

CENTRE FOR  
Women's Safety  
and Wellbeing

Preventing violence  
Promoting health  
Advancing gender equality

## Safe Place Emergency Accommodation Program Inclusion Round

Submission to Engage, Department of Social Services

Centre for Women's Safety and Wellbeing

10 March 2023





## Acknowledgement of Country

The Centre for Women's Safety and Wellbeing acknowledges the Whadjuk Nyoongar people as the Traditional Owners of the land where our office is located. We acknowledge Aboriginal and Torres Strait Islander peoples of this nation, and we pay respect to Elders past and present. We acknowledge the continued deep spiritual attachment and relationship of Aboriginal and Torres Strait Islander peoples to this country and commit ourselves to the ongoing journey of reconciliation.

## Recognition of Victims and Survivors

The Centre for Women's Safety and Wellbeing recognises the strength and resilience of adults, children, and young people who have experienced domestic, family, and sexual violence and acknowledge that it is essential that responses to domestic, family, and sexual violence are informed by their expert knowledge and advocacy. We pay respect to those who did not survive and acknowledge friends and family members who have lost loved ones to the preventable and far-reaching issue of domestic, family, and sexual violence.

## About the Centre for Women's Safety and Wellbeing

The Centre for Women's Safety and Wellbeing is the leading voice for women and children affected by gender-based violence in Western Australia and the peak body for domestic, family and sexual violence services and community based women's health services in Western Australia. The Centre for Women's Safety and Wellbeing (the Centre) works to prevent domestic, family and sexual violence against women and their children; promote women's health and wellbeing; and advance gender equity. The Centre works to ensure that the evidence is taken up in policy and practice to further the safety, health and wellbeing of women and their children. We advocate for systems and structures that enable and support the safety, wellbeing and economic security of women. The Centre for Women's Safety and Wellbeing also promotes non-violent and respectful attitudes and behaviours towards women and girls in the broader community, and community responsibility for violence prevention.





## Introduction

The Centre for Women's Safety and Wellbeing (CWSW) appreciate the opportunity to provide feedback on the Safe Places Emergency Accommodation Program (Inclusion Round). To inform our response to this consultation, CWSW sought feedback from our members, which includes specialist family and domestic violence services.

CWSW is acutely aware of the need for more emergency accommodation for women and children escaping perpetrators of domestic and family violence. CWSW welcomes adding new and appropriate emergency accommodation places and is in support of improving access to appropriate emergency accommodation for First Nations women and children, women and children from culturally and linguistically diverse (CALD) backgrounds, and women and children with disability. However, there are concerns with the proposed approach to the grant opportunity outlined in the Safe Places Inclusion Round Discussion Paper. The most significant concern is regarding the grant amount and what it is allocated for (i.e. capital works only). This and other concerns are discussed in our responses to the questions below.


### **Question 1: Are the proposed funding amounts of between \$500,000 and \$8 million per project appropriate for Inclusion Round grants?**

Members have emphasised that the amount of funding is not appropriate. The minimum grant awarded, \$500,000, does not provide sufficient funds for most small-scale projects, likewise, the maximum grant awarded, \$8 million, is not sufficient for larger projects, such as new purpose-built accommodation.

For example, a regional refuge in Western Australia was awarded \$5.8 million through the Safe Places Grant Program (First Round), and they obtained additional funding through other grants. The grants totalled \$7,259,100; however, the total capital build project is estimated to cost \$8.61 million, leaving a funding shortfall of \$1.35 million.

The members noted that the funding amounts do not account for the cost of land. If land were to be purchased, it would be a substantial upfront cost, particularly considering the proposed accommodation is expected to be close to transport, medical services, schools, and so forth. Land in the appropriate location is often not available in Western Australia, this would mean that applicants would likely need to purchase established buildings to renovate or renovate their own existing buildings.





Also, in Western Australia, most existing family and domestic violence emergency accommodations are communal living facilities and do not comply with the definition of 'safe place' outlined in the Discussion Paper and accepted by the Australian Institute of Health and Welfare (AIHW). As such, extensive renovations are needed to provide new, additional safe places in Western Australia which would necessitate significant funding.

Additional concerns from the members are that the funding does not contribute to the upkeep of the building although the grant is expected to fund a 15-year project. The cost of upkeep could be an unmanageable burden and potential risk for many not-for-profit organisations, particularly community based services.

For instance, the Government of Western Australia recently funded a purpose-built emergency accommodation service to be constructed in the south metropolitan area. Once completed, the new build was then contracted to a long-standing, community based, not-for-profit organisation that provides services and support to women and children who have experienced domestic and family violence. When the organisation took this on, the ongoing costs were not known and it has been challenging for them to absorb these costs (i.e., land rates, utilities).

Members also pointed out that renovating an existing service or building a new facility to create new, additional safe places will require additional staffing. The members highlighted the need for additional funds to appropriately staff and resource the new, additional safe places. In particular, the additional funds that may be required to provide appropriate support for women and children with disabilities. An accessible building is only one aspect of being an accessible service, supporting women and children with disabilities will also require bringing in specialised staff. Many services do not have these resources and access to specialised staff. Without staff and resources to support the safe places and deliver quality services, services may be set up to fail.

The sustainability of community based services needs to be considered and accommodated from the outset. The proposed grant opportunity should include funding to cover operational costs for the duration of the project, this includes upkeep, ongoing costs and staffing.





## **Question 2: Should applications for mixed-use type proposals secure funding (e.g. loans, state funding, philanthropy) for the long-term housing aspects of their proposal prior to seeking Inclusion Round funding?**

If the applications for mixed-use type proposal should secure funding prior to submitting their Inclusion Round grant application, then the lead-in time should reflect this. Our members have suggested that an appropriate lead-in time would be 12-18 months, this time also allows appropriate time for consultation. A short lead-in time is not sufficient time to secure funding from other sources.

## **Question 3: Is the proposed milestone schedule the best model for delivering capital grants under the Inclusion Round?**

Members who have recent experience with building projects shared that the building sector in Western Australia is currently fraught with problems due to a shortage of materials and skilled workers, this poses considerable risks and challenges to building and renovating, which can be difficult not-for-profit organisations to manage financially. Considering this, members suggested that more funds be allocated to Milestone 1, Signing of the Grant Agreement, to ensure organisations can cover the up-front costs.


## **Question 4: Will Development Periods encourage community based FDV service organisations to apply for funding?**

### **a. Is 6 months an appropriate timeframe for the Development Period?**

All organisations should be given sufficient time to develop a high-quality proposal. Members suggest all applicants be granted 12-18 months to develop a proposal. A 12–18-month lead-in time is needed to develop a robust funding model, quality service model and facilitate thorough consultations with a range of stakeholders and specialists.

Many community based family and domestic violence specialist services have limited staff and resources, and are without sufficient capacity to develop grant proposals in short-time frames. Potentially, a short time frame will disadvantage the smaller organisations whose lack of capacity is not indicative of their capability and the level of specialist knowledge and skills that they hold to deliver trauma and violence informed practice. The requested lead-in





time of 12-18 months should be given to all applicants to provide a fair and equitable opportunity.

### **Question 5: Are there other ways to support applicants to develop high quality proposals?**

Members of CWSW suggest that funding and resources be allocated to supporting organisations to develop their proposals. As indicated above, not all services have the staff and resources to develop high-quality proposals, yet they may be the best placed in terms of delivering evidence-based, safe and quality services.

### **Question 6: Are the proposed eligibility and assessment criteria appropriate and able to be demonstrated?**

#### **Eligibility Criteria**

The eligibility criteria states ‘evidence of capability to deliver appropriate family and domestic violence specialist services may be required’, this should be changed to ‘evidence of capability to deliver appropriate family and domestic violence specialist services is required’. It is critical that this funding is awarded to services that have specialist knowledge in domestic and family violence and can provide best practice and enhance safety and quality outcomes for women and children who have experienced domestic and family violence. Otherwise, there is a risk that the service will cause harm and further trauma to the women and children they are supporting.

The eligibility criteria notes that the delivery model should be consistent with the standards and requirements in the relevant state. However, some states and territories do not have standards and requirements, as such this component of the criteria does not ensure that the service will be delivering trauma and violence informed practice. It is suggested that national standards and requirements be developed for specialist domestic and family violence services to ensure service provision is trauma and violence informed, inclusive and culturally safe.

The inclusion of the National Principles for Child Safe Organisations is important. However, not all services may be able demonstrate that these principles are upheld. For example, in Western Australia, not all services have been provided with the resources and support to implement and demonstrate these principles.





## Assessment Criteria

The assessment criteria should include consultation as a requirement. Organisations developing a proposal need to consult with a range of experts and stakeholders to ensure services are appropriate for the local area, environmentally sound, culturally safe and trauma-informed. All applicants should evidence that they have consulted with a range of stakeholders in their local area, including Aboriginal elder and Aboriginal Community Controlled Organisations (ACCO), individuals and groups that represent culturally and linguistically diverse women and children as well as women and children with disabilities.

### Question 7: Are there additional criteria that should be considered?

Members suggest that LGBTIQ+ communities be included rather than grouped into 'other cohorts'. Family and domestic violence specialist services need to be capable of delivering safe and appropriate support to women in the LGBTIQ+ community who are experiencing domestic and family violence. This should be reflected in the criteria and demonstrated by applicants.


### Question 8: What are the best measures to determine an applicant's suitability to meet the needs of First Nations women and children?

As noted above, providing evidence of consultation with local Aboriginal elders and ACCOs in the development of the proposal is one measure to determine applicant's suitability to meet the needs of First Nations women and children. Applicant's partnering with ACCOs is strong measure of suitability. Other measures include establishing an Aboriginal Advisory Group to make certain decision-making is culturally safe for First Nations women and children, developing a service model that demonstrates a commitment to providing staff with cultural competency training and ongoing cultural supervision, and ensuring staff understand the different types of abuse First Nations women and children may experience and the impact it can have on their lives.

### Topic 3 Question 9:

Measures to determine an applicant's suitability to meet the needs of women and children from CALD backgrounds are similar to those outlined in question nine. These measures





include evidence of consultation with local individuals and groups who represent culturally and linguistically diverse women and children in the development of the proposal, partnering with services who specialise in supporting culturally and linguistically diverse women and children, developing a service model that demonstrates a commitment to providing staff with cultural competency training and ongoing cultural supervision, and ensuring staff understand the different types of abuse women and children from CALD backgrounds may experience and the impact it can have on their lives.

**Question 10: What are the best measures to determine an applicant's suitability to meet the needs of women and children with disability?**

Measures to determine an applicant's suitability to meet the needs of women and children with disability are similar to those outlined for the other cohorts. Measures include evidence of consultation with local individuals and groups who represent women and children with disabilities in the development of the proposal, partnering with services who specialise in supporting women and children with disabilities, ensuring staff understand the different types of abuse women and children with disability may experience and the impact it can have on their lives. Another measure needed to determine an applicant's suitability to meet the needs of this cohort is a commitment to providing an accessible service, in terms of the building structure as well as employing staff who are skilled to respond to the varying needs of women and children with disability and able to work collaboratively with health professionals.

**Question 12: Is the proposed designated use period of 15 years appropriate?**

Members understand that that a longer term can provide stability and time to complete the capital works, however, 15 years is not an appropriate period. The proposed designated use period should more closely align with the funding contracts to deliver service provision. In Western Australia, service provider contracts are four to five years.







**Question 14: Are the definitions for ‘emergency accommodation’, a ‘safe place’, and a ‘specialist service’ appropriate?**

**a. Should the definition of ‘emergency accommodation’ include longer stays?**

Overall, members agree with the definition of ‘safe place’, however, it needs to be acknowledged that many of the emergency accommodation services in Western Australia do not meet this definition and this needs to be considered when awarding funding.

## **Summary / Conclusion**

It is critical that this funding is awarded to services that have specialist knowledge in domestic and family violence and can provide evidence-based best practice. Yet, many community based family and domestic violence specialist services have limited staff and resources to develop high quality proposals in short-time frames and, if awarded the grant, limited resources to cover operational costs for the duration of the project. The Safe Places Inclusion Round needs to factor in smaller, community based family and domestic violence specialist services in regard to the amount of funding awarded, what the funds are allocated for, obtaining secure funding, the development period of the proposal, and the period of use. If the Inclusion Round details are not amended to suit community based family and domestic violence specialist services, the grants may not be accessible to smaller, community based family and domestic violence organisations who have the specialist knowledge and skills to deliver trauma and violence informed practice.

