



Tasmanian Council of Social Service Inc.

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# Third Family and Sexual Violence Action Plan

*May 2022*



**INTEGRITY  
COMPASSION  
INFLUENCE**

## About TasCOSS

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TasCOSS's vision is for one Tasmania, free of poverty and inequality where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry in Tasmania; and to challenge and change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

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## Introduction

Thank you for the opportunity to make a submission to the Tasmanian Government in relation to the third Family and Sexual Violence Action Plan ('the Plan').

Our submission will focus on key issues relating to the questions posed as part of the public consultation process, as well as issues raised in consultation with our member organisations.

## Culture, language, messaging and attitudes

### The importance of primary prevention and education

TasCOSS strongly advocates for an increased focus on primary prevention and community awareness, developed and delivered by specialist community organisations. As we have noted in previous submissions relating to proposed legislative reform,<sup>1</sup> we believe increasing community awareness of issues relating to family and sexual violence, as well as awareness of existing supports, is key to promoting women's safety and gender equality. This could include media campaigns to raise awareness of key issues, bystander approach education, and tailored programs to work with particular communities (for example, respectful relationships education in schools).

There are several examples of successful programs being run by Tasmanian community organisations, including primary prevention programs run by the Sexual Assault Support Service (SASS),<sup>2</sup> school education programs run by Laurel House,<sup>3</sup> and joint education programs developed and delivered by Laurel House and Women's Legal Service.<sup>4</sup> We believe ongoing funding for the continuation and expansion of these programs, as well as the development of additional primary prevention programs, should be a clear priority and pillar of the Plan.

Primary prevention and education should also be tailored to ensure it is effective for particular groups or communities and responds to their needs. For example, Australians with disability are statistically more likely to experience violence and abuse, with recent showing that women with disability experience higher rates of intimate partner violence, emotional abuse, stalking and sexual violence than women without disability and men with disability.<sup>5</sup> Tasmanians with disability therefore need to be supported to understand issues relating to violence, safety and healthy relationships, and receive information in ways that are accessible and promote their rights.

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<sup>1</sup> For example, see TasCOSS 2022, Submission to Department of Justice, *Criminal Code Amendment Bill 2022*, February 2022.

<sup>2</sup> SASS run a number of education programs targeted at school-aged children (both primary and secondary), school staff, parents and guardians, aiming to identify and address harmful behaviours and attitudes whilst also promoting healthy, respectful and ethical sexual decision-making.

<sup>3</sup> Consent – Sex and Respect is a program run by Laurel House. It is targeted towards high school students and covers topics relating to consent, respectful relationships and the law, including healthy and unhealthy relationships, violence and online safety.

<sup>4</sup> Consent, Sex and the Law is a collaboration between Laurel House and Women's Legal Service. The program has been piloted within high school communities where parents, carers, teachers and other school staff are encouraged to consider the law and how they can better support their children and students to have respectful relationships.

<sup>5</sup> Georgina Sutherland, Anne Kavanagh, Gwynnyth Llewellyn, Sean Byars, Lauren Krnjacki, and Jen Hargrave, *Nature and extent of violence, abuse, neglect and exploitation against people with disability in Australia*, draft report, March 2020, pp 8–11.

We also note the need for additional training and support for workers across various intersecting areas (including health and mental health services, employment services, police and educational settings) to ensure all Tasmanian workers providing frontline support are equipped to respond appropriately to family and sexual violence. Workers should be able to respond to disclosures or incidents of violence in a wide range of settings, as well as identifying behaviours which may be indicative of violence or risk of violence (particularly in settings where people may not be aware of or able to articulate their experience of violence). This includes the development of cross-sector training and educational resources, as well as further investment in collaborative programs (such as health justice partnerships), where professionals from different backgrounds can learn and work together.

***Recommendation 1: Increased funding for primary prevention and community education programs.***

***Recommendation 2: Training and support for a broad range of service delivery organisations to respond appropriately to family and sexual violence.***

#### **Consistent, positive messaging which challenges myths and promotes healthy relationships**

As well as increasing opportunities for primary prevention and community education, it is extremely important that all services and initiatives are using positive language and messaging to counteract pervasive myths about relationships, family violence and sexual abuse (such as outdated gender norms, false narratives about the 'ideal victim', or ideas which promote unhealthy relationships). For maximum effect, these messages should be included widely in mainstream services and programs, as well as by specialist organisations or in tailored programs working with victim survivors or perpetrators. For example, in the educational context, materials should be developed throughout the curriculum to incorporate clear and consistent messages about healthy relationships, rather than a stand-alone class or session. Family violence is broad and covers a range of destructive behaviours which go far beyond the formal legal definition, so it is particularly important to have clear and consistent messaging about positive and healthy relationships.

Inclusive language is also key to promoting equality and should be embraced sector-wide as an important strategy to combat gender inequality and discriminatory attitudes (such as homophobia, ableism or transphobia).

***Recommendation 3: Build respectful relationships language and messages into mainstream and specialist services, as well as examples of positive and healthy relationships.***

***Recommendation 4: Inclusive language should be adopted across the family and sexual violence sector to combat gendered assumptions and discriminatory attitudes.***

#### **Clear and accessible information**

Information about family and sexual violence, as well as where to access support, must be provided in ways that are easy to understand and to access for all Tasmanians. This includes providing information in language that is appropriate for diverse audiences (for example, culturally and linguistically diverse Tasmanians, people with disability, children, or people with limited literacy skills), as well as in a variety

of formats, including information available online and through face-to-face services. Particular population groups should work with the Government to design and distribute appropriate material.

TasCOSS highlights the current digital inequality in Tasmania, where many older people, or people in remote areas, do not have access to reliable or affordable internet services. We also note the low levels of both literacy<sup>6</sup> and digital literacy<sup>7</sup> in our state.

***Recommendation 5: Information about family and sexual violence and where to find support, should be designed and distributed with input from particular population groups and be more readily accessible for Tasmanians.***

### **Intersectional approach**

Family and sexual violence in Tasmania cannot be addressed in isolation from other social stressors, which can significantly impact a person's experience of family violence or place them at an elevated risk of experiencing violence or abuse. These stressors include a lack of appropriate and safe housing, poor health and mental health, lack of transport, lack of secure employment and poverty. Government strategies and action plans must address these needs alongside measures directly addressing or responding to family and sexual violence.

TasCOSS has previously highlighted concerns with strategies focused on further criminalisation of perpetrators.<sup>8</sup> We note that some marginalised communities in particular (such as LGBTQIA+ communities, Aboriginal Tasmanians and people from culturally and linguistically diverse communities) may have a lack of confidence in the police or be unlikely to seek assistance from the criminal justice system as a response to violence. We are therefore concerned that the proposed model for the Multidisciplinary Centres (MDCs), which has police co-located with support services, may fail to meet the needs of many victim survivors in our community. We strongly encourage the Government to develop initiatives to better support victim survivors outside of the police/criminal justice response, to ensure certain victim-survivors are not further marginalised from receiving the assistance they need.

***Recommendation 6: The Family and Sexual Violence Action Plan and any associated initiatives must reflect the intersecting issues that drive and impact on family and sexual violence, including poverty, mental health and housing stress.***

***Recommendation 7: The Government should fund more responses to family and sexual violence that sit outside the police and criminal justice systems.***

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<sup>6</sup> According to 26TEN, only 49.8% of adult Tasmanians have literacy skills at or above OECD Level 3 – see Tasmanian Government, 26TEN: Tasmania's Strategy for Adult Literacy and Numeracy 2016-2025, <https://26ten.tas.gov.au/Pages/Strategy.aspx>.

<sup>7</sup> According to the Australian Digital Inclusion Index, digital access, affordability and skills in Tasmania are the lowest in Australia – see Thomas, J., Barraket, J., Parkinson, S., Wilson, C., Holcombe-James, I., Kennedy, J., Mannell, K., Brydon, A. (2021). Australian Digital Inclusion Index: 2021. Melbourne: RMIT, Swinburne University of Technology, and Telstra, 5.

<sup>8</sup> For example, see TasCOSS 2022, Submission to Department of Justice, *Criminal Code Amendment Bill 2022*, February 2022 and TasCOSS 2021, Submission to Department of Justice, *Family Violence Reforms Bill 2021*, October 2021.

## Service model design

### Place-based services to provide comprehensive support

Information about and support for people affected by family and sexual violence should be provided through a broad range of services, utilising a ‘no wrong door’ approach. This requires workers and services to be equipped to provide an effective and timely referral system to ensure people are provided assistance when they reach out for help.

Family and sexual support services must be tailored to the needs of the Tasmanian community, acknowledging the reality that most Tasmanians are living in regional or remote areas and ideally designed and developed in consultation with local organisations and groups to ensure programs and services are responsive to actual need and delivered in ways that are most appropriate for community members.

TasCOSS strongly supports models of service which are place-based and utilise existing strong community connections to deliver services. Services must also be equipped to handle the continuum of needs of clients or prospective clients, from primary prevention activities through to acute responses. In many instances, providing comprehensive through-care support will require collaboration between services (for example, partnerships between community legal centres and emergency housing providers). An example of such a service is the proposed Health Justice Partnership soon to be delivered in Tasmania as a pilot project (run by Women’s Legal Service and located at a hospital in Launceston). As noted in previous law reform submissions,<sup>9</sup> TasCOSS supports the further development and funding of cross-sector initiatives, such as health justice partnerships as effective responses to family violence, particularly in instances where violence is perpetrated against women from marginalised populations. TasCOSS also recommends the development of similar initiatives and programs to work therapeutically with perpetrators of family and sexual violence, as well as victim survivors.

We note the Government’s announcement to pilot MDCs as a strategy to combat family and sexual violence. TasCOSS has previously advocated for HUB-style services where people can access a range of services. For example, in the context of the recent consultation in relation to the youth justice system, we recommended the ‘design of HUB-style, multi-agency and wraparound support services for children and young people, offering assistance for issues including homelessness, AOD support and mental health’.<sup>10</sup> Similarly, in the area of family and sexual violence we believe the development of multidisciplinary centres in key locations could provide a range of services to women and families and could also strengthen existing relationships between service providers. However, TasCOSS urges careful consideration of which services should be included and co-located at the centres, noting that a police presence may in fact create a barrier to some victim-survivors seeking support (for the reasons outlined above).

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<sup>9</sup> TasCOSS 2022, Submission to Department of Justice, *Criminal Code Amendment Bill 2022*, February 2022 and TasCOSS 2021, Submission to Department of Justice, *Family Violence Reforms Bill 2021*, October 2021.

<sup>10</sup> TasCOSS, Submission to Department of Communities, *Reforming Tasmania’s Youth Justice System*, March 2022.

***Recommendation 8: Information about and support for people affected by family and sexual violence should adopt a ‘no wrong door’ approach so the social, health and justice service systems can offer appropriate support or make appropriate referrals.***

***Recommendation 9: The design of multidisciplinary centres should be informed by people with lived experience of family and sexual violence including those who seek a non-police response.***

#### **Encouraging collaboration between services**

As outlined above, there are several existing examples of successful collaborations between community organisations, including TasCOSS member organisations already working together strategically to support Tasmanians. Government initiatives should therefore take advantage of the skills, expertise and existing strong relationships between community organisations. Further funding for existing partnerships and jointly-delivered services and programs (such as the Health Justice Partnership) should be prioritised and consideration given to additional collaborative programs and initiatives. This includes funding for initiatives which would assist coordination and collaboration not only between services, but also between the sector and the Government to ensure proposed policies are responsive to the needs of the sector and those with lived experience.

***Recommendation 10: Existing, successful programs and initiatives should continue to receive funding, and increased where there is evidence of unmet need.***

#### **Clear targets and frequent opportunities for reflection on progress**

The development of the third action plan for family and sexual violence is an opportunity for the Tasmanian Government to set clear targets, as well as establishing best-practice frameworks. For example, the Victorian Government’s 10-year plan for change establishes seven clear targets,<sup>11</sup> as well as a rolling action plan which identifies priorities within shorter timeframes.<sup>12</sup> We endorse this approach and recommend the Plan embed opportunities for the Government to report on progress towards the identified targets.

TasCOSS also strongly recommends the inclusion of targets which address the underlying factors contributing to or exacerbating the experience of many Tasmanian victim-survivors. For example, one target could relate to safe and secure housing, a pressing issue for many Tasmanian women and families fleeing and/or experiencing violence. Ideally, these targets could also be included in the Gender Budget Impact Statement, which provides an opportunity for the Government to demonstrate how proposed spending is intended to meet gender equality goals, to think strategically about how the Government can better support women across a number of areas (including housing, health and community services) and to engage in meaningful analysis that tells us, with a gender lens, who benefits and who is disadvantaged by a budget and the policies it supports.

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<sup>11</sup> State of Victoria (Department of Premier and Cabinet), Ending Family Violence: Victoria’s Plan for Change (2016), accessed at <https://www.vic.gov.au/ending-family-violence-victorias-10-year-plan-change>.

<sup>12</sup> See Victorian Government, Family violence rolling action plan 2017-2020 accessed at <https://www.vic.gov.au/family-violence-rolling-action-plan-2017-2020>, and Family violence reform rolling action plan 2020-2023 accessed at <https://www.vic.gov.au/family-violence-reform-rolling-action-plan-2020-2023>.

***Recommendation 11: Develop clear targets and actions and report on progress.***

***Recommendation 12: Include targets to address the drivers of family and sexual violence, such as housing for women.***

## Skilled and knowledgeable workforce

### Clear guidelines to establish best practice

TasCOSS believes there are opportunities to better support the community by adopting a coordinated approach to training in Tasmania. Many of our member organisations have highlighted the need for consistency in identifying and responding to family and sexual violence, and the need for clear frameworks to establish best practice. This includes ensuring all workers across the sector are aware of issues relating to family and sexual violence, including where and how to get help if needed. Training and education programs should draw on the expertise and experience of our specialist family violence sector, who are well-placed to educate the broader community about their work. All training should also be delivered from a trauma-informed lens.

TasCOSS recommends the Plan include steps towards the development of a statewide response to risk, which could include guidelines around assessment, how to safely manage and respond to disclosures or incidents and information-sharing principles. Clear guidelines would promote consistent practice and assist services navigating complex issues (such as how to manage conflicts of interest in multi-disciplinary settings or navigate confidentiality in regional or remote areas). TasCOSS recommends the Government draws on existing guidelines or models to inform this work, for example the Safe and Together Addressing Complexity program<sup>13</sup> or the Victorian MARAM framework.<sup>14</sup>

***Recommendation 13: Develop a cross sector statewide response to risk including guidelines around assessment, responses to disclosures and information sharing.***

***Recommendation 14: Increase sector-wide training for all Tasmanian workers, drawing on the skills and expertise of our specialist family violence workforce.***

### Coordinated approach to training and skill development

Tasmania must also continue to support the development of workers in the community services industry by allowing them greater opportunities to access training and develop their skills. Some ideas for how the Government could promote continuing professional development include the development of a specialist graduate program, programs to attract and retain staff in regional and remote locations, and scholarships/bursaries to encourage ongoing professional development within the community services industry.

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<sup>13</sup> For information about Safe and Together Addressing Complexity (STACEY), please see Australia's National Research Organisation for Women's Safety (ANROWS) project, Safe and Together Addressing Complexity focusing on children, accessed at <https://www.anrows.org.au/project/stacy-for-children/>.

<sup>14</sup> Victorian Government, MARAM Practice Guides and Resources, <https://www.vic.gov.au/maram-practice-guides-and-resources>.



***Recommendation 15: In partnership with TasCOSS, implement the Community Services Industry Plan priorities and actions to attract, retain and develop more specialist workers in community services.***

#### **Consistent and adequate funding to allow long-term planning and improve staff retention**

Many of our member organisations have highlighted difficulties created by short funding cycles, which significantly impact organisations' ability to engage in long-term planning for programs and service delivery. Funding also has a drastic impact on an organisation's ability to recruit and retain staff. In particular, our member organisations working in the area of family and sexual violence have highlighted the time and resources needed to train new staff members and ensure they are appropriately equipped to work safely with their extremely vulnerable client base.

Many of our member organisations have spoken of the pressure felt by their organisations and staff delivering frontline services in the area of family and sexual violence. This pressure has been exacerbated by COVID-19, which saw an increase in demand for services under challenging work conditions. TasCOSS highlights the need to support and protect workers in these organisations who are performing difficult and emotionally fraught work, often under demanding circumstances. Increasing worker and organisational certainty through appropriate, long-term funding is a way to support our community workforce, as well as ensuring the ongoing stability of the industry.

This submission has already addressed the importance of strategic, collaborative work in the areas of family and sexual violence. More adequate long-term funding would also assist community organisations to develop further collaborative projects.

TasCOSS welcomes the recent Budget announcements providing extensions of funding to several family violence and sexual assault specialist support services, allowing for five-year contracts. We strongly support longer-term funding cycles for organisations and programs in family and sexual violence, to create greater certainty around the continuation of service delivery, promote the establishment and continuation of strategic partnerships and ensure staff in the industry, particularly in specialist family and sexual violence services, are appropriately supported in their work.

***Recommendation 16: Continue and expand longer-term funding cycles for service providers, and contracts that reflect the needs and costs of ongoing professional development and support for staff.***

#### **Embedding the voices of lived experience in service design**

TasCOSS strongly supports initiatives which give voice to the lived experience of Tasmanians. We encourage the Government to consider further ways to embed the voice of victim survivors within the family and sexual violence framework.

Many community organisations are already supporting Tasmanians with lived experience of family and/or sexual violence to be involved in further advocacy and engagement. For example, the Advocates for Change program run by Engender Equality is a group of volunteer advocates who share their lived experience of family and/or sexual violence to increase public awareness of these issues and influence public policy decision-making. Volunteer advocates receive training and support from Engender Equality to help them in their role. Other organisations are engaging in pre-and-post engagement research with

clients to record and reflect on the experience of service users more accurately<sup>15</sup> and developing frameworks which encourage the incorporation of lived experience in program design and delivery.<sup>16</sup>

TasCOSS strongly supports the further development and funding of programs and/or projects to create more opportunities for the inclusion of lived experience in service design.

***Recommendation 17: Sustainable funding to ensure the voices of people with lived experience in the design and delivery of services.***

## Evidence, data collection and research

### Embedding the voices of lived experience in research and evidence

As well as our recommendation above for greater opportunities to include lived experience in service design and delivery, TasCOSS also supports initiatives to include the experience and voice of victim-survivors, as well as specialist workers and organisations in research around family and sexual violence.

Tasmanian community organisations are already engaging in practice-based research, which can be an important advocacy and awareness raising tool, particularly in relation to communities or groups who may be marginalised from mainstream research and/or messaging. For example, the work of the Social Action Research Centre has given voice to young people experiencing homelessness in Tasmania, raising awareness of the issues impacting their lives and identifying key priorities for reform.<sup>17</sup> TasCOSS believes community organisations are well-placed to engage in research with marginalised Tasmanians, as they have well-established relationships with their client base and service providers, as well as expert knowledge of the lived experience of victim survivors. This is also consistent with research relating to the Safe at Home project around Australia, which highlights the importance of practice informed research, noting that, ‘practitioners have the day-to-day experience in service provision offering invaluable input about effective processes and measures’.<sup>18</sup>

### Consistent and comprehensive use of data

Our member organisations have highlighted the need for sector-wide consistency in data collection, to ensure services are capturing information in a way that reflects the work and needs of their organisations and clients, wherever they are. A specific data collection and sharing framework could also be developed alongside clear guidelines relating to best-practice (as outlined above). Data collected by both

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<sup>15</sup> For example, a current collaboration between SASS and the UTAS Tasmanian Institute of Law Enforcement Studies (TILES), which will provide local data about the types of sexual violence occurring in Tasmania, the support services available and what improvements can be made to these services. A link to the project can be found here:

[https://www.utas.edu.au/tiles/research/current\\_projects](https://www.utas.edu.au/tiles/research/current_projects).

<sup>16</sup> For example, Tasmania Legal Aid, Client Satisfaction Survey: Summary Report (March 2022), accessed at

[https://www.legalaid.tas.gov.au/wp-content/uploads/2022/03/TLA-Client-Satisfaction-Survey-Summary-Report\\_FINAL.pdf](https://www.legalaid.tas.gov.au/wp-content/uploads/2022/03/TLA-Client-Satisfaction-Survey-Summary-Report_FINAL.pdf).

<sup>17</sup> Catherine Robinson, Social Action Research Centre, Anglicare Tasmania, Better, Bigger, Stronger: Responding to the mental health care needs of unaccompanied homeless children in Tasmania (April 2022), accessed at <https://www.anglicare-tas.org.au/research/better-bigger-stronger-final-report/>.

<sup>18</sup> ANROWS, Safe at Home: Lessons for Practitioners and Policy Makers (11 October 2016)

<https://www.anrows.org.au/news/safe-home-lessons-for-practitioners-and-policy-makers/>.

government and non-government services should also be used to inform future demand for services, the development of programs and initiatives, and directions for research.

***Recommendation 18: Develop a data collection and sharing framework to help guide place-based service responses.***

## List of Recommendations

- Recommendation 1: Increased funding for primary prevention and community education programs.
- Recommendation 2: Training and support for a broad range of service delivery organisations to respond appropriately to family and sexual violence.
- Recommendation 3: Build respectful relationships language and messages into mainstream and specialist services, as well as examples of positive and healthy relationships.
- Recommendation 4: Inclusive language should be adopted across the family and sexual violence sector to combat gendered assumptions and discriminatory attitudes.
- Recommendation 5: Information about family and sexual violence and where to find support, should be designed and distributed with input from particular population groups and be more readily accessible for Tasmanians.
- Recommendation 6: The Family and Sexual Violence Action Plan and any associated initiatives must reflect the intersecting issues that drive and impact on family and sexual violence, including poverty, mental health and housing stress.
- Recommendation 7: The Government should fund more responses to family and sexual violence that sit outside the police and criminal justice systems.
- Recommendation 8: Information about and support for people affected by family and sexual violence should adopt a 'no wrong door' approach so the social, health and justice service systems can offer appropriate support or make appropriate referrals.
- Recommendation 9: The design of multidisciplinary centres should be informed by people with lived experience of family and sexual violence including those who seek a non-police response.

- Recommendation 10: Existing, successful programs and initiatives should continue to receive funding, and increased where there is evidence of unmet need.
- Recommendation 11: Develop clear targets and actions and report on progress.
- Recommendation 12: Include targets to address the drivers of family and sexual violence, such as housing for women.
- Recommendation 13: Develop a cross sector statewide response to risk including guidelines around assessment, responses to disclosures and information sharing.
- Recommendation 14: Increase sector-wide training to all Tasmanian workers, drawing on the skills and expertise of our specialist family violence workforce.
- Recommendation 15: In partnership with TasCOSS, implement the Community Services Industry Plan priorities and actions to attract, retain and develop more specialist workers in community services.
- Recommendation 16: Continue and expand longer-term funding cycles for service providers and contracts that reflect the needs and costs of ongoing professional development and support for staff.
- Recommendation 17: Sustainable funding to ensure the voices of people with lived experience in the design and delivery of services.
- Recommendation 18: Develop a data collection and sharing framework to help guide place-based service responses.