

DOMESTIC
VIOLENCE
VICTORIA

DV Vic's Submission to the National Inquiry into Homelessness

June 2020

YOUR VOICE AGAINST VIOLENCE

Domestic Violence Victoria

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About Domestic Violence Victoria

Domestic Violence Victoria (DV Vic) is the peak body for specialist family violence response services for victims-survivors in Victoria. As such, DV Vic is recognised as the state-wide voice of Specialist Family Violence Services (SFVSs) responding to victims-survivors. We are an independent, non-government organisation that leads, organises, advocates for, and acts on behalf of its members utilising an intersectional feminist approach. However, the organisation is ultimately accountable to victims-survivors of family violence and works in their best interests. DV Vic's work is focused on advocating for, supporting, and building the capacity of specialist family violence practice and service delivery for victims-survivors; system reform; and research, policy development and law reform. DV Vic 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 SFVS sector, broader sectors, government, and other partners and stakeholders.

Introduction

Thank you for the opportunity to make a submission to the National Inquiry into Homelessness.

Family violence is the most common reason that victim-survivors of family violence, including children, become homeless.¹ DV Vic's submission will focus specifically on the following points within the Terms of Reference as they relate to victim-survivors of family violence:

- Opportunities for early intervention and prevention of homelessness
- Services to support people who are homeless or at risk of homelessness

As there was significant overlap between the National Inquiry and the recent Victorian Inquiry into Homelessness, we have attached our submission to the state Inquiry as a supplement to this submission (Appendix A). We have also provided a collection of additional submissions related to specific points raised in this submission to expound upon the points provided here.

Finally, this submission is designed to complement other submissions made by our colleagues in the community services sector with a range of expertise. This submission intends to bring a specific family violence lens to this other work. As a member of the Australian Women's Alliance Against Violence Against Women (AWAVA), DV Vic also endorses AWAVA's submission to this Inquiry.

Opportunities for early intervention and prevention of homelessness

Homelessness among victim-survivors can occur as a direct result of experiencing family violence – for example, having to leave the home to be safe from a perpetrator's use of violence. However, it is also underpinned by structural drivers. These structural drivers include inequality such as gender-

¹ Spinney A. (2012). *Home and Safe? Policy and practice innovations to prevent women and children who have experienced domestic and family violence from becoming homeless*. Final report no. 196. Melbourne: Australian Housing and Urban Research Institute.

based economic inequality, a systemic lack of affordable housing and a poor social safety net that prevent victim-survivors from being able to find an affordable, safe place to live where they can recover from the violence they have experienced.

We know that family violence happens across all communities, cultures and socio-economic groups. The diversity among victims' survivors means that when responding to homelessness among victim-survivors of family violence, a one size-fits-all approach will not work. Victim-survivors of family violence who experience intersecting forms of discrimination, oppression and exclusion such as Aboriginal victim-survivors, victim-survivors from migrant communities, victim-survivors with disabilities and/or victim-survivors from LGBTIQ communities are more likely to become homeless due to systemic discrimination and exclusion than white, middle class, victim-survivors of family violence who are not affected by intersecting structural disadvantage. People experiencing intersecting forms of discrimination and exclusion are less likely to have the personal resources needed to recover from family violence and avoid homelessness (i.e. a good paying job, English as a first language, education, savings, good health, family and friends who are able to financially or emotionally support them). They are thus more likely to be forced to be dependent on government support systems.

The number one way to prevent homelessness as a result of family violence across all cohorts in Australia is to fix numerous policies at the Commonwealth level that drive structural homelessness and poverty. In relation to victim-survivors of family violence, these include:

- Repealing ineffective and inefficient tax laws like negative gearing and Capital Gains Tax that inflate housing prices, lock victim-survivors and other low-income people out of the housing market and put pressure on private rental markets;
- Significantly investing in public housing over a sustained period of time to make up for the decades of lack of investment and ensure that when victim-survivors leave a violent relationship, they have safe and affordable housing to rely upon.
- Increasing income support payments to a level that pays victim-survivors, including children, at a level that allows them to live above the poverty line (For more information we refer to [Good Shepperd's](#) and [AWAVA's](#) submissions to the Newstart Inquiry)
- Ending mutual obligation schemes associated with income support payments that degrade and punish victim-survivors for being poor, including as Parents Next which deliberately targets single mothers, particularly Aboriginal single mothers (see Appendix B); and
- Repealing harsh immigration laws that keep victim-survivors on temporary visas waiting for years for decisions on their visa status while simultaneously denying them access to any form of income support payment, right to work or government support. For more information we refer the Commission to [AWAVA's National Blueprint for Reform](#) on this matter.

These reforms need to sit within a number of other initiatives and programs dedicated to eliminating gender & racial inequality, primary prevention of violence against women, and increased & ongoing investment in Safe at Home programs. In addition, systems need to increase focus on perpetrators of family violence and holding perpetrators, who are overwhelmingly men, accountable for their decision to use violence. This involves increased investment in Men's Behavioural Change Programs (MBCP) and perpetrator case management.

Investment in these types of programs are critical to ending family violence, and by extension homelessness as a result of family violence. However, until the Commonwealth Government changes the structural drivers of homelessness and strengthens the social safety net in this country, programs like Safe at Home and Men's Behavioural Change will only have limited effectiveness at ending homelessness as a result of family violence.

Recommendation: The Commonwealth Government urgently amend policies that contribute to structural homelessness and poverty among victim-survivors of family violence with an aim to strengthen the social safety net in Australia.

Services to support victim-survivors who are homeless or at risk of homelessness

There are numerous specialist family violence services across the country funded to support various diverse groups of victim-survivors of family violence. All of them are important. All of them should be given ongoing, long-term funding to ensure staff security and service continuity. All of them should be funded at rates equivalent to other community service organisations. None of them are funded to meet the true level of demand for family violence support.

It is particularly important that funding is prioritised to specialist family violence services, which have the expertise to work with family violence risk. Specialist family violence services have unique expertise in family violence risk assessments and safety planning, and play an important role as independent advocates for victim-survivors of family violence. For more information, we refer the Commission to [AWAVA's work](#) on this matter.

For the purpose of this submission we will focus on one type of support that we believe must be funded across the country: National Flexible Support Packages.

Funding for Flexible Support Packages (FSPs) was substantially increased in Victoria after the Victorian Royal Commission into Family Violence and have revolutionised the way specialist family violence services provide support to victim-survivors of family violence in Victoria. FSPs are a specific type of brokerage fund available to victim-survivors, including children, who are case managed by a specialist family violence service. They are flexible and can be used to meet a wide range of victim-survivors' needs.

FSP guidelines specify that FSPs should only be used when other brokerage funds cannot be used to meet all of a victim-survivors' needs. This means that they sit alongside, not in place of, other brokerage schemes. Importantly, their flexibility makes them one of the few policy responses that can work well for a diverse group of victim-survivors and meet a variety of needs that can help a victim-survivor maintain or gain housing. For example, they can be used to pay for English classes to increase a victim-survivor's employability, return someone to country or pay for household white goods needed when moving into a property etc.

More information on FSPs is provided in our recent submission to the Victorian State Budget 2020-21 (Appendix C). We note that FSP's current specificity to Victoria means that currently victim-survivors in Victoria are significantly better off compared to victim-survivors in other jurisdictions.

We therefore urgently call on the Commonwealth Government to fund a National Flexible Support Package scheme at a level equal or above the current Victorian scheme.

Recommendation: The Commonwealth Government prioritise funding for family violence to go to specialist family violence services

Recommendation: The Commonwealth Government fund a National Flexible Support Packages scheme at a level equal or above the current Victorian scheme.

Conclusion

Having access to a safe home is one of the fundamental steps in helping victim-survivors recover from family violence. This should not be a luxury. However, homelessness in Australia, including among victim-survivors of family violence, is a long-standing issue that unfortunately is only getting worse.

The Federal Government's response to COVID-19 has redefined what is possible when responding to homelessness, including among victim-survivors of family violence. We have a moment in time to significantly reduce homelessness in Australia if only the Government can find the ongoing will to do so. Rapid influxes of money to house people forced to sleep rough and find alternative accommodation for victim-survivors who could not safely stay in their homes during the pandemic proves that there is enough money to make sure everyone is housed when Government prioritises this.

After the Global Financial Crisis, economic stimulus money was successfully used to build additional social housing stock – one of the few times a significant amount of new social housing stock has been created in decades. This had an extremely positive effects on the economy and on the community service sector's ability to house people. Economic stimulus money has been announced in response to COVID-19. It is DV Vic's view that this investment is a key opportunity to increase the quantum of social housing.

To end homelessness among victim-survivors of family violence, we urgently call on the Australian Government to:

- Reform the policies mentioned in this submission that contribute to structural homelessness and poverty in Australia;
- Invest in specialist family violence services which have the specialist expertise required to support victim-survivors of family violence to safely leave and recover from violence; and
- Fund a National Flexible Support Program to a level equal or above the Victorian scheme to help address factors in victim-survivors' lives that can impact on their ability to gain or maintain housing.

If the Australian Government does the above and uses COVID-19 as a moment to exercise compassion, DV Vic believes the Government can re-make Australia into a country where no one is homeless.

Appendix A: DV Vic Submission to the Victorian Inquiry into Homelessness

Introduction: The scale and nature of homelessness as a result of family violence

Family violence is the most common reason that women and children become homeless.²

Nearly half (47 per cent) of people accessing Specialist Homelessness Services (SHS) agencies in Victoria in 2017-18 listed family violence as their primary reason for seeking support.³ This is compared to only 31 per cent in 2014-15 when Victoria's Royal Commission into Family Violence released its report.⁴ Nearly half of the people who reported experiencing family violence were single parents and the vast majority (94 per cent) were female.⁵

The increase in family violence-related presentations is likely to be a positive indication. It is a sign that Victoria's family violence reforms are enabling more people to come forward and seek help. However, the increased awareness of family violence among the community means that the increase in demand is unlikely to wane. The Victorian Government needs to plan accordingly.

The Royal Commission found a strong link between being able to access long-term housing and victim-survivors' ability to recover from family violence.⁶ It subsequently made a series of recommendations to increase access to housing for victim-survivors of family violence. In response to these recommendations, the Victorian government initiated the Family Violence Housing Blitz and a suite of other reforms including: an increase in private rental brokerage programs, reforms to the Residential Tenancies Act, and expansion of Flexible Support Packages and the redevelopment of communal style family violence refuges to a new core and cluster model.

Despite this dedicated investment, the scale and systemic nature of the housing affordability crisis means that these initiatives have been able to do little to improve access to long-term housing for victim-survivors of family violence. Almost four years after the Royal Commission released its report, the lack of affordable housing in Victoria remains one aspect of the reform where we have seen very little progress and which is a significant barrier to the effective implementation of many of the other family violence reforms.

Homelessness among victim-survivors occurs as a direct result of experiencing family violence – for example, having to leave the home to be safe from a perpetrator's use of violence. However it is also underpinned by structural drivers such as gender-based economic inequality and a systemic lack of affordable housing that prevent victim-survivors from being able to find an affordable, safe place to live where they can recover from the violence they have experienced. As a result, to solve

² Spinney A. (2012). Home and Safe? Policy and practice innovations to prevent women and children who have experienced domestic and family violence from becoming homeless. Final report no. 196. Melbourne: Australian Housing and Urban Research Institute.

³ AIHW (2019) Specialist homelessness services 2017–18: Victoria.

<https://www.aihw.gov.au/getmedia/46473685-40d3-471b-b28d-ae6aaac81e84/aihw-hou-299-vic.pdf.aspx>

⁴ Royal Commission into Family Violence (2016) v2 p38

⁵ Ibid

⁶ Royal Commission into Family Violence (2016) v2 p38

homelessness among victim-survivors, we need good responses to family violence *and* policies that address systemic drivers of homelessness, such as the lack of affordable housing. The family violence reforms have put Victoria on the path toward improving responses to family violence. We now need to find a way to create more affordable housing.

The Royal Commission drew together a comprehensive evidence base regarding the nexus between family violence, housing and homelessness. While drawing on this evidence base, this submission seeks to draw the Committee's attention to several ongoing and emerging issues post Royal Commission and point to recommendations for how to reduce homelessness among victim-survivors of family violence.

Safe at Home vs Leaving Home

The Royal Commission found that best housing outcome for many victim-survivors of family violence is to be supported to stay in their own home.⁷ Homelessness as a result of family violence often leads to a lifetime of disadvantage, discrimination and poverty.⁸ This is particularly true for children, as research demonstrates that children who experience homelessness are more likely to experience homelessness as adults.⁹ Enabling victim-survivors to stay in their home therefore prevents them from needing to spend prolonged periods of time in crisis accommodation and prevents them from becoming entangled in the housing and homelessness system.

DV Vic believes that as a principle, a Safe at Home response should be the preferred housing response to victim-survivors of family violence. Safe at Home refers to a variety of interventions that enable victim-survivors to remain in their home, while the perpetrator of the family violence leaves, often with an Intervention Order (IVO) that includes exclusion provisions. Safe at Home interventions are based on the principle that victim-survivors of family violence should not be further punished and disadvantaged by being forced to leave their home and that sanctions should be directed towards the perpetrator instead.

While a Safe at Home response is not appropriate for everyone, particularly if the risk of family violence is high, Safe at Home responses have been successful at minimising housing insecurity for some victim-survivors. Unfortunately, the success and applicability of Safe at Home responses is somewhat constrained due to policy shortcomings:

- Lack of accommodation options for perpetrators of family violence excluded from the family home,
- Lack of certainty regarding the future of flexible family violence support package and private rental assistance funding.

Accommodation for perpetrators

The Royal Commission identified housing for perpetrators of family violence as a significant gap in the system that undermines victim-survivors' safety. If a perpetrator is removed from the family home

⁷ Royal Commission into Family Violence (2016) v2 p38

⁸ Phillips, J. & Vandenbroek, P. (2014). Domestic, family and sexual violence in Australia: an overview of the issues, retrieved from https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1415/ViolenceAust#_Toc401045316

⁹ Flatau et al (2013) Lifetime and intergenerational experiences of homelessness in Australia.

and becomes homeless as a result, it makes them more likely to try to return home or harass victim-survivors to take them back. It is also harder to engage perpetrators in services when they are homeless.¹⁰ It is much safer for victim-survivors to have perpetrators monitored and engaged in programs than being displaced into dangerous rooming houses or sleeping in their cars. It is also common for perpetrators who are excluded from the home to stay with relatives, most frequently elderly parents. This can place other family members at risk of other forms of family violence, such as elder abuse. Despite this gap being identified, the Royal Commission did not make any recommendation in relation to this issue and little progress has been made in increasing access to accommodation options for this cohort.

DV Vic recognises that the lack of housing for perpetrators is symptomatic of the wider housing affordability crisis and that addressing this crisis is complex. However, given housing perpetrators has significant bearing on victim-survivors' safety, DV Vic advocates for the Victorian Government to take urgent action on making accommodation available to perpetrators of family violence when they are excluded from the family home. These accommodation options should not come at the expense of housing for victim-survivors but needs to complement housing for victim-survivors. Accommodation for perpetrators could include a range of accommodation options including short-term residential programs as well as long-term housing to suit a variety of perpetrator needs and circumstances. It should be accessible at short notice and should be attached to case management and men's behavioural change programs to ensure that men are held accountable for their behaviour and risk to victim-survivors is managed and minimised.

Recommendation 1: The Victorian Government invest in a trial and evaluation of accommodation for perpetrators of family violence with an aim to develop a model that is focused on monitoring changes in risk experienced by victim-survivors and which can respond to a diverse cohort of perpetrators. This model should be scaled up state-wide if evaluated to be successful.

Flexible Support Packages and the Private Rental Assistance Program

DV Vic members unanimously agree that flexible support packages (FSPs) have revolutionised the nature of specialist family violence support. FSPs build on other brokerage programs such as the Private Rental Assistance Program (PRAP), which focuses on supporting people, including victim-survivors of family violence, to stay in or enter the private rental market, by allowing specialist family violence service to flexibly respond to clients' family violence related needs. This could include anything from mental health support to school supplies or the replacement of essential items lost when fleeing family violence. The inherently flexible nature of the packages mean that support can be tailored in a more responsive and agile way that addresses the unique risks, needs and impacts of family violence on each individual victim-survivor, including children. Among the many uses of FSPs is the ability to support a Safe at Home response through the purchase of security measures via the Personal Safety Initiative (PSI). Being able to upgrade the security features of a victim-survivor's home prevents clients from needing to go into crisis accommodation and/or rely on insecure housing arrangements.

To date, the Victorian Government has invested \$64 million in rolling out FSPs. Unfortunately, funding for FSPs runs out this financial year. The loss of this flexible, individually tailored support would be disastrous for the wellbeing of victim-survivors of family violence and significantly undermine services' ability to provide a Safe at Home response. Similarly, funding for PRAP is only guaranteed until mid-2021. Without ongoing funding for this program, a significantly larger

¹⁰ Royal Commission into Family Violence (2016) v2 p73

proportion of FSP money will need to be used for housing related needs, undermining family violence services' ability to respond to other needs related to family violence and diluting the original intent of FSPs. DV Vic believes that FSPs and PRAP need to be made a permanent fixture of the specialist family violence system in Victoria and therefore call on the Victorian Government to commit to ongoing funding for these programs.

Recommendation 2: The Victorian Government invest in FSPs as a permanent service offering within the integrated response to family violence and guarantee funding for FSPs for the next three years at least at the same amount as previous investment (\$64 million).

Recommendation 3: The Victorian Government commit to ongoing funding for PRAP as a key housing support program for victim-survivors of family violence.

Structural Barriers to a Safe at Home Response

Safe at Home initiatives have supported more victim-survivors to remain in their home. However, it is important to note that a Safe at Home response is not the right housing solution for everyone. In addition to some victim-survivors not being able to stay at home due to safety concerns, Safe at Home responses are predicated on an assumption that a victim-survivor has a home they can keep living in and that they will be able to afford to live there on a single income. For many victim-survivors, this is not the case.

Gender inequality in employment, pay and working conditions and as well as a trend for women to provide the majority of unpaid caring responsibilities undermine women's financial welfare¹¹ and can compromise their ability to continue to pay rent or a mortgage repayment in order to stay in their family home. Furthermore, divorce and separation have more severe and longer-term impacts on a women's household income than on men's, which means women are less likely to financially recover from separation even after a long period of time.¹² Punitive social welfare policies, including cuts to single parenting payments and mutual obligation programs like Parents Next, compound financial barriers and disadvantage, particularly for single mothers.¹³ Economic disadvantage can be further compounded for women from marginalised communities, including Aboriginal women, women with disabilities and those from refugee and immigrant backgrounds.

Victim-survivors of family violence are likely to face additional economic disadvantages as a result of family violence. Research estimates that up to 90 per cent of family violence cases involve economic abuse¹⁴ which can include a range of types of behaviour including preventing victim-survivors from being able to work or study, controlling or limiting access to household finances, making a victim-survivor live on an allowance, forcing someone to take on debt in their name or forcing them to claim income support payments to which they are not entitled.¹⁵ Economic abuse is also likely to increase post separation as the perpetrator of violence loses other forms of control. Ongoing economic abuse

¹¹ Australian Bureau of Statistics. (2017) *Gender Indicators, Australia, Sep 2017* (Cat. No. 4125.0) Retrieved February 2, 2018 from <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4125.0>

¹² David de Vaus et al., (2017) *The Economic Consequences of Divorce in Six OECD Countries*. Australian Journal of Social Issues 52, no. 2.

¹³ Canberra: Australian Government Department of Jobs and Small Business. (2018) *ParentsNext Evaluation Report*, https://docs.jobs.gov.au/system/files/doc/other/final_parentsnext_evaluation_report.pdf

¹⁴ Camilleri, O., Corrie, T., and Moore, S., (2015). *Restoring Financial Safety: Legal Responses to Economic Abuse*, Abbotsford: Good Shepherd Australia New Zealand & Wyndham Legal Service Inc.

¹⁵ Women and Money. What is financial abuse? https://www.womenandmoney.org.au/what-is-financial-abuse/?gclid=CjwKCAiApOvwBRBUEiwAcZGdG0t8csY00mUO5pfXYiFMHPpWaZ8GujK_9YdOaBQ0yVzLa3e7GMDVehoCxTsQAvD_BwE

post separation can manifest in prolonged family court proceedings, joint property or debt settlements and non-payment of child support.¹⁶ Finally, victim-survivors of family violence are also more likely to be dependent on income support payments, which are known to keep people in poverty¹⁷ and have been found to be inadequate to cover the cost of private rental or mortgage repayments in the current housing market.

We can see the effects of victim-survivor's financial marginalisation in their ability to access and maintain stable housing. Research, as well as anecdotal evidence from DV Vic member services, indicates that even if victim-survivors can be stabilised in their home initially as part of a Safe at Home response, many victim-survivors find that paying their rent or mortgage on their own is unsustainable.¹⁸ Most programs funded to support victim-survivors to remain in their home, such as those funded through the Family Violence Housing Blitz including the Rapid Housing Program and PRAP are short-term interventions that subsidise rent for up to 12 months. Although these programs are focused on tenants achieving stability and capacity to manage financially once the program ceases, once the subsidies end, victim-survivors can be at risk of losing their tenancies because they are unable to make ends meet and cover rent, which places them at ongoing risk of housing insecurity and homelessness.

Victim-survivors experiencing intersecting forms of oppression and marginalisation such as racism, ableism and homophobia are even less likely to be able to access Safe at Home response because they are more likely to be deeply excluded from the workforce and private housing market. For example, research into housing pathways among Aboriginal victim-survivors found that combinations of kinship networks, financial constraints, limited housing options and difficulty in accessing mainstream services play a critical role in determining housing choices.¹⁹ Aboriginal perpetrators of family violence are also more likely to become homeless upon needing to leave the family home, making it more difficult to provide a Safe at Home response to Aboriginal victim-survivors.²⁰

Victim-survivors on temporary visas are another cohort that are extremely unlikely to be able to access a Safe at Home response. Many victim-survivors on temporary visas have either come to Australia on a sponsored partner visa or as asylum seekers or refugees. They usually do not have work rights or access to income support or Medicare and may not be proficient in English. Without any income, accessing private rental either through a private rental brokerage or Safe at Home response is impossible for this cohort. This is a significant cohort of clients for the specialist family violence sector which is increasingly at high risk of homelessness.

For victim-survivors who are unable to safely remain in their home, either as a result of safety concerns or structural barriers that make it unfeasible, alternative housing and accommodation options need to be made available.

¹⁶ Nilmini Fernando (2018) *Financial 'Teachable Moments' for Women Affected by Family Violence*. WIRE. <https://www.wire.org.au/assets/Uploads/WhenIsTheRightTimeToTalkAboutMoney.pdf>.

¹⁷ <https://raisetherate.org.au/>

¹⁸ Australia's National Research Organisation for Women's Safety. (2019). *Domestic and family violence, housing insecurity and homelessness: Research synthesis* <https://www.anrows.org.au/publication/domestic-and-family-violence-housing-insecurity-and-homelessness-research-synthesis/>

¹⁹ Cripps, K. and Habibis, D. (2019) *Improving housing and service responses to domestic and family violence for Indigenous individuals and families*. AHURI. P 14 https://www.ahuri.edu.au/_data/assets/pdf_file/0011/45200/AHURI-Final-Report-320-Improving-housing-and-service-responses-to-domestic-and-family-violence-for-Indigenous-individuals-and-families.pdf

²⁰ Ibid p 19

Family Violence Crisis Accommodation

For victim-survivors unable to stay at home, their housing pathway usually will involve a stay in some form of emergency (e.g. motel) or crisis (e.g. family violence refuge) accommodation.²¹

Historically, family violence crisis accommodation, commonly referred to as family violence refuge, has been conflated with other crisis accommodation in the housing and homelessness system. This is because of the way specialist family violence services are funded as part of the Specialist Homelessness Services (SHS) system through the National Housing and Homelessness Agreement (NHHA). However, unlike other crisis accommodation provided by homelessness agencies, the purpose of family violence refuge is not to provide a response to family violence-precipitated homelessness alone. It is primarily to provide a safety response to victim-survivors of family violence who are at such high risk of family violence that they cannot safely remain at home. Accessing a family violence refuge reduces homelessness among victim-survivors by addressing the initial family violence risk and safety crisis. This is a critical steppingstone in helping victim-survivors recover from violence and avoid homelessness, but it is not exclusively a housing response to the homelessness that family violence creates.

Traditionally, the model of family violence refuge involved victim-survivors staying for several weeks to a few months in family violence refuge while their initial safety crisis was stabilised, after which point, they transitioned into stable, long-term housing. However, for approximately the past fifteen years, the lack of affordable housing in Victoria – both private rental and social housing – largely prevents this from happening. Home ownership is out of reach for most, if not all, clients of specialist family violence services, due to many of the structural economic factors discussed in the previous section of this submission. The high cost, and lack of vacancies in the private rental market means that a large proportion of victim-survivors are also unable to afford private rental. This leaves social housing (public and community) as the only remaining long-term housing option for many victim-survivors.

The introduction of the Victorian Housing Register and segmented waitlists that give priority to social housing applicants experiencing family violence had a positive effect on access to social housing for victim-survivors. Unfortunately, waitlists for public and community housing are at an all-time high, with over 81,000 people on the social housing wait list, including approximately 25,000 children.²² These long wait lists make it nearly impossible to access any form of social housing, even for victim-survivors on the priority housing list. Our member services tell us that many victim-survivors will wait years before being offered a social housing property.

The lack of exit points into long-term housing from crisis accommodation creates a bottleneck in family violence refuges and is resulting in victim-survivors staying in family violence refuge well past the point where their safety crisis has been stabilised. Originally intended to house victim-survivors for six to eight weeks while their family violence crisis was stabilised, some victim-survivors are staying in family violence refuges for many months. This is particularly true for victim-survivors on

²¹ The term “family violence crisis accommodation” in Victoria can be used to refer to a range of short term accommodation options that includes family violence refuge (funded to work with clients for 6-8 weeks) and other shorter-term, crisis accommodation that is funded by government but run by a specialist family violence community service organisation, such as Safe Steps Safe House (usually funded to work with clients for 1-2 weeks).

²² DHHS, Housing Assistance: Additional Service Delivery Data 2018 – 19, September 2019, Table 15, p8. & Department of Health and Human Services cited in Parliament of Victoria, Legal and Social Issues Committee 2018, Inquiry into the Public Housing Renewal Program.

temporary visas, who in addition to having no access to income or income support payments, are more likely to have large families in need of a home with more than three bedrooms. Strict immigration policies are blowing out wait times for visa applications, leaving many of these families waiting in limbo indefinitely. It is especially difficult to find long-term housing for families in this situation. Data from the Victorian Government's *Support funding for victim-survivors on temporary visas in refuge* shows that 55 per cent of victim-survivors on temporary visas assisted by family violence refuges in the first three quarters of the 2018-19 financial year were in refuge for more than 26 weeks.²³ Our member services report that there are some cases in which victim-survivors on temporary visas remain stuck in family violence refuges for years.

For victim-survivors with a disability, it is a similar story. While traditionally it has been difficult to find a family violence refuge that meets a victim-survivor's disability-related needs, the redevelopment of the communal family violence refuges into a core and cluster model is improving physical access to family violence refuge for victim-survivors with a disability. However, finding an affordable, accessible long-term housing option that meets a victim-survivor's and/or their children's unique needs continues to be extremely challenging in the current housing environment. Without long-term housing options, many victim-survivors with disabilities and their children are forced to stay in violent relationships.

The lack of exit points from refuge creates a backlog in the system which means victim-survivors who are just entering the system are not able to access a bed in a family violence refuge. This backlog has forced services to place more and more victim-survivors in motels as temporary emergency accommodation while they wait for a bed.

The Royal Commission recommendation to redevelop all of Victoria's communal refuges into core and cluster models has been a very welcome investment for family violence services. This redevelopment is marginally increasing bed capacity and increasing access to vulnerable victim-survivors who have historically not been served well by communal family violence refuges, such as victim-survivors with a mental illness or who use alcohol or other drugs, the LGBTIQ community, Aboriginal victim-survivors, and victim-survivors with a disability. However, the number of family violence refuge beds still sits at only approximately 100 beds across the state. The state-wide family violence crisis service, Safe Steps reports that each night they accommodate an average of 60 women and 55 children in either motels or other community crisis accommodation like Safe Step's Safe House. The amount of community-run family violence crisis accommodation is so small that by default most of these women and children will be in motels.

Motels are an inappropriate crisis accommodation response for anyone, but particularly for victim-survivors of family violence who are likely to be experiencing trauma and to have accompanying children. Unfortunately, the use of motels to house victim-survivors of family violence has become a necessary part of the family violence service system. Safe Steps, reports that some victim-survivors are forced to stay in motels for weeks while they wait for an available bed in a family violence refuge. These prolonged stays in emergency accommodation and refuge put victim-survivors at serious risk. Too often victim-survivors decide that it is easier to go back to the perpetrator and live with the violence in order to avoid further housing instability and homelessness.

The bottlenecks and lack of capacity within family violence crisis accommodation also mean that services need to triage victim-survivors and prioritise victim-survivors at the highest risk of family

²³ Family Safety Victoria (June 2019) *Q3 Acquittals report summary: Support for funding for victim survivors on temporary visas in refuge' 1 January 2019 – March 2019.*

violence. There is now a distinct need for non-high-risk family violence crisis accommodation for women who have experienced family violence and are homeless or at risk of homelessness but who are not at high enough risk to require a family violence refuge response. The systemic lack of affordable housing, combined with economic inequality and the traumatic effects of family violence, mean that some victim-survivors may continue to struggle to maintain housing even after the family violence crisis has passed. These victim-survivors often need coordinated support for family violence related mental illness, drug and alcohol abuse or other complex issues resulting from trauma in order to maintain housing. For victim-survivors with complex needs, large, mainstream crisis accommodation facilities can be frightening and retraumatising. Mainstream services are also less likely to have the specialist expertise to help women recover from family violence related trauma which often results in victim-survivors in this situation bouncing around the family violence and housing and homelessness systems for extended periods of time. Family violence and trauma informed, supported accommodation that can coordinate support with other service systems including mental health and alcohol and drugs is a critical gap in the housing system for victim-survivors of family violence which needs to be addressed in order to respond to the spectrum of need among victim-survivors.

There is a clear need for increased capacity within family violence crisis accommodation in order to reduce the use of motels to house victim-survivors. However, an increase in crisis accommodation will not fix the systemic shortage of affordable housing, and on its own, an increase in crisis accommodation is not the solution. It is also difficult to know how much additional family violence crisis accommodation is needed due to unreliable data about unmet demand across the family violence and housing and homelessness sectors, the under reporting of family violence and the lack of long-term housing exit options. To be able to truly know how much additional family violence crisis accommodation we need, in depth demand modelling needs to be done that can accurately record current unmet demand, account for the under reporting of family violence and account for the effects of the chronic lack of affordable housing that is causing a backlog in the system.

Recommendation 4: The Victorian Government conduct comprehensive demand modelling for family violence refuges and other forms of family violence crisis accommodation across the state to determine how many additional family violence refuge beds are truly needed to meet victim-survivors' needs and reduce the reliance on motels.

Disability Family Violence Crisis Response Initiative

Regarding crisis accommodation for victim-survivors with a disability, DV Vic wishes to draw the Committee's attention to the Disability Family Violence Crisis Response Initiative (DFVCRI). This initiative is a fund that is currently managed by Safe Steps that can be used to pay for support workers, equipment and/or accessible transport that a victim/survivor with a disability needs in order to be able to leave a violent relationship and stay in crisis accommodation or other temporary accommodation.

This initiative fills an important gap in services for victim-survivors with a disability because the funds can be distributed quickly and flexibly at short notice to facilitate a victim-survivor's escape. Other schemes such as the NDIS are unsuited to a crisis response because NDIS packages can be slow to negotiate and difficult to change to meet rapidly changing needs. DFVCRI is also an important supplement to other brokerage programs like FSPs, as it provides supports related to disability, thereby leaving FSP money available to provide other supports related to family violence that victim-survivors are likely to need regardless of their disability.

Funding for DFVCRI ends at the end of this budget cycle and no assurance has been given that it will be renewed. This initiative is critical in enabling victim-survivors with a disability to leave a violent relationship. We call on the Victorian Government to commit to ongoing funding for this program.

Recommendation 5: The Victorian Government commit ongoing, long-term funding to the DFVCRI to ensure victim-survivors with a disability have the disability-related support they need to leave a violent relationship.

Social Housing for victim-survivors of family violence

For victim-survivors unable to stay at home or access private rental, social housing is the only long-term housing option. Yet, Victoria has the lowest percentage of social housing of any state in Australia (3.2 per cent) and its recurrent spending on social housing per capita is less than half the national average²⁴. Unsurprisingly, waitlists are impossibly long with only a handful of properties allocated each year.

It is DV Vic's view that the private housing market is limited in its ability to cater to the housing needs of poor and marginalised people, including victim-survivors of family violence. We cannot encourage people to leave a violent relationship if we cannot offer them a safe place to go. It is the State's responsibility to ensure that these members of our community are safely and adequately housed with dignity and respect.

DV Vic is a member of the State-wide alliance of Housing Peaks. As a member of this alliance we urgently call on the Victorian government to develop a social housing strategy and increase social housing stock by 6,000 properties (including 300 Aboriginal specific social housing properties) per year over 10 years in order to match the national average of social housing accounting for 4.5 per cent of total housing stock.

A social housing strategy that can deliver this number of social (public and community) housing will have a direct effect on the wellbeing of victim-survivors by 1) directly housing victim-survivors, reducing the time they need to stay in crisis and emergency accommodation and providing opportunities to establish stability and safety post-violence and 2) by increasing accommodation options for perpetrators which will enable more frequent and effective Safe at Home responses for a greater number of victim-survivors.

Without more social housing, it is not possible to end homelessness among victim-survivors of family violence. Access to more safe, stable and affordable housing is the one piece of the family violence system that has not been addressed. If the Victorian Government is serious about ending family violence and ending homelessness, it will commit to building more social housing to ensure that the most vulnerable members in our society, including victim-survivors of family violence, are safe and housed.

Recommendation 6: The Victorian Government develop a Social Housing Strategy that commits them to creating 6,000 new social housing properties every year for the next 10 years to bring the

²⁴ Australian Productivity Commission (2019) *Report on Government Services 2017-18, Part G Housing and Homelessness*

proportion of housing stock in Victoria that is social housing up to the national average of 4.5 per cent.

Conclusion

Family violence is the most common reason women and children become homeless, but it is not the only driving factor. Experiences of family violence would not need to lead to homelessness if victim-survivors could easily access affordable and safe, long-term housing that met their needs.

The Royal Commission into Family Violence identified the complex relationship between family violence and homelessness and the need for more housing. In response the Victorian Government's Family Violence Housing Blitz enabled a trial of innovative housing initiatives and options for victim-survivors. However, without a state-wide scale up and ongoing investment, they are not able to address the problem of family violence and homelessness.

A Safe at Home response is the preferred housing response for victim-survivors because victim-survivors should not be forced to leave their homes on top of being subjected to violence. Increased access to FSPs, PRAP and Safe at Home initiatives like PSI have also increased victim-survivors' ability to live safely at home and avoid needing to enter the housing and homelessness systems. These programs should be extended. However, a Safe at Home response is not appropriate for everyone. Some victim-survivors may be at such high risk they are not able to safely stay at home and the lack of accommodation for perpetrators further limits Safe at Home options for many victim-survivors.

Even if they were able to stay at home from a safety perspective, the structural nature of poverty and economic disadvantage among victim-survivors of family violence means that many victim-survivors cannot afford the private rental market or wholly take over mortgage repayments. Rental assistance packages and other subsidies are too short-term to address the social and economic disadvantages that family violence and other intersecting forms of oppression create. For many victim-survivors unable to stay at home, social housing is the only other housing option but a chronic underinvestment in social housing means there is simply not enough housing to meet demand.

Unfortunately, the lack of affordable housing is undermining the specialist family violence system's ability to keep victim-survivors safe and is actively contributing to their homelessness. The continued shortage of affordable and social housing means victim-survivors of family violence are frequently forced to choose between staying in a violent relationship or becoming homeless.

Prolonged periods of time stuck in the family violence and housing and homelessness systems, often bouncing between multiple forms of emergency and crisis accommodation, make victim-survivors more likely to return to violent relationships or into dangerous and insecure housing, putting them at serious risk of harm, injury and possibly death.

An urgent, sustained increase in investment is needed from all levels of Government to address the housing affordability crisis. New social housing needs to be built to meet the needs of a diverse group of people to ensure everyone that needs safe and affordable housing can access it.

The increase in demand for family violence related housing and supports also needs to be met by increased investment in family violence crisis accommodation. The Victorian Government has invested a significant amount of money into crisis accommodation following the Royal Commission. However, demand continues to outstrip supply. Even with a fully functioning housing market, crisis

accommodation will always play a role in the family violence system. We need improved demand modelling and research to determine the true level of demand and then sustained investment to match.

This Inquiry into Homelessness is an opportunity to build upon the Royal Commission and draw attention to the link between family violence, homelessness and the lack of affordable housing. We cannot keep victim-survivors safe without more safe, affordable and readily accessible housing. We need all levels of government to commit to investing in a long-term social housing strategy that enables everyone to have access to a safe, affordable and stable home.

We look forward to working with the Committee and the Victorian Government towards a Victoria where victim-survivors of family violence do not become homeless and that is ultimately free of family violence and homelessness.

Summary of Recommendations

Recommendation 1: The Victorian Government invest in a trial and evaluation of accommodation for perpetrators of family violence with an aim to develop a model that is focused on monitoring changes in risk experienced by victim-survivors and which can respond to a diverse cohort of perpetrators. This model should be scaled up state-wide if evaluated to be successful.

Recommendation 2: The Victorian Government invest in FSPs as a permanent service offering within the integrated response to family violence and guarantee funding for FSPs for the next three years at least at the same amount as previous investment (\$64 million).

Recommendation 3: The Victorian Government commit to ongoing funding for PRAP as a key housing support program for victim-survivors of family violence.

Recommendation 4: The Victorian Government conduct comprehensive demand modelling for family violence refuges and other forms of family violence crisis accommodation across the state to determine how many additional family violence refuge beds are truly needed to meet victim-survivors' needs and reduce the reliance on motels.

Recommendation 5: The Victorian Government commit ongoing, long-term funding to the DFVCRI to ensure victim-survivors with a disability have the disability-related support they need to leave a violent relationship.

Recommendation 6: The Victorian Government develop a Social Housing Strategy that commits them to creating 6,000 new social housing properties every year for the next 10 years to bring the proportion of housing stock in Victoria that is social housing up to the national average of 4.5 per cent.

Appendix B: DV Vic Submission to the Inquiry into Parents Next

ParentsNext

Although ParentsNext is framed as working with highly disadvantaged parents, with a focus on indigenous parents, the evaluation report identified that 94.9 per cent of participants in the program were women.²⁵ One in every four women will experience family violence in their lifetime²⁶ and an Aboriginal person is 7.3 times more likely to experience family violence than a non-Aboriginal person.²⁷ As a result, ParentsNext is likely to work with many mothers who have experienced family violence. It is critical that this program does not exacerbate experiences of violence or hinder women's ability to recover.

Equal economic participation and financial security is critical to women's financial independence and their ability to make genuine choices in their lives, including the ability to leave a violent relationship. While ParentsNext is framed as a pre-employment program designed to help mothers enter the workforce, DV Vic does not support the ParentsNext program in its current iteration on account of 1) the program's compulsory nature, 2) the Targeted Compliance Framework and 3) the fact that the program does not address structural barriers that exclude women, particularly mothers and victim survivors of family violence, from equal participation in the workforce.

Compulsory participation

By compelling women to participate in ParentsNext, the Australian Government is removing women's agency to make decisions about what is best for them and their families and perpetuating harmful gender norms that have traditionally cast women as poor financial managers, given financial control to men and which have historically created barriers to women's equal participation in the workforce.²⁸ Paradoxically, these sentiments are the very reason women face economic disadvantage today. Yet, despite these structural reasons for women's economic disempowerment, punitive, mutual-obligation income support policies, such as ParentsNext, continue to imply individual responsibility for failing to be engaged in the workforce.

Similarly, by focusing the program on Aboriginal families, the Government is replicating past government policies that have systematically disempowered Aboriginal communities from taking control of their lives, such as indentured labour, stolen wages and the forced removal of children.²⁹ The ParentsNext Evaluation cites high-unemployment and low labour force participation as a reason for focusing the program on Aboriginal communities.³⁰ However, it implies that high-unemployment in Aboriginal communities is a result of a deficiency within Aboriginal communities instead of recognising

²⁵ "ParentsNext Evaluation Report" (Canberra: Australian Government Department of Jobs and Small Business, 2018), https://docs.jobs.gov.au/system/files/doc/other/final_parentsnext_evaluation_report.pdf.

²⁶ "Family, Domestic and Sexual Violence in Australia" (Canberra: Australian Institute of Health and Welfare 2018, 2018), <https://www.aihw.gov.au/getmedia/d1a8d479-a39a-48c1-bbe2-4b27c7a321e0/aihw-fdv-02.pdf.aspx?inline=true>.

²⁷ State of Victoria, *Victorian Royal Commission into Family Violence: Report and Recommendations*. Parl Paper No 132, Vol 5 (Victoria: 2014-16), 11

²⁸ Nilmini Fernando, "Financial 'Teachable Moments' for Women Affected by Family Violence" (WIRE, November 1, 2018), p 11 <https://www.wire.org.au/assets/Uploads/WhenIsTheRightTimeToTalkAboutMoney.pdf>.

²⁹ Irene Watson, "In the Northern Territory Intervention, What Is Saved or Rescued and at What Cost?," *Cultural Studies Review* 15, no. 2 (2009): 45–60–45–60, <https://doi.org/10.5130/csr.v15i2.2037>.

³⁰ "ParentsNext Evaluation Report."

that high unemployment and low labour force participation are results of a range of complex structural factors including colonisation, dispossession of land and ongoing racism and discrimination. Combined with the gender-based discrimination, Aboriginal women are some of the most disadvantaged people in our society. It is unfair to seek to control their lives more through this program.

Regaining individual agency and control over their life is integral to recovery for victim survivors of family violence. Family violence is about the abuse of power and control. Most family violence victim survivors will have experienced a combination of psychological, financial, emotional, social, physical and sexual violence that is designed to erode their confidence, self-worth and ability to leave the relationship and be independent. For Aboriginal women, these factors are combined with experiences of institutional and individualised racism, discrimination and intergenerational disadvantage. Forcing mothers with these experiences to participate in the ParentsNext program is the antithesis of empowering them to take control of their lives and in fact replicates the control experienced in an abusive relationship.

Although the ParentsNext Summary and Participation Requirements list family violence as a suitable reason for an exemption from the program,³¹ no mention of how potential participants are assessed, what type of evidence is required, or how long the exemption will be granted for is provided in either the ParentsNext Discussion Paper, the ParentsNext Evaluation Report or on relevant departmental websites. Anecdotal reports of women's experiences of the program suggests that victim survivors are being required to participate in the program to the detriment of their recovery³² despite the current exemptions. We are also concerned about reports of women being required to tell their story multiple times to obtain these exemptions.³³ For many women there can be intense feelings of shame associated with family violence. Many women never disclose their experiences at all. Being forced to disclose their deeply personal experiences to a complete stranger to justify their circumstances and why they should qualify for an exemption is disrespectful, a violation of their privacy and can be re-traumatising. We urgently call for compulsory component of ParentsNext to be discontinued immediately for non-Aboriginal and Aboriginal parents alike.

Targeted Compliance Framework

The ParentsNext eligibility criteria stipulates that mothers with children as young as six months may be required to participate in the program and that their parenting payments will be discontinued if they do not comply. Mothers with small children are some of the most time-poor members of our society, with caring duties estimated to be 51 hours a week when a baby is born and housework hours approximately 30 hours per week after a child starts school.³⁴ It is punitive, illogical and unrealistic to require mothers to commit to yet another set of demands to maintain their income at a time when

³¹ "3.5.1.167 ParentsNext Summary & Participation Requirements (PP) | Social Security Guide," accessed January 29, 2019, <http://guides.dss.gov.au/guide-social-security-law/3/5/1/167>.

³² Beth Goldblatt, "More than Unpopular. How ParentsNext Intrudes on Single Parents' Human Rights," *The Conversation*, accessed January 29, 2019, <http://theconversation.com/more-than-unpopular-how-parentsnext-intrudes-on-single-parents-human-rights-108754>.

³³ Luke Henriques-Gomes, "Single Parents Forced to Attend 'story Time' or Lose Centrelink Payments," *The Guardian*, November 5, 2018, sec. Australia news, <https://www.theguardian.com/australia-news/2018/nov/06/single-parents-forced-to-attend-story-time-or-lose-centrelink-payments>.

³⁴ Juanita McLaren and Susan Maury, "Parents Vexed? ParentsNext Is Poorly Designed to Support Mothers into Work," *Power to Persuade*, accessed January 29, 2019, <http://www.powertopersuade.org.au/blog/parents-vexed-parentsnext-is-poorly-designed-to-support-mothers-into-work/18/10/2017>.

they are already likely to be struggling to meet the demands of motherhood. It also completely devalues the role of parenting and the value it brings to children and their development, society and the economy.³⁵

Research into the impact of other Welfare to Work policies on single mothers found that mutual obligation schemes had not helped participating women find employment, undermined their self-worth, and actually increased their financial insecurity instead of improving it.³⁶ It makes no sense to expand failed policies to mothers with even younger children. Requiring mothers to participate in prescribed activities to maintain their income support payments is setting them up to fail and has already resulted in women and their children being cut off from their support payments.³⁷

For victim survivors of family violence, being cut off from parenting payments is particularly dangerous. Economic abuse and the lack of financial resources are some of the main barriers to women leaving an abusive relationship. Similarly, the risk of poverty and homelessness after leaving, particularly when there are children involved, is the main reason women return to the perpetrator.³⁸ For many women, fear for their children's safety and the impact family violence is having on them provides the impetus to leave. Cutting mothers' parenting payments for not meeting the requirements of ParentsNext only adds stress to a situation that is already extremely stressful and makes victim survivors more likely to return to the perpetrator to avoid poverty and/or homelessness.

Making women choose between living in poverty and returning to an abusive relationship should never be the outcome of a government policy and is against the objectives of ParentsNext. Participating in ParentsNext should not be tied to the receipt of parenting payments. ParentsNext's Targeted Compliance Framework should be discontinued immediately.

Structural Barriers to Employment

Economic abuse is estimated to be prevalent in as many as 50-90 percent of all family violence cases.³⁹ One study found that approximately one in every six women in Australia will experience economic abuse in their life time.⁴⁰

In addition to overt acts of financial abuse and control like preventing a victim from working or undertaking education, refusing to give victim survivors access to money and forcing them to take on a perpetrator's debt in their name, research has identified a range of 'covert tactics' that perpetrators use to sabotage a woman's employability. This may include harassment or attacks at the workplace or orchestrating women's quitting or firing from jobs by rendering them unable to work due to physical

³⁵ Marian Sawer and Miranda Stewart, "Gender Innovation: The Global Movement for Gender Budgeting," BroadAgenda, November 8, 2018, <http://www.broadagenda.com.au/home/gender-budgeting-why-we-need-it/>.

³⁶ "The Appropriateness and Effectiveness of the Objectives, Design, Implementation and Evaluation of Jobactive" (Melbourne: Good Shepherd Australia New Zealand, October 10, 2018), <https://www.goodshep.org.au/media/2194/g sanz-jobactive-submission-1018-final.pdf>.

³⁷ Goldblatt, "More than Unpopular. How ParentsNext Intrudes on Single Parents' Human Rights"; Henriques-Gomes, "Single Parents Forced to Attend 'story Time' or Lose Centrelink Payments."

³⁸ Australian Institute of Health and Welfare, "Specialist homeless services data collection 2011-12." (Canberra: 2012)

³⁹ Owen Camilleri, Tanya Corrie, and Shorna Moore, "Restoring Financial Safety: Legal Responses to Economic Abuse" (Good Shepherd Australia New Zealand and Wyndham Legal Services Inc., 2015), https://www.goodshep.org.au/media/1220/restoring-financial-safety_legal-responses-to-economic-abuse_web.pdf.

⁴⁰ Jozica Kutin, Roslyn Russell, and Mike Reid, "Economic Abuse between Intimate Partners in Australia: Prevalence, Health Status, Disability and Financial Stress," Australian and New Zealand Journal of Public Health 41, no. 3 (2017): 269-74, <https://doi.org/10.1111/1753-6405.12651>.

and mental injuries.⁴¹ These covert tactics, plus the trauma some victim survivors experience as a result of family violence, can have a lasting impact on a woman's employability long after the violence has ended. The outcomes of economic abuse are that victim survivors are less likely to be in paid employment or education and are more likely to be reliant on social security benefits.⁴²

Discriminatory attitudes among employers, lack of job availability (particularly in regional areas), lack of flexible work arrangements, the need to balance caring roles with employment and the cost of child care are well established systemic barriers to women's employment. Women who experience additional forms of discrimination (due to race, disability, age, sexuality or socio-economic status) are even less likely to be in paid employment.⁴³ ParentsNext does nothing to address these structural barriers. Instead it only creates additional stress and runs the risk of leaving women and their children in poverty.

Conclusion

Economic independence and wellbeing for women and their children are critical to reducing women's disadvantage and enabling women to make decisions about their life, including when to enter the workforce. However, as it is currently structured DV Vic does not believe that ParentsNext is helping women achieve economic independence. The program should be voluntary, and participation should not be tied to income support payments.

Some mothers, including some who have experienced family violence, may benefit from of the services offered through ParentsNext. However, its current punitive and compulsory nature is more likely to do harm to victim survivors and their children than good. Structural factors that inhibit women's, particularly Aboriginal and migrant women's, participation in the workforce need to be addressed alongside programs like ParentsNext which take an individualised approach.

⁴¹ Fernando, "Financial 'Teachable Moments' for Women Affected by Family Violence." p 48

⁴² Camilleri, Corrie, and Moore, "Restoring Financial Safety: Legal Responses to Economic Abuse."

⁴³ Somali Cerise et al., "Accumulating Poverty? Women's Experiences of Inequality over the Lifecycle" (Sydney: Australian Human Rights Commission, September 2009), https://www.humanrights.gov.au/sites/default/files/document/publication/accumulating_poverty.pdf.

Appendix C: DV Vic submission to the Victorian State Budget 2020-2021 (with specific reference to section on FSPs)

Introduction

The three years since the Victorian Royal Commission into Family Violence (Royal Commission) have been an exciting time to be part of the family violence sector. Family Violence has firmly established itself as a social issue in the consciousness of Victorians. As a society, we are having more conversations about family violence and violence against women than ever before and asking tough questions about those who choose to use violence – primarily men - and how they should be held to account. The Victorian community is more invested in ending family violence than ever before, and the mantra that ‘family violence is everyone’s responsibility’ is increasingly being embraced across all levels of society. It has also been a period of unprecedented investment in family violence prevention and response, with the Victorian Government investing nearly \$3 billion already to implement the Royal Commission’s recommendations.

Victoria is experiencing an ever-increasing demand to respond to reports of family violence and requests for help, particularly from specialist family violence services (SFVSs). However, this is a positive development. It indicates that more victims-survivors of family violence are feeling able to come forward to seek help, and that more cases of family violence are being successfully identified by other sectors meaning more victim-survivors are being offered and are receiving support. It is also an indicator of increased and better identification of family violence and corresponding referrals to specialist family violence services as a result of larger systemic reforms such as the Multi-Agency Risk and Assessment Management (MARAM) Framework.⁴⁴

However, the increase in demand at a time of rapid and extensive change is creating increased complexity and pressure within the system. The reforms have brought about rapid change not only for specialist family violence response services for victims-survivors, but also for the broader systems that intersect with family violence such as the civil and criminal justice systems, housing and homelessness, health, and child and family services. Many of the reforms require more time to be fully implemented and their outcomes realised. The challenge now is to sustain the momentum of the reform agenda in the face of new and emerging issues within the family violence response system and other compelling competing policy priorities.

The Victorian Government’s 10-year plan *Ending Family Violence: Victoria’s Plan for Change*⁴⁵ recognises that reforms of this magnitude take time. We are only three years into a 10-year reform agenda. In many instances the impact of the immediate reforms is only just starting to be felt as the reform agenda moves from design to implementation. As the initial funding commitment to implement the Royal Commission recommendations comes to an end, DV Vic is calling upon the Victorian Government to commit to continuing their investment in the work that is underway to reform Victoria’s

⁴⁴ Family Safety Victoria. (2018). *Family Violence Multi-Agency Risk Assessment and Management Framework: A shared responsibility for assessing and managing family violence risk*. Melbourne: State of Victoria.

⁴⁵ Family Safety Victoria. (2016). *Ending Family Violence: Victoria’s Plan for Change*, Melbourne: The State of Victoria.

family violence system in order to continue progress towards and sustain the vision set out by the Royal Commission.

The Family Violence Reform Landscape

Three years into the Royal Commission reform agenda, a significant amount of reform design and implementation is underway. The policy landscape for the reforms has been established within *Ending Family Violence: Victoria's Plan for Change*,⁴⁶ the Victorian Government's 10-year plan for how to achieve a Victoria free from family violence through implementing the 227 recommendations made by the Royal Commission. This is complemented by the *Family Violence Rolling Action Plan 2017 – 2020*⁴⁷ (*Rolling Action Plan*), which outlines the priority activities for the first three years of reform investment. Under the *Rolling Action Plan* & the 2016/17 budget, specialist family violence services received almost \$2.71 billion in funding to expand case management, counselling services & other response interventions for victims-survivors including the expansion of flexible support packages. The *Rolling Action Plan* also saw investment prioritised for the design and implementation of the Support and Safety Hubs, within which specialist family violence services for victims-survivors are a key partner. Specialist family violence refuges were also prioritised for initial investment to enable their transition from a communal to core and cluster model. Further investment specifically for SFVSs, or for reform specifically involving SFVSs, followed in subsequent budgets.

The Royal Commission recommendations set new expectations for family violence workforce capacity and capability, which have been captured in *Building From Strength: 10-Year Industry Plan for Family Violence Prevention and Response*⁴⁸ (*Industry Plan*). At the core of the *Industry Plan* is a vision for a workforce that is equipped to prevent and respond to all forms of family violence and the individuals who experience or use it, particularly a 'valued, skilled, diverse, safe, empowered and supported specialist family violence ... workforce.'⁴⁹ To this end, the *Responding to Family Violence Capability Framework*⁵⁰ has also been developed, setting the standard for family violence response capability across four tiers of workforces in Victoria. Tier one, referring to specialist family violence workforces, captures the complex knowledge and skills required to undertake specialist response practice and service delivery across four levels of the workforce (Entry, Mid, Senior, Expert).⁵¹ DV Vic welcomed the release of *Strengthening the Foundations: First Rolling Action Plan 2019 – 2022*⁵² in November 2019 and endorses the additional \$16 million investment into the expansion of several capability building initiatives involving the SFVS workforce. These are important 'foundations' upon which to begin the

⁴⁶ Ibid.

⁴⁷ Family Safety Victoria. (2017a). *Family Violence Rolling Action Plan 2017 – 2020*, Melbourne: The State of Victoria.

⁴⁸ Family Safety Victoria. (2017b). *Building From Strength: 10-Year Industry Plan for Family Violence Prevention and Response*, Melbourne: The State of Victoria.

⁴⁹ Ibid, p.1.

⁵⁰ Family Safety Victoria. (2017c). *Responding to Family Violence Capability Framework*, Melbourne: The State of Victoria.

⁵¹ Ibid. p.5.

⁵² Family Safety Victoria. (2019). *Strengthening the Foundations: First Rolling Action Plan 2019 – 2022*. Melbourne: The State of Victoria.

work towards achieving the ambitious yet important workforce outcomes described within the *Industry Plan*.

Cutting across the family violence policy landscape is *Everybody Matters: Inclusion and Equity Statement (Everybody Matters)*, a ten-year commitment to a framework ‘for building a more inclusive system ... [and] a system that is responsive to all’ through embedding an intersectional approach.⁵³ Together with the *Diversity and Intersectionality Framework*⁵⁴ and the specialist family violence services intersectionality capacity building project, the ambitions of *Everybody Matters* demonstrates the scale of transformation underway within, and complexity of, the work of specialist family violence services for victims-survivors.

This policy landscape informs all reform activities and provides a roadmap for priority investment and activities. Significant areas of systemic reform underway include the design, implementation and evaluation of the Support and Safety Hubs model via the establishment of The Orange Door; the development and roll-out of the MARAM Framework, the Family Violence Information Sharing and Child Information Sharing Schemes; and for the specialist family violence services sector specifically, the revision of DV Vic’s Code of Practice for SFVSs for victims-survivors; development of a specialist family violence service model; and the overhaul of the statewide 24hr specialist family violence crisis response model. All these overlapping and coinciding activities have crucial repercussions for the specialist family violence sector. They signal the intention to embed consistent models of service delivery and standards of practice within SFVSs across the state, ultimately leading to better, more coordinated SFVS responses to victims-survivors. They allocate multiple responsibilities to, and call specifically on, the skills and expertise of the specialist family violence workforce, and their success relies on the central role specialist family violence services play in the overall systemic response to family violence in Victoria.⁵⁵

Investment Priorities: 2020-2022

DV Vic’s submission to the Victorian State Budget outlines the case for the Victorian government to allocate budget according to two main themes. Firstly, the investment required to capitalise on the central role of SFVSs in the reform environment and achieve the best outcomes for victims-survivors. Secondly, other family violence investment priorities that best complement the core functions of the SFVSs and add the most value to the Victorian government’s family violence reform agenda related to SFVS service delivery.

Capitalising on the Central Role of SFVSs

Victoria’s 60 SFVSs for victims-survivors are a central component of the newly constituted multi-agency, multi-disciplinary, coordinated, systemic response to family violence in Victoria and therefore require continuing and increasing investment in order to secure the vision of the Royal Commission and the government’s family violence reform agenda. In addition to their unique service delivery to victims-

⁵³ Family Safety Victoria. (2018). *Everybody Matters: Inclusion & Equity Statement*, Melbourne: The State of Victoria, p. 7.

⁵⁴ Family Safety Victoria. (nd). *Diversity and Intersectionality Framework*, Melbourne: The State of Victoria.

⁵⁵ Royal Commission into Family Violence. (2016). *Report and Recommendations: Vol. II, Parl Paper No. 132 (2014 – 16)*, Melbourne: State of Victoria.

survivors of family violence including children, the role, expertise, and intelligence of the SFVS sector is integral to the success of several major systemic reforms such as the Family Violence Information Sharing Scheme, the MARAM Framework, and The Orange Door. Therefore, SFVS sector sustainability and capacity building must be an essential investment for the Victorian government going forward if

IN THE REGIONAL AND RURAL CONTEXT, THERE IS JUST SUCH A LIMITED POOL OF QUALIFIED STAFF. THERE ARE MORE JOBS OUT HERE THAN THERE ARE PEOPLE TO FILL THEM, PEOPLE HAVE A LOT OF CHOICE AND MOVE AROUND TO FIND THE BEST CONDITIONS. OUR CONDITIONS ARE OFTEN NOT THE BEST ON OFFER. THIS HAS A TERRIBLE IMPACT ON OUR SERVICE DELIVERY, MAKES THINGS VERY HARD – LOCAL SFVS PROVIDER, REGIONAL

the goals set out in the family violence reform policy environment are to be realised.

Historically, SFVSs have been dramatically underfunded⁵⁶ and until relatively recently, largely ignored within the broader community services system. The Royal Commission acknowledged that investment in SFVS had been

‘relatively static’ in the ten year preceding the Royal Commission.⁵⁷ As a result, scaling up of SFVSs in response to demand has been ad hoc and inconsistent across the state. Service and governance models and standards have not been well-articulated, as the organisational architecture required to respond to ever-increasing demand has developed in the vacuum of statewide approach. Disparate funding models and a government-driven singular focus on service delivery outputs have resulted in SFVSs not being able to pay its workforce a fair salary that reflects the complexity of the work. Under further pressure from the current family violence reforms, the impact of previously invisible yet crucial operational costs that are critical to the delivery of SFVSs have become more acute. Even despite recent increased funding, the lack of investment in the infrastructure and resources required to support service expansion & reform alignment – such as middle management roles, compliance and accreditation costs, and managing new as well as ongoing programs - are being felt in the rapidly changing and demanding reform environment.

WITHOUT FUNDING TO ASSIST WITH THE IMPLEMENTATION OF THE FAMILY VIOLENCE REFORMS LIKE THE INFORMATION SHARING SCHEME, WE HAVE TO REDIRECT FUNDS AND RESOURCES AWAY FROM CLIENTS – LOCAL SFVS PROVIDER, METROPOLITAN

Compounding these complexities, the SFVS sector is experiencing severe workforce shortages. There are not enough qualified and experienced workers to fill existing and emerging roles, and member services face ongoing difficulties retaining existing staff due to institutional inequalities related to gender, pay and conditions, and role complexity. As a result, it continues to be impossible to meet client demand in a timely way. Recruitment and retention issues place further pressures on operating costs and resources. This is particularly acute in rural and regional areas, where unfilled positions and the pressure of inducting inexperienced and sometimes unqualified staff has a greater impact on smaller organisations covering large geographic areas.

⁵⁶ Theobald, J. & Murray, S. (2017). *From the Margins to the Mainstream: The Domestic Violence Services Movement in Victoria, Australia, 1974-2016*, Melbourne: Melbourne University Press.

⁵⁷ Royal Commission into Family Violence. (2016). p. 27.

This is occurring at the same time as demand for services is increasing and the system is becoming more complex and services are expected to respond to constant change and systemic transformation. The Royal Commission recognised that ‘specialist family violence services are overwhelmed by high levels of demand’ which affects their ability to provide services to everyone who needs them.⁵⁸ This is as true today as it was in 2016 and the data suggests that demand for SFVSs is going to continue to increase, at least in the short to medium term.⁵⁹ Numbers of victims of family violence has steadily increased since 2015.⁶⁰ Crime Statistics Agency data shows that in the year ending June 2019, 82 652 family violence incidents were recorded, ranging between 6187 to 7849 incidents per month.⁶¹ This is an increase of over 6500 incidents from the previous year, and an 11 751 increase in incidents since June 2015.⁶² Of all unique victims of crime in the year ending June 2019, 15% were victims of at least one incident of family violence. These increases in reporting rates are, in part, a reflection of the success of the family violence reforms and government’s increased investment. They translate into continuously increasing demand for SFVSs and the case workers to deliver them within a progressively more complex coordinated and multiagency systemic environment.

I’VE NEVER SEEN CASES BEFORE THAT ARE AS COMPLEX AS THE ONES WE’RE DEALING WITH NOW – RAMP CO-ORDINATOR, REGIONAL

A number of pressure points have developed at the confluence of these current states, which detract from the capability of SFVSs and their governing Boards to effectively and efficiently scale up to meet demand and fully realise their central role in the systemic response:

- Case workers providing support to victims-survivors experiencing increasingly complex impacts of family violence, in an increasingly complex coordinated and multiagency service delivery environment.
- Significant and growing demand for SFVSs results in demand management strategies that prioritise the most complex and highest risk victims-survivors, resulting in all case workers requiring the technical skills and knowledge to work constantly with clients who are high risk, but whom are not remunerated at a level that reflects this.
- Decreasing capacity for early intervention & secondary prevention with victims-survivors assessed as low risk and low need, which anecdotal evidence suggests translates to higher longer-term demand when many of those clients re-present within the system at higher risk.
- Recruitment of newly qualified and/or inexperienced staff requiring additional & intensive support, training and supervision in order to meet client demand immediately.
- Increasingly obvious lack of pay parity between the SFVS sector and other sectors, and within the SFVS sector itself, leading to disenchantment within the workforce and workforce attrition.

⁵⁸ State of Victoria. (2016). *Royal Commission into Family Violence: Report & Recommendations, Vol. II. Parl. Paper No 132 (2014 – 16)*, Melbourne: Victorian Government, p.27.

⁵⁹ The data reported here reflects only incidents reported to Victoria Police. Family violence is recognised as being under-reported, therefore this data is acknowledged as being an underrepresentation of the overall frequency of family violence.

⁶⁰ Crime Statistics Agency. (2019). *Unique Victims*. Retrieved from <https://www.crimestatistics.vic.gov.au/crime-statisticslatest-crime-data/unique-victims>

⁶¹ Crime Statistics Agency. (2019). *Family Incidents*. Retrieved from <https://www.crimestatistics.vic.gov.au/crime-statisticslatest-crime-data/family-incidents>

⁶² *ibid.*

- In the reform environment, family violence skills and experience have become highly sought after by other sectors (including the public sector) that can offer better wages and conditions
- More frequent short-term funding, translating into fixed-term contracts that make it difficult to retain experienced staff.
- Workforce attrition creating instability in organisational continuity & culture.
- Gaps in middle management roles and resources required to manage and lead larger teams, undertake capacity building of newly qualified and/or inexperienced staff, backfill gaps in workforce, lead change, and support senior leadership.
- Increasing compliance and accreditation costs, payment of which require budget to be redirected from other areas.
- Increasing demands on senior leadership to participate in reform activities and be stewards of large-scale change & alignment within their services/organisations.
- Salary and operational costs being subsidised by other income in larger community-based organisations, creating performance inequity and competition within the specialist family violence sector.

If these pressure points are left to build as the result of insufficient further investment, there is unacceptable risk that SFVSS will flounder and the coordinated, multiagency systemic response to FV will falter. As a result, victims-survivors will continue to fall between old and new cracks in the systemic response.

Investment Priorities

DV Vic supports government's intention to pilot more flexible case management funding arrangements for the specialist family violence and sexual assault sectors in 2020/21. This approach to funding will enable SFVSS to focus more specifically on client outcomes rather than outputs, and to deliver services that are agile and more dynamically responsive to their own organisational architecture and to the complexity of client risk and need. It will also assist the system to more accurately capture the nature and scope of support being provided by SFVSS.

However, within this framework, *the funding quantum must address the pressures described above* if the true operational costs of the organisational infrastructure mechanism required to sustain SFVSS in the newly emerging systemic response is to be sustained. Therefore, DV Vic makes the following recommendations related to the quantum of funding for SFVSS within the Victorian State budget allocations for 2020-2022:

- 1. Immediate and ongoing investment in the organisational architecture and administration costs required to sustain SFVSS in the increasingly complex family violence response environment.**
 - a. Unit costing to adequately account for operational costs so that funding does not have to be diverted from service delivery or salary to cover these.
 - b. Funding recognises that SFVSS operational costs include costs of participating and aligning with the reform; quality assurance, compliance and accreditation costs; the infrastructure to manage and supervise a higher number of staff and build capacity of new & existing staff; the operational burden of constant recruitment and induction; increased infrastructure to manage specialist intervention programs such as FSPs,

RAMP, capacity building programs and secondary consults (for example, related to the MARAM Framework); and managing rising demand for SFVSs.

- c. Investment in modelling for management/supervisor to case worker ratios and caseload limits, and ongoing investment to implement these once established.

2. Investment in the SFVS workforce.

- a. Salary funding model and corresponding investment that enables SFVSs to pay its workforce at a classification/level that is congruent with the qualifications, knowledge, and skills required to respond to the complexity and high risk nature of their work with clients and to the sophistication of the multiagency, multisectoral and multidisciplinary family violence systemic environment they are engaged in, and that

ACCESS TO FLEXIBLE SUPPORT PACKAGES HAS BECOME ABSOLUTELY ESSENTIAL FOR BOTH FV CRISIS WORK AS WELL AS LONGER-TERM SUPPORT. IN MY YEARS WORKING IN SPECIALIST FAMILY VIOLENCE SERVICES, I HAVE SEEN THE DIFFERENCE FLEXIBLE SUPPORT PACKAGES MAKE TO THE RECOVERY AND WELL-BEING OF SURVIVORS. THE SPECIALIST FAMILY VIOLENCE SECTOR WOULD BE LOST WITHOUT THEM.
 – SFVS ACCOMMODATION PROVIDER, REGIONAL.

commensurate with other similar roles/sectors, without having to divert budget from service delivery and operations.

- b. Investment in sector readiness to respond to new entrants to careers in the SFVS response sector, including newly qualified social work graduates and career changers.

3. Adequate funding to support rising demand for SFVSs that enable both early intervention and high-risk responses.

Prioritising the above investment will contribute to overall stabilisation and sustainability of the SFVS workforce, and therefore the role of SFVS in delivering the vision of the Royal Commission.

Other Family Violence Sector Priorities

Flexible Support Packages

SFVSs who are DV Vic members unanimously agree that flexible support

packages (FSPs) have revolutionised the nature of specialist family violence support. The inherently flexible nature of the packages mean that support is able to be tailored in a more responsive and agile way that addresses the unique risks, needs and impacts of family violence on each individual victim-survivor, including children. FSPs provide options for accessing immediate safety for clients that were not available previously, such as facilitating access to alternative short- and long-term accommodation or being able to safely stay at home through the purchase of security measures via the Personal Safety Initiative, thus avoiding clients having to go into crisis accommodation and/or rely on insecure housing arrangements. FSPs also increase the dignity and choice of victims-survivors when they are rebuilding their lives as a result of family violence. They enable them to buy good quality material items to assist with their recovery, as well as purchase specialised counselling, training and education courses and materials, and pay off bills and debts that would have otherwise inhibited their recovery from family

IN ORDER TO ATTRACT & RETAIN A SKILLED WORKFORCE, IT IS IMPERATIVE THAT FAMILY VIOLENCE SERVICES OFFER WAGES THAT ARE COMPETATIVE WITH OTHER SECTORS – LOCAL SFVS PROVIDER, METROPOLITAN

violence. FSPs assist victims-survivors to regain autonomy and independence in the face of family violence and have become an integral intervention option in the SFVS support model.

The introduction of FSPs has also improved efficiency within the system. Case workers no longer have to use valuable hours searching for charities and donated goods to fill gaps in service provision to victims-survivors, meaning they can dedicate more time to frontline, direct support for other clients. SFVSs report that FSPs provide greater opportunities for stabilising a victim-survivor's situation earlier, thus preventing cases from escalating to more complex situations and minimising client churn through the system, retaining more whole of system resources.

DV Vic notes that Victorian SFVSs are envied by our sister services in other states because of the provision of FSPs. FSPs were the one difference in recent advocacy around early access to superannuation for survivors of family violence to assist with the costs associated with their recovery – peak bodies and SFVSs in all states recognised that it was unfair that victims-survivors of family violence should have to access their own retirement savings to cover costs that have been incurred upon them by someone else and argued that the state should cover these costs. It was also argued that early access to superannuation would increase the gender gap in retirement. Victoria was the only state where there was a viable alternative option to early access to superannuation, and DV Vic the only peak body in Australia who could confidently argue against this federal proposal. In this way, FSPs are also contributing to longer-term gender equity.

DV Vic urges the Victorian government to prioritise ongoing investment to ensure that FSPs continue as a permanent, core element of the response to family violence in Victoria. The loss of this flexible, individually tailored support option would be disastrous for the well-being of victims-survivors of family violence and lead to costs blowing out in other areas.

Housing

Family violence remains the most common reason that women and children become homeless,⁶³ and homelessness resulting from family violence more often than not leads to a lifetime of disadvantage, discrimination, and poverty for victims-survivors.⁶⁴ Yet as other parts of the Royal Commission family violence reform are progressing, access to safe and affordable housing remains an obstacle in victims-survivors recovery from family violence. Approximately 47% of all the people who received homelessness assistance in Victoria listed family violence as their main reason for seeking support,⁶⁵ and 82,000 people (including 25,000 children), are on the social housing

IN THE SPECIALIST FAMILY VIOLENCE REFUGE SETTING, FLEXIBLE SUPPORT PACKAGES ARE KEY. THAT THEY ARE SO FLEXIBLE, IT MAKES SUCH A DIFFERENCE TO WHAT WE CAN DO TO SUPPORT WOMEN AND CHILDREN – SFVS ACCOMMODATION PROVIDER, METROPOLITAN.

⁶³ Spinney A. (2012). *Home and Safe? Policy and practice innovations to prevent women and children who have experienced domestic and family violence from becoming homeless. Final report no. 196*. Melbourne: Australian Housing and Urban Research Institute.

⁶⁴ Phillips, J. & Vandenbroek, P. (2014). Domestic, family and sexual violence in Australia: an overview of the issues, retrieved from https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1415/ViolenceAust#_Toc401045316

⁶⁵ AIHW. (2019). *Specialist homelessness services 2017-18: Victoria*, retrieved from <https://www.aihw.gov.au/getmedia/46473685-40d3-471b-b28d-ae6aac81e84/aihw-hou-299-vic.pdf.aspx>

IT'S CHALLENGING TO SUPPORT WOMEN WHO HAVE EXPERIENCED SO MUCH TRAUMA AND ARE FINALLY IN A PLACE WHERE THEY CAN START TO REBUILD AND MOVE ON, BUT PHYSICALLY, THEY ARE STUCK BECAUSE WE HAVE NOWHERE FOR THEM TO GO – SFVS ACCOMMODATION PROVIDER, REGIONAL

waiting list.⁶⁶ Many victims-survivors cannot afford the private rental market, and rental assistance packages are too short-term to address the social & economic disadvantages family violence creates for victims-survivors and therefore do not

necessarily contribute to accessing long-term, stable housing. Short-term strategies such as the Family Violence Housing Blitz enabled a trial of innovative housing options for victim-survivors, but without a statewide scale up and ongoing investment, will not provide a sustainable solution to the problem of family violence and housing in itself.

The social housing shortage and lack of affordable housing options instils in victims-survivors of family violence a fear of becoming homeless if they leave the relationship in which they are experiencing family violence. As a result, the lack of viable housing alternatives is one of the primary barriers to victims-survivors of family violence seeking help and being able to leave the relationship. Becoming homeless is also one of the most common conditions under which victim-survivors including children are forced to return to relationships where they are experiencing family violence.

SFVSs, mainly SFVS accommodation providers, are consistently reporting to DV Vic that women and children in particular are getting 'stuck' in motels, specialist family violence refuges, and transitional housing because there is nowhere for them to go. To reduce the number of victims-survivors becoming homeless or at risk of homelessness as a result of family violence, DV Vic joins other housing and homelessness providers calling for a sustainable, strategic commitment from the Victorian Government to address the chronic under investment in social and affordable housing infrastructure.

Multiagency Risk Assessment and Management Framework and Information Sharing

The MARAM Framework and the Information Sharing Schemes are two whole-of-system pieces of family violence reform that are likely to have the greatest impact on how the social services system responds to family violence. A vast range of entities from housing and homelessness services, courts, police, child protection, drug and alcohol, mental health and youth services are required to align their policies, procedures, practice guidance, and tools to the MARAM Framework.

Likewise, the workforce numbers in scope for implementing the MARAM Framework are significant. A workforce of 37,500 personnel came into scope during Phase One of the Framework on 27 September 2018. Phase Two comes into effect in September 2020 and is expected to bring an additional 370,000 personnel into scope for implementation of the Framework.

⁶⁶ Department of Health and Human Services cited in Legal and Social Issues Committee. (2018). *Inquiry into the Public Housing Renewal Program*, Melbourne: Parliament of Victoria, p. 202.

This is vital reform on a hugely ambitious scale. Aligning to MARAM requires a significant cultural shift for workforces, particularly for those that have not previously understood responding to family violence as part of their role or function. Many non-family violence specialist organisations currently in scope for MARAM Framework implementation are still working to interpret and understand their responsibilities. Significant resourcing to develop and support workforce implementation strategies and capability building is required to ensure these organisations successfully align to the MARAM Framework. Resourcing should be directed to networks and services with existing family violence expertise within local areas, supported by a statewide coordination function. Examples of successful, cost-effective models for structuring such a program include the statewide coordination of RAMP and the Mental Health and Alcohol and Other Drugs Statewide Capacity Building Project.

The *Industry Plan* recognised that, ‘Creating ongoing, systemic opportunities for building and maintaining workforce capability will take time and careful consideration.’⁶⁷ In the meantime, there’s an urgent need to make sure that victims-survivors do not fall through the cracks, and that perpetrators are identified, held accountable and given opportunities to change their behaviour at the earliest possible point. Without adequate resourcing, the significant number of the broader workforce that interest with family violence will not have the capability to identify and assess family violence risk nor respond appropriately when family violence is identified, putting adult and children victim-survivors at risk. A commitment to continue to fund and resource the full implementation of the MARAM Framework and Information Sharing Schemes is required.

Investment Priorities

DV Vic firmly believes that the above issues are priority areas for further investment that provide immediate and tangible complementary benefits to the support provided by the SFVS sector. Investment in these spaces will ensure the greatest traction of reforms arising from the Royal Commission. As such, DV Vic calls on the Victorian Government to:

1. **Invest in FSPs as a permanent service offering within the integrated response to family violence.**
 - a. Guarantee funding for FSPs for the next three years at at least the same amount (\$64 million).
 - b. As the MARAM Framework and other family violence reform initiatives are implemented, demand for FSPs is anticipated to increase. Government should monitor this and be prepared to increase future investment in FSPs as demand increases.

IF MARAM AND INFORMATION SHARING IS ACTUALLY GOING TO BE SYSTEMIC, IT HAS TO BE MATCHED BY INCREASED INVESTMENT FROM GOVERNMENT TO MEET DEMAND & ENSURE THAT EVERYONE IS SUPPORTED TO IMPLEMENT IT. FOR SERVICES WHO ARE NOT SPECIALIST FAMILY VIOLENCE, THEY ARE REALLY ANXIOUS ABOUT HOLDING THE RISK AND NEED SUPPORT AND TRAINING – LOCAL SFVS PROVIDER, METROPOLITAN

⁶⁷ Family Safety Victoria. (2017b), p. 60.

2. **Develop and invest in a 10-year social housing plan to address Victoria’s housing and homelessness crisis.**
 - a. To simply maintain the current proportion of social housing at 3.2 per cent, we need 3,500 new units per year over the next 10 years.
 - b. We need 6,000 new units each year to increase social housing stock to 4.5 per cent of all housing in Victoria, keep up with population growth, house Victorians on the Victorian Housing Register and those living in extreme housing stress.
 - c. At least 300 of all new units built each year must be Aboriginal housing.
3. **Renew investment in the MARAM Framework and Information Sharing reforms to ensure they are successfully implemented and embedded into practice.**
 - a. Increase investment for non-family violence specialist workforces to understand their roles and responsibilities under the MARAM Framework and Information Sharing Schemes.
 - b. Invest in networks with existing family violence expertise and enable technical support by a statewide coordination function to ensure consistency of practice.

Conclusion

The government’s Royal Commission family violence reform agenda is ambitious but essential. The vision of the Royal Commission and that outlined in the family violence policy landscape of a Victoria free from family violence requires a focus on both immediate and long-term, whole of system transformation that is worthy of the investment required to achieve the outcomes that have been set. The Victorian Government must not turn its attention away from its family violence reform agenda as a result of competing and emerging issues such as those that will arise from the Royal Commission into Mental Health. Investment must continue to capitalise on the progress that is underway. DV Vic shares the views expressed in the most recent report produced by the Family Violence Reform Implementation Monitor that ‘the work on the reform remains ambitious and ground-breaking’, yet much remains to be done in both the acquittal of the Royal Commission recommendations and the planning and governance of the reform agenda to ensure the benefits that are emerging are sustained.⁶⁸

SFVSs sit at the centre of the systemic response and are the lynchpin in the success of several of the largest scale reforms underway. This submission has highlighted why investment in key priority issues related to SFVS sustainability and capacity must be addressed for that central role to be maintained and the contingent successes realised. The submission has also highlighted key complementary areas of investment that, if prioritised, will add the most value to the role SFVSs have in facilitating choice, safety and wellbeing for victims-survivors.

⁶⁸ Family Violence reform Implementation Monitor. (2019). *Report of the Family Violence Reform Implementation Monitor: As at 1 November 2018*, Melbourne: The State of Victoria, p. 39.