



Women's Safety Services SA

WHO WE ARE

Women's Safety Services SA (WSSSA) supports women and their children who are experiencing domestic and family violence. We are an organisation committed to helping people find safety and support during and after experiencing violence and abuse.

WSSSA is a non-government organisation established in 2016 as the result of the merger of three front line domestic and family violence services. Since that time, the organisation has grown rapidly, incorporating other front-line specialist domestic and family violence services and taking on a range of new programs.

WSSSA's programs and services aim to achieve the safety of women and their children by ensuring that violence is prevented before it begins; recognised as soon as possible; and responded to immediately.

WSSSA is the lead provider of specialist Domestic Family Violence (DFV) services in South Australia. We are a women's led organisation with a proud grass-roots history of advocacy and frontline crisis response service provision. Our practice and training programs are evidence-based, informed by the lived experience of women and their children.

MODEL OF CARE

WSSSA's service delivery is uniquely tailored to clients' circumstances and moving towards partnership with clients and other agencies to address safety and risk. There is no standard pathway, service or outcome for clients as interactions will vary due to our clients' diversity, their individual risk factors, the changeable nature of DFV and their varying support needs

ABOUT THIS SUBMISSION

WSSSA's response to the Royal Commission's Issues Paper focuses primarily on the need for a strategic whole-of-government framework that is evidence based, transparent, and accountable at the highest levels. Acknowledging the importance of DFV specialist women's-led services, ensuring lived experience is embedded in policy decisions, and implementing a child-centred practice approach are all crucial components to effective reform. Our intention is to provide an overview of the most critical areas of focus for the Commissioner, which will be expanded upon in WSSSA's substantive submission responding to the terms of reference.



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SYSTEMIC CHANGE IS NEEDED

Systemic change is desperately needed in South Australia to ensure that women and their children can live safely and without fear. This Royal Commission will provide the government, policy experts, and community services with the data and experiences required to thoroughly understand the barriers to safety for women, children and others experiencing violence right across our entire service system. We need a whole-of-government strategic and integrated approach to preventing and responding to DFV, and that means from the top down.

The Premier, relevant ministers, government departments and associated agencies, specialist women's services, health, mental health, child protection, the justice system (SAPOL and the Courts Administration Authority) – we all have a responsibility to ensure women and their children are safe from violence, and how we work together to create meaningful and lasting change is crucial to this success. Cross-sector collaboration which supports integration and increasing the capacity of services to coordinate responses across sectors and between services is crucial.

Domestic family and sexual violence is a much larger problem than any one reform cycle. Local specialist women's services require longer funding cycles to ensure priority programs are delivered in areas of highest need, and data collection is improved and shared to provide targeted responses where it will have the most impact. Short-term funding arrangements result in specialist services competing for small pots of money, and programs very limited in their scope and reach, despite demand for services increasing exponentially.

Recommendation 1: Information sharing, data development and analysis across government departments and service providers needs to be shared (with privacy concerns taken into consideration) and better coordinated. No single government or service can be the solution; a collective approach is needed to address this systemic problem.

Specifically, there is no, or limited, data on¹:

- children's experiences, including attitudes, prevalence, severity, frequency, impacts and outcomes of these forms of violence
- specific at-risk population groups, including Aboriginal and Torres Strait Islander people, people with disability, and lesbian, gay, bisexual, transgender, queer and intersex (LGBTQI) people, including those in same-sex relationships
- the effect of known risk factors, such as socioeconomic status, employment, income and geographical location
- services and responses that victims and perpetrators receive, including specialist services, mainstream services and police and justice responses
- pathways, impacts and outcomes for victims and perpetrators

¹ AIHW, [Family, domestic and sexual violence in Australia](#), 2018





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- the evaluation of programs and interventions.

IMPORTANCE OF SPECIALIST SERVICES

“Where possible, specialist crisis services responding to victims/survivors of violence against women should be run by independent and experienced women’s nongovernmental organizations providing gender-specific, empowering and comprehensive support to women survivors of violence, based on feminist principles.” UN Women (2012) Handbook for National Action Plans on Violence against Women²

WSSSA is an experienced specialist provider in the South Australian community sector providing skill-based training drawing on the latest domestic and family violence research and practice frameworks. We offer a suite of relevant courses relating to recognising and responding to DFV, safety planning, responding to disclosures, risk assessment, safety management, coercive control, family safety framework and many others.

Experience tells us that failure to sufficiently resource specialised women’s services has a direct impact on early intervention and prevention work. Specialist staff are trained to understand trauma and address the multiple and complex needs of survivors / victims as well as the impact of decisions and actions taken. This understanding can help dismantle barriers to services and assist clients to navigate complex systems such as child protection, police, courts, immigration and income support

Specialist women’s-led services, provide expert, integrated and coordinated support for victim-survivors, through domestic and family violence services, sexual assault and rape crisis services, women’s legal services, and women’s health services. Women-only and women-led services are widely acknowledged in international minimum support standards and frameworks.³ Our work is underpinned by an understanding of gendered violence, and we work within a holistic client-centred, trauma-based framework that enables victims and survivors to trust the service and support they are receiving so they can determine their pathway to recovery and live free of violence

Keep gender analysis central.

It is important to recognise and acknowledge the role that feminism and the women’s movement in Australia played in making domestic violence visible as one of the biggest social problems in our society. This history is important, when reflecting on the contribution the women’s movement has had on advocating for shelters/refuges, emotional and practical support for women and children, and being at the forefront of calls for social change, including legal responses to the perpetration of domestic violence.

² <https://www.un.org/womenwatch/daw/vaw/handbook-for-nap-on-vaw.pdf>

³ Council of Europe (2006) Combatting Violence Against Women: Stocktaking study on the measures and actions taken in Council of Europe member states (2006)

[http://avrupa.info.tr/fileadmin/Content/Downloads/PDF/CDEG\(2006\)3_en.pdf](http://avrupa.info.tr/fileadmin/Content/Downloads/PDF/CDEG(2006)3_en.pdf)



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It was, and still is, feminism that continues to centralise gender and coercive control in analyses of domestic violence. This advocacy and evidence must be sustained in a climate where the debates and contestations of gender continue in this space.

Recommendation 2: The state government must prioritise funding and resourcing of the specialist women's DFV services in prevention and response to all forms of violence against women.

Recommendation 3: Specialist women's DFV services must be identified as a priority program across government, with dedicated funding and coordinated integration with services that work with Aboriginal and Torres Strait Islander women, women with disabilities, women from culturally and linguistically diverse backgrounds, LGBTIQ services and services for women who live in regional, rural or remote areas.

IMPORTANCE OF ABORIGINAL COMMUNITY CONTROLLED ORGANISATIONS (ACCOS)

The right to self-determination is based on the simple acknowledgment that Aboriginal and/or Torres Strait Islander people are Australia's first people, as was recognised by law in the historic Mabo judgement. It is enshrined in multiple international and domestic human rights instruments.

In SA, there are a range of Aboriginal and Torres Strait Islander specialist family violence services located within Aboriginal Community Controlled Organisations (ACCOS), programs in community health services and local family violence services.

It is crucial that we recognise, and are guided by, the pivotal role played by ACCOs in delivering culturally secure services to Aboriginal and Torres Strait Islander people across South Australia. We know that when Aboriginal and Torres Strait Islander people have access to place-based, locally led and culturally safe services the outcomes for success are far better.

Recommendation 4: The state government must increase funding to specialist women's ACCO services to provide culturally safe services to support communities impacted by gendered violence.

Recommendation 5: Any strategy or action plan for the state must be developed and delivered alongside ACCOs, acknowledging the views, knowledge and experience of Aboriginal and Torres Strait Islander people to determine their own governance and engagement arrangements.

STRATEGIC VISION, LEADERSHIP, GOVERNANCE AND ACCOUNTABILITY

With minimal coordination at a whole-of-government level, South Australia is falling behind in its response to domestic, family and sexual violence. We need an overarching state specific strategic vision, informed by the National Plan that recognises the complex and intersecting



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drivers of DFV, and responds in a way that elevates it to a public health issue that affects all facets of society.

By focussing on a women in crisis model, and not equally focussing on prevention and early intervention, our current approach will not result in a significant reduction of DFV in our community.

It is critical that the South Australian government establish an overarching governance mechanism to drive and oversee the development and implementation of a whole-of-government statewide strategy that responds to the Royal Commissioner's recommendations. To ensure that this receives the response and attention it deserves, an independent Office for the Prevention of Domestic, Family and Sexual Violence must be established. This would support the centralisation and coordination of funding and contract management for SA's domestic, family and sexual violence services system.

WSSSA sees this overarching governance mechanism as an essential component to effectively drive, oversee and implement a whole-of-government strategic approach that provides integration and coordination across systems.

Recommendation 6: 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.

Recommendation 7: That a Chief Executives governance group be re-established, chaired by the Minister for the prevention of domestic, family and sexual violence. This high-level governance group would consist of the Premier, Attorney-General, Ministers for Aboriginal Affairs, Health, Education, Human Services, Housing, Child Protection, Police & Corrections. Chief Executives of the relevant departments, Police Commissioner, Courts Administration Authority – which includes Coroner's Court, relevant ACCOs and DFV sector representation.

The purpose of this high-level group not only elevates the issue of DFV to the highest level in the state, but also ensures there is accountability and oversight to policy responses across government. This group would also oversee the implementation of Royal Commission recommendations, funding distribution, as well as oversight and accountability to long term plan in eliminating violence against women and their children.

Recommendation 8: The government review the existing structure of the DFV Multi Agency Responses Governance (MARGG) Group to broaden its remit and membership to develop a whole-of-government framework for action featuring a vision statement, guiding principles and outcomes.

- **This new structure would enable a whole of system accountability and transparency, serve as a robust guiding framework for policymakers, and ensure a coherent and clear plan of activity is guided by shared data to provide a clear picture of what is happening, and inform targeted service responses.**



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Recommendation 9: The MARGG be responsible for signing off on the funding distribution from the Federal Government for implementing the *National Plan to End Violence against Women and Children 2022-2032*, to ensure it aligns with strategic directions and priorities for South Australia.

Recommendation 10: The state government establish an Office for the Prevention of Domestic, Family and Sexual Violence within the Department of Premier and Cabinet to:

- **Coordinate funding and contract management across the DFV service system**
- **drive quality, sustained uptake of prevention work across the state**
- **build knowledge and evidence about what works to prevent violence**
- **keep prevention on the policy and public agenda**
- **support social change and educating the community that violence is preventable**

SOUTH AUSTRALIAN DOMESTIC AND FAMILY VIOLENCE SAFETY ALLIANCE

The South Australian Domestic and Family Violence Safety Alliance, “the Alliance” was established in 2021, with the aim to make it easier for vulnerable people to get the help they need when they need it. The model was based off the now disbanded Glasgow Alliance model on addressing homelessness.

The purpose of the Alliance is to provide specialist domestic and Aboriginal family violence services to victim-survivors across South Australia through 8 service delivery partners and 19 services, alongside government partners.

While the Alliance has overseen the formalising of the statewide DFV accommodation partners and the roll out of the Safe at Home program, WSSSA remains concerned that the model it operates under is designed for homelessness, not the specialised needs of DFV services and clients.

Recommendation 11: An independent review into the South Australian Domestic and Family Violence Alliance be established to investigate:

- **The impact of the Alliance on client outcomes and sector coordination**
- **The role of NGOs undertaking contract management functions**
- **Governance risks of financial responsibility**

DOMESTIC AND FAMILY VIOLENCE DEATHS – REVIEW NEEDED

“Death review is designed to prevent future avoidable deaths by identifying patterns and risk factors and by reviewing the effectiveness of policies, protocols and services designed to



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*protect the vulnerable.*⁴ Australian Human Rights Commission, *A National System for Domestic and Family Violence Death Review 2016*

Domestic and family violence is a feature in a high proportion of homicides and suicides in Australia. Data from the Australian Institute of Criminology shows that the most common relationship between a homicide victim and offender is a domestic relationship.

The first Australian Domestic and Family Violence Death Review Team was established in Victoria in 2009 to review deaths where there has been a context of domestic and family violence.⁵ Death review is a forensic investigation into the complex array of factors and circumstances that have bearing on domestic and family violence death, examining and evaluating all factors that could have assisted in preventing the death.⁶

In 2011, a Senior Research Officer (Domestic Violence) position was established within the South Australian Coroner's Office through a partnership between the Office for Women and the Coroners Court of South Australia.

For reasons unclear to WSSSA, this position was defunded in 2021, meaning that South Australia currently has no dedicated formal mechanism to research and investigate deaths where there is a context of domestic and family violence.

This has left South Australia on the outer and unable to participate in and contribute to the Australian Domestic and Family Violence Death Review Network to the extent of other jurisdictions. This national Network not only shares data, and analysis, but is currently working towards nationally consistent data collection in relation to domestic and family violence-related deaths.

Recommendation 12: The dedicated research position in the coroner's office be re-established as a matter of priority, to research and investigate deaths where there is a context of domestic and family violence.

WE MUST NOT LOSE SIGHT OF PREVENTION

Preventing family violence and violence against women is a challenge that belongs to us all and is critical to the success of efforts to eradicate violence against women and their children. Tackling the underlying drivers of violence must be at the forefront of any strategy adopted by government. We need targeted and cohesive strategies for primary prevention in conjunction with crisis response efforts – not one or the other.

Without a solid understanding of what drives all different forms of family violence, we won't know what will work to prevent it from happening in the first place.

⁴Australian Human Rights Commission, [A National System for Domestic and Family Violence Death Review](#), 2016

⁵ As above

⁶ As above



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Effective governance, infrastructure and coordination, including for research, standard setting, workforce development, monitoring and evaluation will ensure there is greater consistency in primary prevention efforts in South Australia, to align with our responsibilities under the National Plan.

Following on from the Royal Commission into Family Violence, Respect Victoria was established as a statutory authority under the Prevention of Family Violence Act 2018 (the Act) to fulfil Recommendation 188 of the Royal Commission.⁷ The establishment of Respect Victoria recognises that primary prevention — which is distinct from early intervention — is critical to bringing an end to violence. Building prevention structures and systems is key when developing best practice primary prevention programming.

Recommendation 13: The state government must commit to ongoing and sustainable funding models for primary prevention and gender equality.

EXPAND HUBS FOR CRISIS AND EARLY INTERVENTION

WSSSA sees benefit of development of hubs - placed based responses which are focused on crisis and early intervention responses that include women's NGO services, crisis responses, early intervention outreach support, Police, Legal services, health, Domestic violence disclosure scheme (DVDS), Migrant support and support services for children.

How services can work together at the point of crisis and earlier before it requires crisis accommodation can include service responses such as Safe at Home security upgrades, legal advice, Intervention Orders, Office of the Director for Public Prosecutions and Police Prosecution referrals for risk and safety reports, crisis counselling, information sharing, DVDS, risk mitigation, safety management,— all provided in a safe and confidential space

Recommendation 14: Roll out dedicated hubs in identified areas of need to provide a holistic response for crisis and early intervention cases.

RECOVERY AND WELLBEING MODELS

Currently, South Australia offers minimal programs to support long term recovery and financial independence. For these services to be effective, they need to be separated to the front end, crisis responses. Models for recovery and wellbeing must connect women and their children to community and longer-term interventions that can help stop the cycle for families and leads to living a life free of violence.

Developing multidisciplinary models that work for families with multiple and complex needs, means that families can navigate service systems and get the right help at the right time. There is no one size-fits-all approach for women and children – the system must be flexible, and able to provide support at whatever point of the cycle someone is in.

⁷ [Family Violence Reform Implementation Monitor](#), Respect Victoria



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Complexity of client issues is not a determining factor for access to WSSSA programs, rather it shapes determinations about how WSSSA can best support a family. This may be inclusive of referrals to alternative services, the development of a case plan, and the prioritisation of work related to particular needs.

Creating pathways to specialist services such as those in mental health, drug and alcohol, and community health is essential to wind back years of underfunding that has resulted in less people being able to access critical support.

Recommendation 15: We need to increase capacity and priority for DFV victims/survivors and strengthen services for: – drugs and alcohol – domestic and family violence – health (including mental health) – disability – education – justice – housing – employment services

Recommendation 16: With more than 30% of Zahra Foundation referrals coming from WSSSA, the importance of building the capacity of organisations that focus on financial independence and pathways to employment and/or education must be prioritised.

SILENT VICTIMS OF FAMILY VIOLENCE – CHILDREN

The Victorian Royal Commission's report referred to children as the "[silent victims](#)" of family violence. We need to explore our responses to children and young people and how we can ensure that the framework and response mechanism look into:

1. Crisis intervention – including crisis accommodation
2. Early intervention
3. Recovery therapeutic services

Although it is difficult to accurately determine the scope and impact of DFV on children, research and practice reveals DFV is experienced by many children. For example, more than two-thirds (68%) of mothers with children in their care when they experienced DFV reported that their children had seen or heard the violence.⁸

In 2022/2023 it was estimated that children made up more than 40% of our DFV shelter clients. When children and their mothers are living in DFV shelters, children may be removed from immediate harm that is the focus of the child protection system but will continue to have a range of needs that must be addressed for their immediate and longer-term wellbeing.

Child and family welfare practitioners come from a range of professional backgrounds with different qualifications, knowledge and skills and a systemic approach to protecting the best interests of the child depends on effective operation and interaction between the domestic and family violence service sector; child protection system; and the family law system.

⁸ AIHW, [Family, domestic and sexual violence in Australia](#), 2018





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WSSSA and the Department of Child Protection trialled a collaboration to develop an understanding about the ways in which children and families experiencing domestic and family violence and child protection concerns navigate and interact with the service systems⁹. The recommendations and findings from this collaboration formed the basis of a Flinders University study and will be explored in WSSSA's substantive submission.

Recommendation 17: Implement a child-centred practice approach within women's shelters and reinstate funding for specialist children's workers to ensure early intervention, crisis and recovery responses are targeted and effective.

Recommendation 18: Funding for specific early intervention, crisis and recovery training targeted at practitioners and services that are geared toward children and young people who have experienced family violence.

INVESTMENT IN TRAINING AND EDUCATION

For coordinated whole-of-government approaches to be successful, increased investment in specialist women's services to provide infrastructure, expertise, pathways and practices, as well as to develop workforce capability and capacity at the local level is needed.

WSSSA is South Australia's leading specialist in providing an integrated response to women and children experiencing domestic and family violence. As part of this work, WSSSA develops and delivers practice and skill-based training around recognising and responding to domestic and family violence. WSSSA delivers foundational, intermediate and advance level courses that address the core knowledge and skills required to respond to families affected by domestic and family violence, as well as more specialised modules that focus on exploring key high-risk factors.

WSSSA specialist training is evidence-based, culturally reviewed by First Nations and CALD practitioners; informed by practice and inclusive of lived experience voices. Specialist training is critical to build the knowledge, understanding and practice skills of the DFV sector and broader services system such as health, child protection and police.

Recommendation 19: With demand for training increasing, the government must commit to funding the rollout of core WSSSA training modules for government service providers and the sector.

⁹ Bastian, Wendt, Bromley 2023 *Building collaboration at the intersection of domestic and family violence and child protection: WSSSA and DCP*, Flinders University -



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