurable and lacking in accountability.

Similarly, fostering a strong, sustainable and capable domestic, family and sexual violence specialist sector has elements around funding sustainability, workforce, data and evaluation, collaboration and integration and more. Each of these elements is complex, and requires multiple agencies to take actions to progress.

Priorities such as these should be redrafted to provide greater specificity on what will be progressed within the 10-year timeframe of the Strategy, and how it will deliver on the related outcome. The agency or agencies responsible for progressing the priority should also be identified.

In addition, many of the outcomes do not directly link to a priority. It is unclear how the Strategy intends for these outcomes to be achieved.

For example, an outcome under Recovery and Healing is “people impacted by violence have economic security and their social, cultural and economic needs are met, including being supported to access affordable, accessible and safe housing, from crisis accommodation to transitional and long-term housing.”

A lack of affordable housing is one of the most significant barriers to people leaving violent relationships, to achieving financial security and building a solid foundation for their future. For young women aged 14 to 25 years, sexual violence remains the single leading cause of homelessness within this age group.^{vi} The outcome is certainly relevant and welcome. Yet neither of the two priorities identified under Recovery and Healing relate to economic security or access to housing.

There are many possible priorities that could have been included, like additional public and community housing, expansion of rental brokerage, more refuge accommodation (including exploring alternative models), investment in financial counselling services, better access to

brokerage or emergency payments, working with businesses to build employment opportunities for victim survivors and maintain their connection to the workforce.

Similarly, the outcome related to “primary-care givers impacted by violence have access to supports for their own well-being, in turn supporting them to nurture their child” has no related priorities. The role of Child and Youth Protection Services and family services in supporting protective parents is not recognised, nor is the high prevalence of domestic and family violence in statutory child protection cases.

We suggest that the draft Strategy be reworked, in consultation with community and victim survivors to ensure each outcome has identified actions and priorities to enable it to be achieved.

Show a deeper understanding of intersectionality and violence

The draft Strategy rightly recognises that gender inequality can intersect with racism, ageism, ableism, homophobia and other forms of discrimination and inequality to exacerbate violence or make the level of violence experienced more extreme.

It recognises that First Nations women experience additional barriers to accessing support, and that initiatives need to be informed by First Nations’ voices. But there is no detail around how Aboriginal and Torres Strait Islander community-controlled and Aboriginal-led services will be supported to be strong and sustainable, and to deliver culturally safe and self-determined services to First Nations victim survivors, or how mainstream services will be supported to deliver culturally safe services to First Nations communities. There are also numerous other consultation processes underway with First Nations communities, where listening reports and findings have yet to be published. It is unclear how the Strategy will reflect these processes.

It also lists other groups of people who experience violence at higher rates, including people with disability, people from culturally and linguistically diverse communities and LGBTIQ+ people. But it doesn’t go far enough or explore how different communities experience violence differently and need community-led responses.

Under early intervention, a priority includes delivering targeted intervention to address domestic, family and sexual violence risk factors in high-risk groups. To be meaningful, this priority should, for example, identify how women with disability can experience family violence differently to other women, including by carers or other residents in their home or in institutional settings. The forms of violence can also be different, including restraint, withholding medication or supports and threats to withdraw care. There should be actions and funding directed towards specialist responses, informed and led by the voices of people with disability.

LGBTIQ+ people are mentioned only as one of a list of communities under a recovery and healing priority. The Strategy should recognise that violence in LGBTIQ+ communities is often invisible, despite occurring at rates comparable to the non-LGBTIQ+ community. There could be reference to the work done by Meridian and Women’s Health Matters in the *lgbtqW Health survey*, to understand local need and priorities. Trans and gender diverse people are at higher risk of lethality when violence occurs. The violence they experience can be from their family of origin. It can be difficult to find safe and gender affirming support services.

The Strategy should recognise the need for specialist responses and workers, in peer and community-led services. For example, There are no specialist LGBTIQ+ positions in the ACT to support victim-survivors of DFSV. The proportion of Commonwealth funding, announced in the

October 2022 budget,^{vii} for domestic and family violence workers in LGBTIQ+ services was redirected to mainstream positions without consultation with community.

The Strategy could identify other intersecting factors that can make people more at-risk of violence, increase the risk of lethality, or make it more difficult to escape violence. Poverty and financial insecurity, the risk of homelessness, visa status, addiction to gambling or illicit drugs, mental illness, engaging in sex work can all intersect with people's experiences of violence, and increase the complexity of the situation they face.

Include measurable targets and data requirements

The draft Strategy has no information about reporting and accountability against it.

The Strategy needs ambitious and measurable targets if we are to track our progress towards eliminating gender-based violence. A strong data and outcomes framework is essential to making the strategy accountable.

We recommend the ACT Government consider the framework under the *Capital of Equality Strategy*, where Directorates are required to report against whole of government Action Plans, an Outcomes Framework tracks performance against the objectives and progress against actions is reported annually and made publicly available.

Baseline data about domestic, family and sexual violence in the ACT is limited. The *Listen. Take action to prevent, believe and heal* is the foundation report for the ACT in relation to improved understanding and response to sexual violence.^{viii} It assists in the setting of the framework for ACT victim survivors of SV to receive improved and coordinated response to disclosures of sexual violence.

The report identified significant gaps in data collection about sexual assault and service responses. It recommended the ACT Government commission a Sexual Violence Data Collection and Reporting Framework to guide consistent and coordinated compilation and analysis of statistical data for all specialist organisations (government and non-government) delivering services for victims and/or perpetrators of sexual violence. The framework would ensure adequate data collection standards are set for the collection of demographic information, that there are standard agreed definitions, and consistent reporting on service delivery and operational considerations.

A similar priority should be included in the Strategy, calling for the development of a comprehensive data framework.

Ensure the Strategy guides cross-government action and accountability

The 2016 *Glanfield Review into the system level responses to family violence in the ACT* said:

There is nothing more difficult in government at any level than dealing with a complex policy or social issue that crosses the boundaries and roles of many agencies.^{ix}

The Review said the implementation of its recommendations will require resourcing, but

Most importantly will require strong leadership and oversight to drive the move from the currently siloed sector to a fully collaborative and information sharing sector focused on improving the safety of all family members.^x

There is still a long way to go in delivering a well-integrated service sector, and cross-government responsibility for preventing, identifying and responding to domestic, family and sexual violence.

While the introductory section indicates the whole of the ACT Government will have responsibility for the Strategy, there is little reference to the role of other parts of government, beyond the Domestic, Family and Sexual Violence Office within the Community Services Directorate. For example, there is no detail on how the Education Directorate will build the knowledge of children and young people on safe, respectful and healthy relationships. Nor does the draft Strategy engage with how Police will build knowledge and improve responses to coercive control, or how the Health Directorate will consistently identify, respond to and refer victim survivors of family violence. It does not draw links between the experiences of mental illness, poverty, homelessness and addiction and DFSV, and how the system can respond in a way that recognises these complex intersections.

More broadly, embracing the role of Directorates outside justice and human services, that have not traditionally seen themselves as central to violence response, would strengthen the Strategy, and its commitment to whole of government action and leadership. For example, the Justice and Community Safety Directorate has responsibility for emergency management. Gender-based violence increases in the aftermath of disaster, and risk and safety must be considered in disaster planning, response and recovery. Similarly, public transport services can be a site where sexual violence and harassment occurs, but can also be a key site for primary prevention and education campaigns.

It is unclear how the Strategy will interact with other ACT Government Strategies and Plans, including the ACT Women's Plan, the ACT Wellbeing Framework, the Disability Justice Strategy and the Next Steps for Our Kids. While a large number of reports and strategies are listed in the draft Strategy, there is no indication of how they fit together. Some kind of overarching framework that demonstrates how the Strategies fit together and clarifies accountability lines would be helpful.

It is also unclear how the Strategy will provide the cross-government leadership and oversight necessary to drive the kind of change called for in the Glanfield report. The Coordinator-General of Domestic, Family and Sexual Violence role has now been combined with other Deputy Director-General responsibilities in the Community Services Directorate. The already substantial role will be pulled in many directions, and its specific focus and prioritisation of domestic, family and sexual violence lost.

We recommend reconsidering combining the role of Coordinator-General with other directorate responsibilities, to maintain its responsibility for cross-government accountability.

Conclusion

The draft Strategy's vision is that all Canberrans live free from domestic, family and sexual violence and feel safe in their relationships, homes and communities. We all share this vision.

We look forward to working constructively with the ACT Government to strengthen the strategy, to make sure it provides the necessary platform to deliver on the vision of a Canberra free from violence.

-
- ⁱ ACT Policing (2024) [Crime Statistics and data.](#)
- ⁱⁱ Australian Bureau of Statistics (2023) [Personal Safety, Australia.](#)
- ⁱⁱⁱ D Haslam et al (2023) [The prevalence and impact of child maltreatment in Australia: Findings from the Australian Child Maltreatment Study: Brief Report](#)
- ^{iv} Government of Western Australia Department of Communities (2020) [Path to Safety: Western Australia's strategy to reduce family and domestic violence 2020-2030](#)
- ^v Family Safety Victoria (2022) [Family Violence Lived Experience Strategy](#)
- ^{vi} S Wendt, K Natalier, S Goudie S (2024). [Young Women's Experiences of Violence and Homelessness.](#)
- ^{vii} Department Social Services (2021) [Family, Domestic and Sexual Violence Responses 2021-27](#)
- ^{viii} The Sexual Assault Prevention and Response Steering Committee (2021) [Listen, Take Action to Prevent, Believe and Heal](#)
- ^{ix} Laurie Glanfield (2016) [Report of the Inquiry: Review into the system level responses to family violence in the ACT](#)
- ^x Ibid.