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**Domestic and
Family Violence
Safety Alliance**

DFVSA Feedback

March 2023

Safe Places Accommodation Inclusion Round

Domestic and Family Violence Safety Alliance (DFVSA)

The Domestic and Family Violence Safety Alliance (DFVSA) provides specialist domestic and Aboriginal family violence services to victim-survivors across South Australia through our 8 service delivery partners and 19 services, alongside government partners. The service partners are:

- Women's Safety Services South Australia (WSSSA)
- Centacare Catholic Family Services (CCFS)
- Centacare Catholic Country Services (CCCSA)
- Yarredi
- Nunga Mi:Minar
- Uniting Country South Australia
- Junction Australia
- The Salvation Army

The Alliance is proud to have 2 Aboriginal-specific services as partners in this work - Nunga Mi:Minar is an ACCO based in Adelaide, and Ninko Kurtangga Patpangga is a specialist Aboriginal service provided through WSSSA in southern Adelaide.

Our services support over 4,500 people annually, and include local place-based support and state-wide services such as the Domestic Violence Crisis Line. Services provide support in a range of accommodation types, primarily including hotels, motels, caravan parks and other providers of Emergency



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Accommodation Program accommodation, service-led crisis accommodation (often congregate sites of 4-10), Supportive and Transitional Housing Program accommodation. We also provide SA-wide Safe at Home support, supporting women and children to remain in a home of their choosing in a uniquely integrated model.

As the primary providers of frontline crisis DFV specialist support, we are uniquely positioned to provide input and feedback on this proposal, and welcome the opportunity to ensure that specialist services, including Aboriginal-specific services, are included in the framing this important work.

DFVSA Feedback

General Feedback

While DFVSA is pleased to see specific funding and resources allocated to Aboriginal, multicultural and disability communities, we acknowledge that by defining 'inclusion' to specific communities, there are other communities who may need or benefit from specialist responses who are not considered – in particular, those who identify as LGBTIQ+. For example, in South Australia we do not have a specialist LGBTIQ+ service, nor specialist emergency or other accommodation tailored to this community's needs. However, this is a significant recommendation of a recent review of support for LGBTIQ+ community by the Alliance, and we would be happy to discuss this further. We absolutely acknowledge and honour that DFV is gender-based violence, and that women and children remain most at risk, but would welcome an opportunity to further explore safe accommodation options for victim-survivors who do not identify as female.

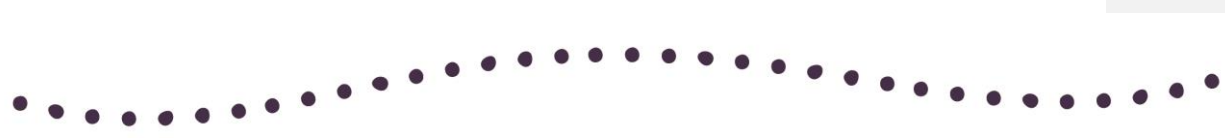
We also acknowledge that limiting to these communities negates opportunities for perpetrator responses (for example, where a police intervention may lead to the perpetrator being removed from the property, rather than the victim-survivor and children). We would be interested in exploring options where women were better supported to stay in a safe home and the perpetrator, ultimately responsible for the violence, can be removed.

Defining inclusion thus also potentially pits different communities against each other in a competitive tender process, which may result in additional inequity of access to accommodation across the country (for example, where some states only tender for accommodation for disability community without proportional funding available to all community needs based on a state-wide analysis of need). We do have some concerns that this funding may further 'other' communities who should be considered and included in all DFV service delivery, including built environment, and so would encourage strong engagement with broad community, with a strong intersectional lens and clear messaging regarding other funding and options available to communities outside those listed in this round.

Finally, and vitally, we strongly encourage specific and active engagement with leaders and those with lived experience from these communities in the development and procurement process for this process, including active inclusion in the decision-making process to ensure that appropriate, community-informed and victim-survivor led processes are embedded. This could be embedded through the Selection Advisory Council, if appropriate.

Questions:

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



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We feel that having a minimum funding amount may reduce opportunities for small, but impactful, projects. This may particularly impact on regional areas where there may be limited demand or capacity for large-scale projects, but there are opportunities for refurbishing or retrofitting existing decommissioned or underutilised stock to provide better options for local communities. We would encourage a reduction or elimination of the minimum amount to ensure that local, impactful projects are eligible.

While we appreciate that this is a capital works project, and acknowledge that this is sorely needed in our state (as evidenced by ongoing reform around the existing Emergency Accommodation Program), we are concerned that there are no funds allocated to partner service delivery agencies who provide direct specialist services for victim-survivors. We fully agree with the position that emergency accommodation must be linked with specialist, quality case management and client support services provided by specialist DFV services. However, ensuring that the case management/support element is adequately funded is hugely important. This is a sector that is consistently required to do more with less, and the power imbalance created by funding solely for capital works without funding to support administrative and/or service delivery components of partner agencies may put increased pressure on service delivery organisations. We acknowledge that for some, this may be incorporated into business as usual (particularly if the capital works directly replace inappropriate existing accommodation types), but we also know that as demand continues to rise, the sector will continue to absorb increased workload in response. We would encourage flexibility in enabling a proportion of funding to go towards partner organisations, at a minimum to manage the administrative, reporting and associated costs, but ideally to support case management and support costs where this is unable to be redirected from elsewhere. If this is unavailable through this funding stream, ensuring that this is clearly linked to future funding options, and can be considered, would be appropriate.

We would also strongly encourage all proposals to ensure that ongoing tenancy maintenance and management costs are included for the lifespan of the project, and are adequately included in budgets and financial statements as they are fundamental to the operation of emergency accommodation and should be the responsibility of the applicant/accommodation provider rather than the specialist DFV service.

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?

We encourage proposals to consider the long-term sustainability of the housing/accommodation as part of proposals. While funding may not be fully secured, there should be a strong basis for any assumptions of longer-term funding with clear risks articulate. This should also be informed by specialist services to consider the longer-term accommodation needs of the sector and of emergency accommodation.

3. Is the proposed milestone schedule the best model for delivering capital grants under the Inclusion Round?

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?



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As this is contingent on budget remaining following the initial grants round, this may impact on the interest of, and ability for, community-based DFV organisations to apply, as there is no guarantee that this funding will be available. As this is a capital-based project, we would encourage the main grants round to include either a reduced threshold (see Q1 above) or to ringfence a proportion of funding to community-based organisations seeking smaller grants for local projects with a specific impact on their community.

5. Are there other ways to support applicants to develop high quality proposals?

Scope to consider financial support to smaller organisations to develop high quality proposals would be of benefit to those organisations with the skills and speciality but with limited capacity to commit to developing large high quality proposals. This was provided by the South Australian state government 15 years ago and was well-received by the sector to both support quality proposals and to limit the impact on existing service delivery and organisational management requirements.

6. Are the proposed eligibility and assessment criteria appropriate and able to be demonstrated?

'New (additional) safe places' should be defined – does this include an option to repurpose or reform existing accommodation, for example through refurbishing to increase capacity?

Defining the role of partnering specialist agency, where the primary applicant does not have specialist DFV service delivery as part of existing core business. While this may vary between applications, some consistency in ensuring that administrative or other costs (if not direct service delivery, which would be preferable) are included in any funding application, and identifying appropriate contracting modalities (i.e. sub-contracting, consortium bid, partnering proposal) to support agencies to understand the risk and responsibilities incurred in engaging in this process.

Priority locations should be developed as part of proportionate state allocation, to ensure that smaller states are not disadvantaged through this process. South Australia has a much smaller population than other states and territories, and those outside of metro areas are often relatively small populations across large distances and significant complexities. When compared with more densely populated states, this could disadvantage South Australian proposals where the need may seem lower, but there are extremely limited services or facilities available and where access and distance can be a significant barrier to emergency accommodation support. We would advocate for a minimum proportion of funding to be earmarked for each state/territory, with an additional amount to be based on more generalised criteria.

There are no minimum standards of EA included in this document – we know that current commercial offerings in SA are unfit for purpose, and we would encourage consideration for what minimum standards could be included in this process to ensure that victim-survivors' dignity, rights and needs are meaningfully addressed. This may include access to appropriate cooking facilities, laundry, outdoor/child-friendly spaces etc (noting that some of these are identified, but without specifics of what the requirements may be to be appropriate).

7. Are there additional criteria that should be considered?

Assessment should also include if the target community was engaged in the development of the proposal, and on evidence on the local needs that are being addressed through clear partnership or engagement with specialist DFV services and government to ensure that a holistic proposal suitable for the local target community is developed. While the capital works are important, the utility, appropriateness (cultural, accessible, safety, family-focused and otherwise) must be a core element of the assessment.



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

This should be co-designed with the Aboriginal and Torres Strait Islander community (at a minimum – led by would be preferable), noting that an appropriate mechanism for ensuring that local perspectives and input should be proactively sought and incorporated.

9. What are the best measures to determine an applicant's suitability to meet the needs of women and children from CALD backgrounds?

This should be co-designed with the multicultural community, noting that an appropriate mechanism for ensuring that local perspectives and input is proactively sought and incorporated and due consideration given to the diversity of this group.

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

This should be co-designed with the disability community, including peak bodies, and with due consideration for intersectional life experiences.

11. What standard of the Livable Housing Australia design guidelines should emergency accommodation for First Nations women and children, women and children from a CALD background and women and children with disability meet?

12. Is the proposed designated use period of 15 years appropriate?

This should also consider any projected demographic changes over the future years to ensure that built environment remains fit for purpose into the future (for example, ageing and/or younger populations)

13. What is the best measure for determining an applicant's ability to support clients using the emergency accommodation over the designated use period?

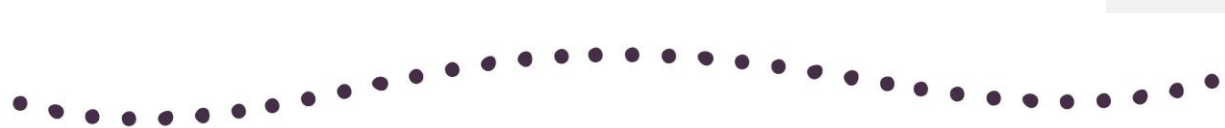
Experience and expertise in this space, including existing service delivery scope and practice, engagement with and appropriate support to target communities and endorsement from those communities. Aboriginal organisations should be prioritised to provide support and services with Aboriginal communities.

We would also encourage reference checks and/or letters of support from key government and specialist services to ensure that applicants have the appropriate skills, expertise and relationships with specialist services and departments to ensure high quality, evidence-based and client-centered specialist responses.

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?

While there is a definite dearth of emergency accommodation/safe place across the nation, and in SA in particular, how this impacts on and links to broader housing needs, medium-to long-term housing outcomes and recovery and healing support is currently missing in the definition of 'emergency accommodation'. This should include a consideration for those who may struggle to find appropriate housing outcomes due to a range of issues (including visa status impacting on ability to earn income or be



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eligible for public/community housing, institutional racism impacting on private rental options, accessibility needs impacting on the suitability of alternative housing exits).

Ensuring a flexible, person-centered and trauma-responsive service

is crucial to ensure that victim-survivors have access to the support and healing they need without unnecessary pressure to identify housing exits.

The definition of emergency accommodation should include information on minimum standards of the built environment (see point above), how it links to and supports the broader housing market and existing local/state/national systems and what appropriate options may include.

It should also encompass inclusive options, including options for single people and families and an assumption that nobody will be disadvantaged due to the size of household or occupancy rate requirements.

'Specialist service' should also have expertise and experience in supporting children, and have specialist staff/training/support for Aboriginal community, those with disability and/or multicultural community.

15. Are there alternative accommodation options that should be considered as eligible or not eligible for Inclusion Round funding?

There should be options to include accommodation for differing needs and circumstances, based on input and guidance from key communities with lived experience of DFV or from the target communities themselves. This would support the development of potentially innovative, more responsive and appropriate accommodation options which may not be considered otherwise.

16. What advice/templates/checklist items would assist applicants in developing quality proposals?

