

WRITTEN SUBMISSION to provide comment on
the **ACTION PLAN CONSULTATION FRAMEWORK**
for **ADDRESSING VIOLENCE AGAINST WOMEN AND THEIR CHILDREN**

Please complete your submission in a **Word.doc format** and email to the Office of Women's Policy (OWP):

submissions.owp@dhs.vic.gov.au

by **no later than Friday 23 March 2012.**

Should you have any questions relating to your submission, please contact the Office of Women's Policy - Selina Getley on 9918 7328 or Angela Bourke on 9918 7346.

Please complete:

Name of stakeholder/ organisation / individual making this submission:

City of Melbourne

Name(s) and position(s) of the author(s) of this submission:

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The comments provided in this submission are from the perspective of (please bold or underline those that apply):

Local government

Submissions

The information provided in this submission will be used to inform a feedback report to the Minister for Women's Affairs and other responsible ministers. The feedback report will consist of aggregated, de-identified information and will be used to inform the final Action Plan for addressing violence against women and their children. It is not intended that this report will be published.

Submissions will be treated in confidence and will not be published. Any request made under the *Freedom of Information Act 1982* for access to a submission will be determined in accordance with that Act.

CONSULTATION QUESTIONS

Please provide your feedback by responding to the consultation questions below.

1. Does the Consultation Framework provide balance in terms of addressing all forms of violence against women and their children?

1.1 The City of Melbourne commends the Victorian Government for developing the comprehensive *Addressing Violence Against Women and their Children Action Plan Consultation Framework*.

1.2 The Plan acknowledges many forms of violence against women and their children however the consultation framework should be stronger in approach and language. For example, it could recognise that family violence is largely a gendered crime against women and that adequate resources are urgently needed to focus on changing men and boys attitudes and behaviours towards women and girls. More specifically:

1.2.1 Stronger recognition of all forms of violence against women and children is required and how to support women in these situations e.g. non familial violence, random attack, cultural violence such as genital mutilation, community violence, social violence, peer abuse and bullying, advertising and media violence, sexual objectification of children, sexting, sexual harassment, pornography and elder abuse.

1.2.2 There needs to be a focus and greater awareness on gender and the impact of debt as a result of family violence - in the context of women being primary carers, having less earning capacity, less superannuation, loss of home via separation and divorce and inheriting debt that prevents them accessing financial and accommodation resources.

1.2.3 Violence against children and the harmful impacts could be stated more strongly including the high propensity of those witnessing violence to become abusive and violent in their behaviour as adults. In general, the framework needs to strengthen its stand regarding family violence involving children (inter familial and extra familial). It requires actions based on a whole of government (and cross sectorial) approach including primary prevention, early intervention and secondary/tertiary response.

1.2.4 The plan could broaden its scope to recognise the impact of major community emergencies/natural disasters that can have high associated violence and trauma during the event and increased family violence in the aftermath. A gendered response in preparedness strategies, emergency management and care is required.

1.2.5 Indirect abusive behaviours, for example, control of the assets, earnings and/or the pension of women with disabilities of all ages. Women in these situations are often rendered powerless and are unable to gain appropriate representation of their individual right to pursue their life aspirations.

1.2.6 Requests to leave abusive 'dependent relationships' from parents or partners often results in verbal and physical violence for women with disabilities (and their children).

1.2.7 More research is required into the specific causes of cyber-bullying, sex trafficking and female mutilation and the most effective strategies to address these forms of violence before it is possible to take effective action to prevent them from occurring.

2. Does the Consultation Framework provide the right balance between prevention, early intervention and response?

2.1 Structural and causal factors of violence should be more strongly recognised in the framework. The City of Melbourne's research on *Women's Experience of Homelessness 2011* clearly identifies that for the women who participated in the study the leading cause of their homelessness was family violence which often led to extreme poverty (eg sexually inherited debt) and subsequent homelessness.

2.2 Whilst it is appreciated that the framework highlights the need for an integrated approach across primary, secondary and tertiary systems from a local government perspective there is an urgent need to strengthen a coordinated primary prevention and early intervention approach that stops women and children having to leave their homes, friends, and communities in order to be safe.

2.3 Resources need to be made available to local government to strengthen multifaceted community education programs that promote safe communities and safe families, improve parenting skills by informing parents and carers of the impacts and long term effects of violence on children's development, and to promote respectful relationships across all program areas –in a whole of life approach –from infancy in child care centres to seniors in aged services.

2.4 Current resource allocation highlights the perennial challenge of where to direct energy. With approximately 93% of State Government funding going towards the Service Response end of the continuum and the number of family violence reports continuing to rise, it is clear more resources are needed for early intervention and prevention in efforts to address the attitudinal base.

2.5 Action areas are not detailed, so it is difficult to comment on whether 'the right balance' has been achieved. The reality will come down to commitment by all levels of Government, who has carriage of which actions and how are they resourced.

2.6 Evidence suggests that the optimal approach for preventing violence against women and their children should include multi-level and reinforcing strategies, implemented in partnership with the community sector, across a wide range of settings (VicHealth 2011). This not only includes settings such as schools and media as highlighted in the Action Plan but also local government, workplaces, sports and recreation, faith communities, arts and culture, health and community services, cyberspaces, and male dominated institutions such as the defence forces.

2.7 Primary prevention strategies need to be universal in focus, however complementary programs also need to be developed for hard to reach population groups such as culturally and linguistically diverse (CALD) and indigenous communities.

2.8 In order to build on the current evidence base and extend the reach and effectiveness of primary prevention strategies, the Action Plan should provide opportunities to develop, trial and evaluate new programs, as well as supporting the expansion and transfer of existing evidence based programs.

2.9 Greater emphasis must be placed on the importance of community education – starting in primary school with children being taught the importance of effective communication and effective problem solving in relationship situations. This can be approached from a philosophical basis of the inappropriateness of violent responses in all situations.

3. Will the Action Areas improve primary prevention, early intervention and responsiveness?

3.1 Further details are required under the proposed action areas in order to determine whether they will be effective. There are a number of successful initiatives in operation but not a coordinated consistent approach across the whole of government. For example, in the primary prevention space a range of existing initiatives could be enhanced such as Family Violence Help Cards being made available state wide and further developed to include cards for young people and children.

3.2 As high level statements, the action areas have potential. Critical to improvement will be:

3.2.1 prioritisation of the Action Plan by all levels of government, including specific resource allocations.

3.2.2 means by which high-level objectives are managed and implemented, including consistency of frameworks across similar organisations (e.g. local government) with strategies differing according to demographics.

3.2.3 development and implementation of tools and guides to support the strategies.

3.2.4 commitment to partnerships across government, business and community organisations.

4. Should particular Action Areas be prioritised?

4.1 There is significant benefit to the State Government in supporting local councils to engage in activity to address the issue of violence against women and their children. The Action Plan will add value existing plans and strategies including Early Years Plan, Youth Plan, Municipal Public Health Plan, Positive Aging Plan, Community Safety Plan, Emergency Management Plan, Disability Action Plan, Municipal Strategic Statement and Council Plan.

4.2 Local councils also have a long history of working effectively in partnership with a range of stakeholders including local residents, businesses, traders, police, schools and sporting clubs.

4.3 The engagement of men in the prevention of violence against women and their children needs to be further explored and prioritised.

4.4 The role the media plays in portraying and / or promoting women as sex objects needs to be addressed as a matter of urgency, including the messages young men (predominantly) are receiving about women.

4.5 The level of under reporting from women and children (particularly from CALD background) experiencing family violence is an ongoing issue that needs to be addressed through the universal promotion of the different forms of violence against women, and its unacceptability within the community.

4.6 It is imperative that the actions within the plan are prioritised, with responsibility and anticipated costings denoted. For example, ensuring adequate legal representation for a woman with a disability is extremely costly. In addition, service response issues are further compounded with requirements for suitable housing, personal support and care of children needing to be addressed immediately (at the time a woman seeks support or when there is a police response).

5. Are there any gaps in the Consultation Framework that should be considered?

5.1 It is important to highlight that violence against women is a leading contributor to illness, disability and premature death for women aged 15-44, far greater than other well known risk factors such as high blood pressure, alcohol use and obesity (VicHealth 2004). Most importantly, in order to prevent violence against women and address its determinants, we must:

- 5.1.1 promote equal and respectful relationships between men and women;
- 5.1.2 promote non-violent norms and reduce the effects of prior exposure to violence; and
- 5.1.3 improve access to resources and systems of support.

5.2 The Action Plan does not adequately address:

- 5.2.1 the issues and needs of young mothers and women from CALD backgrounds who are vulnerable to violence and homelessness.
- 5.2.2 women's safety is compromised by a lack of housing options when leaving violent relationships.
- 5.2.3 there are so few housing pathways available to women leaving refuge, often having to exit into absolute homelessness or inappropriate accommodation such as hotels, motels or rooming houses.

5.3 Of key importance is the voice of women and their children who have experienced violence should be encouraged and included throughout development and delivery of the Action Plan.

5.4 Acknowledgement that violence against women and children escalates in times of natural disaster.

5.5 There is no significant mention of Maternal and Child Health Services in the document.

5.6 In Action Areas focussing on engagement of men, there is little acknowledgement of diversity and the widespread nature of entrenched, often unacknowledged sexism. For example: **P11** Engaging men as leaders..... while important to do, this tends to spread the message to 'the converted'. **R 22 & 26**- seeks to engage 'offenders'. The majority of men fall within this group – how to tackle a way of thinking that does not acknowledge lack of respect for women. (e.g. recent ex-AFL star and twitter conversation).

5.7 There is little in the framework by way of engaging with sporting clubs, sporting venues, bars and nightclubs to promote respectful relationships between men and women within such settings where large volumes of alcohol is often consumed.

5.8 The need to work with and encourage Victorian businesses to develop workplace policies and programs to support women in the workforce who are experiencing violence is an area that the State Government can play an important role.

5.9 As highlighted in Q4, for women with a disability it is ensuring appropriate legal protection that protects their rights as individuals within society and the lack of the women's support system to be adequately able to address the housing, support, care and child requirement of women with disability who present for support from current or probable violent situations.

5.10 Violence against women in care situations – be it women accommodated in Community Living Units, younger women with disabilities in nursing homes, and older women with disability in mental health or aged care settings – by their carers or nursing staff.

6. How can future governance arrangements most effectively engage partners across government and community?

6.1 The City of Melbourne believes the suggested leadership structure within the Action Plan does not reflect the broad focus of primary prevention activities. It is important that Ministers responsible for Local Government, Sport and Recreation, the Arts, Multicultural Affairs, Early Childhood, Police, Consumer Affairs, Mental Health, Housing, Youth and Attorney General's Office are represented as having carriage of primary prevention activities within the Action Plan.

6.2 Data and accountability needs to be considered in the governance arrangements, particularly in the provision and sharing of improved data collation and analysis.

6.3 The key to effective governance is stakeholder ownership of and responsibility for the Action Plan.

6.4 An independent Reference Panel/Steering Committee should be established with responsibility to monitor, review and report on the implementation of the Action Plan to the community. This committee would have a responsibility in making future recommendations.

7. What are the potential barriers and risks to be managed and mitigated in delivery of the actions?

7.1 Despite recent efforts by Government and Victoria Police to raise the profile of violence against women, there is limited understanding amongst the community as to the magnitude of the issue. A universal marketing and promotional campaign highlighting the issues and the urgent need for a Government response is paramount.

7.2 The Action Plan is very broad, with 37 Action Areas. With such an enormous task, there is a risk that many of the Action Areas will involve 'ticking off' to a list of existing strategies rather than a fresh appraisal.

7.4 There is an initial statement that the Action Plan will build on the current platform of research, evidence and evaluation. This must be applied rigorously to each Action Area.

7.4.1 is this built into the Action Plan?

7.4.2 what does it mean 'now' and how is it accessible?

7.4.3 how will it occur in future?

7.4.4 will inadequate funding be a barrier?

7.5 The Action Plan acknowledges the importance of research and data collection however does not mention the need or development of a comprehensive evaluation, monitoring and review framework. A comprehensive evaluation framework will allow the government to measure both the reach, and in the longer term, the impact of individual action areas and the Action Plan as a whole.

7.6 The community services sector, and many not for profit organisations who are committed to, and skilled in addressing this issue are constrained by lack of staff and financial resources. Project implementation funds should be made available to support service system and process improvements. For example, the data may indicate that more women with a disability will report and leave violent family situations if alternative suitable housing arrangements can be provided. If access to appropriate housing is not addressed many women with disability will stay in violent situations because there is no other option open to them. Allocation of funds to ensure refuges and temporary/long term housing arrangements address the physical or sensory needs of women with a disability is of utmost importance.

7.7 Adequate legal representation for women with mental health issues, those with alcohol and drug misuse, counselling and case management for these women will often involve longer agency support timeframes and financial resourcing.

8. What other issues need to be considered?

If you would like to provide comment on any specific action areas as set out in the Consultation Framework, please specify the number of the action area(s) on which you are commenting. For example P1, E12 or R29.

8.1 P2 – government can play a role in not just supporting but also facilitating attitudinal change in organisations and communities.

8.2 P4 – it is also important to work with media to reject or eliminate the promotion of women as sex objects.

8.3 P4 – in addition to positive representations of women, there needs to be creative community education advertisements that show up sexist behaviour and language for what it is.

8.4 P7 –prevention strategies targeting women with a disability must address the variant needs and requirements of the various disability cohorts (e.g. women with disability who are blind, deaf, have mental health issues, mobility restrictions and those who are unable to communicate using verbal speech).

8.5 E17 – mention of collaboration with pregnancy and early years health services. This could be expanded into a separate Action Area which outlines a plan for promotion of the father's role during pregnancy and early childhood and engagement of fathers with child and family services. Encouraging the role of men as hands-on fathers and partners in parenting draws out nurturing qualities, and offers an identity to men as parents. Government, business and service systems too often inadvertently exclude men at this crucial and vulnerable stage of family life.

8.6 R26 – behaviour change programs must start when children are at school. The lack of the primary/secondary school sector focus in the Action Plan is a huge gap. As is well recognised change behaviour programs are best commenced during the early childhood development and effective communication and respectful relationship issues must be reinforced in high schools during sex/health education and basic living classes. Work within schools to talk about healthy sexual interactions for young people that tackles some of the misperceptions perpetuated by mainstream media and pornography.

Follow up

Do you give permission for the Office of Women's Policy OWP to obtain further information from you or your organisation? **If so, please ensure you have provided relevant contact details on page 1 of this submission.**

Yes

Written submissions are required **no later than Friday 23 March 2012.**

Please submit via email (in a Word.doc format) to submissions.owp@dhs.vic.gov.au.

The Minister for Women's Affairs **thanks you for taking the time to provide feedback** on the Action Plan Consultation Framework for addressing violence against women and their children.
