

Submission

To	Department of Social Services
Topic	Second Action Plan (National Plan to End Violence against Women and Children 2022-2032)
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About

We are an inclusive not-for-profit community service provider working alongside more than 110,000 South Australians each year and have been creating positive change for South Australian communities for more than 120 years.

We advocate for systems change across diverse social justice issues to shape public and social policy that delivers better outcomes for marginalised communities. Our input is based on deep experience in the provision of related social and legal services to those impacted by DFSV. This includes:

- **GRIT (Growth, Resilience, Insight, Transformation):** Therapeutic support for young men and non-binary young people affected by, or at risk of using, family, domestic or sexual violence.
- **Ruby's Reunification Program:** Combines short-term accommodation, therapeutic counselling and family support to help young people and their families address conflict, improve relationships and achieve safe reunification where possible.
- **Therapeutic Counselling and Specialised Family Violence Service:** Trauma-informed counselling for adults, children, and families affected by FDSV. Including: Men's Behaviour Change, partner contact, and group programs.
- **Family Relationship Centre:** Delivers integrated family dispute resolution, counselling, parenting support and family law services to support families navigating relationship challenges, separation and parenting arrangements.
- **Family by Family:** Peer-led family support that connects families experiencing challenges with families who have navigated similar experiences.
- **Settlement Engagement and Transition Support (SETS):** Settlement support for migrants and humanitarian entrants to build independence and connect with their communities.
- **New and Emerging Communities:** Support for culturally and linguistically diverse communities, including migrants and refugees, to strengthen inclusion and access to services.
- **Specialist Elder Abuse Unit:** Provides an integrated lawyer and social worker model, combining legal advice, advocacy, counselling and case management to support older people experiencing elder abuse, including abuse by intimate partners and family members.

Submission to DSS Second Action Plan to End Violence Against Women and Children

Uniting Communities thanks the Department of Social Services for the opportunity to provide input into the Second Action Plan under the National Plan to End Violence against Women and Children 2022-2032. The consultation is a timely opportunity to identify practical priorities for the coming years, particularly as housing availability and affordability continue to affect the safety and wellbeing of women and children. In South Australia, implementation of the Royal Commission into Domestic, Family and Sexual Violence recommendations is underway, creating an opportunity to align state and national reform efforts and strengthen system responses.

The Action Plan should also recognise housing as a core safety issue. Without access to safe, affordable and appropriate housing, victim-survivors may be forced to remain in unsafe environments, return to violence or enter homelessness. Stronger alignment between family violence responses, homelessness services and housing policy will be essential to improving safety and long-term recovery.

The consultation's strong focus on children and young people in their own right is welcome. We agree that more targeted support is needed, including a better understanding of their voices and experiences to ensure services are responsive, effective and fit for purpose.

We recommend that the Action Plan place a strong emphasis on shared accountability and greater consistency across state, territory and federal systems, so outcomes are not dependent on where a person lives.

As a service provider working with children and adults who have experienced family, domestic and sexual violence, as well as those who use violence, we bring a holistic understanding of the system to our recommendations. As a provider of aged care services and a specialist elder abuse service, we also bring an important older person's perspective. Many of our services intersect with family, domestic and sexual violence, reflecting its overlap with alcohol and other drug use, homelessness, child protection and other service systems.

In summary, Uniting Communities recommends that the Second Action Plan prioritise nationally consistent, child-centred and whole-of-system responses to family, domestic and sexual violence. This includes tailored supports for children and young people in their own right, stronger capability across non-specialist services, sustained investment in perpetrator accountability and behaviour change, improved information sharing across systems, greater recognition of elder abuse within the family violence response, and stronger safeguards against technology-facilitated abuse and exploitation.

Priorities for the Second Action Plan:

- **Develop tailored responses for children and young people affected by family violence in their own right, including adolescents experiencing violence from a parent and children who use violence, with alternatives to adult-centric responses where these do not reflect their developmental, care and support needs.**

- **Strengthen the capability of non-specialist services to respond to family, domestic and sexual violence through training that goes beyond identification and includes trauma-informed responses, risk assessment, referral pathways and safety planning.**
- **Increase investment in perpetrator accountability and behaviour change initiatives, including collaborative and wraparound supports that address intersecting needs such as mental health and alcohol and other drug use.**
- **Develop a nationally consistent framework for information sharing, including shared definitions and risk principles, to support collaboration across health, community services, police and other relevant sectors.**
- **Strengthen legislative and regulatory requirements for online platforms to prevent technology-facilitated abuse and the sexual exploitation of children and young people, including online grooming, image-based abuse and harms resulting from online contact.**
- **Women arriving on family-sponsored visas receive education and support comparable to that provided to humanitarian entrants, including information on rights, protections, family violence and pathways to support.**
- **Recognise elder abuse perpetrated by intimate partners and family members within the family, domestic and sexual violence system, and ensure older women can access specialist FDSV services regardless of age.**

Consultation

1. Victim-survivors of domestic, family and sexual violence

CALD communities

It is important that the Action Plan recognises the unique experiences of violence, barriers to support, and service needs of people from culturally and linguistically diverse (CALD) backgrounds. There continues to be a concerning number of women from CALD communities, particularly those on humanitarian and family-sponsored visas, who report being fearful of disclosing violence or abuse within the home. These fears are often linked to concerns that seeking support may impact their visa status, jeopardise their residency, or result in family separation.

A key factor contributing to these concerns is the limited structured orientation, information and support available to some people arriving on family-sponsored visas, including partner visas and other family migration streams. Unlike many humanitarian entrants, people arriving through family sponsorship pathways may have limited access to information about Australian laws, rights and protections, pathways to support, and understandings of family, domestic and sexual violence.

As Australia's culturally diverse population continues to grow, ensuring a tailored and accessible response will be increasingly important. We support efforts to strengthen the capability of services to deliver culturally safe, trauma-informed and violence-informed responses for migrant and refugee communities.

This must be complemented by consistent education and support for new arrivals, regardless of visa category, so that people understand their rights and are aware of the services available to them.

Case study

An older woman arrived in Australia from Venezuela on a family-sponsored visa and was living with relatives. She paid rent to her daughter but experienced family violence within the household and significant social isolation. Due to limited English literacy and a lack of understanding of available services, she struggled to seek assistance and navigate everyday activities independently.

Elder abuse

Women are disproportionately affected by elder abuse, including abuse perpetrated by intimate partners, adult children and other family members. However, once women reach a certain age, they can become ineligible for specialist family and domestic violence services and are instead directed to elder abuse services. While specialist elder abuse services play a critical role in addressing a broad range of abuse and safeguarding concerns, it is inequitable that older women experiencing family violence may be excluded from accessing services specifically designed to respond to domestic and family violence.

It is important that the next Action Plan recognises the overlap between elder abuse and domestic and family violence and ensures that service responses are coordinated rather than siloed. There remain significant legislative and systemic gaps in responses to elder abuse, including limited protections for older people who need to evict a perpetrator from their homes without formal tenancy agreements, and inadequate mechanisms to address financial abuse and facilitate restitution. These issues can leave older women particularly vulnerable to homelessness, poverty and ongoing victimisation. We also see cases where poor information sharing across justice, police and support systems can compromise the safety of older victim-survivors, highlighting the need for nationally consistent approaches to risk assessment and information sharing.

Many older women experiencing intimate partner violence are leaving long-term relationships after years, and in some cases decades, of abuse. We are increasingly seeing women present with complex trauma, significant financial disadvantage, and a lack of safe and affordable housing options. The next Action Plan should ensure that older women are not overlooked within the broader family, domestic and sexual violence service system, and that they are able to access appropriate support regardless of their age.

2. Prevention and early intervention

Embedding FDSV across the service continuum

Family, domestic and sexual violence (FDSV) should be embedded across the service continuum, with a strong focus on early intervention. FDSV rarely occurs in isolation and is often interconnected with other issues, including child protection involvement, alcohol and other drug use, mental health issues, and homelessness. As a result, many people accessing community services and non-specialist family violence services are either experiencing or have experienced FDSV.

There is a significant opportunity to strengthen responses across the broader community services sector. However, service constraints, funding arrangements and contractual obligations can limit the ability of services to respond holistically to identified violence. Given the frequent contact that many frontline services have with victim-survivors and people using violence, they should be appropriately resourced and supported to identify and respond to FDSV. This should include consistent training for frontline workers that goes beyond identification and focuses on safe, effective and trauma-informed responses, referral pathways and risk management.

Services

Uniting Communities delivers the GRIT program, an innovative service focused on adolescent boys affected by, or at risk of using, family, domestic and sexual violence. While the service currently supports young people aged 12-18 years, we continue to receive referrals for younger children, including children as young as eight. This highlights both the broad age range of children requiring support and the need for earlier, developmentally appropriate intervention responses.

Tailored, one-to-one support models such as GRIT are particularly important, as they can respond to a young person's individual circumstances and experiences. There are also significant service gaps, particularly in regional areas. Expanding access to long-term, early intervention programs such as GRIT would help ensure children and young people receive support before issues escalate.

Front line response

Dedicated family violence officers within police services can provide specialist expertise and more appropriate responses to family violence incidents; however, access to these roles is not consistent across jurisdictions and locations. While police play a critical role in ensuring immediate safety, there are circumstances where a more therapeutic and engagement-focused response is also needed.

Consideration should be given to multidisciplinary models that partner police with social workers, family violence practitioners or advocates, similar to existing co-response models that have been trialled in mental health settings. These approaches can support earlier engagement with victim-survivors and families, particularly in lower-risk incidents where a police response alone may not lead to ongoing intervention. Expanding these models could help address missed opportunities for early intervention, prevent violence from escalating, and improve pathways to support for those experiencing or at risk of family violence.

Domestic Violence Disclosure Schemes

South Australia's Domestic Violence Disclosure Scheme is a promising early intervention initiative that supports people who may be at risk of family and domestic violence to make informed decisions about their safety. The scheme enables individuals to access information about a current or former partner's history of relevant violent offending, intervention orders and related concerns. Consideration should be given to expanding and strengthening domestic violence disclosure schemes nationally to provide consistent access regardless of location.

School-Based Prevention Programs

School-based prevention programs play an important role in promoting respectful relationships and preventing the development of harmful behaviours. We have seen positive outcomes through the delivery of the *Love Bites* program in South Australia, which supports young people to develop skills in healthy relationships, consent, communication and recognising coercive and controlling behaviours. Expanding evidence-based respectful relationships education, including programs such as *Love Bites*, should be a priority within the next Action Plan to ensure prevention messages reach children and young people early and consistently.

3. Children and young people in their own right

A strong focus on children and young people within the Action Plan is a welcome inclusion, including measures that support both victim-survivors and children and young people who use violence. Children and young people who use violence have distinct needs and circumstances that differ significantly from adults who use violence, and therefore require tailored responses.

We agree with the discussion paper's recognition that the current system remains largely adult-centric. This can result in fragmented and inconsistent responses that fail to adequately address the needs of children and young people. Too often, children are viewed primarily through the lens of their parent's experience and are treated as an adjunct to services provided to their mother, rather than being recognised as individuals with their own needs, experiences and rights.

The Action Plan should also recognise the complexities of family violence involving children and parents, including situations where violence is perpetrated by or towards children and young people. These circumstances require nuanced, specialist responses and appropriately resourced frontline services equipped to respond to the unique dynamics, risks and support needs involved.

Parent using violence

The current frontline response to children and young people affected by family violence is not always equipped to respond to the complexities of parent-child relationships and can rely heavily on approaches designed for intimate partner violence. Police are increasingly required to act as the primary responders to situations that often require broader therapeutic, family-based and child-focused interventions.

In South Australia, a common response to reported violence perpetrated by a parent towards an adolescent child is the use of an Intervention Order (IO). While Intervention Orders can be a mechanism for ensuring immediate safety, they can also create unintended consequences for young people who remain dependent on their parent or guardian for care and decision-making.

For example, no-contact provisions may prevent communication between the parent and child, as well as with third parties involved in supporting the family. Where child protection services are not able to assume or resume responsibility, this can leave young people without an active legal guardian able to make day-to-day decisions about their care. Community services are then often required to provide accommodation and support despite having limited authority to make decisions regarding the young person's health, education and wellbeing.

This can create significant challenges when responding to a child's care needs, particularly where parental consent is required for medical treatment or other important decisions. It can also limit opportunities for services to work with both the parent and child to address safety concerns and, where appropriate, support family restoration.

Family violence involving parents and children differs significantly from violence between adults because children and young people remain dependent on their caregivers. The Action Plan should support responses that balance safety with the practical care needs of the child, while providing pathways for therapeutic intervention, family support and reunification where appropriate.

Children and young people using violence

Ensuring an appropriate early response to children using violence is critical to preventing escalation over time. Responses must avoid the pathologisation and criminalisation of children and young people, as these approaches can undermine effective outcomes. As highlighted in the discussion paper, approximately 28 per cent of children exposed to family violence at a young age go on to use violence as adults. While this demonstrates an important correlation, it also highlights that the majority will not. Interventions must therefore be approached with care and avoid assumptions about a child's future behaviour.

We have supported many families experiencing adolescent violence in the home. In some cases, Intervention Orders (IOs) are being used in ways that do not adequately reflect the complexities of parent-child relationships. This includes circumstances where an IO is issued against a child without the parent's support or where the order prevents the child from living at home. In these situations, parents are often left to find alternative living arrangements for their child or face potential consequences if the order is breached.

Through our work, parents, most often mothers, frequently report that their primary need is not punitive action but access to support, therapeutic intervention and practical strategies to safely manage violent behaviour. Even where an IO permits the child to remain at home, reliance on a legal mechanism with potential criminal consequences can reflect an adult-centric response that is not always appropriate for children and young people.

The Action Plan should support the development of more tailored responses to child and adolescent violence, including national guidance for frontline services and police that promotes collaboration with specialist family violence, child and youth services to ensure responses are therapeutic, family-centred and developmentally appropriate.

E-safety and sexual violence

There has been a significant increase in technology-facilitated abuse impacting children and young people. Through our youth services, we have supported many young people who have experienced sexual exploitation and abuse following interactions with strangers online. This includes online grooming, the sharing of intimate images, sexual extortion, and sexual assault following contact initiated through digital platforms. The increasing prevalence of social media and online communication platforms has created new opportunities for perpetrators to target, groom and exploit children and young people.

Addressing this issue requires action across the prevention, early intervention and response spectrum. While education for children, young people and families remains important, responsibility must also sit with technology companies to prevent harm on their platforms. Digital platforms have access to technologies that can detect, disrupt and prevent offending behaviours and should be required to take proactive steps to improve online safety.

Evidence suggests technology-facilitated sexual abuse is a growing national issue. Recent work by the eSafety Commissioner highlights increasing rates of online sexual exploitation and sexual extortion, alongside concerns about platform responses. We recommend that the next Action Plan include a dedicated focus on technology-facilitated abuse, including online grooming, image-based abuse, sexual extortion and child sexual exploitation, alongside measures that strengthen platform accountability, prevention initiatives and specialist support services for victim-survivors.

4. People who use violence

Addressing the needs of people who use violence requires a balance between accountability and meaningful behaviour change. While accountability is essential, long-term prevention also requires effective interventions that support people to address and change their behaviour. Some people who use violence have also experienced violence or trauma themselves, reflecting the complex interplay between trauma, learned behaviours and intergenerational experiences of violence. This does not excuse the use of violence, but it highlights the importance of responses that address underlying drivers alongside accountability measures.

For adults, experiences of violence often intersect with other challenges, including mental ill-health and alcohol and other drug use. Behaviour change interventions should therefore be supported by integrated access to mental health, alcohol and other drug, and other relevant health services to maximise their effectiveness and support long-term change. The next Action Plan should place a stronger emphasis on responses for people who use violence, recognising that meaningful reductions in family violence require sustained investment in perpetrator accountability and behaviour change programs.

As noted above, the pathologisation and criminalisation of children who use violence can lead to poor outcomes and may undermine opportunities for early intervention and behaviour change. Responses for this age group should be developmentally appropriate and focused on support, accountability and addressing the underlying causes of harmful behaviour.

5. System integration and workforce

There is a need for a national framework for information sharing within the family, domestic and sexual violence (FDSV) system. Current arrangements are fragmented and largely governed by state-based legislation and frameworks. While Victoria's MARAM framework provides a structured approach to information sharing and risk management, it is limited to Victorian services and programs operating under

the state's legislative and funding arrangements. Other jurisdictions, including South Australia, lack a consistent cross-sector framework.

This can create barriers to effective risk assessment, case management and coordinated support. Information held by family violence, homelessness, alcohol and other drug, health and police services is often critical to understanding risk and supporting individuals and families experiencing FDSV. While child protection systems have clearer guidance regarding information sharing, there is no nationally consistent approach for responding to risks faced by adults experiencing violence.

Integrated and hub-based service models also play an important role in improving collaboration and coordination. Co-located services and strong partnership approaches enable more holistic, wraparound support and improve outcomes for clients with complex and intersecting needs.

Conclusion

We appreciate the opportunity to contribute to the development of the Second Action Plan under the National Plan to End Violence against Women and Children 2022-2032. Our experience highlights the need for more tailored responses for children and young people affected by family violence, including those experiencing violence from a parent and those using violence. Current responses are often adult-centric and do not adequately reflect the unique needs and circumstances of children and young people.

The next Action Plan should strengthen investment in perpetrator accountability and behaviour change, improve information sharing and coordination across systems, build the capability of frontline and non-specialist services, and ensure vulnerable cohorts, including CALD communities and older people experiencing violence, can access appropriate support. It should also include clear implementation responsibilities, measurable outcomes and transparent reporting so that reform commitments translate into practical and consistent change across jurisdictions.