



# Monitoring the Family Violence Reforms: Our Submission to the Family Violence Reform Implementation Monitor

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## Introduction

inTouch Multicultural Centre Against Family Violence (inTouch) welcomes the opportunity to provide a submission to the Family Violence Reform Implementation Monitor on the family violence reforms.

The family violence response and services sector has undergone enormous change since the Royal Commission into Family Violence (Victoria). The commitment of the Victorian state government to implement all the recommendations of the Royal Commission's final report has seen the rapid growth of the services sector, as well as notable shifts in discourse around family violence in our state.

In this submission, we will highlight some of the most significant achievements of the reforms and their impacts on our organisation and the migrant and refugee communities that we work with. In particular, we will discuss the incredible developments in MARAM and information sharing, The Orange Doors, perpetrator interventions, and early intervention programs. We will also discuss the positive impacts and growth our agency has seen as part of the reforms.

Alongside highlighting these achievements, our submission will also outline some of the challenges or gaps in the reforms to date. It is our view that the reforms will have the most positive impact and reach when intersectionality is adopted at all levels of service design and provision. The importance of intersectionality has been acknowledged by the Victorian Government, and the Everybody Matters: Inclusion and Equity Statement reflects this acknowledgement and the commitment of the government to establish inclusive policies and practices across the family violence sector. We commend the government and Family Safety Victoria for showing such commitment to inclusion. There is however, significant work that needs to be done. Our submission provides a list of recommendations.

Following on from the discussion of the successes and challenges of the reforms, and our recommendations, we provide you with some information on the impacts of COVID-19 on our clients and our services.

## About inTouch

inTouch provides integrated, culturally responsive services to migrant and refugee communities. Over the past 35 years, we have addressed the specific needs of communities and helped over 20,000 women experiencing family violence. In the 2018–19 financial year, inTouch provided services to 1430 women from 101 different countries, and over 1350 of their children.

We have become a critical piece in Victoria's family violence response system. In 2016, the Royal Commission into Family Violence in Victoria recommended that the government fund inTouch to better support the system in meeting the needs of people from refugee and migrant backgrounds experiencing family violence. As a leading expert with these communities, the reach and impact of inTouch's work has significantly increased.

inTouch works across the family violence continuum, from prevention and early intervention, to crisis intervention, post-crisis support and recovery. Our services and programs include:

- An integrated, culturally responsive model based on inLanguage, inCulture case management. Our case managers are highly diverse, offering direct client services in over 25 languages. They have a



unique understanding of a client's lived migration experience, cultural influences, and the barriers faced when trying to seek help.

- An in-house accredited community legal centre, the only one of its kind in a specialist family violence service, which provides legal advice, court advocacy and immigration support to inTouch clients.
- Capacity building of specialist and non-specialist family violence providers, and community organisations to better deliver support to refugee and migrant women experiencing family violence. This includes a public training calendar.
- An early intervention program, Motivation for Change, working directly with men from culturally and linguistically diverse communities who use violence towards their families.
- A victim-survivor advisory group called Inspired for Change, comprised of former inTouch clients. This advisory groups helps to guide and inform many of our programs.

inTouch provides assistance to women who are victim-survivors of family violence. The overwhelming majority of our clients have experienced family violence perpetrated by their male partner and/or other family members. The issues that we have identified and the recommendations that we make in this document are based on the experiences of these women and their children.

## Key reforms

### 1. MARAM and information sharing

Through the development and adoption of MARAM, the Victorian government sought to address multiple gaps and issues that were identified in the Royal Commission and the Coronial Inquest into the death of Luke Geoffrey Batty. The MARAM Framework overhauls the existing CRAF systems, aiming to ensure that the services sector is consistent in its collection of data and the sharing of information in order to ensure the safety of victim-survivors.

#### Achievements

inTouch was proud to play a significant role in providing input and advice in the development of MARAM guidelines. Our organisation provided guidance to best collect data and share information for clients who are from culturally and linguistically diverse communities. Through our contribution, we wanted to ensure that the information that was collected would reflect an intersectional view of family violence.

It is our view that MARAM is a far superior tool than the CRAF, and the planned implementation of the same risk assessment for all Victorian services will have a positive and far reaching impact.

The Family Violence Information Sharing Scheme has also seen significant reforms with productive, efficient and positive impacts. The provisions have simplified shared access to information previously held separately by different organisations. By sharing information agencies involved with clients/ families can take a more collaborative approach and develop more informed, comprehensive case plans to identify and mitigate risk.

#### Challenges

We applaud the efforts of Family Safety Victoria and other services in implementing these new frameworks. It is our view however, that there is further work that needs to be done to ensure the efficacy of these new



practices in collecting and sharing data particularly in relation to culturally and linguistically diverse communities.

- a) From an application perspective, it is important to note that MARAM does not align with the existing client database that many family violence services use – the Specialist Homelessness Information Platform (SHIP). As a result, the roll out of MARAM has been challenging and time consuming. While staff, including management have been trained in the MARAM framework, and agency practices have been aligned to this, in practice the inability to complete use the MARAM assessment tools within SHIP has delayed their full implementation.
- b) Some of the most important questions that can help to paint the clearest picture of a client's story and her needs are not yet mandatory to enter when assessing risk or engaging with a client on MARAM or CRAF. We believe that the more information that is collected regarding a client's preferred language, cultural needs, and visa status, can help to prepare the best response to her needs and ultimately her safety. It will also provide a stronger evidence base of the language, cultural and visa trends for the purposes of early intervention and response work by policy makers. It is our understanding that at this stage, many practitioners are not collecting this information from clients.
- c) Further to the above point, there needs to be more training across family violence service providers to understand what the information collected in regards to migration, language and cultural background can mean for a client and how to best meet her needs. This training would need to recognise intersectionality in the experience of a victim-survivor, in order to better understand her needs.
- d) MARAM and information sharing need to have further emphasis on the meaning of a victim-survivor's visa status. The status of a woman's visa reflects further insights into her needs and any barriers she may be facing. For example, many women who are on temporary visas cannot access Centrelink payments and extensive support from housing services. For these women, there are multiple barriers to accessing safety. Some men use visa status as a way to control the woman and hide his abuse. A victim-survivor may therefore not disclose the family violence for fear of being deported. We believe MARAM and information sharing requires reporting of visa status and family violence services to be trained in their ability to understand the meaning of her migration status so as to appropriately provide services or referrals.

## 2. The Orange Door hubs

The Orange Door hubs (TOD) have been one of the biggest investments of the Victorian Government following on from the Royal Commission. The hubs establish a single point of access that can provide services to victim-survivors and perpetrators of family violence, and help to refer clients to other agencies for support when required.

This one-stop, multiagency response to family violence is aimed at ensuring cohesive and effective care for victim-survivors.

### Achievements



TOD hubs provide cohesiveness of response to victim-survivors of family violence. The objective of these hubs are to provide a model of care and referrals for clients. It is our view that these hubs are gaining considerable recognition in the community.

The hubs reflect excellent collaborative practice between government agencies, police and non-government services. As the model evolves and strengthens, this will undoubtedly provide invaluable improvements in providing more cohesive care for clients and communities.

Furthermore, the establishment of the Central Information Points have been an excellent achievement and success, providing comprehensive information sharing within TODs.

### Challenges

inTouch has been working with Family Safety Victoria's The Orange Door Statewide Reference Group and DV Vic's The Orange Door Working Group. inTouch was also commissioned by Family Safety Victoria to undertake a review of TOD hubs and the cultural responsiveness and competency of staff. Through our ongoing work in supporting the implementation of TOD hubs, our organisation has been able to make a number of observations. Most importantly, we believe there are significant gaps in the skills and knowledge of the workforce in the hubs when it comes to culturally responsive practice. In this next section, we will discuss some of the issues that have been identified and how these can be improved to better engage with and service migrant and refugee communities.

- a) It is our view that staff across TOD hubs have minimal understanding of the principles of culturally responsive practice. In order to better understand and service the needs of migrant and refugee communities, it is critical that staff across all TOD hubs have training – at induction and regularly throughout the year – to ensure that there is consistent approaches and practices in this regard. Our research across all the hubs identified a strong motivation from practitioners to have access to professional development to increase their skills in terms of culturally responsive practice.
- b) Having consistent practice approaches across all hubs will ensure a sustained approach to the principles of culturally responsive practice and a strengthened understanding of issues that relate to migrant and refugee communities, including:
  - Visa status  
Visa status can have a tremendous impact on the experience of family violence for a victim-survivor. Visa status can be used by perpetrators of family violence to further control the victim. Visa status can heighten risk for a client and also determine what health services, welfare services, working rights, and social security people are eligible for. It would be incredibly beneficial for staff at hubs to understand the intersection between family violence and visa status.<sup>1</sup>
  - The importance of culture  
inTouch was advised by a staff member of TOD that if a client can speak English at a sufficiently communicable standard, TOD staff will not take any consideration of the client's cultural needs. The role of culture on a person's identity, on their community relations, and on how they will perceive and respond to their circumstances is significant and must be taken on board respectfully and with understanding.

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<sup>1</sup> See inTouch Position Paper, Women on Temporary Visas Experiencing Family Violence, March 2020 < [https://intouch.org.au/wp-content/uploads/2020/03/inTouchPositionPaper\\_WomenOnTemporaryVisasExperiencingViolenceInAustralia\\_March2020\\_website.pdf](https://intouch.org.au/wp-content/uploads/2020/03/inTouchPositionPaper_WomenOnTemporaryVisasExperiencingViolenceInAustralia_March2020_website.pdf) >.



- Complex forms of family violence  
Staff across the hubs should have better knowledge of the complex forms of family violence some victim-survivors may have experienced. For example, it is crucial in many circumstances they understand the differences between arranged marriage and forced marriage. It is also important for staff to be able to identify dowry abuse, or family violence that is perpetrated by extended family members.
- c) It is our view that interpreters need to be used more frequently at TOD hubs. The use of interpreters is a crucial way to reduce barriers many clients from migrant and refugee backgrounds experience when they are accessing support services. Furthermore, with a heavy reliance on phone based consultations, consistent practice guides and training should be provided for staff on induction to inform how to best work with interpreters.
- d) Through engagement with TOD hubs across the state, we also noticed a lack of information and resources in community languages across the sites. Whilst some sites had some information in community languages, others had less. Producing information in languages (both written and audio) that are relevant to the local community of that particular hub would be very beneficial.
- e) Access to the Central Information Points from agencies that are external to TOD hubs would significantly assist with timely information sharing, as agencies could submit one request and receive a comprehensive response, rather than submitting multiple requests.

### 3. Keeping men 'in view'

The Royal Commission highlighted the importance of holding perpetrators of family violence to account for their actions, and keeping them in view of services. Subsequently, various reforms have therefore been directed at ensuring that men who use violence are held accountable for their actions and that there are services that can assist in changing behaviours.

#### Achievements

Since the Royal Commission, there has been a noticeable shift in discourse around family violence policy in Victoria. Historically and traditionally, policies, practices, and services around family violence have predominantly put the onus on victim-survivors to access assistance and make any changes to their lives. The Royal Commission helped to shift the narrative in this way, ensuring that whilst funding and services would continue to support victim-survivors, there would also be more work done to hold men accountable for their actions.

The establishment of the Expert Advisory Committee on Perpetrators helped to guide these changes. With this focus on men's behaviour, additional funding was granted for perpetrator interventions and programs.

inTouch received funding from Family Safety Victoria as part of the Perpetrator Innovation Trials [INSERT] for the Motivation for Change (MFC) program. Although similar to mainstream men's behaviour change programs (MBCP), the MFC program provides intensive group work as well as one-on-one case management support for participants, using our inLanguage, inCulture service delivery model. This service delivery is highly effective in addressing some of the key barriers our clients face when they are accessing mainstream MBCPs, in particular language barriers, understanding of cultural traditions, beliefs and practices, as well as understanding of the migration journey. The themes in the curriculum of the MFC



programs address the impact of the migration journey, as well as past and present trauma experienced by the client, and any challenges they may face integrating into mainstream services.

The MFC programs have had excellent retention with approximately 90 percent of participants completing the full program. Anecdotal information collected by the men in the program reflect the view that the men felt being in a group with men of the same culture felt positive and encouraging. Furthermore, having facilitators and case managers of the same language or cultural group means that those cultural practices and views that are generally stigmatised, are raised in strategic yet respectful ways. For example, case managers from the same cultural background as their clients have developed effective strategies to discuss sexual violence and abuse with their clients, in ways that overcome previously stigmatised conversations, whilst holding the men accountable and not-colluding. These are critical strategies to affect real behaviour change.

Another strength of the MFC program has been the family safety contact work which occurs by working alongside our main Direct Services Team (DST). Our case managers in the DST work with the MFC team to ensure that thorough reassessments of risk factors are undertaken.

### Challenges

- a) A key challenge to further advances in perpetrator intervention in our view has been the lack of an intersectional approach to the work. We believe adopting such a view has helped our specific program succeed. Not only does our program dive into cultural norms and traditions with the men, in their preferred language, but it also acknowledges the experiences of men relating to their migration journey that may also impact on their responsiveness to the program. For example, trauma from their migration journey such as living in a refugee camp, is acknowledged and becomes part of the work we engage with him in changing his behaviour. It is our view that the lack of an intersectional framework in MBCP and other perpetrator interventions is a barrier to more men engaging through the programs.
- b) Another barrier to continued engagement with men who use violence is the lack of ongoing funding for the programs. This has been a significant issue for inTouch. As each funding round comes to an end, there is little known about whether the program will continue, despite the fact that there is continued participant, community and stakeholder interest. This means that staff begin to look for other work, and leave the program, which is a significant concern due to the difficulty of recruiting suitably qualified staff to run an inLanguage, inCulture program. In order for the recommendations of the Royal Commission that relate to perpetrator interventions and programs to continue to be effective and successful, it is imperative that there is continued funding and commitment to these programs.

## 4. Advances in early intervention

A number of recommendations of the final report of the Royal Commission were directed at early intervention measures through court-based responses, policing, sentencing, recovery, and other key policy areas. The value and importance of early intervention was therefore highlighted by the Royal Commission.

### Achievements

inTouch commends the Victorian State Government and Family Safety Victoria on their commitment to early intervention to change the course of family violence. There have been a number of ways in which



changes have directly and positively impacted victim-survivors and their families. For example, the Recommendation 74 stated that intervention orders should be available online across Victoria. We believe having intervention orders available online has made it more accessible for our clients and their case managers. We also point to the implementation of Recommendation 220, which seeks further commitment and emphasis of the State Government's Statewide Family Violence Action Plan towards prevention, early intervention, and support for the long-term recovery of victims. We acknowledge the State Government's commitment to these initiatives, and would like to highlight that our organisation has also been entrusted to work with the Department of Premier and Cabinet in providing support and capacity building across the multicultural sector, to build awareness and change. Since the Royal Commission, inTouch has worked with dozens of ethno-specific, cultural, and faith groups to build awareness and capacity to identify family violence in communities and appropriately refer victim-survivors to services.

### Challenges

- a) It is our view that there continue to be significant gaps in early intervention initiatives that can assist migrant and refugee communities. Prior to the COVID-19 pandemic, a quarter of our clients at inTouch were referred to us directly through the courts or by one of our court support case managers. This reflects a lack of reach of early intervention programs for many migrant and refugee women who are experiencing family violence. Many of our clients do not seek assistance for safety until the abuse and violence has escalated substantially. This is generally due to a number of reasons including lack of systems literacy, fear of being ostracized from their community, fear of deportation (temporary visa holders), and cultural stigma. Early intervention initiatives must have a stronger reach in migrant and refugee communities.

## 5. The impacts of the reforms on our organisation

### Achievements

Since the Royal Commission, inTouch has expanded its reach and services significantly, and has become an active participant in consultations and decision-making in the family violence services sector. From a small team of approximately 18 staff members, inTouch currently employs approximately 50 staff members. Our core programs and services include:

- Direct services – intake, risk assessment and inLanguage, inCulture case management
- In-house legal centre, with a migration agent and three lawyers
- Sector and community team that provides training and capacity building across Victoria's family violence sector
- Motivation for Change – a program that works specifically with migrant and refugee men who have used violence on their families.

The growth and additional resourcing that inTouch has received has meant that we are able to assist in excess of 1300 clients each year. Our bilingual and multilingual case managers provide more support to clients than ever before.

Recommendation 139 of the final report of the Royal Commission stated that inTouch should be funded to provide training and establish partnerships with the family violence services sector on how to better support culturally and linguistically diverse communities. The implementation of this recommendation has led to the establishment of a specialist team at inTouch that provide public training, training for agencies,



produce resources, and facilitate communities of practice with a range of ethno-specific and faith-based community groups.

Furthermore, inTouch now sits on a number of state-wide and local advisory groups and committees. Our knowledge of migrant and refugee communities and their needs are now being recognised by our State Government and other stakeholders. inTouch is proud to be able to inform some of the key policy decisions around family violence and multicultural communities.

## Looking forward: our recommendations

Based on the achievements and the challenges that we have identified above, inTouch makes the following recommendations to continue to change and improve the family violence service system in Victoria:

1. The role of the Family Violence Reform Implementation Monitor to continue. The Implementation Monitor has played a critical, independent voice in the way that the family violence reforms have been implemented.
2. MARAM and information sharing practices should ensure that diverse identities are always accurately captured, in ways that are culturally sensitive. This requires widespread and frequent training across the sector.
3. Training for TOD hub staff on culturally responsive practice, to better understand diverse and complex experiences of clients from migrant and refugee communities, including knowledge of migration and visa status, and its impact on clients.
4. Training for TOD hub staff on how to work with interpreters.
5. Ongoing commitment and funding for programs such as inTouch's Motivation for Change program, which works with migrant and refugee men who perpetrate family violence. Such commitment and funding will acknowledge that diverse communities require a diverse response to perpetrator interventions.
6. Further commitment to early intervention programs for migrant and refugee communities that centre the needs and work of migrant and refugee communities. It is imperative that meaningful change in diverse communities is led by the communities themselves, who have a deep understanding of their experiences.

## Impacts of the COVID-19 pandemic

The COVID-19 pandemic has had far reaching impact on our clients and on our services. The demand for inTouch services increased both during the first wave of the pandemic in Victoria (April) and the current wave (July). Below are some of the issues that our service is aware of as a result of the pandemic and the subsequent 'stay at home' and social isolation directives.<sup>2</sup>

1. Lack of access to financial support for women on temporary visas

We estimate that approximately half of our clients are temporary visa holders or temporary residents. Clients who are temporary visa holders or temporary residents include those who are on spousal or partner visas, working visa holders, student visas, tourist or visitor visas, and bridging visas.

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<sup>2</sup> These issues were documented first on an Issues Paper written by inTouch in April 2020. Please see to read the paper [https://intouch.org.au/wp-content/uploads/2020/04/inTouch\\_COVID19IssuesPaper\\_April2020\\_website.pdf](https://intouch.org.au/wp-content/uploads/2020/04/inTouch_COVID19IssuesPaper_April2020_website.pdf).



Women on temporary visas who experience family violence face multiple and varying layers of disadvantage. Temporary migration status can be used as an additional tool for coercion and control by perpetrators of family violence. There are significant barriers many of these women face when they are seeking support from health and family violence support services. Furthermore, many of these women are in Australia without other family or friendship networks, and may depend on the perpetrator of violence for social and community connections.<sup>3</sup>

These barriers and challenges have been amplified during COVID-19. For many of our clients, becoming financially independent after leaving an abusive relationship is challenging under normal circumstances. As COVID-19 restrictions took hold, a large number of our clients who were on temporary visas had their income significantly reduced or cut completely. Many of these clients worked in nail salons, beauty salons, in childcare, and hospitality services. These clients had not only experienced family violence and were seeking safety and stability, but were now dealing with unemployment and lack of income.

Some of our clients on temporary visas have been able to access limited Centrelink payments such as Special Benefits or Jobseeker payments, and some with Australian-born children have been able to access payments such as Family Tax Benefits.

However, a larger number of our clients on temporary visas, in particular those on bridging visas, student visas and visitor visas, have not been eligible for any income from the Government. These clients have been relying on loans from friends as well as food and vouchers from charity groups to survive.

inTouch has been able to provide some of these clients with some support through the Victorian state government's Flexible Support Packages (FSP). According to our records, during March and April 2020 when the COVID-19 restrictions were most strict, inTouch had a 50 percent increase in the number of requests for vouchers for essential items of food and rent assistance. On average, over 70 percent of FSP requests came from women on temporary visas.

## 2. Homelessness and housing insecurity for women on temporary visas

Women on temporary visas often face multiple barriers to accessing stable and affordable housing. Housing services often require the woman to have permanent residency/citizenship or income support before they can provide her with ongoing assistance. Immediate crisis housing and accommodation may be available for temporary visa holders who are experiencing family violence. However, due to limited space, refuges may be reluctant to accept referrals for a woman on a temporary visa knowing she may have an extended stay there due to lack of stable housing options for her to go to.

The COVID-19 pandemic has further exacerbated this situation for many of our clients. Those who have lost their jobs and income sources are finding themselves in extremely precarious situations where they are unable to secure stable or long-term housing. We have many clients who have experienced family violence only recently, many of whom have children, who have been temporarily staying with friends or relatives, and many who have needed to borrow money or seek assistance from charities to pay their rent.

This hardship and housing insecurity has led some of our clients to return to the perpetrator of family violence.

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<sup>3</sup> For further information, please refer to: inTouch, Position Paper: Women on Temporary Visas Experiencing Family Violence (Melbourne: 2020), [https://intouch.org.au/wp-content/uploads/2020/03/inTouchPositionPaper\\_WomenOnTemporaryVisasExperiencingViolenceInAustralia\\_March2020\\_website.pdf](https://intouch.org.au/wp-content/uploads/2020/03/inTouchPositionPaper_WomenOnTemporaryVisasExperiencingViolenceInAustralia_March2020_website.pdf).



### 3. The challenge of 'keeping men in view' during COVID-19

Due to COVID-19 restrictions, inTouch suspended the group work component of our Motivation for Change men's program. Although we have continued to provide one-on-one case management remotely, our ability to keep the men 'in view' whilst working on their behaviour has been hampered. As a result, helping to mitigate the risk of these clients breaching existing obligations such as intervention orders, has been challenging. Furthermore, many of the men in the program lost their sources of income as a result of the pandemic. Many have expressed their lack of knowledge and understanding of government rules and public health restrictions due to low levels of English language and systemic literacy. For many of these men, the lower English language and systems literacy is a barrier for them to meaningfully engage with mainstream MBCP. Some of the MFC participants are also at risk of homelessness and without our continued engagement with them, may be likely to disengage from services.

### 4. The weaponisation of COVID-19

We are aware of accounts where COVID-19, the government restrictions, and other aspects of the current pandemic are being used by abusive partners to control women. Our clients have reported that their current or ex-partners have used elements of the pandemic to generate and exacerbate fear or have put them at risk by breaching social distancing laws. For example, we have had clients report that their partner has invited friends into their home and later told the woman that the visitors were infected with COVID-19 to generate fear and distress in the woman. Another client advised our case manager that her ex-partner had threatened to infect her with the virus.

### 5. No 'safe time to call'

We have had a number of clients express that there is no longer a safe time to talk to their case manager and they have subsequently disengaged from our service. Social distancing laws and shut downs have meant that many of these women are isolated at home with their abuser who is no longer attending work.

## Conclusion

The Royal Commission into Family Violence in Victoria made many recommendations that have since been implemented and are changing the landscape of family violence service provision across the state. These reforms will undoubtedly help to make far-reaching and long term changes to the incidence of family violence and our responses to them. The Family Violence Reform Implementation Monitor has played an incredibly valuable, independent role in this process.

Our organisation has benefited tremendously from the reforms. We are now able to service more clients than ever before, we are equipped to share our knowledge and expertise to upskill our colleagues across the sector, and crucially, we feel we are playing a significantly active role in policy and decisions made about family violence service provision in migrant and refugee communities.

As stated throughout this submission, we congratulate the work of the State Government in its reforms across the family violence sector. We strongly hold that the reforms will become more effective for migrant and refugee communities with the adoption of more intersectional and culturally responsive practices.