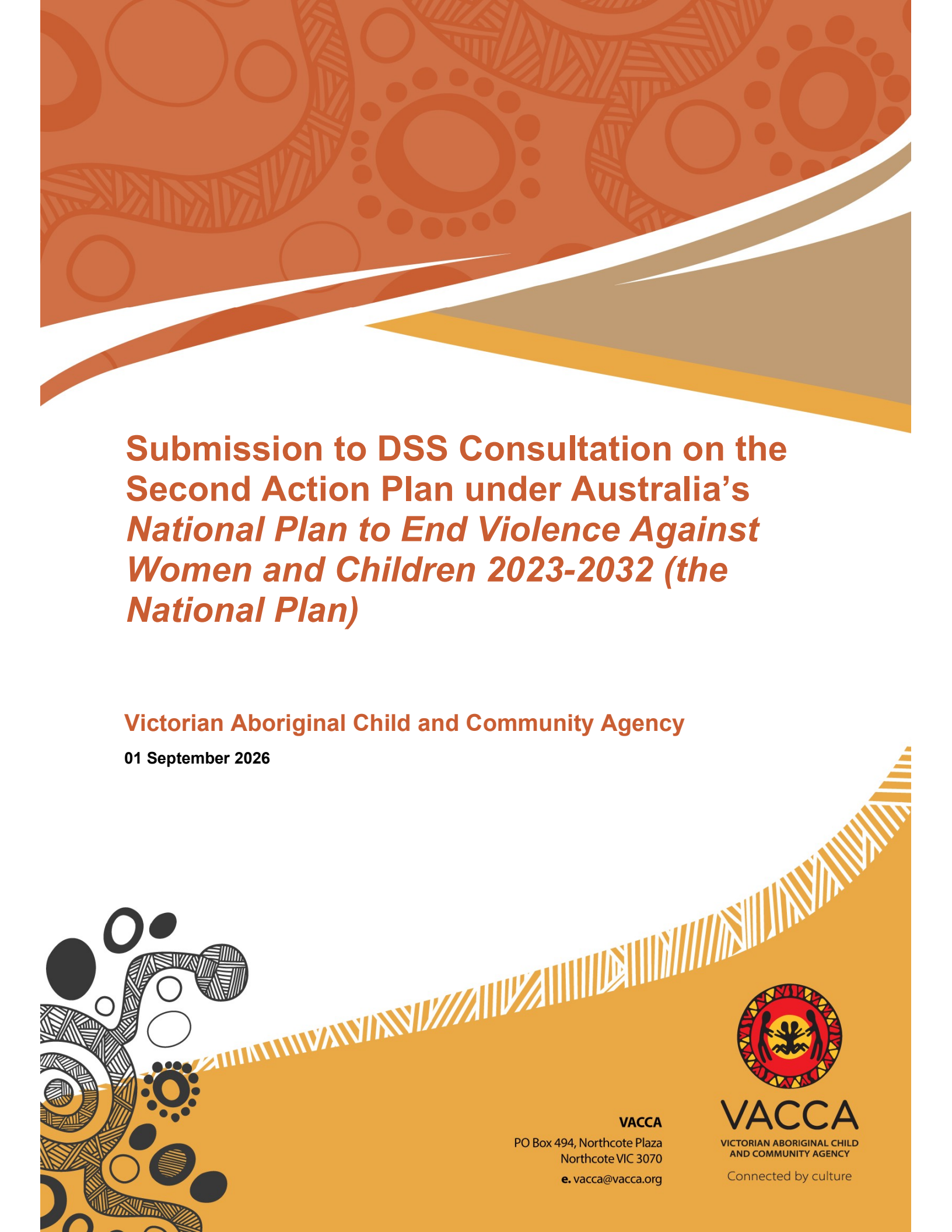




Submission to DSS Consultation on the Second Action Plan under Australia's *National Plan to End Violence Against Women and Children 2023-2032 (the National Plan)*

Victorian Aboriginal Child and Community Agency

01 September 2026



VACCA

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VACCA

VICTORIAN ABORIGINAL CHILD
AND COMMUNITY AGENCY

Connected by culture

Acknowledgment

We acknowledge the Traditional Owners of the lands across Victoria that we work on, and pay our respects to their Elders, both past and present and to their children and young people, who are our future Elders and caretakers of this great land. We acknowledge the Stolen Generations, those who we have lost; those who generously share their stories with us; and those we are yet to bring home.

Note on Language

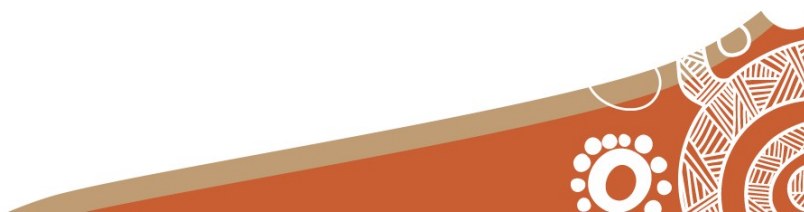
We use the term 'Aboriginal' to describe the many Aboriginal and Torres Strait Islander Peoples, Clans and Traditional Owner Groups whose traditional lands comprise what is now called Australia. We use the term 'Indigenous' as it relates to Indigenous peoples globally as well as in the human rights context. The terms 'First Peoples' and 'First Nations' are employed in the Australian context, by recognising that Aboriginal and Torres Strait Islander peoples are the First Peoples/First Nations of this land, it directly relates to their inherent un-ceded sovereignty.

Contact

We welcome the chance to discuss this submission in more detail. For further information, please contact [REDACTED]

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About VACCA

The Victorian Aboriginal Child and Community Agency (VACCA) is the lead Aboriginal child and family support organisation in Australia and the largest provider of Aboriginal-led family violence services in Victoria. We work holistically with children, young people, women, men, and families to ensure they have the necessary supports to heal and thrive. We do this by advocating for the rights of children and providing everyone who walks through our doors with services premised on human rights, self-determination, cultural respect and safety.

VACCA's family violence services support Aboriginal women, men, young people and children to heal from their experiences of family violence and move forward with their lives. Our family violence service footprint includes Outreach Services, Women and their Children Family Violence Case Management, therapeutic supports, Holistic Healing Groups for Elders, therapeutic sexual assault counselling services, crisis accommodation for women and children fleeing violence, programs and services for people using violence together with a range of early intervention, prevention and community awareness raising programs like Healthy Respectful Relationships and Cultural Camps for young people.

We provide support services to more than 9,800 children and young people, and their families and carers each year, as well as support services for Stolen Generations through Link-Up Victoria.

VACCA shows respect for observance of and compliance with Aboriginal cultural protocols, practice and ceremony. VACCA was established in 1976 and emerged from a long and determined Aboriginal Civil Rights movement in Victoria. Today, we continue to act, serve and advocate for the rights of Aboriginal Victorians, especially children, women and families.

While VACCA is a Statewide service provider, we operate primarily in metropolitan Melbourne, Inner Gippsland and the Ovens Murray regions. Across our six regions, VACCA operates in 36 locations delivering over 80 programs. We employ over 1300 staff, making it one of Victoria's biggest employers of Aboriginal people. Our Aboriginality distinguishes us from mainstream services and enables us to deliver the positive outcomes we achieve for our people.

VACCA is guided by Cultural Therapeutic Ways, our whole of agency approach to our practice of healing for Aboriginal children, young people, families, community members and carers who use our services, and to ensure that VACCA is a safe and supportive workplace for staff. It is the intersection of cultural practice with trauma and self-determination theories. The aim of Cultural Therapeutic Ways is to integrate Aboriginal culture and healing practices with trauma theories to guide an approach that is healing, protective and connective.

Executive Summary

Family violence continues to have unacceptable impacts on Aboriginal and Torres Strait Islander people, families and communities.

In Victoria, available data shows that Aboriginal people experience disproportionate rates of violence compared to non-Aboriginal people, and that the prevalence of violence against Aboriginal people is increasing disproportionately compared to non-Aboriginal people. One of VACCA's key concerns is the increasing prevalence of violence against Aboriginal children and young people.

Aboriginal people who experience family violence continue to face significant barriers to accessing safe and effective support, including systemic racism, misidentification by police, culturally unsafe services and inequitable access to Aboriginal-led responses.

The Second Action Plan presents a critical opportunity to address these disparities and improve outcomes for Aboriginal people and families. For this to occur, the Plan must be developed and implemented in genuine alignment with the National Agreement on Closing the Gap. This requires a shift **from** approaches that seek to adapt existing systems to Aboriginal people, **towards** approaches that centre Aboriginal self-determination, strengthen the Aboriginal Community Controlled sector and transform mainstream systems.

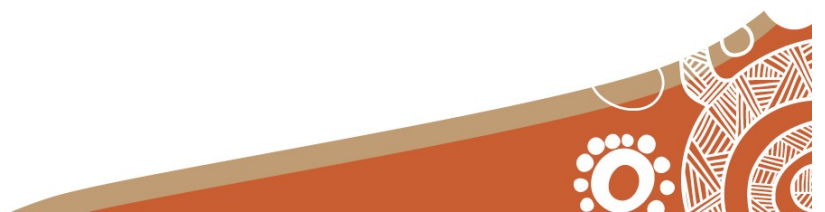
VACCA supports the development of the *Our Ways – Strong Ways – Our Voices Aboriginal and Torres Strait Islander Plan*, and recognises the importance of alignment between the National Plan and other national strategies addressing family violence, child protection and sexual violence. However, Aboriginal people's experiences and tailored responses cannot be relegated to the Aboriginal plan alone. The Second Action Plan must also respond to the needs of Aboriginal people and families.

VACCA's recommendations are aligned to the four Priority Reform Outcomes under the National Agreement on Closing the Gap: shared decision-making, building the Aboriginal Community Controlled sector, transforming mainstream institutions, and Aboriginal and Torres Strait Islander-led data. This includes proportionate and long-term investment in ACCOs, Aboriginal ownership and governance of data, accountability for systemic racism, and genuine Aboriginal participation in policy and funding decisions.

Across the five priority areas identified by DSS in the Consultation Paper, the Second Action Plan must strengthen culturally safe responses for people experiencing violence; address systemic racism and racial bias across police, courts, child protection and mainstream services; ensure equitable access to support across metropolitan, regional and remote communities; invest in Aboriginal-led prevention and early intervention; and strengthen culturally grounded responses for people who use violence. These responses must recognise the whole family and the intersectional experiences of children and young people, Rainbow Mob, Elders, people with disability, people experiencing sexual violence and Aboriginal men who experience violence.

The Second Action Plan must also recognise that family violence does not occur in isolation. Housing and homelessness, alcohol and other drug use, poverty, racism and involvement with the criminal justice and child protection systems can compound risk and undermine safety. Effective prevention and response therefore requires stronger integration across these systems, alongside greater national consistency in definitions, information sharing and risk assessment and management.

Aboriginal communities and organisations know what is needed to prevent and respond to family violence. The critical gap is sustained investment and the willingness of governments and mainstream institutions to share power, change practice and be held accountable for outcomes. The Second Action Plan must provide the mechanisms and resources to make this change.



Summary of Recommendations

Policy Alignment with the National Agreement on Closing the Gap

- **Recommendation 1:** Ensure alignment between the Second Action Plan and the National Agreement on Closing the Gap.
- **Recommendation 2:** Establish genuine partnership between Governments and Aboriginal communities, applying a cultural lens to all policy development and transforming Governments' approach to accountability, funding reform and self-determination.
- **Recommendation 3:** Recognise and resource ACCO-generated evidence as equally valid to Western evidence frameworks in policy and funding decisions.
- **Recommendation 4:** Implement an explicit cultural loading across all service funding to recognise the additional cultural, relational, healing and community-based work required to deliver culturally safe services.
- **Recommendation 5:** Include requirements for proportionate funding to ACCOs in all Commonwealth funding allocations to states and territories, including establishing ACCO-specific procurement processes, with transparency regarding proportion allocated to ACCOs and mainstream Community Service Organisations (CSOs).
- **Recommendation 6:** Commit to long-term, recurrent funding models that enable continuity of service, community connection and culturally responsive practice over time.
- **Recommendation 7:** Establish a stand-alone Aboriginal-led response to family violence, with governance and funding arrangements determined by Aboriginal communities.
- **Recommendation 8:** Implement accountability mechanisms to identify and address systemic racism across statutory and service delivery systems, including clear standards, independent oversight, and consequences for discriminatory practice to ensure institutions are held responsible for the experiences of, and outcomes for, Aboriginal and Torres Strait Islander peoples.
- **Recommendation 9:** Ensure Aboriginal communities have ownership, control, access and governance over data that relates to them, regardless of where it is held.
- **Recommendation 10:** Resource ACCOs to build data governance capability and infrastructure.

Policy Alignment between all Action Plans

- **Recommendation 11:** Ensure all plans, including the Second Action Plan, are aligned with, and respond to, the needs of Aboriginal families.

Improving Understanding and Interpretation of Data Trends

- **Recommendation 12:** Leverage Aboriginal knowledge and wisdom to understand data trends and inform prevention and response approaches.

Ensure Access to Culturally Safe and Responsive Support

- **Recommendation 13:** Ensure ongoing investment in training for all practitioners in the family violence sector, designed, led and delivered by Aboriginal people and organisations to build further understanding of the impacts of colonisation, the support needs of Aboriginal people and families and implementation of cultural safety in practice.

- **Recommendation 14:** Ensure funding requirements for mainstream family violence service providers include demonstration of cultural safety, including but not limited to Aboriginal oversight for every Aboriginal case
- **Recommendation 15:** Expand Aboriginal Access Points to all states and territories, led by local ACCOs and Aboriginal communities.
- **Recommendation 16:** Ensure that funding to ACCO's reflects the service demand for Aboriginal people requiring family violence services. Funding should be based upon service hours not case numbers, in recognition of the complex needs of Aboriginal clients.

Address Systemic Racism and Racial Bias in Practice

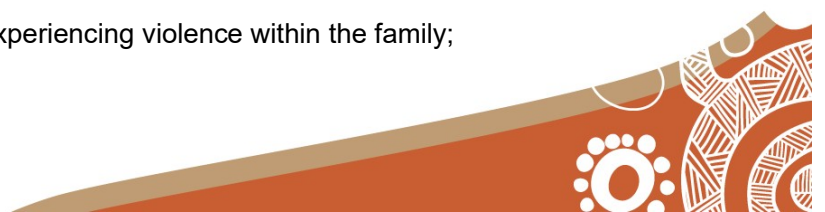
- **Recommendation 17:** Prioritise investment in ACCOs to deliver and expand Aboriginal-led, delivered and evaluated early intervention, prevention, and family preservation and reunification programs to address the risk factors that contribute to the involvement of Aboriginal families with the child protection system.
- **Recommendation 18:** Mandate comprehensive, ongoing anti-racism and cultural safety training for police, co-designed and delivered by First Nations organisations, with measurable outcomes.
- **Recommendation 19:** Strengthen data transparency requirements, including disaggregated reporting on police misidentification of Aboriginal and Torres Strait Islander people.
- **Recommendation 20:** Advance Aboriginal-led solutions that eliminate the misidentification of Aboriginal women as the 'predominant aggressor' by police, including improved training, accountability and review mechanisms that accurately collate data identifying its occurrence, prevalence and effective strategies for mitigation.
- **Recommendation 21:** Ensure policing responses to family violence across all jurisdictions are trauma-informed and culturally responsive, with mandatory consideration of historical patterns of abuse.
- **Recommendation 22:** Refine accountability measures and procedures on Police and Courts for when Family Violence Intervention Orders (FVIOs) are breached, with a focus on safety for the applicant.

Ensure Equitable Access

- **Recommendation 23:** Ensure equitable access to culturally responsive support across all regions through identifying and addressing ACCO funding gaps and resourcing program expansion across regional areas.
- **Recommendation 24:** Enable after-hours Aboriginal-led Family Violence support through resourcing the ACCO Sector.
- **Recommendation 25:** Mandate that mainstream service providers integrate Aboriginal cultural oversight into their out-of-hours service delivery.

Embed Inclusivity and Intersectionality

- **Recommendation 26:** Ensure family violence service delivery models reflect an intersectional understanding of family violence, accounting for the experiences of all Aboriginal people, families and communities, including:
 - Children and young people experiencing violence within the family;



- Young people experiencing intimate partner violence;
 - Young people using AVITH;
 - Rainbow Mob;
 - Elders;
 - People who have experienced sexual violence;
 - People with Disability;
 - Men who have experienced violence.
- **Recommendation 27:** Develop an Aboriginal-specific Family Violence Information Referral Portal to improve Community awareness of and accessibility to family violence support services. The portal must provide online service points be easily accessible via online search engines.
 - **Recommendation 28:** Call on Federal, State and Territory governments to build upon and expand therapeutic models of care, including VACCA's Aboriginal Children's Healing Team, to support children affected by family violence.
 - **Recommendation 29:** Invest in the development and delivery of targeted, holistic family violence support programs for young people experiencing and using violence in intimate partner relationships.
 - **Recommendation 30:** Invest in family violence therapeutic services for individual and family group work, alongside preventative programs such as healthy and respectful family relationship programs which are necessary in assisting the whole family to heal and build trust and support young people using AVITH.
 - **Recommendation 31:** Establish specialist disability worker roles within family violence services.
 - **Recommendation 32:** Establish an Aboriginal-led specialist integrated brain injury and family violence service.
 - **Recommendation 33:** Dedicate funding to expand healing-informed practice support delivered through the Aboriginal Sexual Assault Support Service (ASASS) and other statewide healing-focused programs, so children, families and carers have access to culturally grounded healing support alongside the investigative response.
 - **Recommendation 34:** Explore the trends and data around Child Exploitation/Grooming sitting alongside incidences of Sexual Assault (noting that criminal exploitation needs to be standalone category in reporting systems for more accurate data).
 - **Recommendation 35:** Improve data-sharing processes across Police, ACCOs, Child Protection and mainstream organisations around Persons of Interest for a faster disruption pathway.
 - **Recommendation 36:** Invest in place-based practice reviews, a cross-ACCO community of practice, and culturally grounded healing and youth voice - to develop a shared, evidence-based agenda for strengthening the sector's response for ACCOs, mainstream out-of-home care providers, and the Victorian Government (including DFFH).

Strengthening the Aboriginal Evidence Base

- **Recommendation 37:** Invest in Aboriginal-led evidence development, resourcing ACCOs to drive self-determined data collection according to Data Sovereignty principles.
- **Recommendation 38:** Collate national data to build an accurate national picture.

- **Recommendation 39:** Build a stronger evidence base on the crossover and intersection between other factors like alcohol and other drugs, housing and homelessness, unemployment, suicide, incarceration, deaths in custody, child protection.
- **Recommendation 40:** Invest in longitudinal studies on the long-term impact of prevention and early intervention programs, particularly those aimed at children and young people.

Long-term Investment in Aboriginal-led Prevention and Early Intervention

- **Recommendation 41:** Provide long-term sustainable funding for ACCO-designed and led prevention and early intervention programs.

Challenging the Drivers of Violence Against Aboriginal People in all Prevention Activities

- **Recommendation 42:** Actively name and challenge racism as a harmful attitude and key driver of violence against Aboriginal people in all prevention efforts.
- **Recommendation 43:** Embed Aboriginal-led, culturally responsive prevention and early intervention programs in the National curriculum for all students, both Aboriginal and non-Aboriginal.
- **Recommendation 44:** Ensure the Commonwealth and State governments do more to address and challenge the rise in racism, misogyny and other social drivers of family violence in society, with particular focus on media perpetuation of harmful narratives, social media and online forums where hate is being spread.

Engaging People Who Use Violence to Change Behaviour

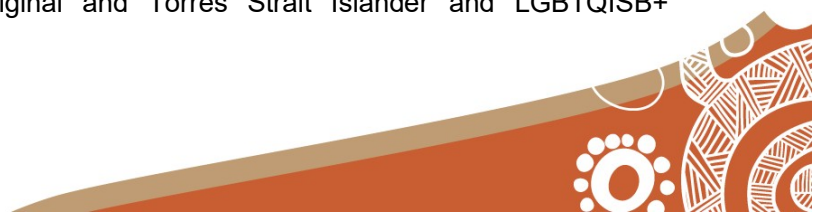
- **Recommendation 45:** Invest in ACCOs to deliver holistic men's behaviour change programs incorporating case management that respond to contributing factors. The safety of women and children must be supported by inclusion of partner contact workers in all programs.
- **Recommendation 46:** Ensure all case management and behaviour change programs for men who use violence address harmful attitudes towards Aboriginal people.
- **Recommendation 47:** Improve access to housing across the family violence spectrum, including housing with wraparound supports for men using violence; in addition to crisis accommodation, short- and long-term housing options, wraparound supports for affected family members.
- **Recommendation 48:** Invest in evidence-based intensive programs to engage men while in prison and upon release.

Address Compounding Risk Factors

- **Recommendation 49:** Establish culturally-safe housing and homelessness supports as an essential element of the family violence response system.
- **Recommendation 50:** Embed an integrated, multi-disciplinary approach to service delivery across specialist homelessness, AOD, mental health, family violence and family services to better respond to the intersecting and compounding needs of those accessing these services.

National Consistency Across Jurisdictions

- **Recommendation 51:** Develop a nationally consistent, intersectional definition of domestic, family and sexual violence, that encompasses a broad range of experiences of violence, including those experienced by Aboriginal and Torres Strait Islander and LGBTQISB+ communities.



- **Recommendation 52:** Establish a national information sharing scheme to address barriers to managing risk across jurisdictional borders and systems.
- **Recommendation 53:** Establish a nationally consistent framework for risk assessment and management, with an intersectional cultural lens embedded.

Cross-Cutting Actions

In this section of our submission, we present a number of cross-cutting actions that must guide the development of the Second Action Plan. These actions call for:

- Policy alignment with the National Agreement on Closing the Gap
- Policy alignment between all action plans
- Improving understanding and interpretation of data trends

Policy Alignment with the National Agreement on Closing the Gap

Recommendation 1: Ensure alignment between the Second Action Plan and the National Agreement on Closing the Gap.

Recommendation 2: Establish genuine partnership between Governments and Aboriginal communities, applying a cultural lens to all policy development and transforming Governments' approach to accountability, funding reform and self-determination.

The primary objective of the National Agreement on Closing the Gap (2020) is to overcome the entrenched inequality faced by Aboriginal and Torres Strait Islander people so that their life outcomes are equal to all Australians.¹ **The Agreement commits all governments to mobilising all avenues and opportunities available to them to meet the objective of the agreement, working in full and genuine partnership with Aboriginal and Torres Strait Islander people in making policies to close the gap.**² Meeting the objective of the Agreement is determined by achievement of 4 Priority Reform Outcomes and 19 Socio-Economic Targets.

Socio-Economic Target 13 is most closely aligned to the objectives of the *National Plan to End Violence Against Women and Children 2023-2032*. Target 13 states: By 2031, the rate of all forms of family violence and abuse against Aboriginal and Torres Strait islander women and children is reduced at least by 50%, as progress towards zero.

The following targets are also of significant relevance to the National Plan:

- Target 10: By 2031, reduce the rate of Aboriginal and Torres Strait Islander adults held in incarceration by at least 15 per cent.
- Target 11: By 2031, reduce the rate of Aboriginal and Torres Strait Islander young people (10-17 years) in detention by at least 30 per cent.
- Target 12: By 2031, reduce the rate of over-representation of Aboriginal and Torres Strait Islander children in out-of-home care by 45 per cent.

The Second Action Plan represents a critical avenue and opportunity to meet the objective of the National Agreement on Closing the Gap.

What is impeding progress on Closing the Gap

The Productivity Commission's first review of the Agreement in 2024 found that **governments are not adequately delivering on their commitment to achieve the objective of the National Agreement.**³ The Commission identified that the lack of power sharing needed for joint decision-making, and the failure of governments to acknowledge and act on the reality that Aboriginal and Torres Strait Islander people know what is best for their communities, remain persistent barriers to achieving the Agreement's objective and meeting its outcomes.⁴

The findings of the first independent Aboriginal and Torres Strait Islander-led review of the National Agreement on Closing the Gap, conducted in 2025, showed strong correlation with those of the

¹ Australian Government (2020), *National Agreement on Closing the Gap*, p.3.

² Ibid.

³ Productivity Commission (2024), *Review of the National Agreement on Closing the Gap: Study Report Volume 1*, p. 3.

⁴ Ibid.



Productivity Commission's.⁵ The independent review found limited evidence that governments are making any systemic changes to meet commitments under the National Agreement.⁶ A significant contributing factor to this is the lack of governmental knowledge about Aboriginal and Torres Strait Islander ways of being, knowing and doing.⁷

The independent review found that **for the National Agreement to work effectively a shift in approach regarding accountability, funding reform, self-determination and genuine partnership is needed. Importantly, transforming governments requires the application of a cultural lens to policy and program development.**⁸

The recommendations below highlight key actions that will support alignment between the Second Action Plan and the National Agreement on Closing the Gap. These actions are integral to achieving the objectives of both the National Plan and Closing the Gap.

Shared Decision-Making –

Recommendation 3: Recognise and resource ACCO-generated evidence as equally valid to Western evidence frameworks in policy and funding decisions.

Building the Community-Controlled Sector –

Recommendation 4: Implement an explicit cultural loading across all service funding to recognise the additional cultural, relational, healing and community-based work required to deliver culturally safe services.

Recommendation 5: Include requirements for proportionate funding to ACCOs in all Commonwealth funding allocations to states and territories, including establishing ACCO-specific procurement processes, with transparency regarding proportion allocated to ACCOs and mainstream Community Service Organisations (CSOs).

Recommendation 6: Commit to long-term, recurrent funding models that enable continuity of service, community connection and culturally responsive practice over time.

Recommendation 7: Establish a stand-alone Aboriginal-led response to family violence, with governance and funding arrangements determined by Aboriginal communities.

Improving Mainstream Institutions –

Recommendation 8: Implement accountability mechanisms to identify and address systemic racism across statutory and service delivery systems, including clear standards, independent oversight, and consequences for discriminatory practice to ensure institutions are held responsible for the experiences of, and outcomes for, Aboriginal and Torres Strait Islander peoples.

Aboriginal and Torres Strait Islander-led Data –

Recommendation 9: Ensure Aboriginal communities have ownership, control, access and governance over data that relates to them, regardless of where it is held.

Recommendation 10: Resource ACCOs to build data governance capability and infrastructure.

⁵ Jumbunna Institute for Indigenous Education and Research (2025), *Closing the Gap Independent Aboriginal and Torres Strait Islander Led Review*, University of Technology Sydney, p. 7.

⁶ Jumbunna Institute for Indigenous Education and Research (2025), *Closing the Gap Independent Aboriginal and Torres Strait Islander Led Review*, University of Technology Sydney, p. 5.

⁷ Ibid.

⁸ Jumbunna Institute for Indigenous Education and Research (2025), *Closing the Gap Independent Aboriginal and Torres Strait Islander Led Review*, University of Technology Sydney, p. 6.

Policy Alignment between all Action Plans

Recommendation 11: Ensure all plans, including the Second Action Plan, are aligned with, and respond to, the needs of Aboriginal families.

We note that DSS is utilising written feedback from this consultation to design the Second Action Plan under the National Plan, alongside the following plans:

- The First Action Plan under *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026-2036* (Our Ways)
- The Second Action Plan under *Safe and Supported: The National Framework for Protecting Australia's Children 2021-2031*
- The Second Aboriginal and Torres Strait Islander Action Plan under *Safe and Supported 2021-2031*
- The Second Action Plan under the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030*.

We support the Department's recognition that these plans need to work together given overlapping experiences of violence. While we strongly support the development of the *Our Ways Plan*, its development does not abrogate responsibility to ensure all plans respond to the needs of Aboriginal people. Aboriginal people's experiences and tailored responses cannot be relegated to the Aboriginal plan only. **The National Plan must align with, and respond to, the needs of Aboriginal families as well.**

Improving Understanding and Interpretation of Data Trends

Recommendation 12: Leverage Aboriginal knowledge and wisdom to understand data trends and inform prevention and response approaches.

Aboriginal and Torres Strait Islander people continue to experience domestic and family violence at disproportionately high rates.

More work is needed to address known system failures experienced by Aboriginal and Torres Strait Islander people, including racism, victim misidentification, and unsafe or inconsistent responses from police, courts and mainstream services.

While the PSS shows prevalence of violence has decreased most in Victoria compared to other jurisdiction, VACCA agrees that this data does not fully show how the National Plan is working for all groups, especially those at highest risk.

Analysis of Crime Statistics Agency data in Victorian shows a disproportionate increase in Aboriginal people's experience of family violence compared to non-Aboriginal people between 2017 and 2025.

Drawing on ABS population estimates, Crime Statistics Agency data suggests that the rate of Aboriginal people experiencing violence per 1,000 population has increased from 51.7 in 2017 to 81.6 in 2025. Over the same period, the rate of non-Aboriginal people experiencing violence increased from 10.3 per 1,000 population in 2017 to 13.2 in 2025.^{9,10}

⁹ Crime Statistics Agency (2025), Indigenous Data Tables Family Incidents Visualisation Year Ending December 2025, [Download data | Crime Statistics Agency Victoria](#); Crime Statistics Agency (2021), Indigenous Data Tables Family Incidents Visualisation Year Ending December 2021, [Download data | Crime Statistics Agency Victoria](#).

¹⁰ ABS (2024), 'Estimates and projections, Australian Aboriginal and Torres Strait Islander population', Table 4: Estimated resident and projected Aboriginal and Torres Strait Islander population, medium series, sex and single year of age by states and territories and Australia, 2011 to 2031, [Estimates and projections, Australian Aboriginal and Torres Strait Islander population, 2011 to 2031 | Australian Bureau of Statistics](#).



Dynamics of Family Violence between Aboriginal and non-Aboriginal people

The data highlights an important nuance in the use and experience of family violence between Aboriginal and non-Aboriginal people, that **the occurrence of family violence is increasing most significantly within inter-cultural relationships.**

Between December 2017 and December 2025:

- Incidents involving an **Aboriginal 'Affected Family Member'** and an **Aboriginal 'Other Party'** increased by **74%**
- Incidents involving an **Aboriginal 'Affected Family Member'** and a **non-Aboriginal 'Other Party'** increased by **107%**
- Incidents involving a **non-Aboriginal 'Affected Family Member'** and an **Aboriginal 'Other Party'** increased by **115%**.¹¹

Children and Young Peoples' Experience of Family Violence

The data highlights that children and young people experiencing violence is also increasing at concerning rates, particularly for young people (both Aboriginal and non-Aboriginal) aged 15-20 years old.

Crime Statistics Agency data shows key trends relating to children, young people and young adults' experience of family violence. Between Dec 2017 and Dec 2025:

- Incidents involving an **Aboriginal child** (0-14 years old) as the **'Affected Family Member'** increased by **68%**
- Incidents involving a **non-Aboriginal child** (0-14 years old) as the **'Affected Family Member'** increased by **9%**
- Incidents involving an **Aboriginal young person** (15-20 years old) as the **'Affected Family Member'** increased by **143%**
- Incidents involving a **non-Aboriginal young person** (15-20 years old) as the **'Affected Family Member'** increased by **139%**
- Incidents involving an **Aboriginal young adult** (20-25 years old) as the **'Affected Family Member'** increased by **52%**
- Incidents involving a **non-Aboriginal young adult** (20-25 years old) as the **'Affected Family Member'** increased by **3%**.¹²

Young people aged 15-20 are a key cohort requiring specialised support and response.

Important data considerations

Reporting rates of family violence are heavily influenced by perceptions of police and the relationships between police and the community.¹³ Victoria's family violence reform agenda and proactive policing may be contributing to higher reporting rates in Victoria compared to other jurisdictions. **Racial bias and over policing of Aboriginal communities is likely to have resulted in an overrepresentation of Aboriginal people as the person using violence in family violence data.**

¹¹ Crime Statistics Agency (2025), Indigenous Data Tables Family Incidents Visualisation Year Ending December 2025, [Download data | Crime Statistics Agency Victoria](#); Crime Statistics Agency (2021), Indigenous Data Tables Family Incidents Visualisation Year Ending December 2021, [Download data | Crime Statistics Agency Victoria](#).

¹² Ibid.

¹³ AIHW (2026), FDV reported to Police, <https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/police/fdv-reported-to-police%23changed>.

Community members, including Elders subject to Elder abuse, are less likely to disclose incidents of family violence to police for a vast range of reasons including shame and stigma, fears of child removal, and not wanting to criminalise family members.¹⁴

The available data can be used as a guide but must be underpinned by the lived experience and community knowledge of Aboriginal people and communities.

¹⁴ AIHW (2026), Aboriginal and Torres Strait Islander People, <https://www.aihw.gov.au/family-domestic-and-sexual-violence/population-groups/aboriginal-and-torres-strait-islander-people>



Supporting People Who Have Experienced Violence

This section of our submission responds to the following two priority areas identified by DSS:

- Priority Area 1: Victim-survivors of violence against women and children and other forms of gender-based violence, and;
- Priority Area 3: Children and Young People in their own right.

We have chosen to respond to these two priority areas together, as our recommendations apply to all people who have experienced violence, regardless of age. Our recommendations are grouped according to **four key actions** for inclusion in the Second Action Plan:

- **Ensure access to culturally safe and responsive support**
- **Address systemic racism and racial bias in practice**
- **Ensure equitable access to support**
- **Embed Inclusivity and Intersectionality**

Together, these four key actions, and associated recommendations, address the systemic barriers that Aboriginal people who have experienced violence face when accessing support.

Ensure Access to Culturally Safe and Responsive Support

Cultural safety is the most important element in ensuring that Aboriginal people who have experienced violence have access to appropriate and effective support when seeking help.

Family violence reform in Victoria is significantly advanced compared to other jurisdictions. In Victoria, the establishment of The Orange Door has made substantial progress in ensuring that there is 'no wrong door' for people who have experienced violence when seeking support. However, lack of cultural safety in The Orange Door remains an ongoing issue impacting safety and effective management of risk. While The Orange Door is a Victorian specific example, we use it in our Submission to demonstrate where further action is needed at a national level and believe these insights are broadly applicable to service delivery in all jurisdictions.

Initiatives such as Aboriginal Access Points and Aboriginal Practice Leads in The Orange Door demonstrate the impact of Aboriginal expertise and Aboriginal positions improving cultural safety in family violence service access. Greater numbers of and support to Aboriginal Practice Leads are needed to strengthen cultural safety and reduce workforce burnout. Aboriginal Access Points provide Community with culturally safe place to seek in-person support, knowing that their experiences will be listened to and understood. These are examples of community-led initiatives that must be funded for expansion and refined to ensure that all Aboriginal people impacted by family violence have culturally safe avenues to seek support.

Build the knowledge and skills of non-Aboriginal practitioners

Recommendation 13: Ensure ongoing investment in training for all practitioners in the family violence sector, designed, led and delivered by Aboriginal people and organisations to build further understanding of the impacts of colonisation, the support needs of Aboriginal people and families and implementation of cultural safety in practice.

Recommendation 14: Funding requirements for mainstream family violence service providers must include demonstration of cultural safety, including but not limited to Aboriginal oversight for every Aboriginal case.

Recommendation 15: Expand Aboriginal Access Points to all states and territories, led by local ACCOs and Aboriginal communities.

Building the knowledge and skills of non-Aboriginal practitioners in the family violence sector to provide culturally safe and responsive support is critical to effective management of risk for Aboriginal people who have experienced violence.

Since 2023, a group of ACCOs including VACCA have been leading the 'Strengthening Cultural Safety in The Orange Door project'.

Project staff report that they witness practitioners demonstrating a lack of respect for Aboriginal people and culture in their practice. This is shown through use of discriminatory language and stigmatising labels.

In other cases, non-Aboriginal practitioners express that they are 'afraid of getting it wrong' when it comes to supporting Aboriginal clients. This lack of confidence leads to placing increased pressure on Aboriginal staff in The Orange Door to support all Aboriginal clients, without the resourcing needed to meet demand.

While VACCA supports calls for increased proportionate funding to ensure that Aboriginal clients can access ACCO-led support as will be discussed below, mainstream non-Aboriginal practitioners must also be able to provide culturally safe and responsive support.

In some cases, Aboriginal clients may choose a mainstream response due to conflict of interest arising from having family and community ties with Aboriginal workers. This is particularly common in smaller communities in regional and remote areas.

Aboriginal staff have been facilitating cultural safety training across Victoria through the 'Strengthening Cultural Safety in The Orange Door project' since 2023. This training is having positive impact on improving cultural safety. In the Southwest region for example, project staff report there has been a 12% increase in people reporting that The Orange Door feels culturally safe. Project staff also report however, that for some practitioners the mandatory training is approached as a 'tick box' exercise. These practitioners are less likely to implement their training in their practice. Project staff observe that how the training is valued by people in senior leadership roles has significant impact on staff uptake and attitudes towards it.

Project staff also note that completing a series of cultural safety training modules once does not ensure cultural safety in practice. Cultural safety must be considered an ongoing process.

In line with Closing the Gap Priority Reform 3: Transforming Mainstream Systems, **the Second Action Plan must include actions aimed at building the knowledge and skills of mainstream services and non-Aboriginal workers to provide culturally safe and responsive support.**

Resource Aboriginal Community Controlled Organisations with Proportionate Funding

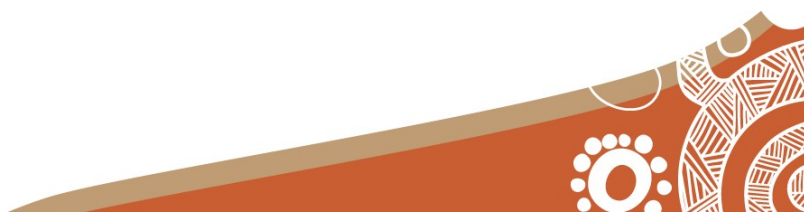
Recommendation 16: Ensure that funding to ACCO's reflects the service demand for Aboriginal people requiring family violence services. Funding should be based upon service hours not case numbers, in recognition of the complex needs of Aboriginal clients.

Aboriginal workers in The Orange Door, often in Aboriginal Practice Lead roles and Aboriginal Response Teams, report experiencing high levels of burn out from the colonial load placed on them. Though often well meaning, Aboriginal staff are frequently consulted on cases by non-Aboriginal staff due to non-Aboriginal practitioners' lack of knowledge and skills in culturally responsive practice. While VACCA supports requirements for non-Aboriginal staff to consult with Aboriginal practitioners, without appropriate resourcing, this is placing undue burden on Aboriginal workers.

While some Aboriginal clients may choose a mainstream response due to family and community connections with Aboriginal staff (as discussed above), VACCA staff report that in other cases Aboriginal clients opt for a mainstream response as current resourcing means that a mainstream response can be provided immediately, while the client will have to wait a number of weeks for an ACCO response.

In line with Closing the Gap Priority Reform 2: Building the Aboriginal Community Controlled Sector, **the Second Action Plan must include actions aimed at better resourcing Aboriginal-led responses to family violence.**

Stand-Alone Aboriginal Response



There is significant variation in practice between Orange Door locations, leading to differences in terms of how the principles of Aboriginal self-determination are embedded in practice. VACCA practitioners have highlighted the North-Eastern Melbourne Area (NEMA) Orange Door as an example of where things are working well, and that there is essentially a 'stand-alone' Aboriginal response nested within the NEMA Orange Door with Aboriginal referrals being directed to VACCA and strong relationships developed across the other services. That means that in practice, ACCOs have adequate time and resources to assess and plan with the family, which can help in diverting cases from further Child Protection involvement. The success of the NEMA Orange Door highlights that when there is a culturally responsive service families are more likely to be supported to engage with services and less likely to be referred to child protection.

Whilst VACCA currently provides services at 11 of 18 Orange Door locations, there remains an inequitable access to resources, supports and information available to Aboriginal women, compared with non-Indigenous women. VACCA staff report that the development of a centralised intake process has led to a drop in the number of families self-referring and have observed that families appear to be coming to the attention of service system later on, meaning that cases are more complex and there are often more immediate safety concerns for practitioners to respond to. These reflections from VACCA staff mirror the findings of the 2018 evaluation of the Orange Door which found that collaboration on assessment and planning was "inconsistent and not yet embedded in within practice" but that it was most consistent in the work of Aboriginal practitioners.²⁰

Due to these variations, VACCA believes **that addressing family violence requires the establishment of a stand-alone Aboriginal response to family violence.**

Address Systemic Racism and Racial Bias in Practice

For many First Nations people, police and the criminal legal system are not experienced as sources of safety, but as sites of surveillance, discrimination, and harm. The initial police response for Aboriginal people (often women) who have experienced family violence significantly influences the outcome of subsequent service interventions. Systemic racism and personal racial bias is also known to be weaponised by users of violence when police are responding to incidents. These factors can result in protracted and extremely harmful systems abuse.

The new *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036* describes this as 'systemic entrapment', when the mainstream family violence system, police and child protection interact in ways that increase risk and harm for Aboriginal people.

Child Protection Responses

Recommendation 17: Prioritise investment in ACCOs to deliver and expand Aboriginal-led, delivered and evaluated early intervention, prevention, and family preservation and reunification programs to address the risk factors that contribute to the involvement of Aboriginal families with the child protection system.

In Victoria, Aboriginal children are 7 times more likely to be placed in out-of-home care, often as a result of exposure to violence in the home.¹⁵ A 2016 inquiry by the Victorian Commission for Children and Young People found that family violence was an identified driver of child protection involvement and entry into out-of-home care for 89% of Aboriginal children whose files they reviewed.¹⁶

¹⁵ AIHW (2024), 'Child Protection in Australia', <https://www.aihw.gov.au/reports/child-protection/child-protection-australia-2023-24/report-editions>.

¹⁶ Commission for Children and Young People (2016), 'Always was, always will be Koori kids', <https://ccyp.vic.gov.au/inquiries/systemic-inquiries/always-was-always-will-be-koori-children/#:~:text=Always%20was%2C%20always%20will%20be%20Koori%20children%20is%20the%20report,of-home%20care%20in%20Victoria>.

VACCA staff have observed that mainstream systems and services that are meant to be a source of support, safety and healing instead frequently drive increased risk for Aboriginal people. For example, many Aboriginal women tell VACCA practitioners they do not feel culturally safe to engage in help seeking via The Orange Door or to report experiences of family violence to the police because they fear notification to child protection and risk of child removal.

VACCA practitioners report that these fears are well-grounded, reflecting intergenerational trauma of historic child removal **and** contemporary practices. They report instances where The Orange Door has notified child protection and the child protection response has failed to reflect protocols that ensure accurate assessment of risk for Aboriginal children and families and maintenance of Aboriginal cultural connection.

We also heard that when Aboriginal women experiencing family violence don't speak openly and frankly because of these fears, they are often labelled as "disengaged" or "difficult". The lack of cultural safety in the mainstream response is not recognised as the problem.

Police Responses

The role of racism and racial bias in how police respond to Aboriginal people who have experienced family violence remains a critical issue that the Second Action Plan must actively address.

Recommendation 18: Mandate comprehensive, ongoing anti-racism and cultural safety training for police, co-designed and delivered by First Nations organisations, with measurable outcomes.

Recommendation 19: Strengthen data transparency requirements, including disaggregated reporting on police misidentification of Aboriginal and Torres Strait Islander people.

Recommendation 20: Advance Aboriginal-led solutions that eliminate the misidentification of Aboriginal women as the 'predominant aggressor' by police, including improved training, accountability and review mechanisms that accurately collate data identifying its occurrence, prevalence and effective strategies for mitigation.

Recommendation 21: Ensure policing responses to family violence across all jurisdictions are trauma-informed and culturally responsive, with mandatory consideration of historical patterns of abuse.

VACCA staff observe that a significant proportion of Aboriginal women who are recorded as respondents in family violence incidents have previously been identified as the person *experiencing* family violence.

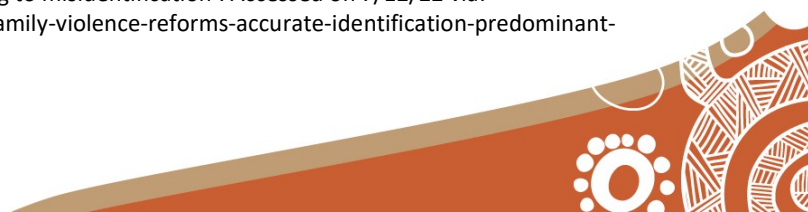
This is reflected in Crime Statistics Agency data, and was a key finding of a systemic review published by the (now disbanded) Victorian Family Violence Implementation Monitor (FVRIM) in 2021. The FVRIM review found that between 2016 and 2020, nearly 80 per cent of Aboriginal women who were identified by police as the respondent in family violence incidents had also been previously recorded as an affected family member (compared with nearly 60 per cent for all female respondents).¹⁷ The FVRIM identified gaps in training, limited understanding of trauma, and a tendency to assess incidents in isolation rather than within broader histories of abuse.¹⁸

The misidentification of Aboriginal women as the 'predominant aggressor' by police is one of the clearest examples of racial bias in police practice, perpetuating over-incarceration and resulting in holding Aboriginal women responsible for the violence used against them.

The ongoing phenomenon of misidentification of Aboriginal women reflects a failure to adequately assess the context of violence, including patterns of coercion, self-defence, and prior victimisation.

¹⁷ The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, 'Alarming rates of family, domestic and sexual violence of women and girls with disability to be examined in hearing' October 2021. Via [weblink](#).

¹⁸ Family Violence Reform Information Monitor, 'Acknowledging the complexity of the family violence incidents police attend, police practice and processes are contributing to misidentification'. Accessed on 7/12/22 via: <https://www.fvrin.vic.gov.au/monitoring-victorias-family-violence-reforms-accurate-identification-predominant-aggressor-5>.



During our consultations, VACCA staff described multiple instances in which police dismissed or normalised violence, failed to take statements, or responded with harmful stereotypes about Aboriginal communities and culture. For example, one practitioner noted,

“I’ve sat in rooms with police where they’re minimising and sometimes I had to intervene... sometimes they even refuse to take statements and just say [the violence] it’s part of their household.”

Staff also reported that Aboriginal identity is at times questioned or denied based on appearance, with one worker recounting that police told a client:

“You don’t look Aboriginal, so you’re not Aboriginal.”

These experiences contribute to a deep and ongoing mistrust of police, and people affected by family violence choosing not to report because they do not expect to be believed or protected. Analysis of coronial investigations into the deaths of Aboriginal women has found that both the actions and inaction of police are “akin to systemic racism, or at the very least, lazy policing”.¹⁹

What is working well in Victoria

Development of misidentification tools for police

Family Safety Victoria (FSV) have developed a suite of misidentification and predominant aggressor tools that VACCA staff report have been influential in supporting work to address misidentification by police.

Police and Aboriginal Community Protocols Against Family Violence (PACPAFV)

The Police and Aboriginal Community Protocols Against Family Violence (PACPAFV) are an agreement between local area Aboriginal community services and Victoria Police. The Protocols outline how police and community work together to best respond to family violence and ensure everyone gets the help they need. The Protocols are in place at 17 areas across Victoria. Police, Aboriginal community and family violence service providers at these sites meet regularly to ensure the protocols are being implemented in the community.

VACCA staff report that in locations where PACPAFV are functioning well they provide an effective mechanism to share concerns and manage risk. This is particularly important in cross-border areas where jurisdictional differences in law and practice create additional barriers to managing and mitigating risk.

Strong Relationships between The Orange Door and Victoria Police

VACCA staff in the Ovens Murray region of Victoria report that proactive communication by The Orange Door Hub Manager with Victoria Police has had a positive effect on building trust and ensuring police are undertaking appropriate training. In this region, the Victoria Police Family Violence Unit can present at The Orange Door to speak with community members, instead of them needing to present at the police station. This creates greater safety and trust for Aboriginal people who have experienced violence when engaging with police.

Staff also report positive outcomes in regions where ACCOs like VACCA have strong relationships with Victoria Police. This relationship ensures that when Aboriginal people report inappropriate responses by police, VACCA staff are able to notify Sergeants within the Family Violence Unit, who ensure the response is reviewed internally.

Court Responses

¹⁹ Cripps, K. (2023). Indigenous women and intimate partner homicide in Australia: Confronting the impunity of policing failures. *Current Issues in Criminal Justice*. <https://doi.org/10.1080/10345329.2023.2205625>.

Recommendation 22: Refine accountability measures and procedures on Police and Courts for when Family Violence Intervention Orders (FVIOs) are breached, with a focus on safety for the applicant.

VACCA staff report that there is a lack of accountability for people who use violence when their actions breach active FVIOs. Victoria has adequate legislation in place, however, police are failing to adequately follow up breaches of FVIOs, promoting questions on their effectiveness to provide safety for the applicant. Staff also gave examples of people who have used violence contacting their partners while in prison, despite full FVIOs being in place with no accountability or repercussions. It is necessary to ensure that all parties involved clearly understand the terms of the FVIO.

Ensure Equitable Access

Regional Equity

Recommendation 23: Ensure equitable access to culturally responsive support across all regions through identifying and addressing ACCO funding gaps and resourcing program expansion across regional areas.

Ensuring that Aboriginal people who experience violence can access culturally responsive support no matter where they live must be a key priority of the Second Action Plan. As is the case across all jurisdictions, people living in regional and remote areas of Victoria do not have equitable access to programs and support services compared to those in metropolitan areas.

Regional challenges include a lack of access to services and inadequate service coordination, a shortage of workers in the community services sector (in particular family violence practitioners), and the need for additional support stemming from the rising cost of living and higher service delivery costs. Research by ACOSS in 2022 highlighted that only 3 per cent of services felt they could meet the demand they faced, and 81 per cent of family violence services reported their main service was affected by staff exhaustion or burnout.²⁰

Although VACCA and other ACCOs have worked to increase the culturally safe service offerings across metropolitan and regional Victoria, these programs are still underfunded and lack consistency across regions.

After-Hours / Crisis Response Equity

Recommendation 24: Enable after-hours Aboriginal-led Family Violence support through resourcing the ACCO Sector.

Recommendation 25: Mandate that mainstream service providers integrate Aboriginal cultural oversight into their out-of-hours service delivery.

Access to culturally responsive after-hours crisis support remains a critical gap in Victoria's family violence system. While mainstream services often engage ACCO's to provide secondary consult during business hours, VACCA staff report that clients accessing crisis support between 5pm and 9am often experience culturally unsafe responses that ultimately fail to appropriately mitigate risk and ensure safety. This is reported to be due to a lack of knowledge and skill of workers in mainstream organisations to understand the violence a client has experienced from an Aboriginal perspective, as discussed above. In some cases, this results in crisis services denying Aboriginal people support. VACCA staff gave examples of crisis services denying support on the basis of their assessment that the violence experienced was 'community violence' rather than family violence, referring to specialist homelessness services instead, or waiting for a client to call back after undertaking a risk assessment, rather than proactively engaging them. These issues reiterate the importance to improving understandings of cultural safety and skills in providing culturally-responsive practice within mainstream services.

²⁰ Cortis, N. and Blaxland, M. (2022) Helping people in need during a cost-of-living crisis: findings from the Australian Community Sector Survey, Sydney: ACOSS.



Embed Inclusivity and Intersectionality

Despite intersectionality being a key principle of the National Plan, the First Action Plan has not yet succeeded in addressing critical service and program gaps to ensure all cohorts of people who experience violence have access to appropriate and effective support.

Recommendation 26: Ensure family violence service delivery models reflect an intersectional understanding of family violence, accounting for the experiences of all Aboriginal people, families and communities, including:

- Children and young people experiencing violence within the family;
- Young people experiencing intimate partner violence;
- Young people using AVITH;
- Rainbow Mob;
- Elders;
- People who have experienced sexual violence;
- People with Disability;
- Men who have experienced violence.

Recommendation 27: Develop an Aboriginal-specific Family Violence Information Referral Portal to improve Community awareness of and accessibility to family violence support services. The portal must provide online service points be easily accessible via online search engines.

Aboriginal Children and Young People Impacted by Violence

Recommendation 28: Call upon Federal, State and Territory governments to build upon and expand therapeutic models of care, including VACCA's Aboriginal Children's Healing Team, to support children affected by family violence.

In VACCA's experience, there often remains a significant lack of direct focus on the needs of children in family violence service delivery and recognition of trauma experienced by children and young people who witness violence in the home.

VACCA staff report that workers in mainstream organisations and child protection are frequently neglecting their obligation to complete a distinct child focused risk assessment under the Multi-Agency Risk Assessment and Management (MARAM) framework.

Key to respecting the rights of Aboriginal children and young people is through a policy and practice response that views them as victims in their own right, whilst acknowledging the importance of supporting the family in a holistic way that promotes healing. **The Second Action Plan needs to take further action to build on and expand therapeutic models of care for children and young people.**

VACCA's Aboriginal Children's Healing Team (AHT) provides integrated, therapeutic care for children who have experienced trauma. There is an opportunity to expand on this program so it is available to all Aboriginal children impacted by family violence – children need access both to crisis, short-term interventions so they have an opportunity to debrief in the aftermath of a traumatic event, as well as longer-term supports to address its impacts and heal.

Aboriginal Young People Experiencing Intimate Partner Violence

Recommendation 29: Invest in the development and delivery of targeted, holistic family violence support programs for young people experiencing and using violence in intimate partner relationships.

Practitioners have reported a concerning rise in intimate partner violence between young people, which continues to be largely conceptualised as an issue that only impacts adult intimate relationships. As demonstrated by the data outlined above, young people aged 15-20 years old experiencing and/or using violence is one of the fastest growing cohorts in Victoria. At present, the service system is ill-equipped to assist young people experiencing intimate partner violence. The lack of available services makes it challenging for young people to receive supports including case

management, accommodation, early intervention, and prevention supports and education on respectful relationships.

From consultations across VACCA's Family Violence programs it appears that these issues are particularly pronounced in the Ovens Murray, Wodonga, and the Eastern and Western regions of Victoria. As a result of the lack of programs and services, VACCA case managers have highlighted the increased instances of serious violence escalating in relationships between young people. There is consensus that this violence is not being taken as seriously by police as adult violence, and responsibility is falling to case managers to do everything they can to keep young people safe without the support they need from the broader system. VACCA is concerned that without adequate support for children and young people, there is the risk of further compounding intergenerational cycles of violence.

Aboriginal Young People Using Adolescent Violence In The Home (AVITH)

Recommendation 30: Invest in family violence therapeutic services for individual and family group work, alongside preventative programs such as healthy and respectful family relationship programs which are necessary in assisting the whole family to heal and build trust and support young people using AVITH.

There remains relatively scarce research and reporting on adolescents who use violence in the home (AVITH). Despite the acknowledgement of the significant harms and impacts of AVITH, particularly noted in the Royal Commission into Family Violence, there are still limited specialised service responses across Victoria, in particular culturally safe and appropriate services for Aboriginal young people.

VACCA currently runs the Adolescent Using Violence in the Home therapeutic case management program in the North and West regions of metropolitan Melbourne. However, there is no indication if this program will be funded to be rolled out across more regions, which is required to increase therapeutic case management for Aboriginal young people.

The system is failing to remember that young people who use violence are still themselves children, who have often experienced violence or abuse. Research demonstrates that exposure to traumatic violent experiences for children and young people can often lead to young people themselves using violence in the home.²¹ VACCA believes **children and young people who use violence in the home require age and developmentally appropriate therapeutic intervention.**

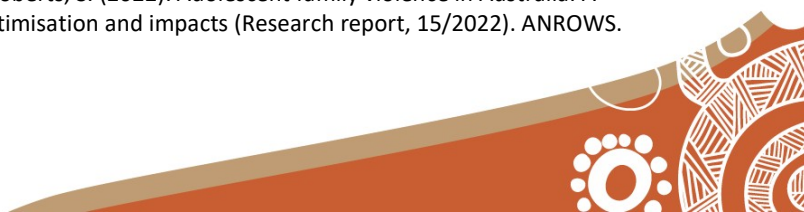
LGBTQIASB+ Community / Rainbow Mob

More needs to be done to ensure LGBTQIASB+ Aboriginal community members experiencing violence can access appropriate and safe support. Rainbow Mob experience additional barriers in accessing family violence supports, including experiences of discrimination and a lack of understanding of the dynamics of family violence within LGBTQIASB+ relationships. Despite this, there is currently no specialist funding provided to ACCOs, including VACCA, to deliver specialised family violence services to Rainbow Mob. Whilst VACCA holds Rainbow Tick Accreditation, we know that there are many ACCOs which have yet to receive theirs, and that this is primarily an issue of resourcing. ACCOs should be funded to continue building their capacity to be responsive to the specific needs of the LGBTQIASB+ people. For example, ACCOs could be funded to design and deliver specialised training for family violence workers to support them in delivering inclusive and safer services to LGBTQIASB+ members of the Aboriginal community.

Elders

While many Elders experience family violence within their immediate family, such as from their children and/or grandchildren, this form of abuse often remains invisible. A significant focus is needed on increasing community awareness and education around the issue of Elder abuse, addressing stigma and providing information on available supports. Whilst specialised family violence services should be inclusive of and responsive to the unique needs of Elders, it is also

²¹ Fitz-Gibbon, K., Meyer, S., Boxall, H., Maher, J., & Roberts, S. (2022). Adolescent family violence in Australia: A national study of prevalence, history of childhood victimisation and impacts (Research report, 15/2022). ANROWS. Retrieved from [Weblink](#).



important that social and community programs have staff with the training, resources and referral pathways to identify and support Elders who might disclose experiences of abuse to them.

Aboriginal People Experiencing Sexual Violence

While increased awareness of family violence in recent years has improved reporting and attitudes towards violence against women and children, there remains stigma within the mainstream and Aboriginal community around sexual violence. There are significant barriers for Aboriginal women and children to report incidents of sexual violence, including a lack of cultural safety as well as systemic racism and bias across many sectors. There is a need for improved service responses across sectors inclusive of family violence and sexual assault systems but also the health, housing and education systems, Child Protection, police, and justice systems. **A joint, integrated and holistic approach that includes a minimum basic assessment of historical drivers and current risk factors must be implemented across all sectors.** This approach should be based on a set of agreed upon principles and framework that also considers what key culturally appropriate safety measures should be in place.

Aboriginal People Experiencing Community Violence

Understandings of family violence within the sector often erase community violence. The extended kinship systems of Aboriginal communities is not reflected by the normative Western understanding of nuclear family models. These differing conceptions of 'family' in service frameworks lead to exclusion from support for Aboriginal people who are experiencing violence from extended kinship and community members.

The harm caused by community violence is significant, and the needs of these community members are just as urgent and parallel to those who experience violence from 'immediate' family. Drivers of community violence intersect with known drivers of violence against Aboriginal people, that is, ongoing impacts of colonisation, racism and gender inequality.

Given that knowledge of the nuances and dynamics of community violence is needed, it is critical that all responses and supports for this issue must be Aboriginal-led, but nonetheless accommodated by the family violence service sector.

Aboriginal People with Disability

Recommendation 31: Establish specialist disability worker roles within family violence services.

Recommendation 32: Establish an Aboriginal-led specialist integrated brain injury and family violence service.

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability raised concern about the alarming rates of family and sexual violence experienced by people with disability (often women and children). The Royal Commission found that 40 per cent of women with disability have experienced physical violence since the age of 15 (compared to 26 per cent for women not living with disability).²² The Commission also highlighted that close to 50 per cent of women living with cognitive disability or psychological disability had experienced sexual violence (compared to 16 per cent of women not living with disability).²³

The correlation between family violence and acquired brain injuries (ABI) has also been well documented.²⁴ The Victorian Royal Commission Into Family Violence recognised the potential for ABIs to contribute to the use of family violence, both increasing the risk that one might use violence but also that one might experience it. Research by Brain Injury Australia found that 40 per cent of

²² The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, 'Alarming rates of family, domestic and sexual violence of women and girls with disability to be examined in hearing' October 2021. Via [weblink](#).

²³ Ibid.

²⁴ Lansdell, G. T., Saunders, B. J., Eriksson, A., & Bunn, R. (2022). Strengthening the connection between acquired brain injury (ABI) and family violence: the importance of ongoing monitoring, research and inclusive terminology. *Journal of family violence*, 37(2), 367-380.; Monahan, K. (2018). Commentary: intimate partner violence, traumatic brain injury, and social work: moving forward. *Social Work*, 63(2), 179-181.

affected family members attending Victorian hospitals over a 10-year period presented with an ABI and that Aboriginal people were significantly overrepresented.²⁵ It has been reported that Aboriginal women experience head injury at a rate 69 times higher than other Australian women.²⁶

Aboriginal men who experience violence

While VACCA support a greater focus being placed on women and children within the family violence sector given the disproportionate prevalence of violence used against them, we also know that some Aboriginal men experience violence as adults. VACCA is concerned that the National Plan erases the nuanced nature of those who experience violence. VACCA has a small number of programs to support men who experience violence. These are important programs that must continue to be funded.

Aboriginal Sexual Assault Support Services

Recommendation 33: Dedicate funding to expand healing-informed practice support delivered through the Aboriginal Sexual Assault Support Service (ASASS) and other statewide healing-focused programs, so children, families and carers have access to culturally grounded healing support alongside the investigative response.

Recommendation 34: Explore the trends and data around Child Exploitation/Grooming sitting alongside incidences of Sexual Assault (noting that criminal exploitation needs to be standalone category in reporting systems for more accurate data).

Recommendation 35: Improve data-sharing processes across Police, ACCOs, Child Protection and mainstream organisations around Persons of Interest for a faster disruption pathway.

Recommendation 36: Invest in place-based practice reviews, a cross-ACCO community of practice, and culturally grounded healing and youth voice - to develop a shared, evidence-based agenda for strengthening the sector's response for ACCOs, mainstream out-of-home care providers, and the Victorian Government (including DFFH).

VACCA has identified culturally-specific sexual assault support as a gap in the broader family violence response. VACCA sees this issue as critical, considering the traumatic and intergenerational continuity risk for children and young people exposed to sexual violence and the links to family violence and further exploitation.

VACCA runs Aboriginal Sexual Assault Support Services (ASASS), which currently operate out of three regions; Western, Southern and Gippsland VACCA regions.

Internal data demonstrates the impact of these services, however funding constraints and inconsistent arrangements (2 services funded by the Victorian Government and one region receives federal funding), this is not meeting demand within the funded regions. Lack of specific training and qualification is a further limiting factor for statewide access to culturally-specific sexual assault support. ACCOs often rely on Family Violence workers to provide sexual assault support, rather than the specialist sexual assault response required.

VACCA has implemented internal training to identify the risk of child exploitation, leading to skyrocketing reporting rates. The data highlights that the highest-risk areas for child sexual exploitation are not currently funded for ASASS. In the areas where VACCA does not hold specialised Sexual Assault Services, Aboriginal-led specialised services are sparse or non-existent. ACCOs rely on referrals to mainstream services which are not culturally safe for our people. As well as highlighting the need for increased funding for ASASS, VACCA's evidence base proves that further training is needed statewide, across all Child Welfare organisations and workers working with our children and young people.

²⁵ Brain Injury Australia and Monash University. (2018). The prevalence of acquired brain injury among victims and perpetrators of family violence.

²⁶ ANROWS, Invisible disability: Indigenous women living with traumatic brain injury, retrieved from: [weblink](#).



Further work is also needed to address child sexual exploitation and child criminal exploitation which continue to hurt our children and young people, impact upon the work of ACSASS and reverberate across the Family Violence, Child Welfare and

Justice systems.

Prevention and Early Intervention

This section of our submission responds to Priority Area 2: Prevention and Early Intervention, as identified by DSS. As noted in the Consultation Paper, Aboriginal people remain disproportionately impacted by violence. Aboriginal communities and organisations know what it will take to prevent violence, what we do not have is adequate resourcing.

We have identified 3 key actions for inclusion in the Second Action Plan to address the gaps currently experienced by Aboriginal people in relation to prevention and early intervention, including:

- Strengthening the Aboriginal evidence base
- Long-term investment in Aboriginal-led prevention and early intervention programs
- Challenging the drivers of violence against Aboriginal people in **all** primary prevention activities

Strengthening the Aboriginal Evidence Base

Recommendation 37: Invest in Aboriginal-led evidence development, resourcing ACCOs to drive self-determined data collection according to Data Sovereignty principles.

Recommendation 38: collate national data that helps to build an accurate national picture.

Recommendation 39: Build stronger evidence base that addresses crossover and intersection between other factors like alcohol and other drugs, housing and homelessness, unemployment, suicide, incarceration, deaths in custody, child protection.

Recommendation 40: Invest in longitudinal studies on the long-term impact of prevention and early intervention programs, particularly those aimed at children and young people.

The family violence sector continues to rely on an evidence base that was not designed for or reflective of Aboriginal people, families and communities. The evidence base continues to centre Western, white and non-Aboriginal experiences of violence and build prevention activities around this literature. It is clear from the data that these prevention efforts are not working effectively at reducing the disproportionate rates of violence experienced by Aboriginal people.

In alignment with Closing the Gap Priority Reform Outcome 4: Aboriginal and Torres Strait Islander Data, it is essential that further investment is made to **enable ACCO's and Aboriginal communities to build a stronger, culturally grounded evidence base of the dynamics of violence experienced and used by Aboriginal and the most effective approaches to prevention and early intervention.**

Long-term Investment in Aboriginal-led Prevention and Early Intervention

Recommendation 41: Provide long-term sustainable funding for ACCO-designed and led prevention and early intervention programs.

VACCA's *Deadly Lovin'* and *Deadly Kids* programs are two examples of innovative and effective Aboriginal-led primary prevention programs that have been curtailed by short-term funding contracts.

VACCA's *Deadly Lovin'* program was designed and developed as a healthy respectful relationships training package for professionals working with Aboriginal young people aged 12–17 years. Developed between 2021–23, *Deadly Lovin'* was delivered as a train-the-trainer package.

Through culturally safe activities and advice, the program drew upon cultural strengths to build a sense of pride and empowerment. This often took place in peer learning environments such as camps, therapeutic groupwork or classroom settings, to support open learning, promote insight sharing and reinforce program content.

Staff reported supporting young people to navigate unhealthy intimate partner relationships, find pathways to safety, and support young people who have disclosed historical abuse. These are tangible positive impacts for young people who are facing real problems navigating relationships while having limited access to prevention initiatives.

Building on the success of *Deadly Lovin'*, VACCA's *Deadly Kids* program is a primary prevention project designed to support Aboriginal children aged 8-12 to build and maintain strong and healthy relationships with their peers, friendship group and family. The project aims to improve understanding of what a healthy and respectful relationship looks like at an early age, as children begin to navigate their first intimate partner relationships.

In partnership with the Centre for Evidence and Implementation, VACCA used a train-the-trainer model to deliver training to other Aboriginal Community Controlled Organisations working with children and families.

External evaluation undertaken by Centre for Evidence and Implementation found the program surpassed engagement targets and to be highly successful in supporting community to heal from trauma, increase pride, and support participants' connection to culture, country, kinship, history and spirituality. There has also been a notable increase in school attendance among participants.

VACCA recommend *Deadly Kids* would be an ideal program to build a longitudinal study regarding impact of the program for children in preventing violence.

Despite demonstrating the effectiveness of the programs through evaluation, funding for *Deadly Kids* and *Deadly Lovin'* expired at the end of the 2026 financial year. **The requirement for ACCO's to develop and deliver innovative, successful prevention initiatives in short funding cycles, without ongoing funding guarantees significantly impacts the long-term success of this work.**

Challenging the drivers of violence against Aboriginal people in all primary prevention activities

Recommendation 42: Actively name and challenge racism as a harmful attitude and key driver of violence against Aboriginal people.

Recommendation 43: Embed Aboriginal-led, culturally responsive prevention and early intervention programs in the National curriculum for all students, both Aboriginal and non-Aboriginal.

Recommendation 44: Ensure the Commonwealth and State governments do more to address and challenge the rise in racism, misogyny and other social drivers of family violence in society, with particular focus on media perpetuation of harmful narratives, social media and online forums where hate is being spread.

The evidence is clear that for Aboriginal people the enduring legacies and impacts of colonisation, including interpersonal and systemic racism are key drivers of violence. In many 'mainstream' primary prevention activities, these drivers are treated as secondary to the gendered drivers of violence, or are completely absent.

In our recent submission to the Commonwealth [Inquiry into racism, hate and violence directed at Aboriginal and Torres Strait Islander people](#), we demonstrated that racism remains embedded in the design and operation of mainstream service and statutory systems. Racism is not episodic or isolated, but systemic, persistent and cumulative.

VACCA has seen a substantial increase in racist comments received on our Facebook page since the 2024 Voice Referendum. There has been a sustained increase in racist engagement across organic posts over the last 12 months. Platform algorithms that prioritise engagement – particularly



content that provokes anger and outrage – amplify racist narratives, while limited transparency and moderation controls prevent effective mitigation.

Given the rise in racism being experienced across Australia, alongside the ongoing disproportionate rates of violence experienced by Aboriginal people, including a high prevalence of non-Aboriginal men using violence against Aboriginal women, **it is essential that all primary prevention efforts respond the drivers of violence for Aboriginal people, not just the gendered drivers of violence.**

People Who Use Violence

This section of our submission responds to the DSS identified Priority Area 4: People who use violence. Our recommendations are grouped according to **two key actions** for inclusion in the Second Action Plan:

- **Engaging people who use violence to change behaviour**
- **Holding people who use coercive control accountable**

We have identified **three key enablers to better engaging people who use violence** to change behaviour, including:

- **Development and delivery of culturally grounded, therapeutic behaviour change programs for Aboriginal men;**
- **Ensuring provision of secure housing options;**
- **Intensive program support while in prison and post-release.**

To hold people who use coercive control accountable for their behaviour, VACCA do not support the Victorian Government's proposal to introduce a standalone criminal offence. Rather, we recommend that a whole-of-community approach and investment in evidence-based programs that improve the identification and management of family violence risk will lead to greater accountability.

Engaging people who use violence to change behaviour

Culturally grounded, therapeutic behaviour change programs for Aboriginal men

Recommendation 45: Invest in ACCOs to deliver holistic men's behaviour change programs incorporating case management that respond to contributing factors. The safety of women and children must be supported by inclusion of partner contact workers in all programs.

Engaging Aboriginal men who use violence requires programs that respond to their needs, including strengthening connection to culture and healing. Through such programs, men can collectively take a lead role in addressing violence, increasing the safety and wellbeing of families.

VACCA delivers multiple men's family violence programs for men who use violence. These programs provide specialised support to addressing the reasons and behaviours behind the use of violence, and to ensure there is accountability and responsibility.

However, culturally safe programs for men who use violence remain scarce, and research has found this service gap acts as a significant obstacle to achieving the intended goals of participants.²⁷ In many instances men who are seeking therapeutic support cannot make the progress they want due to the lack of availability of cultural support services, and instead are at risk of disengaging after long wait times.

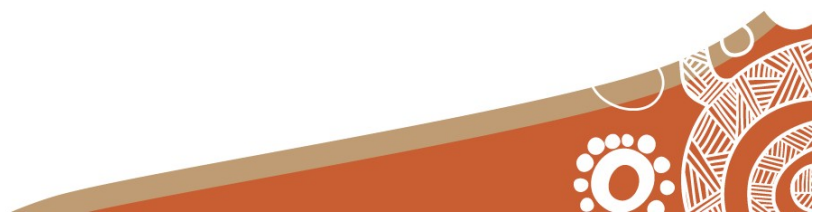
Access to programs for men is particularly limited in the Ovens Murray, Wodonga, and Eastern regions of the state. When Aboriginal men do not have a culturally safe option they are instead diverted into a mainstream program which does not sufficiently cater to their needs, creating a risk of disengagement.²⁸

Research has indicated that men's support programs need to be "more accessible, available and appropriately targeted" to meet increasing demand and the complex needs of people who use violence.²⁹ The VACCA Family Violence Team has worked together to develop men's programs which have a clear therapeutic and healing direction, ensuring that culture underpins practice as much as possible.

²⁷ Langton, M., Smith, K., Eastman, T., O'Neill, L., Cheesman, E., & Rose, M. (2020). Family violence policies, legislation and services: Improving access and suitability for Aboriginal and Torres Strait Islander men (Research report, 26/2020). Sydney: ANROWS.

²⁸ Ibid.

²⁹ Ibid.



One example of VACCA's work engaging with men who use violence is our Family Violence Men's program in Gippsland, which has been highly successful in providing therapeutic support for Aboriginal men in the region via Family Violence 1:1 individual case management and group counselling. This program focuses on:

- Understanding family violence
- Understanding and dealing with intergenerational trauma
- Talking about relationships and emotional regulation strategies for Persons using violence.
- Connecting to culture via Group work activates to promote healing: such as artwork camping and fishing on country, making clap sticks, boomerangs and spears, gym sessions golfing and through music.

Non-Aboriginal men using violence against Aboriginal women and children

Recommendation 46: Ensure all case management and behaviour change programs for men who use violence are developed with a cultural lens, addressing harmful attitudes towards Aboriginal people.

As shown in the data discussed at the beginning of this submission, non-Aboriginal men account for a high proportion of violence experienced by Aboriginal women and children. It is critical that the Second Action Plan consider the nuances and emerging patterns of violence in inter-cultural relationships. Culturally grounded programs are not appropriate for engaging non-Aboriginal men who have Aboriginal partners and/or children.

Housing as an enabler to engagement, homelessness as a driver of risk

Recommendation 47: Improve access to housing across the family violence spectrum, including housing with wraparound supports for men using violence; in addition to crisis accommodation, short- and long-term housing options, wraparound supports for affected family members.

VACCA staff identify that the current lack of housing options for men seeking support is one of the main barriers to successful men's programs. Men who use violence are often displaced from the home as a condition of their Family Violence Intervention Order (FVIO). Homelessness has been an ongoing challenge for men accessing VACCA programs, due to the lack of housing options and high prices for temporary accommodation. VACCA's ultimate concern is the impact this has on the safety of their partner and/or family members who are experiencing violence.

If we address the risk of homelessness for men engaged in our programs, we minimise client disengagement and breaching of FVIOs. It is also a noted fact that family violence has increasingly become common amongst family member groups as well as child to parent and sibling to sibling at times.

The lack of safe, affordable crisis, short- and long-term housing options, particularly for clients with complex needs, alongside the stress that comes from insecure housing can also cause men to disengage in the therapeutic elements of the program, limiting the progress that could otherwise have been made.

The critical importance of housing in the context of family violence, and associated recommendations, will be discussed further in the following section of this submission.

Utilising increased motivation to change behaviour while in prison and post-release

Recommendation 48: Invest in evidence-based intensive programs to engage men while in prison and upon release.

VACCA staff report that when men who have used violence are most motivated to change their behaviour when they are exiting prison, making it a critical time for successful engagement.

It is well documented that incarceration has a criminogenic effect. While prison may provide immediate safety for those who have experienced violence, if intensive effort is not made to support people who use violence to change their behaviour while in prison and upon release, long-term safety cannot be achieved.

VACCA's experience in delivering justice programs demonstrates that successful transition from custody requires intensive support both pre and post-release. Through these programs, we've developed deep understanding of the critical support needs that vary between youth and adults, and across different cohorts.

Pre-release engagement must be flexible and responsive to different custodial contexts. For young people, who may be in custody for very short periods, a rigid 6-month pre-release timeframe is unrealistic and would exclude many from accessing support. Youth Through Care programs succeed when they adapt to these shorter timeframes while maintaining intensive support. VACCA's Youth Through Care staff are in youth justice facilities 3-4 times weekly, building relationships and preparing young people for release regardless of their sentence length.

The adult prison context presents different challenges. With approximately 12 men's prisons spread across Victoria, many people are incarcerated far from their home communities. This geographical spread requires careful consideration in program design and funding.

VACCA's Beyond Survival program has demonstrated success working across multiple facilities, but this requires significant resources for travel and coordination. Men are also more likely to have longer sentences, allowing for more structured pre-release planning but requiring strong connections back to their home communities.

Beyond Survival is a 3-day group program that provides trauma informed facilitation of narrative group work for prisoners including yarning circles to support healing and to strengthen each person's connectedness to family, community and culture.

The Beyond Survival program also provides a point of contact post release to support people to navigate and access Aboriginal and non-Aboriginal services and to help connect them to family, community and culture. In doing so, creating wrap around supports that will help sustain the positive changes made in prison, build their protective factors to maximise effective reintegration into the community and reduce the likelihood of reoffending.

Holding people who use coercive control accountable

Failure of criminalisation to deliver accountability and safety

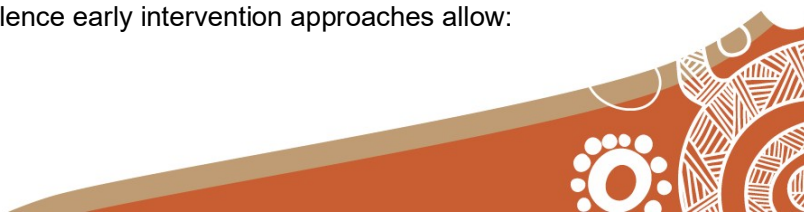
In Victoria, the Labor government and opposition party have both announced their intention to create a stand-alone offence to criminalise coercive control, acknowledging the link between coercive control and female intimate partner homicide.

While the Labor government is yet to table their own proposal, legislation drafted by the Opposition party largely duplicates existing offences, including *Contravene Family Violence Order* and *Stalking*.

It is VACCA's position that criminalisation delays real and genuine accountability. When a person is charged or is the subject of a Family Violence Protection Order application, they are often advised by lawyers to 'make no admissions' and give 'no comment interviews'. This is their right and there is no suggestion that these legal rights should dissipate. But **a whole of community response to family violence cannot be successful where the system only achieves accountability through general deterrence at the expense of demanding true and genuine accountability from individuals who commit family violence.**

The proposal to criminalise coercive control will likely disproportionately target Aboriginal people and will not overcome the barriers police have in prosecuting offences, including gathering evidence to prove matters beyond reasonable doubt. It will not increase safety nor impact positively on individual accountability for those who commit family violence.

For Aboriginal children affected by family violence early intervention approaches allow:



- a 'whole of community approach and community strengthening be grounded in cultural respect and cultural strengthening promote non-violent social norms'³⁰
- 'accountability frameworks that don't rely solely on carceral responses, acknowledging that over-policing and incarceration'³¹
- positive outcome [s] from ...court intervention without...going on to the ramifications of criminal charges to the family³²

Funding of law-and-order approaches rather than prudent investment in evidence-based programs that reduce incidents of family violence and increase safety for families is a backward step. However, **recognition and a shared community understanding of coercive control in the *identification* and *management* of family violence risk would provide a more effective avenue to ensuring the safety of those who have experienced violence.**

³⁰ Royal Commission into Family Violence, Volume V Report and recommendations, March 2016 at 19 sourced at [Royal Commission into Family Violence: Report and Recommendations Volume 5.](#)

³¹ Mandel, D. 'Ensuring the Voice of the Child is Heard, and Child's Best Interests are Considered in Domestic Abuse Cases Safe & Together Model and the Rights of Children', 2024 published by Safe & Together Institute sourced on 10 April 2026.

³² Magistrate Kate Hawkins in evidence to the Royal Commission into Family Violence, Volume 3 Report and recommendations, March 2016 at 285 sourced at [Royal Commission into Family Violence: Report and Recommendations Volume 3.](#)

System Integration

This section of our submission responds to DSS identified Priority Area 5: System Integration and Workforce. We have provided response to issues related to building the specialist and cultural safety skills of the workforce under the section 'People who Experience Violence'. In this section, we focus our response on actions needed to improve system integration. Our recommendations are grouped according to **two key actions** for inclusion in the Second Action Plan:

- **Address compounding risk factors** (including homelessness and AOD use);
- **Build consistency across jurisdictions** (including the definition of family violence, information sharing schemes and risk assessment and management frameworks).

Address Compounding Risk Factors

There are many dynamic risk factors that increase the likelihood of experiencing and/or using violence, including housing stress and homelessness, financial stress, poverty, alcohol and other drug (AOD) use, mental health issues, lower levels of education attainment and underemployment/unemployment.³³ As identified by the Closing the Gap socio-economic targets, the presence and impacts of these risk factors is often compounded for Aboriginal people as a result of historical **and** contemporary systemic discrimination and racism since colonisation. The compounding effect of these risk factors highlights the importance of aligning the Second Action Plan with the objectives of the National Plan. **To eliminate violence we must have a holistic approach, focused on improving system integration beyond the family violence sector, taking into consideration the intersecting and compounding nature of dynamic risk factors.**

Housing and Homelessness

Recommendation 49: Establish culturally-safe housing and homelessness supports as an essential element of the family violence response system.

In Victoria, family violence is the primary driver of homelessness for Aboriginal women and children. Lack of access to safe and affordable housing remains one of the most significant barriers to safety, healing and recovery for Aboriginal families.

The Inquiry into Homelessness in Victoria found that in 2019-20 the number of people seeking housing assistance due to family violence rose by 81.5% cent from 2011 to 2019.³⁴ These findings are echoed in data from the Report on Government Services where 30% of all Victorian clients in 2023-24 receiving specialist homelessness services funded through the National Housing and Homelessness Agreement also received support for family violence, which was above the national average of 24.3%.³⁵

For people seeking to leave a violent household, there is a lack of options available when they require safe, secure and specialised housing to meet their needs. There are significant gaps in housing infrastructure, including a lack of one and two -bedroom units for people who use violence and insufficient refuge spaces for the person experiencing/affected by family violence, and a general shortage of affordable housing. These insufficiencies are felt across the State in both regional communities and in metro Melbourne.

Many women who seek specialist homelessness services request assistance as they do not have the financial stability to acquire housing and consequently their options are extremely limited, impacting on their ability to leave a violent environment. Alternative crisis accommodation consists of options which are not culturally safe or long-term, including motels, boarding houses, hostels and caravan parks. Motels are particularly unsuitable for families and can lead to intervention by the

³³ AIHW 2026, 'Factors Associated with FSDV', <https://www.aihw.gov.au/family-domestic-and-sexual-violence/understanding-fdsv/factors-associated-with-fdsv>

³⁴ Legislative Council: Legal and Social Issues Committee. (2021). Inquiry into Homelessness in Victoria. [Weblink](#)

³⁵ Productivity Commission. (2025). Report on Government Services. [Weblink](#)



Child Protection system, increasing the risk of child removal. While motel accommodation is widely recognised as unsafe and unsuitable, it often remains the only available crisis option.

In addition, compounding housing stressors such as unstable housing tenure, homelessness, mortgage and rental stress due to family violence causes families to become vulnerable and at risk of involvement from child protection and to child removal.

Unaffordable or insecure housing means that those fleeing violence are often economically dependent on users of family violence and increase vulnerability to financial abuse. Women are often faced with living with family violence or entering policy induced poverty, with research identifying how insufficient social security payments contribute to the experience of financial hardship.^{36,37}

The lack of 1 and 2-bedroom units present a major barrier for recovery and rehabilitation for those who use violence and we know that without appropriate resources for people using violence, it is impossible to end the chronic cycle of family violence and its intersection with homelessness.

This intersection is further compounded in regional and rural areas where there is already limited housing stock and an affordable housing crisis. VACCA's Refuge, Orana Gunyah, is one example of community-led service delivery embedded in Aboriginal self-determination and the rights of women and children. Operating in regional and rural areas, Orana Gunyah provides critical culturally appropriate crisis service and accommodation in Gippsland.

VACCA advocates for greater investment in culturally appropriate family violence programs in regional areas across prevention, early intervention, and response, but in particular, we call for culturally safe crisis accommodation noting the compounded impact of family violence and experiences of homelessness in regional areas.

The provision of ample, Aboriginal-specific, culturally safe, affordable, accessible and sustainable housing is key to addressing the cycle of poverty, family violence and homelessness. This must also be combined with ACCO-led, wrap-around, trauma-informed responses that support the specific needs of Aboriginal families affected by family violence.

Purpose-built, Aboriginal-led housing options

Immediate and proportionate investment in a continuum of purpose-built, Aboriginal-led housing options, spanning crisis accommodation, transitional, and long-term housing options is needed. Housing must meet the needs of people experiencing and affected by family violence including:

- Aboriginal people escaping family violence, including women, men, children and, elders and LGBTQIA+ community.
- Aboriginal users of violence
- Women presenting with alcohol and other drug issues.

Wraparound Services and Holistic Housing Models

Any housing and homelessness plans developed by governing bodies for those affected by family violence need to be holistic, culturally safe, and based on community-led housing models. These models should be co-designed with Aboriginal communities and co-located with essential services such as schools, healthcare, and employment opportunities. Wraparound support services that address not only housing but also healing, recovery, and social connection are critical to improve outcomes at the intersection of family violence, housing, and homelessness for Aboriginal communities in Victoria.

People Using Violence

Immediate investment in 1 and 2-bedroom units specifically for people who use violence. These units allow individuals to be removed from the family home while maintaining stable housing, facilitating accountability and engagement in behaviour change programs and also support the safety of affected family members.

³⁶ Summers, A. (2022). The Choice: Violence or Poverty. University of Technology Sydney p22.

³⁷ Australia's National Research Organisation for Women's Safety. (2022). *Economic security and intimate partner violence: Research synthesis*. ANROWS.

Crisis Accommodation

Investment in Aboriginal-specific crisis refuges, noting that motel and hotel crisis accommodation has been determined to be unsuitable and unsafe and should be replaced by purpose-built crisis accommodation. These refuges should be available statewide and must be culturally safe, community-led, and grounded in connection to Country and kinship. Their design and operation must be led by Aboriginal communities to ensure they meet local needs and reflect cultural values.

Transitional Housing

Investment in stock and expanding nomination rights for ACCOs would improve equitable access and enable culturally safe placements in transitional housing. Investment should focus on developing trauma-informed, culturally appropriate transitional housing, designed in partnership with ACCOs and Aboriginal leaders to ensure alignment with community needs and values.

Long term, secure housing

Investment in housing models that support the transition to long-term housing is critical for breaking the cycle of family violence and homelessness. The Housing First model is one example of a widely recognised framework for addressing homelessness, particularly among individuals with complex needs, including those affected by family violence. This model prioritises immediate access to permanent and long-term housing. To ensure the effectiveness and cultural safety of the Housing First model for Aboriginal people, it is essential that the framework be adapted to reflect Aboriginal values, principles of self-determination, and community-led practices.

AOD Support

Recommendation 50: Embed an integrated, multi-disciplinary approach to service delivery across specialist homelessness, AOD, mental health, family violence and family services to better respond to the intersecting and compounding needs of those accessing these services.

Some Aboriginal people who have experienced violence are denied access to family violence crisis accommodation because they have AOD dependency. Denial of service is akin to failure of duty of care, and contributes to systemic discrimination against Aboriginal women. In Victoria, the Multi Agency Risk Assessment and Management framework (MARAM) notes the compounding and intersecting nature of family violence and abuse, including the impact on mental health and wellbeing, as well as the use of AOD as a means of coercion and control, or a coping mechanism against trauma by the affected family member. Yet, when these vulnerable at-risk community members are denied crisis support services, this shows an abject disregard by the system for their rights to service and a life free from violence.

National Consistency Across Jurisdictions

Nationally consistent, intersectional definition of domestic, family and sexual violence

Recommendation 51: Develop a nationally consistent, intersectional definition of domestic, family and sexual violence, that encompasses a broad range of experiences of violence, including those experienced by Aboriginal and Torres Strait Islander and LGBTQISB+ communities.

As has been discussed throughout this submission, VACCA hears from many Aboriginal clients who have been denied support from mainstream services due to practitioners' failure to understand their experiences of violence from a cultural perspective. It is critical that the Second Action Plan supports the development of a nationally consistent, intersectional definition of family violence, that captures the experiences of all Australians, not just those that reflect a heteronormative, Western-centric, nuclear family experience.

We advocate for the adoption of **a holistic approach to family violence, inclusive of the whole family**, which still holds people who are using violence to account, but also recognises the impacts of colonisation, intergenerational trauma, Stolen Generations, and experiences of family violence on both affected family members those who use violence.



The definition needs to **emphasise that the cycle of family violence brings people into contact with many different parts of the service system, and efforts to reduce violence and improve outcomes for Aboriginal people and children must work across all of these systems**, including family violence services; police, the justice system and the courts; housing and homelessness services; child and family services; child protection and out-of-home care; and health, mental health, and substance abuse.

National Information Sharing Scheme

Recommendation 52: Establish a national information sharing scheme to address barriers to managing risk across jurisdictional borders and systems.

In Victoria, the establishment of the Family Violence Information Sharing Scheme (FVISS) and the Child Information Sharing Scheme (CISS) has improved the ability for services to work collaboratively to better manage risk and ensure safety. FVISS and CISS are legislated under Victoria's Multi-Agency risk Assessment and Management (MARAM) Framework.

As a state-wide service, VACCA staff support many families who live near the Victorian border. Jurisdictional differences in information sharing protocols and legislation create significant barriers to managing risk in cross-border regions.

National alignment of risk assessment and management frameworks

Recommendation 53: Establish a nationally consistent framework for risk assessment and management, with an intersectional cultural lens embedded.

VACCA staff also report barriers to effectively supporting families in cross border regions due to jurisdictional differences in approached to risk assessment and management. It is critical that risk assessment and management frameworks across all jurisdictions to ensure that when families move across borders, whether temporarily or permanently, smooth coordination between services and accurate assessment of risk can be managed effectively.

Since the development of MARAM in 2018, VACCA has undertaken significant work and advocacy to ensure that a cultural lens is embedded across all aspects of this framework. In addition, we have advocated consistently for the need of, and then been funded to develop resources and adapt tools to embed a cultural lens in the screening, assessment, and management of family violence risk across VACCA. This includes the development and adaption of training tools and resources for adults and children who have experienced violence. As implementation of MARAM has progressed, VACCA has seen the involvement of ACCOs increase and occur at an earlier stage, which we see as fundamental to the successful implementation of MARAM. Instead of Aboriginal involvement being perceived as an 'add-on', we have observed an increased recognition of the need to partner with Aboriginal organisations. This has provided the opportunity for a cultural lens to be embedded in more meaningful and substantive ways. As the suite of tools under MARAM expands and develops, there will also be a need to consolidate and develop training, tools and resources for practitioners who work with all members of the family impacted by family violence.

In aligning risk assessment and management frameworks nationally, Victoria's efforts to embed a cultural lens in the MARAM Framework provides a useful blueprint.