

# DOMESTIC VIOLENCE VICTORIA (DV Vic)

## SUBMISSION TO FEDERAL GOVERNMENT'S GREEN PAPER ON HOMELESSNESS: *Which Way Home?*

June 2008



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Peak body for domestic violence services for women & their children

Australia is signatory to the United Nations Convention on the Elimination of all Forms of Discrimination against Women (CEDAW). The Declaration of the Elimination of Violence against Women (DEVAW) passed by the General Assembly of the United Nations in December 1993, recognises that the effective implementation of CEDAW would contribute to the elimination of violence against women.

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## About Domestic Violence Victoria

Domestic Violence Victoria (DV Vic) is the peak body for family / domestic violence services in Victoria that provide support to women and children to live free from violence. With the safety and the best interests of women and children as central, DV Vic provides leadership to change and enhance systems that prevent and respond to family violence.

### DV Vic Objectives

- To enhance services available to women and children experiencing family violence in Victoria;
- To support practice development and critical best practice in service delivery to women and children experiencing family violence;
- To facilitate coordinated responses and provide commentary representing the family violence service system to government regarding relevant issues, policy initiatives and directives;
- To facilitate communication between services and other key stakeholders to inform policy, protocol and other requirements of systems integration;
- To provide a central point for services, government and other relevant stakeholders regarding information and advocacy related to family violence and the service system;
- To inform public policy and research;
- To raise community awareness and promote community responsibility for violence prevention.

DV Vic core values emerge from an understanding of feminist, human rights and social justice frameworks. Our core values reflect those detailed in DV Vic's Code of Practice for Specialist Family Violence services and are demonstrated in all areas of policy and practice.

- **Rights:** Family violence is a fundamental violation of human rights and unacceptable in any form
- **Safety:** The safety of women and children who experience family violence is of paramount consideration in any response
- **Children:** Children need to be protected from harm; to have their rights protected; and to have their opportunities for development promoted.
- **Empowerment:** Family violence services work with women and children to build on their strengths and enhance their capacity to make informed decisions and exercise their right to self determination without coercion and free from judgement.
- **Diversity:** Family violence is experienced by women and children regardless of class, ethnicity, religion, age, abilities, or sexual preference. The experiences of women and children who live with family violence are distinct and unique.
- **Access and Equity:** Services responding to women and children experiencing family violence provide accessible support in a fair and equitable manner.
- **Collaborative Practice:** Services responding to family violence are committed to improving their services through greater coordination and integration.
- **Responsibility:** Responsibility for violence rests with the perpetrator of the violence, and eradication and prevention of violence is the responsibility of the community as a whole.
- **Accountability:** Perpetrators should be held accountable for their use of violence and challenged to take responsibility for their actions.
- **Power:** Responses to family violence must recognise and address the power imbalance and gender inequality between those using violence (predominately men) and those experiencing violence (predominately women and children).
- **Justice:** Physical or sexual violence within the family is a crime which warrants a strong and effective justice system response.
- **Advocacy:** Family violence services advance the rights and interests of women and children affected by family violence on an individual and broader societal level.

## Summary of DV Vic Recommendations

1. The Australian Government commit to a collaborative whole of government, whole of community response to family violence and homelessness
2. To reject the disaggregation of SAAP as proposed in Option One of the Green Paper
3. To retain and invest in improvements to the Supported Accommodation Assistance Program underpinned by human rights based legislation.
4. A national approach to preventing homelessness must acknowledge, take account of and seek to address, the influence of gender. This common understanding should underpin a national framework for homelessness as well as the responses of both mainstream and specialist family violence services.
5. To develop the capacity of mainstream agencies to prevent and respond to homelessness and family violence.
6. A ten-year plan to address homelessness must include a Commonwealth Government commitment to invest in significant growth in social housing.
7. The Australian Government's National Homelessness Framework to include options for women to remain safely in their homes with a range of well co-ordinated responses in place to support their choices.
8. A National Homelessness Framework to commit to funding a diversity of best practice support models for women and children experiencing family violence.
9. A National Homelessness Framework must include as a top priority a workforce strategy that recognises the skills and competencies of workers, ensures fair and adequate remuneration, addresses recruitment and retention issues and provides for professional development opportunities and career pathways.
10. Funding for accompanying children in SAAP to ensure the full range of services they require are identified and provided.
11. The National Homelessness Framework develop benchmarks to ensure best outcomes for the most disadvantaged groups of women and children experiencing family violence: those with disabilities, from Indigenous communities and those from culturally and linguistically diverse backgrounds without permanent residency and the full legal protection as citizens

## Introduction

This submission details Domestic Violence Victoria's (DV Vic) response to the Australian Government's Green Paper on Homelessness: *Which Way Home?* DV Vic is the peak body for 45 women and children's family violence organisations in Victoria including:

- State-wide crisis services;
- Regional crisis services;
- Women's crisis support and accommodation services;
- Services providing specialist support to specific client groups (including support to Indigenous, culturally and linguistically diverse, lesbian women, and women with disabilities);
- Outreach services - crisis support services;
- Services providing after hours assistance;
- Intensive case management programs;
- Training and resource services;
- Services providing private rental brokerage;
- Services participating in regional leadership, service integration and planning.

As a representative of these services, DV Vic advocates for the right of women and children to live free from violence. DV Vic has consulted with its member organisations and the views presented in this paper are broadly representative of those services. Please see Appendix A for a list of the services, and regional networks that have formally endorsed this submission.

DV Vic welcomes the Australian Government's commitment to developing a new approach to homelessness across Australia, as well as the development of a National Plan to Reduce Violence against Women and Children; two integrally linked policy frameworks. With family violence cited as the single greatest reason for women and children seeking supported accommodation assistance, efforts to prevent violence must be central to the reduction of homelessness in Australia. Equally, reducing homelessness caused by family violence by supporting women to safely remain in their homes should be a priority of the National Plan.

Both homelessness and family violence are community problems that cannot be addressed by one sector, level of government or service system alone. The Australian Government's Social Inclusion Agenda will be an important mechanism to ensure that all levels of government meet targets and benchmarks to reduce homelessness. The White Paper on Homelessness and the policy framework for addressing homelessness that emerges from it must clearly articulate the responsibilities of all three tiers of government in preventing and responding to homelessness and the prevalence of family violence. Particular attention must be given to women and children in marginalised groups, who are especially vulnerable to the effects of violence<sup>1</sup>. Women with disabilities, women from culturally and linguistically diverse backgrounds and Indigenous women face additional and particular barriers to securing protection and support. Benchmarks targeted to the most disadvantaged groups who experience the highest rates of family violence and the most difficulty accessing support must be embedded into a national framework as a matter of priority for these reforms.

DV Vic supports calls for the development of a National Affordable Housing **and Homelessness** Agreement that incorporates all key funding relevant to the national response to homelessness and in which the Supported Accommodation Assistance Program (SAAP) is retained as a distinct program. With COAG commitment to goals, principles and strategies, the Commonwealth can take the lead in planning for and setting nationally consistent targets and benchmarks and providing incentives for states and territory governments to meet best practice standards in integrated family violence and homelessness service delivery. The development of the NAH(aH)A provides an opportunity to set

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<sup>1</sup> Code of Practice for Specialist Family Violence Workers for Women and Children, Domestic Violence Victoria, 2006

binding goals and targets by which the performance of the states & territories can be measured. These goals and targets will provide an accountability mechanism to measure performance at all levels of government. A whole of government approach must ensure policy cohesion in addressing homelessness across portfolio areas and service systems. National Partnership Payments may be an effective mechanism for providing incentives to the States and Territories.

DV Vic is encouraged by the Commonwealth's commitment to joined-up, whole of government and cross-sectoral solutions to the interconnected problems of family violence and homelessness. Victoria is a national leader in the implementation of innovative and integrated systems, and we believe that we have a great deal to offer in regards to informing the development of a holistic nationally coordinated framework to address homelessness<sup>2</sup> in which recognition and acknowledgement of the central importance of prevention of violence against women and children is given. Hence, this paper will focus on Victoria's experience of the development and implementation of an integrated family violence system.

**Recommendation One: The Australian Government commit to a collaborative whole of government, whole of community response to family violence and homelessness**

*The Green Paper options: an overview of Victorian family violence organisations' responses*

DV Vic welcomes the opportunity that the Green Paper process provides for discussion and engagement with the sector to canvass new policy options for addressing homelessness. We understand that the options presented in the Green Paper are intended to encourage discussion and are not necessarily indicative of Government policy. While DV Vic's consultations have elicited much discussion and sharing of ideas about ways that the existing SAAP sector can be improved, DV Vic has also heard widespread concern expressed regarding the three options presented in the Green Paper. Although the options presented include some ideas that would certainly improve the existing homelessness service system and improve outcomes for women and children experiencing family violence, **DV Vic does not wholly support any of the three distinct options.**

DV Vic has many concerns with the proposal set out in Option One to disaggregate SAAP and move the four streams to distinct portfolio areas. DV Vic member services have voiced significant concerns in relation to the proposal for the administrative function of family violence to move to a justice portfolio. Firstly, while a strong and effective judicial response is critical to both preventing and dealing with family violence, we know that many women experiencing family violence do not access the justice system for myriad reasons: many do not report their experience of violence at all, and for those who do, they may not necessarily identify domestic violence as their reason for seeking help<sup>3</sup>. Women from culturally and linguistically diverse (CALD) backgrounds, women with disabilities and women with mental health and drug and alcohol problems all face considerable barriers in accessing the justice system, including beliefs that seeking assistance will instigate children being removed from their care. The risk of further marginalising these groups from support services would be a significant error and could risk their safety.

We have specific concerns in relation to the impact on Indigenous women's lives and culture of justice responses. Due to historical experience Aboriginal women tend to not favour mainstream police and judicial interventions for fear of the impact on their partners and families<sup>4</sup>. The Victorian Indigenous Family Violence Ten Year Plan was developed in recognition that family violence impacts on Indigenous communities in particular ways that require Indigenous led and culturally grounded strategies.

Victoria has made significant investments in its whole of government integrated family violence system; there is concern that a shift in portfolio area could jeopardise the progress made to date. There is doubt over whether justice departments are adequately equipped to provide contract management in human

<sup>2</sup> DV Vic endorses the Council to Homeless Persons call for creation of a Commonwealth Homelessness Services Policy Framework.

<sup>3</sup> Murray, 2005 An Impossibly Ambitious Plan? Australian Policy and the Elimination of Domestic Violence, *Just Policy*: No 38.

<sup>4</sup> Atkinson, J 2002, Voices in the Wilderness: Restoring Justice to Traumatized Peoples, *UNSW Law Journal*, vol 25, no1

services. It is doubtful that this approach would necessarily link women and children experiencing violence with the full range of services that they need. Further, disaggregating SAAP could create divisiveness between homelessness responses which is precisely the issue that the original Supported Accommodation Assistance Program was developed to overcome. The proposal outlined in Option One is antithetical to a holistic understanding of homelessness and to addressing the complexity of needs common to SAAP clients.

**Recommendation Two: To reject the disaggregation of SAAP as proposed in Option One of the Green Paper**

DV Vic's member organisations are strongly in favour of retaining SAAP as a discrete programmatic response to homelessness. Family violence services within SAAP have developed specialist, experienced, evidence-based and innovative responses to assist women and children experiencing family violence. The expertise that this sector has developed over time must be recognised and remain central to the new national approach to homelessness. SAAP funded family violence services in Victoria are typical of SAAP services across the country: working in chronically under-resourced circumstances at the limits of capacity, undertaking work that they are not funded to do, and unable to meet increasing demand. Despite this, the SAAP sector in Australia is internationally recognised, and many of the services that it is able to provide, despite the constraints service providers operate within demonstrate innovation and best practice. This is evidenced by the findings of the most recent National Evaluation Report of the SAAP program<sup>5</sup>.

The SAAP IV evaluation recognises that demand for crisis accommodation cannot be met within current funding allocations: 55% of those seeking immediate accommodation do not receive it on any given day<sup>6</sup>. Greater focus on prevention and early intervention initiatives, if successful will help to reduce demand over the medium to long term, however **the service system must be funded to meet existing demand.**

The legislative framework that underpins a new homelessness framework, whether it is the existing *Supported Accommodation Assistance Act 1994* or a new piece of legislation, must include a human rights and social justice focus that reflects access to safe and secure housing as a basic human right. Irrespective of whether the SAA Act is retained as a distinct piece of legislation, or whether in the process of developing the National Affordable Housing (and Homelessness) Agreement a new piece of legislation is drafted, the core features of the SAA Act need to be recognised, valued, and retained.

DV Vic would support the creation of a Homeless Persons Ombudsperson to protect the rights of homeless people.

**Recommendation Three: To retain and invest in improvements to the Supported Accommodation Assistance Program underpinned by human rights based legislation.**

Specialist family violence services are underpinned by a gendered understanding of family violence which recognises that women are at greater risk of family violence than men; women's experience of violence significantly differs from men's and that violence against women is linked to gender inequality.

**Recommendation Four: A national approach to preventing homelessness must acknowledge, take account of and seek to address, the influence of gender. This common understanding should underpin a national framework for homelessness as well as the responses of both mainstream and specialist family violence services.**

<sup>5</sup> Erebus Consulting Partners, National Evaluation of the Supported Accommodation Assistance Program (SAAP IV) Final Report, A Report to the SAAP National Coordination and Development Committee, May 2004

<sup>6</sup> *ibid*

Whilst DV Vic's member organisations are clearly committed to SAAP, there are critical areas that require urgent attention in an improved Supported Accommodation Assistance Program. A new approach to homelessness provides opportunity to address the underlying social, economic and structural contributors to homelessness and look beyond the parameters of the existing homelessness assistance sector. Strengthening mainstream capacity to identify and respond to family violence is particularly pertinent given that many women experiencing family violence who are homeless do not access the SAAP system<sup>7</sup>. Mainstream agencies must take greater responsibility for responding to and preventing homelessness and family violence, but this cannot be at the expense of a well-resourced and effective specialist support system that supports people from crisis, through transition and into long term, sustainable situations. DV Vic supports a model that both enhances SAAP (builds on its strengths) and involves other sectors to create a framework for a holistic national response to homelessness.

An effective response to homelessness that invests in prevention & early intervention must examine the structural or systemic contributors to homelessness and address the impact of wider Government policies and programs on homelessness. This includes reviewing and engaging the following Australian Government policy areas that impact on women and children experiencing family violence:

- Social security law, including welfare to work reforms and breaching policies;
- Review of migration law and regulations, including access to social services for those without permanent residency;
- Family law reform, including the impact of recent Family law amendments on women experiencing violence, and conflicts between Federal Family Law and State Family Violence judicial processes;
- Child protection services.

In an integrated system SAAP services would work in partnership with mainstream agencies to ensure best outcomes for women and children. Incentive payments tied to established performance measures and targets could be a mechanism for ensuring mainstream agency engagement. It will be critical that such mainstream engagement is underpinned by principles of universal access and non-discrimination, in order to ensure that clients with complex needs and those experiencing high disadvantage have their needs met. Enhancing the response of mainstream services will require long-term investment and cross-agency coordination.

**Integrated service provision involving partnerships between specialist family violence and mainstream agencies can be facilitated via the following strategies:**

- Protocol development to articulate appropriate responses to clients where domestic and family violence is present i.e., risk assessment; secondary consultation with a specialist service; development of referral pathways; safety planning;
- Training for staff on issues that need to be considered when working with women and their children who have experienced family violence, including examination of the structural and cultural origins of violence against women;
- Increasing the visibility of domestic and family violence in strategic planning, policies, procedures, targets and data collection;
- Increasing awareness of the service sector through participation in networks; development of MOUs and informal collaborative arrangements.

Building the capacity of mainstream services to prevent homelessness must be a priority objective of the new approach to homelessness. At a Commonwealth level a number of policy areas will require

<sup>7</sup> AIHW 2007. Homeless people in SAAP: SAAP National Data Collection Annual Report 2005–06 Australia. SAAP NDCA report Series 11.Cat. no. HOU 156. Canberra: AIHW. pp.35-36

coordination in order to make a difference to homelessness in Australia. A national homelessness services policy framework will need to extend engagement to:

- State and Territory public housing services;
- Social security;
- Correctional and juvenile justice services;
- Employment services;
- The public, private and community health systems;
- Mental health service systems;
- Drug and alcohol service systems;
- Disability services;
- Education and childcare systems.

**Recommendation Five: To develop the capacity of mainstream agencies to prevent and respond to homelessness and family violence.**

### *The intersection of family violence and homelessness*

The Green Paper recognises that women leaving family violence, along with the children who witness or live with such violence, are the single greatest proportion of clients presenting to SAAP services<sup>8</sup>. Too often domestic and family violence is rendered invisible in mainstream discourse surrounding homelessness, yet agencies and workers at the forefront of supported accommodation and mainstream services come into contact with women and children affected by violence every day. DV Vic is pleased that the Green Paper has adopted a wide definition of homelessness that extends beyond 'rooflessness' or 'rough sleeping' to acknowledge secondary and tertiary homelessness. For women and their children experiencing family violence, the concept of homelessness includes not having access to safe, secure and adequate housing. *"Repeated physical, sexual and verbal abuse in the home renders women homeless negating feelings of control and security"*<sup>9</sup> While someone may have a physical home but is not safe in that environment, such as in the case of family violence they may effectively be experiencing homelessness.

The economic costs of domestic violence to the Australian community have been estimated to be more than \$8 billion annually<sup>10</sup>. This includes costs arising from pain, suffering and premature mortality, health costs, and production and consumption costs. While the largest cost burden is borne by victims (\$4 billion), domestic violence also costs the general community (\$1.2 billion), state and federal governments (\$1.3 billion) and employers (\$175 million). Investments in family violence prevention and strategies to reduce recidivism are therefore prudent strategies to arrest the costs of violence to individuals, families and the broader community.

According to VicHealth (Victoria's Health Promotion Agency) family violence is responsible for more premature death and ill health in Victorian women under the age of 45 than any other preventable risk factor, including high blood pressure, obesity and smoking<sup>11</sup>.

Women and children can experience extensive trauma and are often physically, emotionally, psychologically and economically displaced when they are forced to leave their homes due to violence<sup>12</sup>. The onus has traditionally been on women to escape violent domestic situations & services have evolved to meet this practice. The availability of appropriate accommodation is a critical factor in women's decisions about whether or not to leave a violent situation, particularly the cost of alternative accommodation, safety, location and tenure. For women with children these decisions may be more complex, with changes having to be made to school and childcare arrangements and loss of connection

8 Female SAAP clients and children escaping domestic and family violence 2003-04, Australian Institute of Health and Welfare (2005)

9 Nunan, C., & Johns, L., (1996), Raising the Roof on Women's Homelessness – A framework for Policy Development, WESNET, Canberra.

10 Access Economics, 2004 The Cost of Domestic Violence to the Australian Economy, Australian Government, Canberra

11 VicHealth (2004) The health costs of violence, Measuring the burden of disease caused by intimate partner violence, Victorian Health Promotion Foundation, Melbourne

12 Chung, D Kennedy, R O'Brien B et al (200) Home Safe Home: Preventing Homelessness for Women Experiencing Domestic and Family Violence, FACS.

to local community and support networks. Disruption to children's education due to frequent movement is demonstrated to result in poor educational outcomes<sup>13</sup>. Balancing the level of disruption to their lives can sometimes result in women staying in violent situations<sup>14</sup>.

The impact of the current housing crisis across Australia has further exacerbated the lack of options for women and children leaving violence. DV Vic is aware that women's refuges across Victoria are supporting clients for longer periods as exit points from transitional and long-term accommodation become increasingly difficult to locate. Chronic shortages and increased waiting lists for public and community housing, together with a scarcity of affordable private rental properties, has created a bottlenecking of the SAAP system, where women and their children are unable to move on from supported accommodation, and others in turn are unable to access assistance. Women and children returning to violence because of a lack of alternative accommodation options is an appalling reality of the contemporary Australian housing environment.

Funding for social housing (i.e. public and community housing) has fallen by 17% in real terms between 1997-98 and 2006-07<sup>15</sup>. The SAAP IV evaluation report states that the lack of affordable and sustainable long term housing is the single most influential structural cause of homelessness<sup>16</sup>. DV Vic welcomes the commitment of \$150 million to the *A Place to Call Home* and other affordable housing initiatives however much more investment is required in order to affect change in the homeless population. Investment in affordable and secure housing in a diversity of areas is imperative to effectively prevent homelessness. DV Vic supports the goal of ongoing investment in public and community housing, as well as affordable private rental housing, with the aim of increasing the proportion of affordable rental accommodation as a percentage of Australia's overall housing stock.

**Recommendation Six: A ten-year plan to address homelessness must include a Commonwealth Government commitment to invest in significant growth in social housing.**

### *Models of accommodation and support for women and children leaving family violence*

While there are commonalities to the experience of living with family violence, a sophisticated approach to homelessness requires understanding that living with violence affects women and children in varied and distinctive ways and that those in marginalised and vulnerable groups face even greater barriers in accessing assistance. Indigenous women<sup>17</sup>; women from culturally and linguistically diverse backgrounds; women with disabilities; young women; older women; women with mental health issues; and women in rural areas all experience family violence in unique ways and are at increased risk of experiencing homelessness as a result of family violence<sup>18</sup>. Some women chose to remain in violent relationships and situations, and support should be available for them to do this and minimise the risk to themselves and their children. We also know that family violence cuts across socio-economic groups<sup>19</sup>, and that not all women come into contact with human service agencies. Recognising the diversity of people's histories, experiences and needs is essential to providing them with appropriate support. The support needs of women and children experiencing family violence are unique to their experience of abuse and their safety must be paramount.

DV Vic commends the Australian Government's commitment to efforts to allow women to stay safe within their homes. This represents an understanding that there is a significant inequity between women (and their children) and the male perpetrators who generally do not experience the disruption of leaving

13 Bridge c, Flatau P, Whelan S (2007), How does housing assistance affect employment, health and social cohesion? AHURI research Bulletin, Issue 87

14 Chung, D Kennedy, R O'Brien B et al (200) Home Safe Home: Preventing Homelessness for Women Experiencing Domestic and Family Violence, FACS

15 Productivity Commission 2008, Report on Government Services 2008, p.16.6

16 Erebus Consulting Partners, National Evaluation of the Supported Accommodation Assistance Program (SAAP IV) Final Report, A Report to the SAAP National Coordination and Development Committee, May 2004

17 Indigenous women make up 2% of the female Australian population but 24% of the female SAAP clients escaping domestic violence.

18 Code of Practice for Specialist Family Violence Workers for Women and Children, Domestic Violence Victoria, 2006

19 *ibid*

the home. This is arguably the result of a social failure to fully accept and deal with the criminality of the perpetrators' behaviour. Further, it is consistent with the UN Special Rapporteur on Violence Against Women's recommendation that all States '*should provide for the removal of the abuser from the shared home and allow the victim-survivor to retain her present housing...*'<sup>20</sup>. A random sample of 2000 Victorians surveyed by VicHealth indicates that the Australian community expects that it is the violent partner who should be made to leave the family home<sup>21</sup>.

One of the keystones of family violence reform in Victoria is the principle that men who use violence should be held accountable and challenged to take responsibility for their actions. The new *Family Violence Act* due to be introduced to the Victorian Parliament in mid 2008 is underpinned by this principle, and the legislation once introduced will facilitate women who so choose to remain in their homes following violence.

The target of increasing the number of women and children remaining at home is also important for women and children with a disability who may be reliant on specific local service networks for disability support as well the importance of retaining accessible housing.

While DV Vic is supportive of initiatives to allow women and children to remain in the home we would warn against a response that could increase risk by ignoring the broader and interlinked strategies required to appropriately implement this model. Using this model in isolation or as a cost-saving measure runs the risk of endangering the lives of women and children. The high rates of family violence related homicide in Australia illustrate the risks of getting this wrong: the majority of female homicide victims were killed as a result of domestic-related altercations<sup>22</sup>. Women cannot exercise a right to remain in their homes unless a range of well co-ordinated responses are in place to support their choices: this principle underpins the integrated family system in Victoria. Responses must include legal protection from further acts of violence, an appropriate police response, support of family violence services, mainstream health and community-based services, men's behaviour change programs and the provision of practical assistance to improve security in the home<sup>23</sup>. After hours responses are critical as a significant proportion of family violence occurs after hours. Capacity building strategies for police and judicial officers in supporting women to stay in their homes have been introduced in Victoria including education and training on the dynamics of family violence and a Common Risk Assessment and Risk Management Framework.

**Recommendation Seven: The Australian Government's National Homelessness Framework to include options for women to remain safely in their homes with a range of well co-ordinated responses in place to support their choices.**

While measures to help women and children stay safely at home (where possible) must be central to the Australian Government's new homelessness framework, it is inappropriate to assume that this will be an option for all women seeking assistance for family violence. Although family violence is a major factor in the risk of homelessness, it is a complex social problem and requires a specialist response. Many women experience multiple, complex and inter-related challenges in their lives in addition to violence, including mental illness, drug and alcohol addiction, gambling addictions and poverty. SAAP services have reported an increase in the number of women with high and complex needs seeking assistance over the past decade; providing support to these clients has placed increasing demand on family violence services. The lack of supported housing for mental health clients and drug and alcohol clients, many of whom were also experiencing family violence has been picked up by the SAAP service system. In addition, expansion of Australia's refugee and migration programs has meant that the

20 Coomaraswamy R, (1996), Report of the Special Rapporteur on Violence against Women, its causes and Consequences, UN Doc E/CN.4/1996/53 paras 22-7

21 VicHealth 2004, Two Steps Forward, One Step Back Community attitudes to violence against women Victorian Health Promotion Foundation, Melbourne

22 Australian Institute of Criminology (2002) Homicides resulting from domestic altercations higher for women accessed at: <http://www.aic.gov.au/publications/cfi/cfi022.pdf> [13.05.08]

23 Office of Women's Policy (2002) Women's safety strategy: a policy framework Victorian Government, Melbourne

breadth of CALD women seeking support is growing markedly. Many of these women with complex needs and their children cycle through the supported accommodation system, experiencing ongoing and recurring episodes of homelessness. The definition of 'domestic' violence implies that violence is happening in the home, yet a woman may have no shelter and still be living in a violent relationship. For some women the safest and most viable option is supported accommodation.

A National Homelessness Services Policy Framework must recognise this diversity of experience and ensure that a range of integrated, well resourced, best practice specialist family violence supports is available to enhance women and children's safety and well being and reduce the impact on their lives of their experience of family violence. Support models include:

- Crisis intake and referral (statewide and regional);
- Outreach services – crisis support services;
- Women's crisis support and accommodation services;
- Services providing specialist support to specific client groups;
- After hours services;
- Private rental brokerage;
- Intensive case management;
- Individual counselling services for women and children;
- Support groups from women and children;
- Men's behaviour change programs including partner contact programs;
- Indigenous family violence Healing and Time Out services.

The multiple problems women in these situations face often mean that living in communal situations is inappropriate and difficult for other residents. Most refuge accommodation in Victoria has traditionally been based on a communal model. Capital funding to allow services to re-model refuges and to make them accessible to all women and children has not been available. Many women escaping a violent situation and coming into communal refuge are also dealing with separate crises related to mental health and drug and alcohol dependence, which can be problematic in shared living spaces.

For this reason specialist family violence support and accommodation services have needed to monitor and adapt their service provision to best meet the needs of clients. Many such initiatives, the basis of significantly improved outcomes for clients, are largely unfunded and include:

- The use of previous three-quarter and project houses as full crisis intake properties, adapted to offer a dispersed crisis accommodation model with personal space but mutual support – multiple separate living areas in different properties. This model offers flexible and diverse support to women with a range of security needs
- A deliberate strategic focus over several years on empowering women to believe they have a right to be safe and to promote the option of choosing to return safely to their homes with practical, legal and emotional supports in place<sup>24</sup>.
- A deliberate focus on supporting women and children at their immediate time of crisis by offering interim accommodation and support from experienced family violence workers while awaiting a placement to crisis support and accommodation

These are examples of current initiatives that address violence and homelessness with a focus on client need and should be supported and developed in future planning.

**Recommendation Eight: A National Homelessness Framework to commit to funding a diversity of best practice support models for women and children experiencing family violence.**

<sup>24</sup> In one Victorian crisis accommodation and support service 20-25% of clients achieve this goal.

### Example of Best Practice in Integrated Service Delivery

#### Northern Crisis Advocacy Response Service (NCARS)

The NCARS Program is a pilot being run in the Northern Metropolitan Integrated Family Violence sub-region that demonstrates a best practice model of supporting women to remain in the home after family violence incidents. Preliminary data demonstrates that a majority of women assisted through the pilot have been able to return home with an exclusion order in place and a range of support options available to them. The current pilot has been funded from within existing service budgets, the consortium are now seeking funding to run the pilot for 12-months.

Please see Appendix B for an article on the pilot model.

### Workforce Capacity

The Green Paper recognises that *"funding constraints have limited the ability of organisations to offer employment packages necessary to attract and retain specialist staff to provide quality services for clients with complex needs"*<sup>25</sup>. The SAAP funded family violence sector in Victoria has operated in an environment of extremely constrained funding arrangements for over 15 years; this has had a significant impact on the capacity of SAAP agencies to offer staff adequate packages, professional development and career pathways, which, if not addressed urgently, will have considerable impact on the overall and long-term sustainability of the sector.

The Women's Services Network (WESNET) undertook a survey of women's family violence services across Australia to ascertain the key issues impacting on service provision earlier this year<sup>26</sup>; the issue that emerged as the top concern for services was the retention and recruitment of staff. Family violence work is by nature stressful, emotional and fatiguing work. Among the issues this survey identified are burn-out, vicarious trauma, understaffing and high workloads, long hours, constantly being 'on-call', increased expectation of multi-skilling, complexity of client need, difficulty accessing services and resources for clients, lack of time and a lack of integrated systems outside the service. Limited access to appropriate supervision is also a factor critical to the demand on family violence workers. These factors are coupled with an increase in demand due to increased police response and improvements in the systemic response in Victoria.

DV Vic members are reporting increasing difficulty recruiting and retaining staff, with some services considering candidates for positions who would not have been deemed appropriately qualified or skilled as recently as two years ago. Being able to offer fair and appropriate packages is a critical factor in retaining existing staff and recruiting to new positions. Without this capacity the family violence sector faces significant trouble and loss of knowledge and expertise. The Victorian Office of Housing undertook a survey of workforce capacity<sup>27</sup> in the housing, homelessness and family violence sectors in 2007. The report highlights the challenges facing these interrelated sectors in the coming years, including an ageing workforce, problems retaining staff and lack of professional development opportunities.

However we have a largely highly skilled and professional workforce. The family violence reforms in Victoria have placed increased expectation on family violence workers to perform duties beyond the scope of their positions with little or no additional funding to support this activity. For example, participation in regional committees, networking, collaborative work with partner agencies, assessing and managing significant risk, working with police, supporting women through the court system and providing evidence in court all require particular skill sets and expertise, and there is little recognition of this in both remuneration levels and recognition of skills. Staff in the SAAP sector require highly

25 FaHCSIA (2008) Which Way Home: a new approach to homelessness pg.37

26 Oberin J (2008) From Sydney Squat to Complex Services Challenging Domestic and family Violence: Taking Stock, Parity Vol21, Issue 4 pp24 -25

27 Survey of the Community-managed Housing and Support Workforce, Summary Report, (2008) Department of Human Services

developed skills in order to meet the range of client complexity they encounter, this includes in areas that are less tangible to those listed above including building trust relationships, emotional support, and respect afforded to clients. Professional development, and continuous improvement of the family violence workforce linked to competency standards are critical to a successful integrated system. Victoria's experience demonstrates that workforce capacity constraints put reform agendas at risk; the SAAP sector is not well equipped in the current environment to undergo major reform as flagged in the Green Paper. However, the sector offers a wealth of experience and passion on behalf of clients and is a very valuable platform on which to build this work if adequately resourced.

A broad goal of homelessness reform should be a healthy and robust workforce, without which overall reforms are placed at risk. This needs to be within the context of long-term investment into the Australian Community Sector as a whole.

**Recommendation Nine: A National Homelessness Framework must include as a top priority a workforce strategy that recognises the skills and competencies of workers, ensures fair and adequate remuneration, addresses recruitment and retention issues and provides for professional development opportunities and career pathways.**

### *Children in SAAP*

The primary reason for children's homelessness is family violence - the link between family violence and homeless children cannot be ignored. Of the 106, 563 people assisted through SAAP agencies in 2005-06, there were 54,700 accompanying children – generally accompanying their mother who is leaving a violent situation<sup>28</sup>. Children who experience or witness domestic violence may suffer severe psychological trauma, distress and high levels of depression<sup>29</sup>. Evidence suggests that children who experience or witness family violence are more likely to become victims or the perpetrators in violent or abusive relationships later in life<sup>30</sup>. More than twenty per cent of the children accessing homeless assistance services are Aboriginal and Torres Strait Islander children<sup>31</sup>.

Although SAAP does provide a basic framework for the provision of care for children, the current system does not reflect the growing need for children's services to be funded sufficiently in their own right. Without specific funding for children, services for children cannot be coordinated, monitored or evaluated in a nationally consistent and coordinated way. Extending services to children is an early intervention strategy, insofar as protecting them from violence while they are young is an investment in their long term wellbeing and healthy development. DV Vic is pleased that the need for funding to be directed to accompanied children as clients has been highlighted in the Green Paper, and that the Australian Government is willing to address this matter. In particular, the Government needs to place greater priority on identifying and addressing children's specific needs including their immediate requirements for shelter and care, and for their long term development and well being. This needs to be developed in close collaboration with the National Child Protection Framework. State and Territory governments need to develop a nationally consistent approach that ensures that all Australian children are afforded an appropriate level of care and protection in accordance with the International Convention on the Rights of the Child.

**Recommendation Ten: Funding for accompanying children in SAAP to ensure the full range of services they require are identified and provided.**

<sup>28</sup> Australian Bureau of Statistics Report, 2008. [Table 10.27]

[www.abs.gov.au/ausstats/abs@NSF/bb8db737e2af84b8ca2571780015701e/51232D8E96659BA7CA2573D20010FB02?opendocument](http://www.abs.gov.au/ausstats/abs@NSF/bb8db737e2af84b8ca2571780015701e/51232D8E96659BA7CA2573D20010FB02?opendocument)

<sup>29</sup> Edleson, J. L. (1999). The overlap between child maltreatment and woman battering. *Violence Against Women*, 5(2), pp. 134 to 154.

<sup>30</sup> Margolin, G. (2005) Children's Exposure to Violence *Journal of Interpersonal Violence*, Vol. 20, No. 1, 72-81

<sup>31</sup> Norris, K., Thompson, D., Eardley, T., and Hoffman, S., 2005. Children in the Supported Accommodation Assistance Program (SAAP): Final Report. [[www.facs.gov.au/internet/facsinternet.nsf/via/saap2/\\$File/children\\_in\\_saap.pdf](http://www.facs.gov.au/internet/facsinternet.nsf/via/saap2/$File/children_in_saap.pdf)]

### ***Family Law, Family Violence and Homelessness***

DV Vic is concerned about the impact of the Family Law reforms of 2006 on the vulnerability of women and children experiencing family violence and their access to safe accommodation. Family Law proceedings can be protracted and costly having significant impacts on women leaving violent relationships' capacity to access and sustain safe housing and increasing their susceptibility to financial hardship and homelessness.

In addition to the risk of homelessness, the presumption of shared care arrangements can place consideration of women and children's safety second to the child having contact with both parents, with significant implications for children having unsupervised contact with violent fathers. Although there are safeguards built into the Family Law amendments where family violence is present, capacity to identify family violence among legal practitioners and Family Relationship Centres continues to be a major concern<sup>32</sup>. A further barrier to women disclosing family violence is the "friendly parent" consideration, as they risk being viewed as "non-cooperative" and unwilling to facilitate contact with the other party.

### ***Family Violence Reform in Victoria – a joined-up approach***

Appendix C provides a brief description of the integrated family violence system in Victoria.

Evidence suggests that integrated models are good practice in many areas of social policy<sup>33</sup>. Integrated family violence models have been implemented in a number of jurisdictions in Australia and internationally. One of the outcomes of effective integration is to support women and children experiencing family violence to remain safely in the home, which in turn contributes to the reduction of homelessness and demand on support services.

In 2002 the Victorian Government as part of the *A Fairer Victoria* social policy statement, launched the *Women's Safety Strategy 2002-2007* outlining its vision for family violence reform across the state. Victoria is still in its infancy in implementing its family violence reform agenda – the foundation of which is an effective integration of key agencies, and we have made good progress to date in many of the areas critical to its success.

The Victorian integrated family violence model could be used as a guide by the Commonwealth in developing national standards and benchmarks for integrated systems married with incentives to encourage consistent practice. We would urge thorough research of existing Australian and international integrated social policy systems with close scrutiny of their implementation. There is also a wealth of expertise within the SAAP system; opportunities to learn from on-the-ground service providers who have firsthand experience of integration will be essential to informing policy directions that are grounded in practical experience.

The Family Violence Statewide Steering Committee produced *Reforming the Family Violence System in Victoria* (2005). It identified the following foundations for an integrated family violence system:

- Quality practice approaches;
- The importance of systems integration
- A gendered analysis
- Responding to diversity.

#### **Processes for Integration**

- Development of Codes of Practice
- Continuous assessment of practices and procedures
- Development of standardised practices
- Memoranda of understanding between partner agencies

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<sup>32</sup> Domestic Violence Resource Centre (2007) Behind Closed Doors: Family Dispute Resolution and Family Violence. Discussion Paper 6, 33 Mulrone, J 2003, Trends In Interagency Work, Australian Domestic & Family Violence Clearinghouse Topic Paper

- Functions in facilitating integration

### Tools for Integration

- Planning and coordination
- Data collection and information sharing
- Common risk assessment processes
- Workforce development

The Victorian Government has committed significant funding (including \$35 million in the 2005/06 budget and \$25 million in the 2008/09 budget) to new initiatives critical to the joined-up family violence system including men's behaviour change programs, counselling services for women and children, indigenous specific services and a common risk assessment and referral framework.

The Victorian model is based on multi-disciplinary coordination that engages the range of services that come into contact with people experiencing family violence across the state. Regional coordination allows for consistency across the state with flexibility to be responsive to local needs, available services, key stakeholders and networks.

Some of the key learnings of the Victorian model include:

- The importance of a whole of government approach in which a number of designated Ministers are responsible for the issue of family violence. This has worked well because it provides a holistic approach to addressing the issue and encourages mutual accountability. Within this model Victoria has benefitted from high level leadership and the weight this carries in driving reform.
- Close collaboration and consultation with non-government service providers has meant that the reform process is grounded in the expertise of people working on the ground and informed by the impact of certain interventions. This has encouraged a whole of community responsibility for responding to family violence.
- A significant weakness in the Victorian model has been the constrained funding environment of the existing SAAP funded specialist service system; essential stakeholders in the integrated approach. Funding to SAAP services evolved from a submission basis, not a costed basis, and this funding gap remains today. Existing SAAP services have not had an effective funding increase for over 15 years and have continued to provide excellent and innovative services in a significantly unfunded capacity. This has been further impacted by an improved police response resulting in a significant increase in police charges and intervention orders<sup>34</sup> and has resulted in greatly increased demand of the service system without commensurate resourcing to meet that demand. Without future investment in specialist family violence service providers, the success of the overall reform and the safety of the women and children it seeks to protect could be risked.
- Representation on advisory committees and other governance mechanisms by those working with the most vulnerable is critical (CALD, Indigenous, disability, GLBTI etc...).
- The importance of training for all key stakeholders involved in the joined up approach on the dynamics of family violence, including judicial officers, senior beaurocrats and police in order to ensure responses are appropriate and don't endanger women and children.
- Integrated systems work well because they support clients having a consistent response, and receiving appropriate and streamlined referral processes. A structured and coordinated referral

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<sup>34</sup> Victoria Police, (2008) Unpublished data

process with strong collaborative arrangements, articulated protocols and referral pathways support the client to have the least difficulty navigating the system.

- The Victorian experience to date has taught us that working from the presumption of removing perpetrators from the home requires a coordinated and holistic political, legal and social response aimed at stopping violence against women and children which goes beyond referral to men's behaviour change programs alone. Accommodation and counselling provision would help to increase the probability of perpetrators attending men's behaviour change programs and therefore being challenged on their use of violence. Where a service is engaged with an excluded perpetrator this increases the safety of women and children remaining in the home. Appropriate standards and training for men's behaviour change programs are also essential<sup>35</sup>.
- Implementing an accountable and integrated response to family violence requires time and a coordinated change management strategy. It requires relevant stakeholders to work hard to adapt to new practices and to overcome differences and different ideological paradigms. This all takes time, which needs to be considered in planning for reform. Stakeholders will have to grapple with planning and implementing new processes and structures while continuing to meet client demand, which may increase due to improved responses.
- Although accreditation under the Homelessness Assistance Service Standards requires significant investments of time and resources, it has been largely embraced by the Victorian family violence sector. It provides an opportunity for family violence organisations to review their policies, procedures and practices, to undertake development work in these areas and implement clearer and more consistent processes across and within organisations. It has also provided an opportunity for workers to focus specifically on their practice in relation to the support, information and other interventions they undertake with women. An open and regular reflection and review of practice ensures workers are abreast of contemporary information, theories and ideas about practice, have a strong awareness of the impact of their practice on the outcomes for the women and children with whom they work, and contribute to the continuing development of knowledge and expertise in the family violence sector.

## *Marginalised Communities*

### **Women with Disabilities**

Women with disabilities are among the most socially and economically marginalised in the community. As an example, women with disabilities pay the highest level of their gross income on housing yet are in the lowest income-earning bracket. Many women with disabilities are subject to the control of others, and experience high levels of violence from family members and carers<sup>36</sup>. Women with disabilities are less likely than other women to report family violence, and less likely to receive services that meet their needs. In addition, over a third of women who sought assistance for family violence from disability services acquired a disability as a result of the abuse<sup>37</sup>. Women with disabilities may live in inappropriate accommodation, where they are vulnerable to abuse and/or live without adequate support in the community<sup>38</sup>.

Women with Disabilities Australia identifies the following issues that impact on the homelessness or risk of homelessness for women with disabilities<sup>39</sup>:

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<sup>35</sup> Not to Violence Men's Behaviour Change Group Work: Minimum Standards and Quality Practice [www.nlv.org.au](http://www.nlv.org.au)

<sup>36</sup> Salthouse, S. & Frohmader, C. 2004, 'Double the Odds' - Domestic Violence and Women with Disabilities' paper presented to the 'Home Truths' Conference, Melbourne, 2004

<sup>37</sup> Cockram, J. 2003, Silent Voices: Women With Disabilities and Family and Domestic Violence, accessed at: <http://www.wwda.org.au/cgi-bin/perfect/search/search.pl?q=descriptive&showurl=%2Fsilent7.htm> [18.04.08]

<sup>38</sup> Cooper, Margaret. 1993. 'Housing issues for women with disabilities, A response to the National Housing Strategy, Issues and Discussion Papers', unpublished report accessed at: <http://www.wwda.org.au/housing04.htm> [18.04.08]

<sup>39</sup> 'Unjustified Hardship - homelessness and women with disabilities' by Women With Disabilities Australia (WWDA), 2004 Accessed at: <http://www.wwda.org.au/housing04.htm> [18.04.08]

- Additional costs of living with a disability;
- Discrimination in accessing housing in private and public rental market;
- Safety and location;
- Lack of adequate support services post deinstitutionalisation;
- Lack of accurate and available gender and disability specific data from within national data collection sets e.g. SAAP.

Specific barriers to accessing SAAP services that lead to homelessness or risk of homelessness for women with disabilities include<sup>40</sup>:

- Limited accessible information on SAAP services targeted to women with disabilities;
- Staff attitudes and lack of knowledge and skills around working with women with disabilities;
- Physical environment barriers and lack of personal care facilities;
- Referral agencies not being able to place women with disabilities into appropriate services;
- Lack of equipment, i.e, aids and appliances preventing women with disabilities from using a SAAP service.

As part of any SAAP reform the following minimum requirements for responding effectively to women and children with disabilities who have experienced violence must be addressed. We have attached a comprehensive list of recommendations at Appendix D.

### **CALD Women**

Women from culturally and linguistically diverse backgrounds face particular barriers to accessing family violence support, and are among the most vulnerable groups experiencing homelessness. Barriers can include the cultural appropriateness of services, language barriers, and lack of awareness of services and support available in Australia. In Victoria, women without permanent residency – including those on temporary spousal, interdependent or fiancé visas (visa classes 300, 309, 310, 820, 826) are highly represented in the family violence system. A significant number of all referrals made by the Women's Domestic Violence Crisis Service in Australia (WDVCS) are women without permanent residency<sup>41</sup>. Domestic violence provisions in the Migration Regulations are limited in their application and do not cover all situations of violence that women without permanent residency experience. This in turn limits their eligibility for Special Benefits via Centrelink which places them at extreme levels of risk due to their enforced dependence. Women who enter Australia as part of family units on Provisional Skills and Business Skills visas and people on Temporary Employer Sponsorship visas are also not eligible for the Family Violence provisions under the Migration Regulations. This gap in Australian social policy is shameful given that Australia is signatory to the Declaration of the Elimination of Violence against Women (DEVAW). To seriously address levels of violence experienced by an extremely vulnerable group of women this must be addressed as a matter of urgency.

Access to emergency accommodation for this group of women is extremely limited, with women cycling through and constantly having to move in and out of interim accommodation while they wait for refuge places, however access to women's refuge is extremely limited due to lack of exit options. Crisis accommodation services are funded for six weeks support per client and receive no funding to work with clients with no access to income. Some refuges limit one place to women without permanent residency because of the significant cost and time burden on their service. DV Vic has heard that these women can remain in refuge for extended periods – up to two years in some instances. Issues including lack of housing options, ineligibility for public and community housing and lack of income support all limit the capacity of family violence services to support women without residency rights.

The cost of interpreter services also impacts on services' capacity to take CALD women on as clients. The Department of Human Services in Victoria does fund a pooled interpreter service, however on occasion services will exceed the pool. The Women's Domestic Violence Crisis Service is finding it

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<sup>40</sup> Ibid

<sup>41</sup> Personal communication with Women's Domestic Violence Crisis Centre, [23.06.08]

difficult to refer women who do not speak English on to appropriate support services because of this financial limitation.

The figures on this group of women seeking family violence assistance demonstrate the urgent need for the Commonwealth to expand funding for interpreter services, culturally appropriate family violence service delivery, including accommodation, counselling, case management and dedicated bilingual workers.

Review of temporary visa conditions that limit access to income and employment support, and place CALD women and children experiencing violence at risk of homelessness is imperative. A whole of government approach to homelessness must include the Department of Immigration and Citizenship within its ambit, and ensure coherence between DIAC policies and the goals of the National Homelessness Framework.

### Indigenous Women

Aboriginal and Torres Strait Islander people are dramatically over-represented among those experiencing homelessness and Indigenous women are 45 times more likely to experience family violence and 10 times more likely to die as a result than the non Indigenous population<sup>42</sup>. Indigenous communities have complex family and kinship networks and, while leaving family life is difficult and confusing for all women, the experience of Indigenous women is even more so. The Indigenous community's understanding of family violence includes: 'one on one fighting, abuse involving the Indigenous community workers, self harm, injury and suicide... and is also inclusive of elder abuse and victims of family violence can include parents, uncles, aunties, (step) children, (step) siblings, cousins, grandparents, in laws and distant relatives.'

The Victorian Indigenous Family Violence Taskforce attributes the high incidence and prevalence of family violence among Indigenous people to a number of factors including:

- Dispossession of land and traditional culture;
- Breakdown of community kinship systems and
- Aboriginal Law;
- Racism and vilification;
- Economic exclusion and entrenched poverty;
- Alcohol and drug abuse;
- The affects of institutionalisation and
- child removal policies;
- Inherited grief and traumas and loss of traditional Aboriginal male roles and status.

The trauma of living with family violence is but one of the multiple traumas frequently experienced by Indigenous children. These multiple traumas include the witnessing of community violence, death of loved ones, dislocation from home and community, poor health and extreme poverty<sup>43</sup>. There is considerable diversity in Indigenous cultural practice and among communities which makes it impossible to generalise about the nature of violence or Indigenous women and children's experience of it.

Key elements of effective Indigenous family violence responses include<sup>44</sup>:

- Cultural grounding of programs;
- Community grounding/development of programs;
- Composite programs, integration and holistic approaches;

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<sup>42</sup> Victorian Government Response to the Victorian Indigenous Family Violence Task Force Final Report, 2005 Victorian Government

<sup>43</sup> ibid

<sup>44</sup> Memmott P, Chambers C, Go-Sam C & Thomson L, (2006) Good Practice in Indigenous Family Violence Prevention, Issues Paper 11, Australian Domestic and Family Violence Clearinghouse

- Engagement of men into programs;
- Ensuring the involvement of elders;
- Self-empowerment and self-esteem as capacity building by-products;
- Examining inter-generational family history and cultural experience as a healing element;
- Culturally appropriate responses, including group approaches;
- Capacity building through networking partnerships and interagency collaboration;
- Information collection and dissemination;
- Training skills and acquisition;
- Flexibility and adaptability of programs.

The Victorian Indigenous Family Violence Ten Year Plan is due for release on 27 June 2008 and presents the Victorian Government's strategic plan to address family violence in Indigenous communities over the next ten years<sup>45</sup>.

#### **Responding to Diversity in an integrated family violence system**

- Incorporating responses to diverse groups in the codes of practice and policies of mainstream services. Each key agency should articulate the commitment to, and strategies for, responding to diverse needs, including processes and practices which will form part of their service delivery;
- Mechanisms to ensure that specialist organisations have the capacity to provide information, training and secondary consultation to mainstream organisations working with particular groups along with other strategies to facilitate the provision of culturally competent care;
- Strengthening mechanisms for referral to agencies with specialist knowledge and expertise in culturally and linguistically diverse, Indigenous and disability issues, while recognising the right of all clients to choose to access mainstream agencies. At local levels, linkages and sharing of information between family violence agencies, legal and specialist agencies, should be improved to increase the understanding of diversity issues and available legal responses;
- Targeting of programs, including men's behaviour change initiatives to diverse groups;
- The allocation of specific resources for interpreting and translating services that include non-verbal communications;
- Involving leaders and clients from diverse communities in statewide planning and evaluation of services and programs; and
- Improving the collection and analysis of data relating to diverse groups affected by family violence.
- Resources for training and mentoring for workers in homelessness and family violence sectors to support them in working with marginalised groups.

(Adapted from *Reforming the Family Violence System in Victoria*<sup>46</sup>)

**Recommendation Eleven: The National Homelessness Framework develop benchmarks to ensure best outcomes for the most disadvantaged groups of women and children experiencing family violence: those with disabilities, from Indigenous communities and those from culturally and linguistically diverse backgrounds without permanent residency and the full legal protection as citizens**

<sup>45</sup> Aboriginal Affairs Victoria (2008), *Strong Culture, Strong Peoples, Strong Families: Towards a safer future for Indigenous families and communities*, Victorian Government, Melbourne

<sup>46</sup> *Reforming the Family Violence Sector in Victoria*, (2005), Statewide Steering Committee to Reduce Family Violence

## **A Focus on Primary Prevention**

DV Vic will be making a separate submission to inform the National Plan to Reduce Violence Against Women and Children. We urge the Australian Government to consider the National Plan in parallel with the development of the White Paper on Homelessness given the critical intersection between the reduction of violence against women and children and prevention of homelessness among women and children experiencing violence.

DV Vic urges the federal government to consider the Victorian Health Promotion Foundation (VicHealth) *Preventing Violence Before it Occurs: A Framework and Background Paper to Guide the Primary Prevention of Violence against Women in Victoria* in the development of its National Plan to Reduce Violence against Women and Children and the White Paper on Homelessness. The VicHealth Framework was developed in recognition of the importance of preventing violence before it occurs and that the problem is too prevalent and the consequences too great to limit efforts to post-violence interventions. The Framework recognises the need for a broad spectrum of prevention responses. It considers the structural, cultural and societal contexts in which violence occurs and looks at broad strategies that address some of the contributing factors towards violence against women such as poverty and gender inequality.

DV Vic supports calls for the engagement of business and unions in creating safe and supportive workplace practices and strategies to raise the issue of family violence, to assist working women to stay safely in their homes and challenge the behaviour of offenders. Evidence shows that workplaces can be active agencies in providing practical support to working women choosing to stay in their homes.

## **Client Engagement**

It will be essential that the national homelessness policy framework adopts a strategy for client engagement, ensuring that people who are homeless or have experienced homelessness can contribute to the development of policies and programs.

## **Data and Research**

A National Homelessness Framework will require nationally consistent data collection mechanisms and performance measures. It will also require a robust research agenda, facilitated by funded research bodies. Progress against the performance indicators should be reported upon annually.

Priorities for data collection and research:

- Performance against agreed benchmarks across Commonwealth, States and Territories for best practice integrated systems;
- Core demographic data including client needs information;
- Collection of disability related data. This needs to include: recording the presence of disabilities in clients of services and the type of disabilities clients have; for example, physical, learning, sensory, mental health disabilities. The presence of a disability can be measured among clients seeking support from SAAP agencies through several questions on the in-take form. Questions are currently asked regarding:
  - Income support based on a disability pension
  - Living situation prior or subsequent to attendance at a SAAP agency being in a psychiatric facility
  - Whether a client is referred to specialist services including (psychological, drug / alcohol, psychiatric, physical, and intellectual)
  - Whether client is attending a specialist disability SAAP service
- Performance against identified benchmarks in best practice service provision for the most disadvantaged groups;
- A longitudinal study of homelessness that is multi-jurisdictional, long-term and encompasses a broad diversity of experiences of homelessness;

- A longitudinal study including focus on the impact of family violence offender programs, and housing sustainability for women remaining in the home;
- Assessing the effects of changes in policy, programs or economic conditions on the level of homelessness; and
- National modelling of demand for homeless and family violence services that would support the roll out of homeless programs at a local level.
- Qualitative research studies that involve in depth interviews with clients.

## Conclusion

Domestic Violence Victoria welcomes the Australian Government's commitment to addressing homelessness in Australia and the social inclusion lens that will inform this reform agenda. The parallel process of developing a National Plan for the Prevention of Violence against Women and Children complements the development of a national framework for addressing homelessness and we would urge the importance of close collaboration in the development of these important policy frameworks.

DV Vic and the member services we represent support calls for the development of a National Affordable Housing and Homelessness Agreement that incorporates all key funding relevant to the national response to homelessness, and in which the Supported Accommodation Assistance Program (SAAP) is retained as a distinct program area. Reform of mainstream portfolios areas with a focus on responding to the structural contributors to social disadvantage and homelessness is essential, but not without an adequately resourced corresponding specialist service system.

A robust, professional and well resourced workforce will be the backbone of a successful homelessness system across the country: it is imperative that the Australian Government recognise and respond to current workforce capacity constraints in the forthcoming homelessness White Paper.

We have put forward the integrated family violence system in Victoria as a model of good practice in preventing and responding to family violence including some reflection on its implementation in Victoria, and recommend that the Commonwealth commit to integrated service delivery approaches in developing its new approach to homelessness. National standards and benchmarks for integrated, whole of government, whole of community systems will need to be clearly articulated in the national homelessness framework.

As reiterated throughout the document, particular attention must be given to women and children in marginalised groups, who are especially vulnerable to the effects of violence. Benchmarks targeted to the most disadvantaged groups who experience the highest rates of family violence and the most difficulty accessing support must be embedded into a national framework as a matter of priority for these reforms. We are heartened by the Commonwealth's commitment to reducing homelessness experienced by women and children escaping violence by providing support for measures to allow women and children to stay safely at home following violence. This cannot occur without an effective integrated service system to support women for whom this is a feasible option.

The new approach must be supported by human rights and social justice based legislation which enshrines the rights of people who are homeless to basic entitlements particularly housing.