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embolden

Submission to South Australia's
Royal Commission into Domestic,
Family and Sexual Violence



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Acknowledgement of Country

We acknowledge and respect Aboriginal peoples as the State's First Peoples and nations and recognise Aboriginal Peoples as traditional owners and occupants of land and waters in South Australia. Sovereignty has never been ceded. It always was and always will be Aboriginal land. We recognise that Aboriginal Peoples' spiritual, social, cultural and economic practices come from their traditional lands and waters, that they maintain their cultural and heritage beliefs, languages and laws, which are of ongoing importance, and that they have made and continue to make a unique and irreplaceable contribution to the State. We acknowledge that Aboriginal Peoples have endured, and continue to endure, injustices and dispossession of their traditional lands and waters. We continue to pay respect to the resilience and strengths of Ancestors and Elders past, present and those emerging.

About Embolden SA Inc.

Embolden is the statewide peak body for organisations working to respond to and eliminate domestic, family and sexual violence in South Australia. Our members provide services that promote the safety and wellbeing of women and their children, and work to prevent and respond to violence against women. We lobby and advocate for women's right to respect, safety and self-determination, and represent providers of specialist services in the domestic, family and sexual violence sector, including services that work with men who use violence against women and Aboriginal specialist services.

This submission has been developed in consultation with, and is submitted on behalf of, Embolden's member organisations:

- *Bramwell House, The Salvation Army*
- *Ceduna Regional Domestic Violence and Aboriginal Family Violence Services, Centacare Catholic Country Services*
- *Coober Pedy Regional Domestic Violence and Aboriginal Family Violence Service, Uniting Country SA*
- *54 Reasons*
- *Family Violence Legal Service Aboriginal Corporation*
- *Fleurieu and KI Domestic Violence Service, Junction SA*
- *Kornar Winmil Yunti Aboriginal Cooperation*
- *Mt Gambier and Limestone Coast Domestic Violence Service, Centacare Catholic Family Services*
- *Murray Mallee and Adelaide Hills Domestic Violence Service, Centacare Catholic Family Services*
- *No to Violence*
- *NPY Women's Council Domestic and Family Violence Service*
- *Nunga Mi:Minar*
- *OARS Community Transitions*
- *Port Augusta Regional Domestic Violence and Aboriginal Family Violence Service, Uniting Country SA*
- *Relationships Australia (SA)*
- *Riverland Domestic Violence Service, Centacare Catholic Family Services*
- *Whyalla Regional Domestic Violence Service, Centacare Catholic Family Services*
- *Women's Legal Service SA*
- *Women's Safety Services SA*
- *Yarredi Services*
- *Yarrow Place, SA Health*
- *Yorke and Mid North Domestic Violence Service, Uniting Country SA*
- *Zahra Foundation Australia*

About this submission

In late 2023, Embolden, South Australia's peak body for the specialist domestic, family and sexual violence (DFSV) services sector, led the call for a Royal Commission into domestic, family and sexual violence in South Australia. We were galvanised by a week in which four South Australian women were murdered, allegedly by a man known to them, in what was the worst week for fatal domestic and family violence within any jurisdiction in Australian history. However, Embolden had written to the Premier prior to these terrible acts of violence to raise urgent concerns that our service system is not fit for purpose and to call for a Royal Commission. We now have a critical opportunity for transformative change in how our State prevents and responds to domestic, family and sexual violence.

Embolden's first submission to the Royal Commission,¹ made in August 2024, focused principally on the overarching system elements required for an effective public health approach to domestic, family and sexual violence: a strategic whole-of-government framework; effective cross-sector governance; a robust evidence base and systems-level accountability mechanisms; embedding lived, practice and research expertise; a strong and sustainable specialist DFSV workforce and sector. A public health approach suggests that men's violence against women, children and other men is a national emergency that requires a whole-of-government response that includes a focus on prevention and early intervention. A summary of key recommendations from Embolden's first submission is included at Appendix A.

This second submission focuses on the services and systems with which people experiencing and using violence directly interact, across the key areas of focus within the Royal Commission's Terms of Reference: prevention, early intervention, crisis response, recovery and healing, and service integration and coordination. This submission is informed by the experience and expertise of Embolden's members – South Australia's specialist domestic, family and sexual violence services – and is submitted to the Royal Commission on behalf of the members listed on the previous page.

Embolden's recommendations within this submission directly reflect what we heard from frontline workers and leaders across SA's specialist DFSV sector, through several workshops held over June/July and a detailed online survey of staff teams across our member organisations in August.

Embolden's frontline worker survey questions are at Appendix B. The survey asked respondents to identify what was working well, issues and opportunities for improvement across a range of processes, agencies and systems with which victim-survivors, people using violence and frontline DFSV services interact. Topics focused on areas of particular complexity, often involving cross-sector interactions. These included risk assessment and multi-agency risk management, police and criminal justice process and intersections with systems including child protection and the Family Court. Responses were received from 28 frontline teams or services across 14 of Embolden's member organisations, with even representation across metropolitan and regional/remote services. Most (85%) of the teams work with victim-survivors of domestic and family violence (with one dedicated sexual violence service responding) and 15% of respondent teams work specifically with people using violence.

A significant majority of Embolden's members will also make individual submissions, highlighting the specific issues, priorities and opportunities within the unique contexts in which they operate.

The authors of this submission are Embolden team members Mary Leaker, General Manager and Elsa Reuter and Roshni Thattengat, Senior Policy Officers. The team is enormously grateful to our member organisations, whose staff lent their time and expertise to ensure this submission reflects the voice of our sector. Our gratitude also extends to people with lived experience who generously provided their expertise and critical perspectives on how the current systems are working and what needs to change.

Embolden is pleased to make this submission to South Australia's Royal Commission into domestic, family and sexual violence.



Maria Hagias
Embolden Board Co-chair



Susie Smith
Embolden Board Co-chair



Mary Leaker
Embolden General Manager

¹ Embolden (2024). *Submission to the Royal Commission into Domestic, Family and Sexual Violence*, August 2024, www.embolden.org.au/wp-content/uploads/2024/08/Embolden-submission-to-Royal-Commission_Aug-24.pdf

Summary of key recommendations

Embolden's key recommendations outlined in this submission are as follows:

Domestic, family and sexual violence services system reform: cross-cutting priorities:

- An urgent injection of funding into existing frontline domestic, family and sexual violence services across the continuum of prevention, early intervention, response and recovery and healing.
- The planning, development and funding of place-based integrated service models statewide to effectively prevent and respond to domestic and family violence, to be driven through a cross-sector co-design process.
- The completion of a needs analysis to guide investment in South Australian domestic, family and sexual violence services. This needs analysis should address critical service system gaps and improve equity of service access across the state, including to targeted, culturally safe responses.
- Funding to prevent and respond to domestic, family and sexual violence should:
 - increase the proportion of funding directed to Aboriginal Community Controlled Organisations and promote Aboriginal self-determination;
 - adequately resource services for men, including prevention and early intervention initiatives;
 - enable the domestic, family and sexual violence sector to flexibly meet diverse needs across the community; and
 - support service sustainability, with Embolden advocating for 5-year service contracts.
- Preparation for the criminalisation of coercive control and effective implementation should:
 - involve a strong focus on coercive control within South Australia's whole-of-government statewide domestic, family and sexual violence strategy and monitoring and evaluation framework;
 - be actively driven and overseen by governance groups established for South Australia's domestic, family and sexual violence strategy;
 - enable specialist domestic and family violence services to effectively advise and support victim-survivors of coercive control through targeted training and co-location of legal services; and
 - include ongoing investment in education and training for police, judiciary and the broader services sector on coercive control, which is developed and delivered in partnership with women's safety specialists.

Primary Prevention

Embolden recommends that interventions targeted at a whole-of-population level include:

- Development and implementation of a standalone primary prevention strategy to address domestic, family and sexual violence, or the inclusion of primary prevention as a key pillar of South Australia's overarching domestic, family and sexual violence strategy.
- Adoption of an holistic approach to prevention that encompasses greater strategic focus on, and investment in, targeted initiatives to address reinforcing factors, which interact with gendered drivers to reinforce, exacerbate or influence the occurrence or dynamics of violence against women.
- Adoption of universal programs for new parents that provide support and foster healthy, equal and respectful relationships.
- Commitment to a long-term vision, approach and funding of evidence-based Respectful Relationships Education across South Australia, to be delivered across early childhood education settings, primary school and secondary school to Year 12.
- Greater access for South Australian school students to primary prevention programs that can supplement core Respectful Relationships Education curricula.
- Funding of dedicated positions to support South Australian workplaces to strengthen gender equality and prevent and respond to domestic, family and sexual violence.
- Communication campaigns on coercive control, as well as child sexual abuse and sexual assault, including resourcing communication approaches co-designed with and targeted to specific groups.
- Inclusion of a focus on primary prevention in South Australia's domestic, family and sexual violence workforce strategy, incorporating the development of specialist workers whose substantive role and expertise is in primary prevention.

Early Intervention

Embolden's recommendations for early intervention approaches to stop violence from escalating, protect victim-survivors from harm and prevent violence from reoccurring include:

- Upskilling of universal mainstream services to better understand, identify and respond to domestic, family and sexual violence, including:
 - foundational content in tertiary education programs on domestic, family and sexual violence;
 - workforce training on domestic, family and sexual violence tailored to the workplace context; and
 - implementing universal screening tools for domestic, family and sexual violence in mainstream services, alongside effective staff training and strong referral pathways to specialist services.
- Monitoring the outcomes and recommendations of the Supporting the Primary Care Response to Family, Domestic and Sexual Violence Pilot, and investing in future capacity building initiatives specific to the health system.
- Embedding of specialist domestic, family and sexual violence workers in universal child health services.
- Capitalising on opportunities for early intervention with children and families presented by the introduction of universal three-year-old preschool in South Australia.
- Development of clearer definitions and shared understandings of 'at risk' in the early intervention context, including holding a cross-sector roundtable to enable comprehensive consideration of definitions and tools. This work must have a strong focus on pathways into and out of using violence.
- Greater investment in earlier, holistic supports for families across South Australia, including:
 - funding directed to Aboriginal Community Controlled Organisations;
 - investment in culturally specific workers across the State to improve cultural responsiveness;
 - community-led early intervention supports targeted to LGBTIQ+ people and people with disability;
 - more flexible pathways into services; and
 - funding to promote visibility and awareness of early intervention services in communities.
- Greater investment in specialist children's workers in domestic and family violence services, noting the importance of a whole-family lens and approach.

- Greater investment in therapeutic supports for infants, children and young people, such as play-based narrative therapies.
- Support of dedicated therapeutic supports for child and young people with experiences of childhood sexual abuse.
- Development of critical early intervention opportunities for working with boys and young men, including:
 - leveraging the school system to better identify and respond to boys at risk of using violence;
 - improving interventions with boys and young men through their initial contact with the youth justice system;
 - brief interventions with boys and young men on remand; and
 - improving early intervention with boys and young men at risk of/demonstrating harmful or problematic sexual behaviours.
- Identification and offering of support to men of all ages causing harm to change behaviour as early as possible.
- Strengthening of approaches with men through mainstream and targeted services to deliver earlier supports, which integrate a focus on behaviour change and address a range of intersecting needs.

Responses to domestic, family and sexual violence

Embolden's recommendations to strengthen responses to violence that has already happened include:

South Australia's 24/7 and accommodation-based responses

- A review of South Australia's 24/7 response to domestic, family and sexual violence that considers a co-designed one-stop entry point to all relevant services statewide, as well as the provision of trauma-informed, culturally safe, holistic responses that are flexible and tailored to the needs of all victim-survivors.
- Strengthening of accommodation supports that better meet the needs of all people experiencing violence, including supports that are co-designed, flexible and meet housing and therapeutic needs in ways that are trauma-informed and culturally safe and responsive.
- Establishment of dedicated accommodation-based services and programs for people using violence across metropolitan, regional and remote South Australia.

Risk Assessment & Multi-Agency Risk Management

- South Australia continues to support the national effort to develop a standardised national risk assessment that effectively assesses risk for all victim-survivors in a way that is trauma informed and culturally safe, with consideration for Aboriginal people, infants, children and young people, culturally and linguistically diverse people, LGBTIQ+ people, and men experiencing violence.
- Tailoring of risk assessment training to the unique processes and operational contexts for all agencies and services undertaking domestic, family and sexual violence risk assessments in South Australia.
- Review of the Family Safety Framework, in partnership with participating services/systems and people with lived experience.
- Development of a state-based multi-agency response focused on the person using violence, which can support prevention and diversion, as well as disruption and enforcement.
- Evaluation of the electronic monitoring program to ensure effectiveness in preventing and disrupting violence across South Australia, with consideration of potential expansion.

Justice Responses

- Review of current justice responses and coordination between SA Police, Courts Administration Authority and the Department for Correctional Services regarding Intervention Orders and bail conditions, with consideration of risk and safety for victim-survivors and accountability for people using violence.
- Exploration of options for more coordinated approaches between the Courts Administration Authority, the Department for Correctional Services and SA Police to better support victim-survivors' safety.
- DFSV training for magistrates, Courts and SA Police staff to include a focus on understanding and reducing misidentification of victim-survivors, with consideration of mitigating adverse consequences for victim-survivors who have already been misidentified within the justice system.
- Review of processes and training for SA Police and the Courts Administration Authority to promote appropriate protection of infants, children and young people who experience family and domestic violence, including ensuring all children are included on Intervention Orders.

- Inclusion in SA Police's current review of its response to domestic, family and sexual violence:
 - reviewing and revising training for all staff to effectively recognise DFSV and appropriately respond to victim-survivors, including children and young people, in ways that are trauma-informed, culturally safe and place-based;
 - alternative reporting options for victim-survivors;
 - increasing regional and remote service coverage and engagement with other jurisdictions, including through the Cross Border Justice Scheme;
 - sustainable delivery of welfare checks; and
 - measures for monitoring and reporting on police responses to DFSV.

Embolden's key recommendations to improve **justice responses to sexual violence** are:

- The South Australian Government considers specialist sexual offence courts/dedicated court sitting days for sexual offences, to strengthen judicial practice and justice outcomes for victim-survivors.
- Action is taken to strengthen supports for victim-survivors to understand and exercise their rights through criminal justice processes, including the availability of independent legal advice throughout proceedings and 'justice navigator' services that are culturally safe for Aboriginal and culturally and linguistically diverse women and are accessible.
- Development and implementation of 24/7 anonymous reporting mechanisms for sexual violence in SA, leveraging the experience of other jurisdictions and supporting national harmonisation of anonymous reporting.

Interface with child and family systems

- Development of clearer processes and mechanisms for effective collaboration between child protection and specialist domestic and family violence services.
- Further development of domestic and family violence-informed policies within the child protection system to improve safety and dignity for victim-survivors, especially infants, children and young people.
- Consideration of domestic and family violence-informed case management within the child protection system to support parents to meet conditions and increase accountability for parents using violence.

- Enhancement of domestic and family violence training and professional development for child protection staff, developed in partnership with the specialist sector and included in induction and ongoing professional development.
- Investment in the family group conferencing program to expand access and improve outcomes for families with complex needs, including domestic and family violence.
- Resourcing of the Department for Child Protection to enable consistent representation at Family Safety Framework and interagency meetings.
- Development of a consistent approach across South Australian Government schools for domestic, family and sexual violence services to provide on-site support for children and young people impacted by violence.
- Identification within the Royal Commissioner's report of:
 - the need for increased funding for the Family Court to further reduce wait times;
 - the importance of a domestic, family and sexual violence-informed Family Court to the safety and wellbeing of children and families;
 - the importance of parenting orders that prioritise the safety of women and children in the context of domestic and family violence and that are consistent with jurisdictional protective orders.

Interface with other frontline services

- Reviewing current contract administration processes to identify opportunities to support the provision of wrap around supports, which may include joint intake appointments and collaboration leveraging the specialisation of different sectors.
- Funding interagency meetings as a separate line item in service contracts to improve service integration and coordination and address concerns about such meetings compromising direct service delivery.
- Supporting education for specialist domestic, family and sexual violence workers to better understand the mental health and alcohol and other drugs service systems.

Responses to men using violence

Our efforts to reduce violence against women and girls must focus on men and boys. To complement a strong prevention and early intervention focus on men at risk of/using violence, Embolden's recommendations to strengthen our responses to men causing harm include:

- Development and implementation of a national strategy focused on men using violence.
- South Australia's domestic, family and sexual violence strategy to drive the development of a broad suite of targeted, evidence-based interventions to stop men's use of domestic, family and sexual violence.

Responses to victim-survivors of sexual violence

To strengthen services responses to victim-survivors of sexual violence, Embolden recommends:

- Needs analysis to ensure that investment in child sexual abuse and sexual violence services meets community need, including in regional and remote areas.
- Development and implementation of a 24/7 phone and web-based sexual violence counselling service.
- Review of opportunities across the health system to strengthen trauma-informed responses to child sexual abuse and sexual violence.
- Development of processes and pathways to support greater connection and coordination across specialist domestic and family violence services and specialist child sexual abuse and sexual violence services.

Recovery and Healing

- Investing more in longer-term recovery and healing supports statewide for victim-survivors of domestic, family and sexual violence, including infants, children and young people.
- Developing opportunities to embed a recovery and healing orientation in client-facing services across the continuum of prevention, early intervention and response.

Vision for SA's domestic, family and sexual violence service system

Embolden's vision is for a South Australia where every child and adult can live in safety and with dignity, free from violence and abuse, and where:

- Our systems support the development of healthy masculinities and identify and respond early to boys and men at risk of/using violence.
- We meet people where they are, with mainstream services that are trauma-informed and culturally safe, and able to identify and respond effectively to domestic, family and sexual violence in close collaboration with specialist DFSV services.
- Women, infants, children and men have access to a range of integrated services in their local community that respond flexibly to their needs, including at times of crisis, and provide continuity of support over time.
- People facing intersecting barriers are able to access targeted, culturally safe services that meet their needs.
- In response to violence, our systems prioritise the safety of those experiencing violence, meet the diverse needs of victim-survivors and hold the person using violence accountable.
- All services have a recovery and healing focus and we support people experiencing violence to recover, heal and rebuild their lives over the longer term.
- We collaborate across jurisdictions to prioritise safety and make positive contributions to national initiatives.

Domestic, family and sexual violence service system reform: cross-cutting priorities

In Embolden's view, transformative change in how our State prevents and responds to domestic, family and sexual violence requires action on the following overarching priorities, which apply across the continuum of prevention, early intervention, crisis response, recovery and healing.

Urgent need for much greater investment in South Australia's DFSV services

In the immediate term, there is an **urgent need for an injection of funding into our existing frontline domestic, family and sexual violence services across the continuum**, to meet rising demand and service costs. South Australia lags significantly behind other jurisdictions in funding for domestic and family violence services on a per capita basis. While South Australia's Royal Commission is a critical opportunity for system reform in our State, the increasing structural deficit in funding for our frontline responses is putting women, children and others experiencing violence at risk right now. It is also having a detrimental impact on the wellbeing of frontline workers across the DFSV sector.

To highlight just one example of unmet demand for frontline services: currently, more than one in five calls to SA's statewide Domestic Violence Crisis Line go unanswered. Both Embolden and the Domestic and Family Violence Safety Alliance have written to the Premier outlining the funding required to address urgent gaps in South Australia's domestic and family violence crisis response, summarised in Embolden's submission to the State Government ahead of the 24-25 State Budget. And it is not only our crisis DFV services that need an urgent increase in funding. This applies to our current frontline responses across the service spectrum, including prevention, early intervention, legal services and recovery and healing supports. For example, demand for Zahra Foundation Australia's recovery and healing supports soared in mid-2024, with a 40% increase in service requests, 150 women on the waiting list for Zahra's recovery program, and a wait of over six weeks for financial counselling. Aboriginal-led services, services targeted to children and young people, services for men using violence and sexual violence services also require an urgent increase in funding. Yarrow Place's 24-hour sexual violence response is currently seeing significantly increasing demand in telephone calls, requests for counselling and forensic medical examinations.

While some individual organisations will outline service-level unmet demand data within their own submissions, Embolden's overarching message is clear: **greater funding to meet the needs of South Australians experiencing violence cannot wait for the implementation of the Royal Commission's recommendations or the roll out of the new National Partnership Agreement on Family, Domestic and Sexual Violence Responses from July 2025.**

An urgent increase in funding for our existing frontline DFSV services must sit alongside reform of South Australia's DFSV needs analysis and funding approach, discussed below.

Creation of an holistic, place-based service system to prevent and respond to DFSV across all regions in SA

Action to prevent, intervene early and respond to domestic, family and sexual violence has touchpoints across a range of domains and service systems, including but not limited to; specialist DFSV services, police, legal services, housing, health, and family and community services. Individual victim-survivors and their families may interact with a range of services on their pathway to safety, recovery and healing. In our call for a Royal Commission, Embolden made clear that the foundation of system reform in South Australia should be the creation of an holistic, integrated and place-based service response, able to meet the diverse needs of women and families across our State.

Embolden recommends the planning and development of place-based integrated service models statewide to effectively prevent and respond to domestic and family violence, to be driven through a cross-sector co-design process.

These service models need to be appropriately funded to provide specialist domestic, family and sexual violence workers in metropolitan and regional centres, and account for specific regional contexts. In some regions, this is likely to require dedicated funding for mobile and extensive outreach service provision. Further development of SA's joined-up, community-based response should leverage lessons from service models already operating in the state and in other jurisdictions, which create the infrastructure and conditions for improved system integration.

In Embolden's view, further co-design and development of the place-based integrated services approach has the potential to:

- increase access to help and support for victim-survivors who face barriers to services, including reluctance to contact police;
- promote continuity of support for clients across the service continuum – early intervention, crisis response and recovery and healing – and reduce the need for victim-survivors to repeatedly tell their story;
- facilitate greater flexibility, responsiveness and purposeful information sharing across services, to meet the needs of victim-survivors and families;
- support an effective interface across specialist DFSV responses, including crisis counselling, risk assessment and safety planning, and a range of mainstream services, and strengthen the capacity of non-specialist services to respond effectively to people experiencing violence; and
- assist services to respond to local issues and conditions and to leverage local place-based initiatives and opportunities.

It is important that any co-design process engages Aboriginal people and Aboriginal-led services, to ensure that further development of the place-based integrated services model creates culturally safe spaces and effective integration with Aboriginal-led services. Considerations for further co-design and development of community-based, integrated responses include:

- the scope of the mainstream services incorporated within the model;
- how the approach may be leveraged to improve responses to sexual violence outside the context of domestic and family violence;
- how the model might support a strong focus on people at risk of/using violence and coordination across services working with people using violence and services for victim-survivors; and
- the impacts of integrated service approaches on contracting, data collection and reporting.

Reform of SA's DFSV needs analysis and funding approach

An outlined in Embolden's first submission to the Royal Commission, funding decisions to address domestic, family and sexual violence in South Australia are currently inadequately strategic and ad hoc, increasing the likelihood of ineffective and unsustainable approaches. There is also extremely limited systems-level accountability and transparency, making it difficult to ascertain and monitor the impacts and outcomes of investment.

In Embolden's view, there is a critical need to improve how we assess community need and demand for domestic, family and sexual violence services, and relatedly, our approach to funding services and initiatives. Both the *Report of the Rapid Review of Prevention Approaches*² and the *Commissioner for Domestic, Family and Sexual Violence's Yearly Report to Parliament*³ have called for a needs analysis to determine unmet need and demand for domestic, family and sexual violence services, to better inform strategic funding decisions. While September's National Cabinet meeting signalled work to identify gaps in supports for children and young people who have experienced DFSV, it is not yet clear whether a broader DFSV needs analysis will be progressed nationally.

Embolden is partnering in a new, philanthropically-funded multi-jurisdictional program⁴ that seeks to develop a better understanding of victim-survivors' met and unmet support needs, with the goal of improving the specialist sector and broader system's capacity to meet those needs and, ultimately, increasing people's safety. While this program will provide nuanced insights into a range of different factors influencing the scale and nature of need, demand, supply, capacity and impact of specialist services, this is a longer-term program to be delivered over three years. **Embolden recommends that the State Government complete a needs analysis to guide investment in DFSV services, with the aim of addressing critical service system gaps and improving equity of service access across the State. In addition, Embolden recommends that the State Government support and participate in any national DFSV needs analyses.**

Information and data provided to the Royal Commission by specialist DFSV services, as well as by people with lived experience of DFSV, will inform the state-based needs assessment. Given South Australia's geography, there are **locations across the State where there are significant service gaps, resulting in people missing out on critical services or requiring those who can do so to travel long distances for supports:** for example; DFV supports for victim-survivors, forensic examinations following sexual assault, therapeutic services, including for infants, children and young people, legal services for Aboriginal people experiencing family violence and services for men using violence. We also heard that there is a need to address information gaps for people living regionally and remotely, as people may be unaware of available services.

Additionally, **some community members are experiencing intersectional barriers to service access.** For specific information on these experiences and systemic issues, Embolden defers to people facing intersectional barriers and their representative bodies. This includes South Australians of diverse ages who are Aboriginal and/or Torres Strait Islander, culturally and linguistically diverse, living with disability and/or LGBTIQ+. Importantly, and as the Rapid Review Expert Panel points out, **needs analysis should take into account demand for targeted and culturally safe responses.** These include, but are not limited to, services delivered by Aboriginal and Torres Strait Islander community-led organisations and services targeted to culturally and linguistically diverse or LGBTIQ+ communities.

While investment decisions must be informed by a comprehensive needs analysis, **Embolden advocates that funding to prevent and respond to domestic, family and sexual violence reflects the following principles:**

- Funding of DFSV services must **increase the proportion of funding directed to Aboriginal Community Controlled Organisations and promote Aboriginal self-determination.** As the *Aboriginal and Torres Strait Islander Action Plan 2023-25* states, 'Aboriginal and Torres Strait Islander self-determination requires a systemic shift of power and control from government and the non-Indigenous domestic, family and sexual violence service sector. It requires the transfer of power, control and decision-making and resources to Aboriginal and Torres Strait Islander communities and their organisations.'

2 Rapid Review Expert Panel (2024), *Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence*, www.pmc.gov.au/resources/unlocking-the-prevention-potential

3 Domestic, Family and Sexual Violence Commission (2024). *The Domestic, Family and Sexual Violence Commission: Yearly Report to Parliament*, https://dfsvc.gov.au/sites/default/files/2024-08/DFSVC0011-YearlyReport2024%28A4%29_FA4%28Digital%29_SP.pdf

4 The program will be delivered by a partnership between the specialist domestic and family violence sectors in the Northern Territory, South Australia and Victoria.

- While also meeting the needs of those at risk of and experiencing violence, including children and young people, **DFSV policy and investment must recognise that working with men is essential to preventing gender-based violence and resource services for men accordingly, including prevention and early intervention initiatives.**

Unless we invest in working with men at risk of/using domestic, family and sexual violence, our efforts to reduce the community prevalence of violence will fail. If we don't strengthen the focus on men's services, our systems are reinforcing the implicit message that too many women continue to receive: that victim-survivors must manage, regulate and change men's behaviour alone.

- **DFSV funding must enable the sector to flexibly meet diverse needs across the community.** Our current funding arrangements and service responses are not fit for purpose in meeting the diverse circumstances of South Australian women and families. Funding for the specialist DFSV sector must enable services to meet women and families where they are and respond to what they need in a flexible way. A critical example of funding parameters not meeting victim-survivor needs is that the significant majority of frontline specialist services for women, children and others experiencing DFV in SA are funded under the National Social Housing and Homelessness Agreement. This means that too often, South Australian women and children must be in crisis and prepared to leave their home to get a service, when many women are calling for earlier, holistic and culturally safe services that support their family before they reach crisis point. This issue was also noted in the 2016 report into domestic and family violence by the South Australian Parliament's Social Development Committee. Embolden is pleased to note the National Cabinet's acknowledgement of the importance of funding flexibility through its recent announcement of commitments under the National Partnership Agreement on Family, Domestic and Sexual Violence Responses to commence in July 2025.

- **DFSV funding must support service sustainability.** Five-year contracts would align funding with the National Partnership Agreement and support the sector's efforts to attract and retain staff. The Social Development Committee's 2016 report also noted that short-term funding of DFV services hampers the capacity of services to make strategic plans and to retain and develop their staff. Short-term funding, rolling 12-month contracts and 'pilotitis' remain a critical issue for South Australia's specialist DFSV sector and other non-government family and community services. As the DFSV Commissioner flagged recently in her Yearly Report, funding must be sustainable and consistent to provide certainty for services and the people who use them.

Building capacity across systems to respond effectively to coercive control

The South Australian Government has now introduced a Bill to Parliament to criminalise coercive control, with a significant lead-in time before the Act, once passed, comes into force. The international experience points to the importance of building capacity across our systems to respond effectively to coercive control, to ensure that the new criminal offences improve safety and justice outcomes for victim-survivors, and to reduce the likelihood of unintended negative impacts.⁵

In addition to recommendations for communication campaigns, discussed in the next section, **Embolden makes the following overarching recommendations to prepare our service system for coercive control criminal offences:**

- **That the effective implementation of coercive control offences is a strong focus of SA's whole-of-government statewide domestic, family and sexual violence strategy and monitoring and evaluation framework.**
- **That implementation of coercive control offences is actively driven and overseen by governance groups established for SA's DFSV strategy.** Implementation planning, including the development of a monitoring and evaluation framework, must involve engagement with diverse sector and lived experience perspectives across the community. This includes Aboriginal and culturally and linguistically diverse women, who are at higher risk of being misidentified as the person using violence and abuse.

⁵ Leaker, M. (2023) 'The systems are not really responding': An exploration of how coercive control laws in the United Kingdom are operating in practice and impacts for victim-survivors, Winston Churchill Trust, www.churchilltrust.com.au/sa/fellow/mary-leaker-sa-2020

Additionally, Embolden recommends that:

- **Specialist domestic and family violence services are enabled to effectively advise and support victim-survivors of coercive control, through targeted training and co-located legal services.**
- **There is ongoing investment in education and training for police, judiciary and the broader services sector on coercive control, developed and delivered in partnership with women's safety specialists.**

It is important that education and training on coercive control links to service delivery contexts and organisational processes (for example, risk assessment and management) and that training outcomes are meaningfully evaluated.

The remaining sections of the submission focus on each key area of the Royal Commission's Terms of Reference: prevention, early intervention, crisis response and recovery and healing, with consideration of opportunities for improved service integration and coordination. While we discuss each of these domains separately, in practice there are significant intersections across the continuum, and it is not our intention to reinforce 'siloes' thinking or approaches to service development and delivery.

Primary prevention of domestic, family and sexual violence

Embolden recognises that prevention of future violence occurs across the continuum of prevention, early intervention, response, recovery and healing. This section is focused on the primary prevention of DFSV; that is, those interventions targeted at a whole-of-population level that aim to change the underlying socio-cultural drivers of DFSV, to stop it before it starts. Embolden acknowledges the expertise of Our Watch, Australia's leading organisation for the primary prevention of violence against women and their children and refers the Commissioner to Our Watch's submission to the Royal Commission.

Along with Our Watch, Embolden's view is that there is a significant need for greater strategic focus on, and investment in, primary prevention in South Australia. Embolden supports Our Watch's recommendation that the **South Australian Government develop and implement a standalone primary prevention strategy to address domestic, family and sexual violence or that primary prevention is made a key pillar of SA's overarching DFSV strategy.** South Australia's primary prevention strategy must be co-designed with people with diverse identities and experiences and leverage both Our Watch's foundational framework *Change the Story*⁶ and Our Watch's intersectional work with First Nations people and communities *Changing the picture*,⁷ women and girls with disability *Changing the landscape*⁸ and current work in development with migrant and refugee communities and LGBTIQ+ Australians.

In addition to a strengthened focus on addressing the gendered drivers of domestic, family and sexual violence outlined in *Change the Story*, **Embolden advocates for an holistic approach to prevention that encompasses greater strategic focus on, and investment in, targeted initiatives to address what *Change the Story* refers to as 'reinforcing factors',⁹** which interact with gendered drivers to reinforce, exacerbate or influence the occurrence or dynamics of violence against women. These include – but are not limited to – the use of alcohol, other drugs and gambling by the person using violence, as well as psychological/mental health, socio-economic and environmental factors (for example, natural disasters). Reinforcing factors may be addressed at a primary prevention level – for example, changes to the alcohol and gambling regulatory environments – and/or at other points of the continuum. Given that poverty can impact a woman's ability to enact safety plans, raising Centrelink payments above the Henderson Poverty Line would strongly contribute to primary prevention efforts. Embolden directs the Royal Commissioner to case studies on the impacts of financial resources on women's safety in NPY Women's Council's submission. Embolden notes the Rapid Review Expert Panel's recommendations for a 'safety by design' approach to regulatory settings, including for online environments, alcohol and gambling, and supports the Nationals Cabinet's focus on these issues. Embolden also considers that there is value in the Rapid Review Expert Panel's recommendation of a **Prevention Innovation Fund.**

6 Our Watch. *Change the Story*, www.ourwatch.org.au/change-the-story/change-the-story-framework

7 Our Watch. *Changing the Picture*, www.ourwatch.org.au/change-the-story/changing-the-picture

8 Our Watch. *Changing the Landscape*, www.ourwatch.org.au/change-the-story/changing-the-landscape

9 Rapid Review Expert Panel (2024), *Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence*, <https://www.pmc.gov.au/resources/unlocking-the-prevention-potential>, and the DFSV Commission (2024). *The Domestic, Family and Sexual Violence Commission: Yearly Report to Parliament* reflect the need for an holistic approach to prevention across domains.

Such a fund would enable the development of diverse prevention activities that respond to the needs of specific groups and communities.

While this submission touches on primary prevention relatively briefly, Embolden suggests that it makes good sense to invest in settings with which high proportions of the population interact, including health services, educational settings from early childhood to tertiary, workplaces and broad-reach communication mechanisms. There is a strong consensus that boys and men need to be the focus of prevention work. Our primary prevention efforts must directly engage boys and men and be informed by leading approaches to promoting healthy masculinities and preventing and disrupting adherence to, and expressions of, masculinities associated with an increased likelihood of perpetration of gender-based violence. Embolden makes the additional following specific recommendations in relation to primary prevention:

- Strengthen access to **universal programs for new parents that provide support and foster healthy, equal and respectful relationships** between first-time parents. As discussed later in this submission, a childhood free from experiences of violence and abuse, and warm, supportive relationships with parents/caregivers, are critical protective factors that reduce the likelihood that someone will either use or experience domestic, family and sexual violence later in life. While universal positive parenting programs are available online, Embolden members have pointed to the benefits of **group parenting programs for fathers**, such as the Circle of Security,¹⁰ to support healthy relationships through the development of parenting skills and positive approaches to emotion regulation. Of note is *Baby Makes 3*,¹¹ an evidence-based primary prevention parenting program implemented in Victoria that has *demonstrated positive impacts* on gender-equitable parenting practices in evaluations and includes adapted versions to promote cultural safety for First Nations families.¹²

- Embolden supports Our Watch's call for South Australia to **commit to a long-term vision, approach and funding of evidence-based Respectful Relationships Education (RRE) across SA**. It is Embolden's view that **RRE should commence earlier and be delivered across early childhood education settings, primary school and secondary school to Year 12**.

The Victorian Royal Commission into Family Violence identified the critical role played by early childhood education and schools in driving a culture of gender equality and respect to prevent domestic and family violence. The Victorian Government is resourcing and implementing an evidence-based, best-practice approach to RRE across early childhood services and schools. Implementation of universal three-year old pre-school in South Australia provides a critical opportunity to embed age-appropriate primary prevention in early childhood education settings in our State. Our Watch provides the example of *Sydney's Women's and Girls' Emergency Centre's ALL IN* program,¹³ which is a whole-of-service project that engages early childhood educators and families to promote positive and healthy messages about gender, inclusion and respectful relationships.

There is also the opportunity to **increase access for South Australian school students to primary prevention programs that can supplement core RRE curricula**; for example *Power to End Violence Against Women*.¹⁴ Embolden notes that some well-regarded programs targeted to older students are not currently delivered in SA (for example, *The Man Cave*)¹⁵ or are not delivered widely in SA (for example, *Love Bites*).¹⁶

- That the State Government **fund dedicated positions to support South Australian workplaces to strengthen gender equality and prevent and respond to domestic, family and sexual violence**.

10 While Circle of Security is delivered in SA, there may be opportunities to improve access for new fathers statewide. In Embolden's frontline worker survey, workers from men's services highlighted the positive impacts of Circle of Security. Men who were engaged with their service often recommended Circle of Security to other men and could recall what they learnt from the parenting program.

11 HealthAbility. *Baby Makes 3*, www.healthability.org.au/services/baby-makes-3

12 Australian Institute of Family Studies. *Baby Makes 3*, www.aifs.gov.au/research_programs/evidence-and-evaluation-support/cfc-program-profiles/baby-makes-3

13 Women's and Girl's Emergency Centre. *All In*, www.wagec.org.au/all-in

14 Power Community Limited. *Power to End Violence Against Women*, www.powercommunity.com.au/programs/power-to-end-violence-against-women

15 *Man Cave*, www.themancave.life

16 NAPCAN. *Love Bites*, www.napcan.org.au/programs/love-bites

Given the proportion of South Australians who are in the workforce, workplaces are critical sites to drive improvements in structural gender equality and also values and attitudes in relation to gender and violence against women and girls. Victim-survivors of DFSV have highlighted how the response of their workplace can either support or hinder women as they navigate a pathway to safety and recovery, including whether they are able to maintain their employment (and therefore their financial security) while escaping and recovering from domestic and family violence. The SA Government has previously funded dedicated central positions to support State Government agencies to embed Our Watch's Workplace Equality and Respect Standards¹⁷ and to achieve White Ribbon Accreditation. Feedback from participating State Government agencies has strongly indicated the value for agencies of these central coordinating positions in supporting good practice and efficiencies across government.¹⁸ This approach could be replicated across Local Government, the not-for-profit sector and industry, potentially based on co-funding with the State Government. It is important to emphasise that these workplace frameworks involve material and impactful actions and initiatives, not just awareness-raising activities. Requirements span, but are not limited to, actions to address the gender pay gap, domestic violence leave provisions, key policy settings (including flexible working arrangements and Respect@Work compliance) and building the capacity of managers to recognise and respond to DFV, including to employees who may be using violence and abuse.

- Building on the success of the *See The Signs* campaign,¹⁹ that the **South Australian Government continue to invest in communication campaigns to accompany the implementation of coercive control offences**, to strengthen community understanding of the nature of domestic and family violence and abuse.²⁰

Victim-survivors of coercive control may not always be aware that what they are being subjected to is domestic and family violence. The experience in the UK suggests that communication campaigns featuring well-known victim-survivors of coercive control can have a powerful impact on victim-survivor help-seeking.²¹ Additionally, community understanding and attitudes are critical determinants of how domestic, family and sexual violence is responded to by the peers, families and communities of people experiencing and using violence and abuse. It is also important to recognise that people causing harm in their relationships may talk to and seek support from their families and friends in the first instance. Building awareness among 'natural responders' – families, friends and colleagues – can help to break down stigma and support men's access to expert support services. In addition to universal campaigns, Embolden recommends that the **State Government resource communication approaches co-designed with and targeted to specific groups**, including community members who are Aboriginal, culturally and linguistically diverse, LGBTIQ+ or live with disability.

- That the **State Government fund a coordinated awareness campaign to increase knowledge of, and conversations about, the high rates of child sexual abuse and sexual assault in our communities**. Such a campaign would also be an opportunity to target the stigmatisation of sexual abuse survivors and challenge an ongoing culture of silence around sexual violence.
- In line with Our Watch's recommendations, that **South Australia's DFSV workforce strategy include a focus on primary prevention and the development of specialist workers whose substantive role and expertise is in primary prevention**. Put very simply, we cannot do primary prevention work without primary prevention workers.

17 Our Watch has advised that its Workplace Equality and Respect standards are currently being evaluated.

18 Disclosure: Embolden's current General Manager held the position of Manager, Workplace Equality and Respect Project within the Office of the Commissioner for Equal Opportunity between 2018 and 2021, leading the implementation of Our Watch and White Ribbon Australia workplace frameworks across 24 SA public sector agencies.

19 Government of South Australia. *See the Signs*, www.seethesigns.sa.gov.au

20 Noting this aligns with an existing commitment under South Australia's Equality Blueprint 2023-26, <https://officeforwomen.sa.gov.au/womens-policy/sa-womens-equality-blueprint>.

21 Helplines in the UK experienced a significant increase in calls coinciding with the release of UK TV personality Ruth Dodsworth's documentary *Controlled by my partner? The hidden abuse*, recounting her experience of coercive control, cited in Leaker, M. (2023) *The systems are not really responding: An exploration of how coercive control laws in the United Kingdom are operating in practice and impacts for victim-survivors*, Winston Churchill Trust, www.churchilltrust.com.au/sa/fellow/mary-leaker-sa-2020

Early intervention in domestic, family and sexual violence

Early intervention approaches aim to stop violence from escalating, protect victim-survivors from harm and prevent violence from reoccurring. The *National Plan to End Violence Against Women and Children 2022-2032* (the National Plan) notes that early intervention is one of the least developed areas of action and needs significantly more focus and investment. Early intervention can encompass a range of meanings and approaches, including a focus on chronological age (i.e. targeted to infants, children and young people), early identification and recognition of the potential to experience or cause harm and/or early identification and recognition of actual harm.

Building the capacity of universal mainstream services to identify and respond to DFSV

We know that many people experiencing violence and abuse will never seek help from police or a specialist DFSV service. Universal mainstream services are touchpoints for those experiencing and using DFSV within their relationships and families and present a vital opportunity for early intervention. Embolden notes the critical emphasis placed on embedding DFSV-capability in the roles and functions of the broader non-specialist workforce in the DFSV Commissioner's Yearly Report, given the much larger size of the mainstream workforce in comparison with the specialist sector. The DFSV Commissioner's report also highlights the opportunities that mainstream services present in identifying and responding earlier to boys and men who may be using violence in their relationships.

In our current system, universal mainstream services have limited capacity to respond to DFSV beyond providing educational materials or referral information for specialist DFSV services. Earlier intervention in South Australia starts with **upskilling universal mainstream services to better understand, identify and respond to domestic, family and sexual violence. Tertiary education programs** – across courses in areas including health, law, education and psychology, as well as social work – **should include foundational content on DFSV. Course content will then need to be extended and complemented by workforce training that is tailored for the workplace context.** Partnership with the specialist DFSV services sector on education and training is essential for the non-specialist workforce to bring a DFSV-informed lens to the work they do.

In Embolden's view, reform to develop a place-based, integrated service system – discussed earlier – would create the conditions for more effective identification, response and referral of DFSV through universal services and reduce barriers to service access, both mainstream and specialist.

To support earlier identification of people who may be experiencing or using violence, **Embolden recommends the implementation of universal screening tools for DFSV in mainstream services.**

The inclusion of universal screening questions (for example, in intake processes) must be implemented in conjunction with **staff training and strong referral pathways** to specialist responses where indicated. Universal screening tools need to be flexible enough to identify both people experiencing violence, including children and young people, and people using violence (universal screening for behaving safely in relationships). It is important that mainstream systems recognise the importance of screening, including for the person who may be causing harm, at points of transition or change when we know there are increased risks of violence; such as pregnancy, bringing baby home, relationship separation and mental health escalation.

The UK is ahead of Australia in building the capacity of mainstream services and embedding strong links across mainstream and specialist DFSV services. Embolden notes the Supporting the Primary Care Response to Family, Domestic and Sexual Violence Pilot, potentially based on the IRIS program in the UK,²² which is focused on building the capacity of General Practitioners to identify and respond to DFSV. The pilot is being carried out in SA by Adelaide PHN and Country SA PHN and runs until June 2026. Embolden would like to bring the Commission's attention to the UK's Assessing for Domestic Violence and Abuse in Sexual Health Environments (ADVISE) Program,²³ focused on primary sexual health care settings. **Embolden recommends monitoring the outcomes and recommendations of the Supporting the Primary Care Response to Family, Domestic and Sexual Violence Pilot, and investing in future capacity building initiatives specific to the health system.**

Importantly, there are **key touch points where children and young people come into view of universal mainstream systems** and these present ideal opportunities for early intervention. The birth of a new child is a time when families need extra support and is also identified as a time when patterns of control, abuse and violence can escalate.²⁴ In addition to screening and the parenting programs discussed in the preceding section, Embolden considers that **embedding specialist DFSV workers in universal child health services** would significantly improve early intervention capacity in these contexts, with positive impacts on the wellbeing and life opportunities of infants, children and young people.

Additionally, **the introduction of universal three-year old preschool in SA also presents an opportunity for early intervention with children and families.**

Universal screening tools in intake processes, appropriate for the context of the service, have the potential to strengthen connections with specialist responses early in a child's life. Place-based integrated service models would be ideally situated to develop connections and referral pathways with local preschool centres.

Defining 'at risk' for universal and non-specialist systems

Ensuring that universal and non-specialist systems can clearly identify those who are 'at risk' of experiencing or using violence is key to effective early intervention. Embolden suggests that **SA could benefit from clearer definitions and shared understandings of 'at risk' in the early intervention context.** Risk assessment tools used in the response context are unsuitable for identifying those at risk in order to intervene earlier. Additionally, the applicability of universal screening tools in this context is unclear. Embolden recommends **a cross-sector roundtable to enable comprehensive consideration of the definitions and tools required to identify those who are at risk of experiencing or using violence, to inform early intervention approaches.** In addition to expert researchers and practitioners, the roundtable should include people with lived expertise, who bring vital perspectives on opportunities for early intervention in service system interactions.

There is a particular need to understand the **pathways in and out of using violence**, and to embed this data into early intervention tools. Research indicates that the responsibility for identifying and responding to people who use violence primarily sits with law enforcement agencies and perpetrator intervention programs, despite evidence that men using violence have histories of diverse service system contacts.²⁵ We discuss early intervention with boys and men at risk of/using violence later in this section.

22 IRISi Interventions, *The Iris Programme*, www.iris.org/about-the-iris-programme

23 IRISi Interventions. *Assessing for Domestic Violence and Abuse in Sexual Health Environments (ADVISE)*, <https://iris.org/about-the-advise-programme/>

24 Australian Institute of Family Studies (2015), *Domestic and family violence in pregnancy and early parenthood: Overview and emerging interventions*, www.aifs.gov.au/sites/default/files/publication-documents/cfca-resource-dv-pregnancy_0.pdf

25 Meyer, S., Helps, N. & Fitz-Gibbon, K. (2023). Domestic and family violence perpetrator screening and risk assessment in Queensland: Current practice and future opportunities. *Trends & issues in crime and criminal justice* no. 660, Canberra: Australian Institute of Criminology, www.doi.org/10.52922/ti78818.

More early, holistic supports for families with complex needs

The Australian Child Maltreatment Study shows that there is a critical intersection between children's experience of domestic and family violence and other forms of child abuse and neglect.²⁶ This intersection highlights the importance of integrated early intervention initiatives, including for the reinforcing factors of DFSV presented in Our Watch's Change the Story framework (discussed earlier). Early, holistic supports for families, particularly those with complex needs, have the potential to promote the safety of children, keep families together, change the trajectory of DFSV across generations and promote recovery and healing. Of particular note are findings from the Longitudinal Study of Australia's Children that high trust and good communication with parents lowers the risk of later experiences in adolescence of intimate partner emotional abuse victimisation by 39% and intimate partner sexual abuse victimisation by 77%.²⁷

Frontline DFSV workers surveyed told us that too often children, disproportionately Aboriginal and Torres Strait Islander children, are removed without the provision of services designed to keep families together. We heard that intensive family services are working well for families but that these services cannot accept referrals from specialist DFSV services due to limited resourcing. In Embolden's view, **there is a critical need for greater investment in earlier, holistic supports for families across SA.** Enhanced holistic supports should encompass a targeted focus on intervening earlier to support young parents, men within the family context, and families with children and/or parents living with disability. Within a place-based service context, early intervention programs could adopt an assertive engagement model to strengthen the capacity of the system to be proactive and respond to need flexibly. Particularly in regional and remote SA, an assertive engagement model may include leveraging the role of Local Government and community centres, in addition to services delivered through integrated service models. Embolden also recommends **funding to promote early intervention services** across the community, to ensure that people are aware of available services.

As with all services, it is important that early intervention services are culturally safe and responsive for Aboriginal families and those from culturally and linguistically diverse backgrounds. Embolden notes that South Australia's Commissioner for Aboriginal Children and Young People found 'there is insufficient funding to meet the demand identified for culturally appropriate, early intervention services for vulnerable Aboriginal children and their families'.²⁸ In line with Embolden's recommended cross-cutting priorities for system reform, **more funding must be directed to Aboriginal Community Controlled Organisations to deliver holistic supports to families.** Embolden also recommends investment in **culturally specific workers** across the State to improve the cultural responsiveness of family-based early intervention initiatives, and **community-led early intervention supports targeted to LGBTIQ+ people and people with disability.**

Further, investment in early intervention programs for families should be accompanied by **more flexible pathways into services.** For example, effective early intervention services that can accept referrals from all parts of the DFSV services system (e.g. specialist DFSV services, hubs, health and other non-specialist services) have the potential to provide more effective pathways out of violence for families, prevent child removals and reduce the pressure on crisis response services and other systems 'downstream'. Embolden also recommends consideration of self-referral pathways for early intervention programs for families who are not in crisis but have concerns about the relationship dynamics in their families. Self-referral options will contribute to a broader DFSV services system that partners with the community, increases service access and empowers families.

26 The Australian Child Maltreatment Study (2023), www.acms.au.

27 Growing Up in Australia (2023). Longitudinal Study of Australia's Children, Intimate partner violence among Australian 18-19 year olds, www.growingupinaustralia.gov.au/research-findings/snapshots/intimate-partner-violence-among-australian-18-19-year-olds.

28 Lawrie, A. (2024), *Holding on to Our Future: the Final Report of the Inquiry into the application of the Aboriginal and Torres Strait Islander Child Placement Principle in the removal and placement of Aboriginal Children in South Australia*, Commissioner for Aboriginal Children and Young People, www.cacyp.com.au/inquiry.

Greater investment in supports for children and young people experiencing DFSV

Noting the importance of not compounding stigma and shame for people with adverse childhood experiences, research highlights the link between early experiences of domestic, family and sexual violence and an increased risk of those victim-survivors using and experiencing violence themselves in the future.²⁹ Embolden's members are clear that **effective early intervention must encompass significantly greater investment in supports for children and young people experiencing DFSV, to enable them to recover and heal.** Action 8 of the National Plan's First Action Plan 2023-27 is to *Develop and implement age appropriate, culturally safe programs across all four domains, informed by children and young people, that support recovery and healing from trauma, and intervene early to address violence supportive behaviours.*

We need to do substantially better in South Australia in recognising children and young people as victim-survivors of domestic and family violence in their own right and meeting their needs over the longer term. In conjunction with our other recommendations within this section, **Embolden recommends:**

- **Increased investment in specialist children's workers in domestic and family violence services, noting the importance of a whole-family lens and approach.** The structural deficit in funding for frontline DFV services over time in SA has meant that services have had to redirect funding away from positions with a dedicated focus on children and young people to crisis case management with adult victim-survivors.
- **Increased investment in therapeutic supports for infants, children and young people, such as play-based narrative therapies.** Private therapy is out of reach for many families. Greater funding must meet community need statewide. Embolden members have pointed to the dearth of therapeutic services for children and young people in regional and remote areas, with families needing to travel to Adelaide.

Embolden also notes the importance of **dedicated therapeutic supports for children and young people with experiences of childhood sexual abuse** in preventing both future sexual revictimisation and perpetration.



29 Ogilvie, J. et al. (2022), *Adverse childhood experiences among youth who offend: Examining exposure to domestic and family violence for male youth who perpetrate sexual harm and violence*, (Research report 13/2022). ANROWS, <https://www.anrows.org.au/publication/adverse-childhood-experiences-among-youth-who-offend-examining-exposure-to-domestic-and-family-violence-for-male-youth-who-perpetrate-sexual-harm-and-violence/read/>; Costa, B. et al. (2015), Longitudinal predictors of domestic violence perpetration and victimization: A systematic review, *Aggression and Violent Behaviour* 24, pp. 261-272, <https://www.sciencedirect.com/science/article/abs/pii/S1359178915000828> 20

Intervening earlier with and responding better to boys and men at risk of/using violence

To reiterate a point made earlier, our efforts to prevent and intervene earlier in violence need to have a strong focus on boys and men at risk of/using violence and abuse. Several of our other recommendations in this early intervention section, as well as primary prevention priorities outlined earlier, are geared toward supporting healthy and safe expressions of masculinity within relationships and families. Four Embolden member organisations have significant expertise in working with men – OARS Community Transitions, Kornar Winmil Yunti (KWY) Aboriginal Cooperation, Relationships Australia SA and No to Violence – and Embolden refers the Commission to the submissions made by these organisations in relation to the opportunities to intervene earlier with boys and men at risk/of using violence.

In brief here, **South Australia is currently missing critical early intervention opportunities**, including:

- **Leveraging the school system** to better identify and respond to boys at risk of using violence. KWY is currently delivering some targeted school-based interventions, but services could be further supported to expand and develop work in this area.
- Improving interventions with **boys and young men through their initial contact with the youth justice system**. A pathway is needed for the Youth Court to refer young people into appropriate and intensive supports in relation to intimate partner violence and sexual violence offending.
- Brief interventions with **boys and men on remand**.

Embolden would also like to flag for the Commission's consideration whether there may be **opportunities to improve early intervention with boys and young men at risk of/demonstrating harmful or problematic sexual behaviours**, noting the expertise of SA's Child and Adolescent Mental Health Service, which delivers the Adolescent Sexual Assault Prevention Program (ASAPP).

Earlier intervention in the use of violence and abuse is not only about improving interventions with boys and young men. **Men of all ages causing harm must be identified and offered support to change their behaviour as early as possible**. Our language and communication to men in the broader community should aim to resonate with men who are not in contact with statutory systems and may not recognise their behaviour as abusive, to promote self-referral. Finally, we need to **strengthen approaches with men, through both mainstream and targeted services, to deliver earlier supports that are able to integrate a focus on behaviour change with addressing a range of intersecting needs**, including adverse childhood experiences, intergenerational trauma and racism, addiction, grief and loss, and mental health issues. The need for this integrated approach to violence prevention with men aligns with the perspective of Jess Hill and Michael Slater in their April 2024 paper *Rethinking Primary Prevention*.

*'Pathways to committing gendered violence are not just attitudinal – they are biographical. Those pathways are formed through the lives that men have led, and the ways that violence and coercive control becomes a meaningful and available choice to some men and boys but not others. This pathway to abuse is often developmental, beginning in childhood, grounded in life events that are aversive, abusive or violent. These life events become encoded in men's minds, but also in men's bodies (known in psychology as 'affect'), as a propensity towards aggression, oppression and violence that is then very difficult for us to unpick as they start to move through life stages – the accumulation of experiences, decisions and choices over time.'*³⁰

We focus further on men using violence later in the following 'responses to violence' section.

Responses to domestic, family and sexual violence

This section focuses on system responses to domestic, family and sexual violence that has already happened. In particular, it reflects the experiences of specialist DFSV services and their interactions with key systems, including justice and child protection. Although not exclusively, most of the findings from the Embolden frontline worker survey relate to this section.

We recognise that our intersectional focus on the experiences of diverse South Australians within our current response system is somewhat limited in the context of submission timeframes. We commend the Royal Commissioner's direct engagement with Aboriginal people and their representative bodies and other key organisations, including JFA Purple Orange and the SA Rainbow Advocacy Alliance.

South Australia's 24/7 domestic, family and sexual violence response

The capacity of South Australia to respond appropriately and in a timely manner to people experiencing and using domestic, family and sexual violence is vital to minimise harm and support recovery. While SA's current 24/7 response seeks to do this, it is hampered by resource constraints compounded by increasing demand. As a result, services are limited to crisis response, often unable to meet demand and limited in their ability to provide inclusive and appropriate therapeutic support to victim-survivors, including children and young people, or to people using violence. These problems are exacerbated in regional and remote areas.

One element of South Australia's response is the Domestic Violence Crisis Line (DVCL), managed by Women's Safety Services SA. Services include intake and risk and needs assessment, safety planning, assistance in arranging emergency accommodation, guidance on referral pathways and access to resources and information on accommodation, police, legal, housing and financial issues. However, as previously outlined, the DVCL, along with other DFSV services, is facing significant pressure and challenges with meeting service demand. In late 2023, one in five calls to the DVCL went unanswered, while 2024 has seen an even greater increase in demand. In April 2024, DVCL received the highest number of inbound calls on a single day since its inception. This was exceeded in June and July, with the DVCL only being able to answer 65% of calls in June. As indicated, this increase in demand is also being experienced by Yarrow Place, which delivers South Australia's 24-hour sexual violence crisis response service.

In regional and remote SA, many victim-survivors of domestic and family violence will directly contact their closest DFV service. There is currently no mechanism for quantifying the number of unanswered calls to regional and remote services and many women will not leave a message due to safety concerns. However, as some regional/remote teams are as small as two case managers, who are often unavailable to respond to calls given their large caseload, it is clear to services working in these contexts that many people are falling through the gaps in regional and remote SA.

In addition to specialist DFSV services, mainstream services that provide vital initial responses to victim-survivors are also facing critical resourcing issues that often prevent them from delivering effective 24/7 responsiveness. Frontline services surveyed noted that a 24/7 police response, for example, is not accessible in some regional areas. This is most pronounced in the NPY lands, where the lack of permanent police presence in Pipalyatjara and surrounding communities means that a police response to a DFSV incident in this region can take hours or days. The challenges in providing an effective 24/7 response across the state have resulted in inequitable access to protection for women, with Aboriginal women living remotely among the least protected.

While more needs to be done to ensure effective crisis responses, frontline services consulted have also made it clear that South Australia's 24/7 response needs to broaden beyond crisis response and emergency accommodation, in recognition that supporting recovery and healing for victim-survivors can begin from the moment they seek help. Frontline services consulted recommend that a review of **South Australia's 24/7 response considers the development of a statewide gateway that is co-designed with the DFSV sector and adequately resourced to effectively provide a one-stop entry point for anyone experiencing violence into responsive, appropriate and accessible services**, in both metropolitan and regional contexts.

Victoria's after-hours crisis response was developed with an understanding that a significant proportion of domestic and family violence incidents occurs outside of business hours, and the awareness that to effectively support victim-survivors, this response needed to be about more than emergency accommodation. In the Victorian model, Safe Steps holds the statewide portfolio to triage intake, while local DFV services are funded across Victoria's 18 Local Government Areas to receive after hours referrals and provide a response. Funded DFV services also accept after hours referrals from other local DFV services operating during business hours, hospitals and Victoria Police. These referrals come with a completed risk assessment, safety plan and needs assessment for the victim-survivors. A team of two workers attends the victim-survivor at their location, usually refuge or hotel accommodation, and provides for food and material needs, as well as supporting emotional needs. They provide feedback to the referring service or agency on risks for the victim-survivor, what the workers have done to meet identified needs and any further recommendations.

The demand for this service is evidenced by funded services far exceeding funded targets in their attempts to meet local need. Victoria also acknowledges that current emergency accommodation is often not the best option for victim-survivors, even in terms of a crisis response. Accommodation is discussed further in the next section, but it is important to note here that all refuges are considered more appropriate than hotel/motel accommodation and, in Victoria, are supported to have staff on site 24/7. The Victorian example suggests that South Australia has the opportunity to develop and resource a more holistic 24/7 response that better meets the needs of victim-survivors, including children and young people.

In reviewing South Australia's 24/7 response statewide, key considerations include:

- a one-stop entry point to all appropriate services across the state;
- provision of trauma-informed, holistic responses for victim-survivors that include more than emergency accommodation;
- support for dedicated DFV refuges to maintain 24/7 on-site staff;
- where women and children are unavoidably in emergency accommodation/motels, frontline services are enabled to provide outreach supports;

- supports tailored to the needs of infants, children and young people;
- access to services and supports for victim-survivors living regionally and remotely; and
- effective coordination with services targeted to the person using violence.

Accommodation-based supports

Embolden commends to the Royal Commission submissions made by the Domestic and Family Violence Safety Alliance (DFVSA). As DFVSA has noted, our current system generally requires people to be homeless or at risk of homelessness to be eligible for access to crisis DFSV services. This focus on homelessness diverts attention from the therapeutic supports needed for a trauma-informed approach to effectively support victim-survivors of DFSV.

Frontline services consulted by Embolden also noted issues with accessibility and suitability of current accommodation-based supports, demonstrated by a lack of:

- options for clients with additional support needs, including people with disability;³¹
- accommodation designed to support the needs of children and young people, including supports for young people escaping violence who are unaccompanied by a protective parent or not in the care of the child protection system;³²
- accommodation options in regional and remote areas statewide, to enable victim-survivors, including children and young people, to maintain their connection with their communities, supports and safety networks;
- transport options, particularly in regional and remote areas; and
- options for families to keep pets.

Accommodation options for large families are also important to ensure that all victim-survivors have access to appropriate supports. Frontline services also report a lack of specialist emergency accommodation for clients experiencing mental ill health or for those with alcohol or other substance misuse issues. In these circumstances, there is an expectation that DFSV services support clients with complex needs, which does not take into account the risk that DFSV services hold. As a result, there also needs to be a focus on the appropriate management of and supports for clients experiencing mental ill health and dealing with substance misuse issues during a DFSV crisis.

31 See also Office of the Public Advocate South Australia (2023). *Domestic Family Violence and Exploitation: Findings of the Office of the Public Advocate*, https://www.opa.sa.gov.au/_data/assets/pdf_file/0008/936908/Report-DFV-and-Exploitation-Findings-of-the-PA.pdf

32 See recommendations in *Unlocking the Prevention Potential*, pp. 51-52.

To adequately meet the needs of both victim-survivors and people who use violence, **accommodation-based supports also need to be inclusive of diverse and intersectional needs.** As DFVSA noted, a significant proportion of clients identify as Aboriginal, but many services and systems demonstrate a significant lack of cultural safety. It is therefore vital that accommodation-based services for Aboriginal people are co-designed with ACCOs and Aboriginal community members to ensure they are culturally informed, safe and responsive.

The Victorian Sanctuary model is one example of how trauma-informed accommodation-based services can be provided. Sanctuary is designed to provide crisis accommodation in the context of a wrap-around service model with 24/7 on-site support and specialised therapeutic crisis services, including healthcare, disability support, immigration assistance and legal support delivered in partnership with other service providers. There is a focus on supporting women from culturally and linguistically diverse backgrounds and women and children with disabilities. The expansion of the Sanctuary model in Victoria has been facilitated by the federally funded Safe Places Emergency Accommodation Program.

As DFVSA noted, the emphasis on homelessness and emergency accommodation has also obscured the importance of providing flexible accommodation options to meet the diverse needs of people experiencing violence. This includes **flexible place-based and inclusive options to access crisis, transitional, supportive and long-term accommodation.** Frontline services noted the importance of clear exit pathways to longer-term, safe and supported housing as well as the value of short-term respite housing options, which may better meet the needs of some victim-survivors than current crisis accommodation options. Respite was seen as particularly valuable in several situations, including:

- a vital support in safety planning and management for victim-survivors;
- a place for Aboriginal women and children to stay for safety or during cultural business; and
- temporary accommodation for people using violence, removing the need for the victim-survivors to leave the home.

The frontline survey responses also support the DFVSA's call for **accommodation options for people using violence.** Too often the expectation is for victim-survivors not only to leave the relationship, but also to leave their home. In addition to the burden on victim-survivors, including children and young people, and the lack of accountability for people who use violence, the lack of appropriate accommodation for people using violence increases safety risks for victim-survivors. Respondents indicated that this is a particular problem in regional areas.

Of equal importance are initiatives that support victim-survivors to remain safely in their own home, when they choose to do so. The Safe At Home program provides vital **services to support physical safety of victim-survivors at home and to reduce harm from technological abuse by people using violence,** including ensuring that locations of victim-survivors at high risk of harm are kept secure. However, the current waiting periods for services in metropolitan Adelaide and lack of access to immediate services in regional and remote areas, along with higher costs of safety upgrades and trade services, are hampering service providers' efforts to support victim-survivor safety. **Victim-survivors could be better supported to remain safely at home, if they choose to do so, with an expansion of the Safe At Home program.**

Embolden recommends that, as part of broader system reform, South Australia strengthens accommodation supports to better meet the needs of people experiencing violence.

Key considerations include:

- supports that are flexible and meet housing and therapeutic needs in ways that are trauma-informed and culturally safe and responsive;
- accommodation options for Aboriginal people that are co-designed with ACCOs and Aboriginal community members;
- accommodation options that are safe and appropriate for infants, children and young people, including unaccompanied young people;
- tailored respite options for victim-survivors and people using violence, including culturally safe options for Aboriginal people;
- transitional accommodation options to support clear exit pathways from emergency accommodation;
- long term supported accommodation options;
- dedicated accommodation-based services and programs for people using violence across metropolitan and regional SA; and
- adequate resourcing to support the expansion of the Safe At Home program.

Risk assessment for domestic, family and sexual violence

Embolden's survey of frontline DFSV teams demonstrated significant variety across the tools and approaches used to assess the risk of harm for victim-survivors. There is general agreement that risk assessment tools are effective at identifying risk of physical harm in male-female intimate partner relationships, where the male is the perpetrator of violence. However, frontline services surveyed have suggested that many of these tools are less effective in accurately identifying risk outside of these parameters. In addition, the variety and inconsistent use of tools between various services and agencies leads to varying risk scores and the potential for critical underestimation of risk. The variety of risk assessment tools used across jurisdictional boundaries also makes consistent risk assessment challenging for organisations that deliver cross-border services.

The various risk assessment tools for assessing victim-survivor safety currently used across the surveyed frontline services and the agencies they work with include:

- Domestic Violence Risk Assessment (DVRA) (State Government of South Australia)
- Coercive Control Risk Assessment (Women's Safety Services SA – used in conjunction with the DVRA)
- Family Detection of Overall Risk Screen (DOORS) (Relationships Australia SA)
- Cross-jurisdictional areas – Common Risk Assessment Tool (NT) and Common Risk Assessment (WA)

In addition to using the DVRA, services working with people using violence also use a specific assessment, the Propensity for Abusiveness Scale. SA Health staff also have a risk assessment used when universal screening identifies potential DFSV. In accordance with SA Health policy, when a staff member suspects or identifies an issue or concern relating to DFSV with any female consumer aged 16 or older, they are required to conduct the Ask, Assess, and Respond screening and assessment (see page 18 of this submission).

Services also use a range of other tools to assess additional risks for victim-survivors and people using violence, including:

- Strangulation Assessment
- Connecting with People Suicide Risk Assessment
- Kessler Psychological Distress Scale (K10)
- Depression Anxiety Stress Scale 21
- PTSD Checklist for DSM-5

- Internally adapted or developed risk screening tools covering a range of factors, including self-harm, suicide, alcohol and other drugs, child protection, child sexual exploitation, pregnancy.

Frontline workers identified several issues with risk assessment tools, particularly the standardised DVRA:

- Risk assessment tools are not adequately sensitive to coercive control, except for Women's Safety Services SA's Coercive Control Risk Assessment.
- Assessments that are incident-based with 7- or 14-day timeframes are more likely to miss patterns of abusive behaviour and complexity of risk.
- Assessments are not able to account for multiple perpetrators.
- Not directly addressing miscarriage of pregnancy compromises the ability to understand:
 - Level of risk where violence has previously resulted in miscarriage.
 - Level of risk to the child(ren) in utero in current pregnancies.
- Assessments that do not include prior incidents of assault, including of a previous partner, that did not result in arrest or conviction may underestimate risk.
- Underestimating the impact of DFSV on children and young people, including potential risks to their safety and wellbeing.
- Risk assessments for people using violence rely heavily on honesty, accountability and perception and may not be as accurate.
- Limited ability to adequately capture technological abuse.
- Inability to capture the impact of gang affiliation on victim-survivor risk.

Additionally, frontline services surveyed stated that most risk assessment tools do not adequately capture risk for:

- Aboriginal people, as they do not account well for family violence. Additionally, questions within assessment relating to periods of time (e.g. the last 7 or 14 days) do not align with concepts of time for some Aboriginal people;
- culturally and linguistically diverse people, as they are not accessible for victim-survivors with limited English and do not account well for spiritual/cultural abuse or abuse by members of the extended family; and
- LGBTIQ+ victim-survivors, as they do not account for the increased risk of sexual assault, intimate partner violence and family violence for LGBTIQ+ people, or for the specific forms of violence they may experience.³³

Frontline services surveyed also stated that some tools do not adequately capture sexual harm. The only question specifically related to sexual behaviours of the offender on the DVRA relates to prior arrests for rape or sexual assault. Services noted that for some victim-survivors who did not have a good understanding of sexual assault, the risk assessment questions were not framed well enough to overcome misunderstandings. For example, when victim-survivors did not perceive being compelled to engage in sexual activity as assault, the sexual harm they experienced may not be captured in the risk assessment.

In addition to problems with the tools themselves, frontline services surveyed identified key concerns across the use of risk assessments in practice. Concerns included the subjective nature of questions leading to considerable variation in risk scores. Frontline services surveyed attributed divergence in risk scores to:

- operational approaches within SA Police (SAPOL) whereby officers may complete risk assessments based on victim statements, rather than engaging with victim-survivors directly to work through the questions within the risk assessment; and
- limited understanding of DFSV across all staff and agencies completing the DVRA, including the nature of DFSV experienced by diverse groups of people.

The *First Action Plan 2023–2027* of the National Plan notes that risk assessments are needed to coordinate services and collaborate across sectors and jurisdictions, with an emphasis on the value of consistency.³⁴ Frontline services also noted the value of a risk assessment tool that is standardised across jurisdictions to ensure a consistent and appropriate understanding of risk to victim-survivor safety. Most recently the National Cabinet committed to developing ‘new national best practice family and domestic violence risk assessment principles and a model best practice risk assessment framework’.³⁵ Embolden commends the South Australian Government’s current engagement in national efforts to standardise risk assessment across Australian jurisdictions and the work being done by the Office for Women in collaboration with the Victorian government to develop a shared risk assessment for people using violence who pose a high risk.

Embolden recommends that South Australia continues to support the development of a standardised national risk assessment for all victim-survivors in a way that is trauma informed and culturally safe, with consideration for:

- Aboriginal people
- Children and young people
- Culturally and linguistically diverse people
- LGBTIQ+ people
- Men experiencing violence

Frontline services noted that standardisation may best be achieved by a single risk assessment tool that is split into different sections to enable service responsiveness to the person using/experiencing violence and their context, instead of asking workers to engage with multiple risk assessment tools concurrently.

Considerable variation in risk assessment scores across agencies and services, even with the use of a standardised tool like the DVRA, highlights the importance of ensuring all staff are effectively trained in conducting DFSV risk assessments. While some aspects of this training will be standardised, Embolden contends that training will still need to be grounded in the unique processes and operational contexts of specific services. For example, as observed above, some operational contexts prevent the person completing an immediate risk assessment from working through this thoroughly with the victim-survivor. Given this, consideration could be given to developing a specialised response, for example a **rapid risk assessment tool** and specific training to enable accurate identification of high risk at the time of an incident. Best practice procedure would ensure that the **standardised comprehensive risk assessment** was still undertaken with the victim-survivor in a timely manner.

Embolden recommends that risk assessment training be tailored to the unique processes and operational contexts for all agencies and services undertaking DFSV risk assessments in South Australia. Key considerations should include:

- the context for the victim-survivor in which the risk assessment is conducted, including proximity to the incident, experiences of police, fear of repercussions, impacts on the person using violence, and impacts on children;
- how to conduct assessments in a trauma-informed and culturally-safe way; and
- information on available services, eligibility and referral pathways to facilitate effective collaboration between agencies and service providers.

³⁴ Department of Social Services (2022). *First Action Plan 2023–2027*, https://www.dss.gov.au/sites/default/files/documents/12_202d23-1021308-first-action-plan-accessible-pdf.pdf

³⁵ Prime Minister of Australia (2024). *Meeting of National Cabinet, Friday 6 September 2024*, <https://www.pm.gov.au/media/meeting-national-cabinet-7>

Disrupting and preventing violence by high-risk perpetrators

Family Safety Framework & Multi-Agency Protection Service

Currently, South Australia's dedicated approaches to managing women and families at high risk of experiencing violence include the Family Safety Framework (FSF) and the Multi-agency Protection Service (MAPS). Frontline services surveyed generally agreed that information sharing assists with safety and case management. When the Family Safety Framework works well, collaboration between agencies and services provides a wrap-around support network. SAPOL is seen as responsive and supportive and there are localised examples of good relationships between agencies and services that support family safety, particularly in regional areas and metropolitan hubs. MAPS is valued by frontline services for facilitating early identification of agencies involved in support and is seen as responsive and helpful in reducing unnecessary duplication of services. In cross-jurisdictional cases, frontline organisations noted that coordination between interstate equivalent multi-agency risk management services is vital.

However, frontline services noted several issues that undermine the effectiveness of current multi-agency approaches in supporting family safety and preventing harm. These include:

- a focus on imminent risk of harm undermining services' ability to address complex, ongoing elevated risk;
- a focus on physical harm in assessing and responding to risk;
- reactive approaches are unable to support proactive safety planning prior to the release from custody of a high-risk perpetrator;
- current approach is not supportive of people impacted by other forms of family violence, including elder abuse and people with disabilities at risk of violence from carers;
- infrequent/inconsistent attendance and lack of collaboration with DFSV services on the part of other agencies participating in the Family Safety Framework;
- delays between family safety meetings compromising safety in high-risk cases;
- omission of staff from the Courts in the Family Safety Framework; and
- no pathways for some DFSV services to refer clients to MAPS.

Concerns were also raised around eligibility, with frontline services noting they did not always receive feedback on the reasons for referrals to the Family Safety Framework being rejected. There was also some concern about inconsistency in relation to acceptance of referrals.

In Embolden's view, it is timely that the South Australian Government review the Family Safety Framework, in partnership with participating services/systems and people with lived experience.

Key considerations include:

- work being undertaken to review risk assessments, with the aim of establishing clear and consistent eligibility requirements;
- responsiveness in accepting and rejecting referrals;
- clear communication, including providing feedback and advice on referrals;
- development of refreshed terms of engagement and guidelines, to support participation and effective collaboration across all agencies and with DFSV services; and
- inclusion of representatives from the Courts.

Other initiatives to prevent and disrupt harm by high-risk perpetrators

Embolden welcomes the National Cabinet's commitment to strengthening responses to high-risk perpetrators, including the trialling of new focused deterrence models and Domestic Violence Threat Assessment Centres (DVTAC).³⁶ The proposed DVTAC is expected to improve referrals for people using violence who are believed to be very high-risk, and would coordinate information gathering to support focused intelligence-led policing with the capacity for immediate intervention and monitoring of high-risk individuals. Embolden commends this approach, however, suggests that DVTAC could be complemented by multi-agency processes focused specifically on the person using violence, that support prevention and disruption of harm.

³⁶ Prime Minister of Australia (2024). *Meeting of National Cabinet, Friday 6 September 2024*, <https://www.pm.gov.au/media/meeting-national-cabinet-7>

In the UK, for example, the equivalent to the Family Safety Framework, the Multi-Agency Risk Assessment and Management (MARAM) process, is complemented by a perpetrator focused process to reduce offending – Multi-Agency Tasking and Coordination (MATAC). MATAC can support prevention, diversion, disruption and enforcement interventions, which may include criminal justice sanctions and other interventions depending on perpetrator engagement.³⁷ Meetings include police and community-based intervention teams, which may include drug and alcohol services, housing, victim support, children services, adult services and probation. MATAC was one of a range of initiatives focused on a whole-system approach to domestic abuse that underwent evaluation in 2019. The evaluation found that average monthly domestic-abuse related offending was reduced by 65%, with overall offending reduced by 61%, while noting further investigation of longer-term impacts was needed.³⁸

Embolden recommends that national initiatives like the Domestic Violence Threat Assessment Centre could be complemented by a state-based multi-agency response focused on the person using violence, which can support prevention and diversion as well as disruption and enforcement.

Electronic monitoring

Electronic monitoring for people using violence on home detention was regularly referred to by frontline services. Their survey responses highlighted its value in supporting victim-survivors to feel safe. The automatic inclusion in the electronic monitoring program of people who breach intervention orders with an act or threat of violence was also seen as positive. Frontline services also noted the value of exclusion zones in keeping victim-survivors safe by alerting the Department for Correctional Services when people using violence enter a designated area. The main issue with electronic monitoring noted by frontline services was a lack of internet reliability in regional and remote areas. In these cases, electronic monitoring can give victim-survivors a false sense of security and potentially increase risk. Where this issue could be resolved or was not a problem, frontline services advocated for the expansion of electronic monitoring for more people using violence to support victim-survivor safety.

Embolden recommends evaluation – with consideration given to potential expansion – of the electronic monitoring program, to ensure effectiveness in preventing and disrupting perpetration of violence. Key considerations should include:

- effectiveness in regional and remote areas; and
- regular reporting on electronic monitoring outcomes, including responsiveness to high-risk incidents, in the context of a statewide DFSV monitoring and evaluation framework.

Finally, Embolden would like to highlight the responsibility of the entire justice system in disrupting and preventing high-risk perpetration. As is evident in the subsequent sections, lack of comprehensive understanding and consideration of risk, as well as current limitations in responding effectively to coercive control – across police, corrections, criminal and family courts – will continue to undermine efforts to prevent violence unless concerted actions are taken to build the capacity of the entire justice system to address gender-based violence.

Justice responses for safety and accountability

Consistent across frontline services is the concern that victim-survivors continue to experience victim-blaming and to be held responsible for their own safety. Systems are repeatedly failing victim-survivors in effectively holding people who use violence to account. This is particularly evident in the issues surrounding Intervention Orders and bail conditions. When executed well, both Intervention Orders and bail conditions have the power to effectively hold people using violence to account for their behaviour, as well as preventing future violence and supporting the safety and wellbeing of victim-survivors.

37 Northumbria Police (2017). *Violence Against Women and Girls Strategy: MATAC Presentation*, <https://www.n8prp.org.uk/wp-content/uploads/sites/315/2021/10/MATAC-N8-presentation-final-11-June-2017.pdf>

38 Cordis Bright (2019). *Domestic Abuse: A Whole System Approach: Overall programme evaluation*, <https://www.cordisbright.co.uk/admin/resources/dawsa-evaluation-overall-programme-reportfinal.pdf>

Frontline services expressed the view that when Intervention Order and bail conditions are clear and breaches are effectively policed, they provide a level of safety and security for victim-survivors and clear boundaries, consequences and accountability for people using violence. Services note that Police Interim Intervention Orders can provide immediate safety at the time of an incident, while contact restrictions also provide boundaries for victim-survivors who have previously been coerced into engaging in contact with their perpetrator. Frontline services also noted the value in SAPOL and criminal courts in upholding Intervention Orders when victim-survivors drop charges and stated that this should happen more frequently. Services working with people using violence indicated that a high percentage of their clients understand the reasons for and actively abide by their Intervention Orders and bail conditions and seek clarification as needed. Clear parameters for DFSV workers to report safety concerns were valued and these services noted that, when enforced, consequences for breaches were effective in stopping some clients from reoffending.

However, frontline services highlighted several significant issues with Intervention Orders and bail conditions. Many of these are consistent with recent work done by Uniting Communities and UniSA on improving Intervention Orders.³⁹ As the Uniting Communities report notes, and the surveyed frontline services confirmed, breaches of Intervention Orders with minimal or no consequences are a significant problem for victim-survivor safety and perpetrator accountability. While services note that breaches are being responded to more than they have been previously, the degree of consistency is still insufficient to ensure safety and accountability. Frontline services also highlight specific problems with technology-facilitated breaches. Breaches of no contact orders also occur while perpetrators are in custody, with prisons not putting blocks on victim-survivor phone numbers and perpetrators having access to their mobile phones while on remand.

Furthermore, surveyed services indicate that repeated or constant breaches are not being adequately considered and responded to by courts. Survey respondents also referred to inconsistent decision-making by courts; for example, offenders being remanded in custody for less severe incidents and bail being approved in instances of serious physical assaults. This results in confusion and a lack of trust in the justice system for both victim-survivors and DFSV services. The risk inherent in bail approval processes that do not adequately consider the safety of victim-survivors is most obviously demonstrated by the bailing of people using violence to victim-survivors' addresses, either at home or in DV services supported accommodation, and failing to notify victim-survivors, who may be at heightened risk of harm, of their release. This issue was frequently cited by surveyed frontline services. It was noted as a significant safety concern across all regions and services and occurred during both police and court bail processes.

Embolden recommends a review of current justice responses and coordination between SA Police, Courts Administration Authority and the Department for Correctional Services regarding Intervention Orders and bail conditions, with consideration of risk and safety for victim-survivors and accountability for people using violence.

Key considerations include:

- consistent and effective approaches to responding to breaches of Intervention Orders, including ensuring accountability and transparency in relation to responses;
- preventing breaches of no contact orders while in prison or on remand;
- consistent approaches to sentencing and bail approval including:
 - Consideration of repeated breaches
 - Recognition of, and responsiveness to, the risk factors for severe and fatal violence, including coercive control
 - Consistency between Intervention Order and bail conditions
- mandating and monitoring an internal process for checking bail addresses for risk to victim-survivors.

Other concerns raised by specialist services included barriers to understanding bail and Intervention Order conditions and accessing information for both victim-survivors and people using violence, and the risks that these pose to safety. Frontline services indicated that when SAPOL had clearly explained Intervention Order conditions, this was well understood. However, this was inconsistent across victim-survivors and people using violence, and Aboriginal and culturally and linguistically diverse people were less likely to have received appropriate explanations or been given access to translated information. Given that **lack of understanding significantly increases the likelihood of breaches of intervention orders,⁴⁰ this is an area where improved services have the capacity to make a real difference.** Frontline services also noted that unclear or inconsistent conditions on the Intervention Order, particularly around communication regarding the welfare of children, could easily lead to non-child-related conversations and heightened risk to victim-survivors, including children, in what the Rapid Review Expert Panel report termed 'dangerous parenting agreements'.⁴¹

Frontline services suggested that having a culturally-informed centralised service where Intervention Order and bail condition information could be easily accessed would reduce responsibility on victim-survivors to navigate the system. This could also reduce the pressure on SAPOL stations, response and specialised DFV staff to provide this information in a time of limited staff capacity. The service could:

- proactively inform victim-survivors, DFSV case managers and SAPOL of condition changes and bail approval;
- develop and distribute easy guides to support the understanding of Intervention Order and bail conditions by people using violence; and
- provide information for victim-survivors and people using violence in multiple languages and for varying literacy levels.

In some instances, victim-survivors, DFSV services and even SAPOL were not informed that the person using violence had been bailed or released from custody. Frontline services also cited examples of the Department for Correctional Services releasing offenders after 5pm on a Friday evening. This creates a significantly heightened risk for victim-survivors at a time when services are often working with reduced and on-call staff.

Corrections' Victim Services Unit, for example, is only available by telephone Monday to Friday 9am to 5pm with an out-of-hours message service. It is also important to note that the Victim Services Unit can only support victim-survivors if the person using violence is in prison or under Corrections' supervision in the community. Frontline services consulted raised concerns about the lack of consistent communication between SAPOL, Courts and Corrections and the risk this poses to victim-survivors.

In summary, Embolden recommends that the Courts Administration Authority, the Department for Correctional Services and SA Police explore options for more coordinated approaches to better support victim-survivors' safety. Key considerations include:

- Establishing a central information service for Intervention Order and bail conditions, including alerts for condition changes and bail approval.
- Improved interface of justice systems resulting in timely access to information about people using violence for victim-survivors, DFSV services and SAPOL to improve safety.

Concerns were also raised in Embolden workshops and in the survey around the application of Intervention Orders against victim-survivors, with anecdotal evidence of this increasing in some regions. Misidentification of victims is a common theme across justice responses to victim-survivors. The Northern Territory made changes to the *Domestic and Family Violence Act 2023* to support more accurate identification of the person most in need of protection and reduce the misidentification of victim-survivors as people using violence. In some cases, misidentification will be linked to coercive control, and should be addressed by training, evaluation and monitoring in this context, as noted on page 31 of this submission. However, frontline services also see evidence of misidentification in the absence of coercive control. Aboriginal women are disproportionately likely to be misidentified as people using violence, rather than as victim-survivors. Furthermore, frontline services noted that in some instances Intervention Orders against victim-survivors are being seen as a way of protecting victims, with little understanding of the consequences this has for victim-survivors in their future interactions with justice and statutory systems, such as Family Court and child protection.

40 *Rapid Review Expert Panel (2024), Unlocking the Prevention Potential: Accelerating action to end domestic, family and sexual violence*, p.55
41 *Unlocking the Prevention Potential*, p.48.

Embolden recommends that training for magistrates, Courts and SAPOL staff has a focus on understanding and reducing misidentification of victim survivors, both in the context of coercive control and more broadly. Consideration should be given to mitigating adverse consequences for victim-survivors who have already been misidentified by the justice system.

Frontline services were also clear about the current failure of Intervention Order processes to adequately support the safety of children. Multiple services report that all children present at the time of the DFSV incident are often not included on Intervention Orders, with others stating that getting children listed on an Intervention Order is difficult. This is even the case when there have been threats by the person using violence to kidnap or kill children. This is also despite the clear intent of the legislation to ensure that children are protected. The first object of the *Intervention Orders (Prevention of Abuse) Act 2009* is stated as assisting in the prevention of DFV including 'the exposure of children to the effects of domestic and non-domestic abuse'. Under the Act, an Intervention Order may be issued for the protection of 'any child who may hear or witness, or otherwise be exposed to the effect of, an act of abuse committed by the defendant against a person.'⁴² Furthermore, the expectation that children must maintain a relationship with a person using violence is evidence of a widespread lack of understanding of children's experiences of domestic and family violence, which consistently puts children and young people at risk of continued harm. This is evidenced in the safety risks that result from Family Court orders prevailing over Intervention Orders. This and other issues regarding the Family Court are discussed in further detail on page 35.

Embolden recommends that SA Police and the Courts Administration Authority review processes and training to promote appropriate protection of children and young people who experience domestic and family violence. Key considerations include:

- ensuring all children who have experienced domestic, family and/or sexual violence or have been the subject of threats of violence are included on Intervention Orders; and
- incorporating the impact of DFSV on children and their experiences in all DFSV training for magistrates, Courts and SA Police staff.

Justice responses to sexual violence

There has been a strong recent focus, both nationally and within SA, on improving justice responses to sexual violence. Embolden refers the Royal Commissioner to Health and Recovery, Trauma Safety Services' (HaRTSS) submission. Embolden's recent submissions to other reviews and inquiries on this issue, informed by HaRTSS, are publicly available:

- Submission on the review of sexual consent laws in South Australia (February 2024)⁴³
- Response to the Crimes Amendment (Strengthening the Criminal Justice Response to Sexual Violence) Bill 2024 (March 2024)⁴⁴
- Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence (May 2024)⁴⁵

Embolden makes the following overarching recommendations to improve justice responses to sexual violence:

- The South Australian Government considers specialist sexual offence courts/dedicated court sitting days for sexual offences, to strengthen judicial practice and justice outcomes for victim-survivors.
- Action to strengthen supports for victim-survivors to understand and exercise their rights through criminal justice processes, including the availability of independent legal advice throughout proceedings and 'justice navigator' services that are culturally safe for Aboriginal and culturally and linguistically diverse people and are accessible.
- Development and implementation of 24/7 anonymous reporting mechanisms for sexual violence in SA, leveraging the experience of other jurisdictions and supporting national harmonisation of anonymous reporting.

⁴² *Intervention Orders (Prevention of Abuse) Act 2009* (SA), s.7 (1) (a).

⁴³ Embolden (February 2024). *Submission on the review of sexual consent laws in South Australia*, www.embolden.org.au/resource/submission-on-the-review-of-sexual-consent-laws-february-2024

⁴⁴ Embolden (March, 2024). *Response to the Crimes Amendment (Strengthening the Criminal Justice Response to Sexual Violence) Bill 2024*, www.embolden.org.au/resource/response-to-crimes-amendment-strengthening-the-criminal-justice-response-to-sexual-violence-bill-2024

⁴⁵ Embolden (May 2024). *Submission to the Australian Law Reform Commission's inquiry into justice responses to sexual violence*, <https://www.alrc.gov.au/wp-content/uploads/2024/07/156.-Embolden.pdf>

Police responses to victim-survivors

Frontline services generally agree that the dedicated domestic and family violence officers and services within SAPOL collaborate effectively with specialist DFSV services and support victim-survivors well. This is consistent across the Family Violence Investigation Section (FVIS) teams in regional Local Service Areas and the Child and Family Investigation Section (CFIS) teams in metropolitan districts, and results in good communication and wrap-around support for clients at high risk. When FVIS/CFIS staff are not available, services have noted that Criminal Investigation Branch (CIB) officers are also helpful.

SAPOL involvement in multiagency hubs, such as the northern hub, was also praised for supporting timely access to information, effective collaboration and police responsiveness. The hub model is seen by participating frontline services as facilitating timely, integrated responses to victim-survivors with complex immediate needs. SAPOL's plainclothes and unarmed presence in the hubs also supports reporting from victim-survivors who may be reluctant to engage with police.

Also highlighted as working well were forensic services and police advocacy for improving service outcomes and close-to-home services. There were also several examples given by frontline services of excellent localised police services. In these examples, police had a good understanding of DFV, and established effective working relationships with specialist DFSV services, as well as positive community relationships. Examples included Kungka police working in the NPY Lands and regular meetings between DFSV staff and local station staff to discuss community and service issues in other regional areas.

Across SAPOL more generally however, the frontline DFSV services surveyed highlighted several concerns, the impacts of which ranged from undermining victim-survivors' confidence to actively increasing risks to victim-survivors' safety. The inconsistency of police responses to victim-survivors was highlighted, with frequent references to insensitive and inappropriate responses, including victim-blaming and dismissiveness. This was noted with both response patrols and station staff. Frontline services surveyed contend that this contributes to the reluctance of victim-survivors in reporting DFSV to police.

Frequent references were also made to the lack of cultural safety for Aboriginal and culturally and linguistically diverse victim-survivors. Frontline services surveyed noted the lack of understanding of cultural complexity, including feelings of shame associated with being the victim of assault and

pressure from family networks. Cultural safety is also undermined by systemic racism in police responses to both Aboriginal victim-survivors and Aboriginal staff of specialist DFSV services.

Frontline DFSV services demonstrated a clear understanding that SAPOL's ability to effectively respond to victim-survivors was also often undermined by operational constraints. These were perceived to include:

- SAPOL workload, understaffing and burnout, including limited capacity of Family Violence and Child and Family Investigation Sections.
- staffing constraints resulting in inability to meet demand for welfare checks;
- scaling down or closing of regional and remote police stations, resulting in poor service coverage and lack of 24/7 response in some regional and remote communities, compounded by staff recruitment and retention challenges;
- lack of cross border communication and under-use of existing cross border initiatives, particularly the Cross Border Justice Scheme; and
- limited reporting options for victim-survivors.

Embolden understands that SAPOL is currently undertaking a review of its response to domestic, family and sexual violence. **Embolden recommends that SAPOL's current review includes consideration of the following:**

- reviewing and revising training for all staff to effectively recognise DFV and sexual violence, and appropriately respond to victim-survivors, including children and young people, in a trauma-informed way. Training should be place-based to ensure staff are familiar with the local community context;
- cultural safety for Aboriginal and culturally and linguistically diverse victim-survivors and DFSV staff;
- alternative reporting options for victim-survivors, such as online reporting. Embolden makes a specific recommendation in relation to anonymous reporting on page 31 of this submission;
- increasing regional and remote service coverage, including cross-border initiatives and Aboriginal employment to improve cultural safety of services;
- better engagement with the Cross Border Justice Scheme and establishing regular formal channels of communication with other jurisdictions;
- sustainable delivery of welfare checks across metropolitan and regional areas; and
- measures for monitoring and reporting on police responses to DFSV in the context of a statewide monitoring and evaluation framework.

Finally, Embolden commends to the Royal Commissioner the submissions of specialist legal services, such as Women's Legal Service SA and Family Violence Legal Services Aboriginal Corporation.

Interface with child and family systems

Child Protection

Frontline DFV workers surveyed pointed to opportunities for improved integration and collaboration across the child protection system and specialist DFV services, to support better outcomes for children and families with complex needs.

In particular, earlier collaboration to proactively engage and support families, including consideration of ways to preserve children's relationship with a protective parent who is being subjected to violence, was cited as critical to preventing avoidable removal of children. Research by ANROWS has pointed to significant limitations across child protection, DFV services and the family law system in addressing parenting capacity and providing culturally informed parent/child relational support that meets the needs of parents, infants and children. The restoration of parenting capacity following experiences of domestic, family and/or sexual violence does not appear to be a focus of child protection agencies in their contact with women.⁴⁶

While respondents pointed to pockets of good communication and collaboration with particular Department for Child Protection (DCP) offices, teams and workers, there is a need for improvement at a systemic level. Workers raised concerns about DCP ceasing engagement once a family is linked with a DFSV service, leaving that service to hold high risk for children. Workers also raised concerns about pressure being placed on clients of statutory systems to engage with specialist DFV services, in a context where conditions are placed on the mother/protective parent and there is a lack of accountability for the father/person using violence. To strengthen an effective interface across systems, **Embolden recommends the development of clearer processes and mechanisms for effective collaboration between child protection and specialist DFV services.** This should encompass a focus on strengthened collaboration and pathways between the child protection system and services working with men, in this case fathers using violence in their relationships. It is important that this mechanism is activated outside the context of crisis, especially if there are opportunities for joined-up efforts to intervene earlier to improve outcomes for children, young people and families.

Embolden's frontline worker survey responses also indicate that there is a need to actively build the capacity of child protection staff to identify protective behaviours and respond to domestic violence and abuse in the context of their work with clients. **Embolden recommends the further development of DFV-informed policies within the child protection system** to enable responses that increase safety and dignity for victim-survivors, particularly children and young people. **Embolden also recommends consideration of DFV-informed case management** to support parents to meet any conditions and to increase accountability for parents using violence. These measures should be supported by **enhanced training on DFV, developed in partnership with the specialist DFV sector, included within induction and ongoing professional development for child protection staff.**

Additionally, frontline workers consistently pointed to a need for greater cultural safety and responsiveness for Aboriginal families and highlighted family group conferencing as an opportunity for positive collaboration and client advocacy. As indicated by South Australia's Commissioner for Aboriginal Children and Young People, 'family group conferencing is an internationally recognized model for keeping children safe in their families, communities and culture'.⁴⁷ In South Australia, the family group conferencing process has resulted in very high rates of children remaining safely in the care of their families: 92% in 2021⁴⁸ and 90% in 2023.⁴⁹ Despite these impressive outcomes, the numbers of families being offered family group conferencing is currently low. **Embolden recommends a significant investment in the family group conferencing program to expand access and improve outcomes for families with complex needs, including domestic and family violence.** Aboriginal frontline workers told us that family group conferencing processes for Aboriginal families must include the presence of an Aboriginal staff member or Elder to support Aboriginal family-led decision-making. Expansion of the family group conferencing approach is likely to have attendant positive impacts on cross-system collaboration. In the context of reunification for families with experiences of DFV, **families would ideally be provided with specialised DFV supports post-reunification** that contribute to recovery and healing of individuals and the family as a whole.

46 Kaspiew, R. et al. (2017) *Domestic and family violence and parenting: Mixed method insights into impact and support needs: Key findings and future directions*, ANROWS Compass, Issue 04

47 Lawrie, A. (2024). *Holding on to Our Future: the Final Report of the Inquiry into the application of the Aboriginal and Torres Strait Islander Child Placement Principle in the removal and placement of Aboriginal Children in South Australia*, Commissioner for Aboriginal Children and Young People. www.cacyp.com.au/inquiry

48 Alexander, K. (2022). *Trust in culture: A review of child protection in South Australia*. Department of Child Protection. www.childprotection.sa.gov.au/about/child-protection-initiatives/south-australian-child-protection-expert-group/trust-in-culture-a-review-of-child-protection-in-sa-nov-2022.pdf

49 Department for Child Protection (2024, February 26). *Family Group Conferencing showing promising results for children and families* [Press release]. www.childprotection.sa.gov.au/news-and-events/news-and-media-releases/dcp-news/family-group-conferencing-showing-outstanding-results-for-children-and-families

These services should seek to strengthen families, bolster the parenting capacity of the protective parent and enable them to make sense of their experiences of DFV within the family unit where meaning-making often takes place.

Frontline workers also identified that inconsistent attendance at FSF and other meetings by DCP and high turnover of child protection staff are significant factors that undermine inter-agency collaboration and negatively impact victim-survivors of DFV, including in having to regularly repeat their story. **Embolden recommends that DCP is resourced to enable consistent representation at family safety framework and interagency meetings.** In regional and remote areas, frontline workers identified that staff turnover results in the appointment of inexperienced child protection workers who have limited knowledge of remote contexts and working with Aboriginal people.

Family Court

Embolden notes that changes to the Family Law Act commenced in May 2024 and that these changes speak to a range of concerns presented by the DFSV sector. Despite legislative change and recent initiatives to improve how the Family Court responds to domestic and family violence, Embolden supports the Rapid Review Expert Panel's recommendation of an audit to examine the ways in which government systems, including the Family Court, can be used against victim-survivors by people causing harm.

Victim-survivors of DFSV need to be empowered in Family Court processes. However, significant wait times, lack of childcare options and costs for Family Court proceedings are placing victim-survivors of DFSV in vulnerable positions, particularly when there is a lack of access to free or subsidised legal support and support services for women who are not in immediate crisis. Noting that Family Court reforms have already reduced wait times, current wait times for court proceedings mean that DFSV services will often have stopped working with a client as they are no longer in crisis. However, court proceedings can be an especially challenging time, and support can contribute to the recovery and healing of the victim-survivor and bolster their ability to support their children. In addition to increased access to longer-term recovery and healing supports (discussed in the next section), **Embolden recommends that the Royal Commissioner and the South Australian Government advocate at the national level for increased funding for the Family Court to further reduce wait times.**

Frontline workers consider the role of Independent Children's Lawyers (ICLs) to be important in advocating for the interests of children and young people in Family Court processes. However, to effectively support children, it is critical that ICLs can understand and recognise the dynamics of DFV and coercive control, as well as parental alienation, and the impacts of these behaviours on children. ICLs also need to have a thorough understanding of childhood sexual abuse, including the impacts on children and the common signs and indicators of CSA. ICLs must also be aware of perpetrator tactics and grooming behaviours, to correctly identify and respond to risk. Embolden has made other recommendations earlier in this submission in relation to the importance of education and training of court personnel, and requests that the **Royal Commissioner highlight the importance to children and families of a DFSV-informed Family Court.** Embolden also notes that a DFSV-informed Family Court would reduce the likelihood that experiences of violence, including sexual violence, would be used against victim-survivors in deeming them unable to parent due to trauma.

Finally, frontline workers told us about instances of parenting orders enabling legal, ongoing abuse of victim-survivors, such as allowing or even requiring the types of contact prohibited by an Intervention Order, for example, text message contact or mediation. Embolden requests that the **Royal Commissioner's report highlight the importance of parenting orders that prioritise the safety of victim-survivors, including children, in the context of domestic and family violence and are consistent with jurisdictional protective orders.**

Education

Frontline workers shared that the Department of Education's approach to confidential enrolments has been effective at protecting children and families, however this process has been undermined by gaps in communication within and between schools. Services also identified that different requirements across schools in relation to on-site support for students has made it difficult to collaborate with schools and flexibly meet the needs of children and families. Embolden suggests that the **development of a consistent approach across SA Government schools for DFSV services to provide on-site support for children and young people impacted by DFSV** will be an important step is the provision of wraparound supports for children and young people.

Interface with other frontline services

Frontline workers were clear about the benefits of collaboration in responding to domestic, family and sexual violence, and meeting a range of client needs. As one frontline worker expressed:

'collaboration can create positive outcomes, especially when the coordinated approach relies on the specialty of each service, is transparent and centres client consent.'

However, current funding approaches can inadvertently discourage integration and coordination across direct services being delivered to clients. Frontline workers told us about system-wide practices of services withdrawing once there is another service involved with a client. To address this, **Embolden recommends a review of current contract administration processes to identify opportunities to support the provision of wraparound supports.** This may require amending reporting requirements to account for joint intake appointments and collaboration that leverages the specialisations of different sectors.

Embolden suggests that **funding interagency meetings as a separate line item in service contracts would also improve service integration and coordination and address concerns about such meetings compromising direct service delivery.** In their roles, frontline workers are responding to clients with increasingly complex needs. Survey respondents told us about important intersections across DFSV, mental health and substance misuse, with some sharing that the SA Mental Health Triage Service provides useful advice and that the Urgent Mental Health Care Centre and Southern Wellbeing Hub provide good support.

Embolden has made recommendations earlier in this submission about building the capacity of non-specialist systems to respond to DFSV. **Specialist DFSV workers have suggested that their practice would benefit from education to better understand the mental health and AoD service systems.** While cross-system awareness will contribute to better system integration and coordination, Embolden notes the barriers to mental health and AoD supports due to high costs and long waitlists, particularly in regional and remote SA.

Responses to men using violence

As stated previously, our efforts to reduce violence against women and girls must focus on men and boys, who overwhelmingly perpetrate gender-based violence. In complement to the strong focus on men at risk of/using violence in the prevention and early intervention sections of this submission, Embolden is clear that effectively addressing domestic, family and sexual violence requires that we strengthen our responses to those causing harm. To this end, **Embolden advocates for a national strategy focused on men using violence. At the State level, a South Australian DFSV strategy must drive the development of a broad suite of targeted, evidence-based interventions to stop men's use of domestic, family and sexual violence.**

Several Embolden member organisations have significant expertise in working with men – OARS Community Transitions, Kornar Winmil Yunti (KWY) Aboriginal Cooperation, Relationships Australia SA and No to Violence – and Embolden refers the Commission to the submissions made by these organisations in relation to effective responses to men using violence and abuse. The specialist sector knows that we cannot arrest our way out of violence against women and girls.

While perpetrator accountability through the criminal justice system is important, our responses to men using violence must have a broader focus to genuinely meet the needs of victim-survivors and prevent future violence.

In building on current services to further develop a range of effective responses to men using violence, Embolden highlights the following considerations:

- statewide needs analysis to include a focus on services for men, to strengthen responses and address gaps, including in regional and remote contexts;
- development of an enhanced range of service models, across both mandated and voluntary contexts;
- consideration of pathways into services, including initiatives to increase self-referrals. Some frontline workers noted that the way in which police apprehension reports are completed will determine whether men receive referrals to appropriate services. Additionally, some members have recommended that SAPOL has more powers to make mandated referrals to behaviour change programs, as well as greater penalties for non-attendance at mandated programs;

- effective integration/coordination with services being provided to the victim-survivor/s;
- accommodation-based services for men, allowing women and children to remain in their home;
- modes of service delivery to include structured behaviour change interventions via group work and individualised counselling, as well as individual case management where required. Services must have capacity to respond to men using violence who have experienced significant trauma ('compassionate accountability' in action);
- development of more targeted responses, including for Aboriginal men, culturally and linguistically diverse men, LGBTIQ+ men and older/younger men;
- engagement with work to establish national standards for men's behaviour change; and
- a focus on services targeted to men in the development of SA's workforce strategy for the DFSV sector.

Responses to victim-survivors of sexual violence

In SA, Yarrow Place (HaRTSS) is the lead provider of services for adult survivors of sexual violence and Relationships Australia SA (Child Sexual Abuse Counselling Service) provides the majority of support for children, families and adult survivors of child sexual abuse. Embolden refers the Royal Commissioner to the submissions of both Health and Recovery, Trauma Safety Services (HaRTSS) and Relationships Australia SA in relation to responses to victim-survivors of sexual abuse and violence.

There is a **significant need for greater investment in specialist services statewide to address child sexual abuse and sexual violence**. Limited resourcing of current services and increasing demand is resulting in significant wait times for services and unsustainable pressure on services and staff workload. The DFSV needs analysis recommended earlier in this submission must encompass consideration of the need for sexual abuse and sexual violence services in regional and remote areas. We know that there are significant gaps in regional and remote responses, including for forensic examinations following sexual assault. Additionally, while medical and forensic services are critical, South Australia currently lacks a 24-hour phone counselling service for people impacted by sexual violence. This is an important gap in our current response to victim-survivors of sexual violence in SA. Survivors of sexual violence have also indicated that there is a need to build the capacity of the health system to provide trauma-informed responses to sexual violence. For example, women who have been sexually assaulted may be required to walk through emergency areas to access forensic examination suites.

The Australian Child Maltreatment Study has shown clearly that it is more likely that a child will experience multiple forms of neglect and abuse rather than a single form. Effective responses to children and families would be supported by greater connection, coordination and cross-training between specialist domestic and family violence services and specialist child sexual abuse and sexual violence services.

To strengthen responses to victim-survivors of sexual violence, Embolden recommends:

- needs analysis to ensure that investment in child sexual abuse and sexual violence services meets community need, including in regional and remote areas;
- 24/7 phone and web-based sexual violence counselling service;
- review of opportunities across the health system to strengthen trauma-informed responses to child sexual abuse and sexual violence; and
- development of processes and pathways to support greater connection and coordination across specialist domestic and family violence services and specialist child sexual abuse and sexual violence services.

Recovery & Healing

The National Plan notes that recovery and healing take time and for many victim-survivors will require lifelong support through dedicated and tailored services and intervention. In South Australia, we need **greater investment in longer-term recovery and healing supports for victim-survivors of domestic, family and sexual violence, including children and young people.**

Addressing domestic, family and sexual violence cannot happen without recovery and healing for victim-survivors, who tell us about the long-lasting impacts of violence on their wellbeing and life opportunities. Recovery and healing supports are critical in supporting people impacted by violence to live free from violence in the future. Our current service responses are crisis-driven and often short-term, which leaves people without the holistic supports they need to rebuild their lives over time after experiencing violence. We know that demand for recovery and healing supports, including programs that support women to regain employment and financial independence, currently significantly outstrips supply statewide. As outlined earlier, Zahra Foundation Australia has a wait of over six weeks for financial counselling and 150 women on the waitlist for Zahra's recovery program. There are very few recovery and healing services in regional and remote areas of SA, and we have previously highlighted the limited access to, and high cost of, therapeutic services.

Members have noted the following opportunities to strengthen recovery and healing services across South Australia:

- longer service periods for recovery and healing supports, including longer-term legal support, financial counselling, practical life skills and employment supports;
- more place-based, community-led and culturally-safe services to support recovery and healing;
- whole-family recovery and healing offerings;
- access to specialist therapeutic parenting support for mothers with their infant/toddler, to rebuild and strengthen their relationship to mitigate experiences of DFSV-related trauma;
- broader/more flexible pathways into services, including referrals via non-specialist services and self-referrals. Recovery and healing support should be available to people who experienced DFSV some time ago, in recognition that some victim-survivors may not be ready in the shorter-term;
- more group programs, led by specialist facilitators including peers/people with lived experience;
- services that respond to intersecting needs – there is currently a lack of male Aboriginal workers and lack of supports (including groups) for male victims and LGBTIQ+ people; and
- funding to support women to get their drivers licenses, particularly in regional areas.

As healing takes place in relationships, continuity of support across the service continuum, enabled by the proposed model of place-based, integrated responses, is ideal to support recovery and healing.

As touched on previously, **South Australia also has an important opportunity to embed a recovery and healing orientation in client-facing services across the continuum.** Recovery is not a linear process that only begins after the violence ends. Crisis responses can encompass a recovery and healing focus, as outlined earlier with the recommendation that SA develop an holistic and trauma-informed after-hours response.

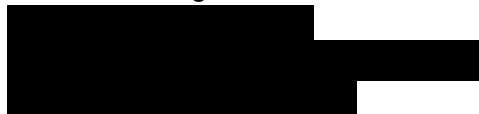
Finally, state and national DFSV workforce strategies must include a focus on building workforce capacity to deliver effective recovery and healing supports, including the development of a dedicated peer/lived experience roles.

Conclusion

Embolden appreciates the opportunity to make this second submission to the Royal Commission, outlining the key reform priorities and recommendations of SA's specialist domestic, family and sexual violence services sector.

Please direct any enquires in relation to this submission to:

Mary Leaker
General Manager, Embolden



Appendix A:

Key Recommendations from Embolden's First Submission to the Royal Commission

The first of Embolden's submissions to the Royal Commission focused on the system elements required for an effective, evidence-based public health approach to domestic, family and sexual violence, including a whole-of-government strategic framework and robust accountability mechanisms.

Embolden's key recommendations outlined in this submission were as follows:

A public health approach to domestic, family and sexual violence

- That South Australia embeds a public health approach to domestic, family and sexual violence through the development and effective implementation of a whole-of-government strategic framework.

Overarching governance mechanisms to drive and oversee a whole-of-government strategic approach

- That a dedicated meeting of State Government Ministers, chaired by the Premier, be convened to drive and oversee the development and implementation of a whole-of-government statewide domestic, family and sexual violence strategy.
- That a Chief Executives governance group be re-established, chaired by the Minister for the prevention of domestic, family and sexual violence.
- That an Office for the Prevention of Domestic, Family and Sexual Violence be established and effectively resourced, attached to the Department of the Premier and Cabinet.
- That the functions of the Office for the Prevention of Domestic, Family and Sexual Violence support the centralisation and coordination of funding and contract management for SA's domestic, family and sexual violence services system.

Embedding lived, practice and research expertise

To embed a cross-sector partnership approach and to ensure that South Australia's domestic, family and sexual violence strategy is informed by lived, research and practice expertise, Embolden recommends that the State Government establish:

- A DFSV Lived Experience Advisory Council, comprising diverse South Australians with lived experience of domestic, family and/or sexual violence.

- A DFSV Reference Group, which would include representation from the Lived Experience Advisory Council, along with Aboriginal leaders and Aboriginal Community Controlled Organisation Sector representatives, DFSV services sector representatives, DFSV researchers, Local Government and the community sector.

Independent monitoring and evaluation

To ensure systems-level accountability for outcomes, Embolden recommends:

- An independent mechanism to monitor and review the implementation of South Australia's statewide domestic, family and sexual violence strategy and Royal Commission recommendations. Consideration to be given to the creation of a South Australian Commissioner for Domestic, Family and Sexual Violence.
- An independent monitoring function to be underpinned by a robust monitoring and evaluation framework, aligned with the National Plan Outcomes Framework and key accountabilities under Closing the Gap and the National Plan's Aboriginal and Torres Strait Islander Action Plan 2023-25.

Embolden is also clear that robust monitoring and evaluation, within the context of a strategic whole-systems approach, is required for South Australia to effectively implement coercive control legislation and to minimise the risk of unintended negative impacts for victim-survivors.

Building sector capacity to contribute to the DFSV evidence-base

- That resourcing to support DFSV services with data development, collection, analysis and reporting be built into service contracts.
- That sector representative bodies – in particular Embolden, SAACCON and the Domestic and Family Violence Safety Alliance – be adequately resourced to contribute to the development of South Australia's DFSV evidence-base, data integration across systems and effective evaluation of interventions to better identify 'what works'.
- That the State Government advocates for data capability to be effectively resourced and reflected within Commonwealth funding agreements.

Review of domestic and family violence-related deaths

- That a targeted domestic and family violence death research and investigation function be reinstated in South Australia, to enable our State to effectively contribute to and benefit from national collaborative work in this area.

Strengthening Lived Experience Engagement

To ensure that the diverse lived experience of victim-survivors is informing policies and solutions in South Australia, Embolden makes the following recommendations:

Invest in the infrastructure to elevate lived expertise

- That the State Government establish and effectively resource a lived expertise advisory council that directly advises government on DFSV policy.
- That the DFSV services sector is effectively resourced to support best practice lived experience engagement in policy development, advocacy, and service design, delivery and practice.
- That lived experience engagement is funded as a line item in service contracts to enable service-level engagement with survivor-advocates, including within a service's governance structure.
- That the DFSV services sector is resourced to develop and implement an Impact Framework for lived experience engagement, to be reported on annually.

Invest in survivor-advocates

That the specialist DFSV services sector is effectively resourced to:

- develop and implement a training and professional development program for survivor advocates, building on existing resources and expertise nationally.
- develop and implement standardised remuneration scales for survivor-advocates, which are reflected in funding agreements.

Leverage existing sector strengths and skills

- That the specialist DFSV services sector is effectively resourced to enable services to consolidate and embed current innovative and diverse lived experience engagement practices, and share learnings on good practice lived experience engagement across the sector.

A strong and sustainable specialist domestic, family and sexual violence sector workforce

- Development and implementation of a dedicated and targeted workforce strategy for the specialist domestic, family and sexual violence services sector in South Australia.

An effective workforce strategy will require comprehensive planning to address the broad range of issues currently facing the sector, including social work registration and competition for staff across sectors in the context of current reforms.

An independent, effective peak body for South Australia's domestic, family and sexual violence services sector

- That funding for Embolden supports an independent, effective peak body for the South Australian domestic, family and sexual violence services sector

Appendix B: Embolden Frontline Staff Survey for Specialist Domestic, Family & Sexual Violence Services

Survey Questions

About your team

1. Please select your organisation from the options below.
2. Please enter the name of your team/service, if applicable.
3. Please indicate the focus of your team/service. (Select all that apply)
 - Victim-survivors of domestic and family violence
 - Aboriginal family violence
 - Children and young people 0-18
 - People who use violence
 - Victim-survivors of sexual violence
4. Please briefly describe the services you provide that relate specifically to DFSV.

Risk Assessment

Please use this section to comment on the current risk assessment process and any opportunities for improvement. Please remember to reflect on the experiences of diverse communities.

5. What risk assessment tool does your team/service currently use?
6. What issues has your team/service identified with current risk assessment processes?
7. What is working well with current risk assessment processes?
8. Please outline your team's/service's suggestions for improving the risk assessment process.

Multi-Agency Risk Management Processes & Information Sharing

Please use this section to comment on multi-agency risk management and information sharing processes, including the Family Safety Framework and the Multi-Agency Protection System, and any opportunities for improvement. Please remember to reflect on the experiences of diverse communities.

9. What issues has your team/service identified with multi-agency risk management and/or information sharing processes?
10. What is currently working well with multi-agency risk management and/or information sharing processes?
11. Please outline your team's/service's suggestions for improving multi-agency risk management and/or information sharing processes.

Interactions with Police

Please use this section to comment on interactions with police, and any opportunities for improvement. Please remember to reflect on the experiences of diverse communities.

12. What issues has your team/service identified with interactions of your clients or your team/service with police?
13. What is working well with interactions of your clients or your team/service with police?
14. Please outline your team's/service's suggestions for improving interactions with police.

Intervention Orders & Bail Conditions

Please use this section to comment on intervention orders and/or bail conditions, and any opportunities for improvement. Please remember to reflect on the experiences of diverse communities.

15. What issues has your team/service identified for your clients or your team/service with intervention orders and/or bail conditions?
16. What is working well with intervention orders and/or bail conditions?
17. Please outline your team's/service's suggestions for improving intervention orders and/or bail conditions.

Interactions with the Criminal Justice System & Courts

Please use this section to comment on the criminal justice system, including criminal courts and Correctional Services, and any opportunities for improvement. Please remember to reflect on the experiences of diverse communities.

18. What issues has your team/service identified for your clients or your team/service with interactions with the criminal justice system and courts?
19. What is working well with interactions with the criminal justice system and courts?
20. Please outline your team's/service's suggestions for improving interactions with the criminal justice system and courts?

Interactions with the Child Protection System

Please use this section to comment on interactions with the child protection system, and any opportunities for improvement. Please remember to reflect on the experiences of diverse communities.

21. What issues has your team/service identified for your clients or your team/service in interactions with the child protection system?
22. What is working well in interactions with the child protection system?
23. Please outline your team's/service's suggestions for improving interactions with the child protection system?

Experiences with Family Courts

Please use this section to comment on experiences with family courts, and any opportunities for improvement. Please remember to reflect on the experiences of diverse communities.

24. What issues has your team/service identified for your clients or your team/service in experiences with family courts?
25. What is working well in experiences with family courts?
26. Please outline your team's/service's suggestions for improving experiences with family courts.

Other Relevant Agencies & Services

Please use this section to comment on complex system interactions involving other agencies and services. Please remember to reflect on the experiences of diverse communities.

27. Which of the following agencies or services would your team like to provide detail on?
 - Drug and Alcohol Services
 - Education
 - Health
 - Mental Health
 - Family and Community Services
28. What issues has your team identified in relation to interactions that your clients or your team/service has with agencies/services you identified in the previous question?
29. What is working well in the interactions that your clients or your team/service has with agencies/services you identified in the previous question?
30. Please outline your team's/service's suggestions for improving interactions with these agencies/services.

Any Other Comments

Please add any other comments here.

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