

NSW Domestic and Family Violence Plan 2022-2027.

Full Stop Australia Submission, August 2022.



Full Stop Australia acknowledges the Traditional Custodians of Country throughout Australia, and their continuing connection to land, sea and community. We pay our respects to them and their cultures, and to Elders both past and present.

Introduction

Full Stop Australia is an accredited, nationally focused, not-for-profit organisation which has been working in the field of sexual, domestic and family violence since 1971. We offer expert and confidential telephone, online and face-to-face counselling to people of all genders who have experienced sexual, domestic or family violence, and specialist help for their supporters and those experiencing vicarious trauma. We also provide best practice training and professional services to support frontline workers, government, the corporate and not-for-profit sector and advocate with governments, the media and the community to prevent and put a full stop to sexual, domestic and family violence.

Full Stop Australia, as a national service, draws upon the experiences of our counsellors supporting people impacted by sexual, domestic and family violence in different jurisdictions, as well as our clients who are part of our [National Survivor Advocate Program](#), to advocate for consistent approaches to family, domestic and sexual violence nationally.

We welcome the opportunity to make comment on the draft NSW Sexual Violence Plan 2022-2027 (**SV Plan**) and the draft NSW Domestic and Family Violence Plan 2022-2027 (**DFV Plan**). Consultations on both plans have been opened simultaneously and we note that we are also preparing a submission on the draft SV Plan separately though this submission does discuss both plans.

We would be very happy to provide any further feedback on any aspect of this submission. You can contact us at any time if you have any further questions at info@fullstop.org.au

Summary and Recommendations

As a preliminary matter, we wish to note that the public consultation period for this strategy was open for a period of 19 days. This is not an adequate period of time to consult on a strategy of this significance - a strategy which serves to guide the actions of the NSW Government on domestic and family violence for the next 5 years. The National Plan to End Violence Against Women and their Children (the **National Plan**) has been subject to extensive and detailed consultation over a period of over 18 months. Given the extremely short timeframe for consultation on the draft DFV Plan, we have tried our best to provide as much guidance as possible. However we strongly urge the NSW Government to consider taking further time beyond the closing of the public consultation period to consider feedback from stakeholders - particularly those with lived experience and representatives from marginalised populations.

We have a number of general comments about the draft DFV Plan which we will discuss first. We will then address each pillar of the plan separately (Prevention, Early Intervention, Response, Recovery and Systems Enablers).

General Comments

Intersection with priorities strategies and plans

The draft DFV and SV Plans do refer to some intersecting plans and strategies, including the National Plan and other NSW Plans and Strategies, including the NSW Women's Strategy 2023-2026. We support the draft SV and DFV Plan's emphasis on alignment with the National Plan and in particular the four pillars.

However, we also have the following comments:

- The draft DFV and SV Plans say that they intersect with other NSW Plans and strategies but this is not fleshed out in the plans themselves. The DFV and SV Plans need to incorporate and intersect with all relevant national and state plans and strategies including (in particular) primary health, mental health, and the health of children and young people.
- The draft DFV and SV Plans do not refer to or align with a broader human rights framework (as does the National Plan). We suggest that this be incorporated in both plans.
- The draft DFV Plan does not intersect in any meaningful way with the draft SV Plan though this is the experience of many survivors of gender-based violence.
- We have not seen the draft of the NSW Women's Strategy 2023-2026. We strongly recommend that stakeholders should have the opportunity to see and comment on this draft prior to a finalisation of the DFV and SV Plans.

Vision

While we appreciate that the draft DFV and SV Plans have a vision, we believe this vision is too broad and not supported by concrete actions and targets. We agree that a community free from violence is the ultimate goal. However, it is not realistic to expect this to occur in 5 years. We would much prefer an ambitious but realistic and achievable vision that links to concrete targets and actions.

Outcomes/Actions/Funding

We support the DFV and SV Plans seeking to align with the National Outcomes and Evaluation Framework of the National Plan. However, we are concerned that the draft DFV and SV Plans are being released for consultation prior to the National Outcomes and Evaluation Framework being

finalised. This makes it difficult for stakeholders to provide meaningful feedback on outcomes. We note that both plans do seek to incorporate some outcomes, but these outcomes are vague with no concrete targets or actions attached.

It is important that any commitments to outcomes be subject to consultation. We thus recommend that the draft DFV and SV Plans be released for a second round of consultation once these commitments have been finalised.

Most importantly, the draft DFV Plan is missing any reference to funding commitments. This makes it difficult to comment specifically on the draft DFV Plan and understand the extent of each commitment.

Prevention

As a general comment, we suggest that the DFV Plan intersect more meaningfully here with the SV Plan. In some cases, commitments are repeated across both plans (for example the commitment the creation of a primary prevention strategy). In other cases, focus areas touch on the same issues but are worded differently, for example in the draft DFV Plan the focus area is to “*Advance gender equality*” but in the draft SV Plan, the focus area is expressed as “*Work across settings to build attitudes, norms and behaviours that promote gender equality and prevent sexual violence*”. It is unclear why these focus areas are expressed differently. Working in non-domestic settings to address gender inequality and violence-supportive attitudes is still a primary prevention measure for domestic and family violence.

Advancing gender equality

We note that this focus area relies heavily on the NSW Women’s Strategy 2023-2026. We have not seen a draft of this strategy and would recommend stakeholders be given an opportunity to see and comment before finalisation of the DFV Plan. This is especially so, given the importance of addressing gender equality as a primary driver of gender-based violence.

Embed prevention approaches in all settings and communities

We welcome the commitment in the draft DFV Plan to embedding prevention approaches in all settings and communities and in particular, the commitment to developing and implementing a NSW Primary Prevention Strategy.

Due to a previous lack of coordinated investment, grassroot organisations like Full Stop Australia have been filling the void and pioneering our own primary prevention initiatives. These primary prevention initiatives sit across government, non-government, business and community based

settings, including education, aged care, sport, the arts and media. We develop our own primary prevention initiatives based on our deep expertise in clinical practice working with survivors of sexual, domestic and family violence and our decades working in the adult education sector.

Full Stop Australia does not receive any government funding for our primary prevention [initiatives](#), which include the following:

- Respectful Workplaces Training – equipping workplaces to better prevent and respond gender-based discrimination, bullying, harassment, and violence.
- Workplace Responses to Domestic and Family Violence – equipping workplaces to better support their employees impacted by domestic and family violence.
- Ethical Leadership in Action – applying a gendered lens to workplace leadership.
- Policy development and review – supporting organisational excellence in preventing and responding to sexual assault, sexual harassment and domestic violence.
- Bystander Intervention – supporting organisations and communities to create safe cultures, free from discrimination, harassment and violence through safe and effective interventions.
- Preventing and Responding to Violence, Abuse and Neglect in Aged-Care and Disability Settings – equipping aged-care and disability services and frontline staff to better prevent and respond to gender-based violence.
- Sex & Ethics for Young People Training – a sexual violence prevention program for young people aged 16-25 navigating consent, helping young people to develop skills they can use to be ethical in their sexual practices.
- Sex, Safety & Respect Training – consent education for university students for decision making in intimate relationships.
- Ethical Pedagogical Practices Training – promoting ethical supervisory relationships between higher degree research supervisors and students.
- Good Night Out - accreditation and training to staff in licensed venues to support them in preventing, and responding to, sexual harassment and assault.

Full Stop Australia recommends that the DFV Plan include a commitment to a significant increase of investment in specific primary prevention initiatives delivered by organisations with clinical expertise and capability like Full Stop Australia.

We also recommend that the DFV Plan work in tandem with the SV Plan to include specific, detailed commitments to RRE. At a minimum, the DFV Plan should be incorporating the SV Plan commitments relating to RRE and strengthening them even further by:

- Creating specific RRE roles that are embedded into the Department of Education and Training to support school-based implementation.
- Building the capacity of all school/early childhood staff via training and professional learning, to be able to understand the key concepts related to RRE, curriculum delivery and

how to implement a whole-of-school approach effectively and safely. Again, it is crucial that these initiatives are informed by an intersectional approach and adhere to trauma-informed principles.

- Committing to the evaluation of the impacts of RRE across school communities, to provide evidence of change over time and to support sustainability of the whole school approach.
- The NSW Curriculum Reform project should look at the entire syllabus in the context of RRE, not just the PDHPE syllabus. In particular how other parts of the NSW Curriculum might reinforce rigid and harmful gender stereotypes and norms.

In addition to the draft SV Plan's focus on RRE, we recommend that the DFV Plan include the following commitment from the draft SV Plan: "Support co-designed community-based prevention projects, with a focus on targeted funding for projects supporting high priority groups and settings". Please also see our comments on this particular commitment from our submission on the draft SV Plan.

Finally, we recommend that all proposed primary prevention actions under the primary prevention pillar - and especially the NSW Primary Prevention Strategy - be aligned with the following national frameworks:

- *Change the Story*: A shared framework for the primary prevention of violence against women and their children in Australia.¹
- *Changing the Picture*: A national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children.²
- *Changing the Landscape*: A national resource to prevent violence against women and girls with disabilities.³

Early Intervention

We note with concern that this section of the draft DFV Plan contains no focus area or strong commitment to many of the priority focus areas of the National Plan including (but not limited to):

- Reducing the long-term impact of exposure to violence and preventing further abuse - in particular in relation to recovery and healing for children and young people.
- Addressing intergenerational trauma.

¹ *Change the Story*, Our Watch (Report, 2021), <<https://media-cdn.ourwatch.org.au/wp-content/uploads/sites/2/2021/11/18101814/Change-the-story-Our-Watch-AA.pdf>>.

² *Changing the Picture*, Our Watch (Report, 2020), <<https://media-cdn.ourwatch.org.au/wp-content/uploads/sites/2/2020/09/20231759/Changing-the-picture-Part-2-AA.pdf>>.

³ *Changing the Landscape*, Our Watch (Report, 2022), <<https://media-cdn.ourwatch.org.au/wp-content/uploads/sites/2/2022/08/01135647/Changing-the-landscape-AA.pdf>>.

- Supporting culturally-safe, trauma-specialist early intervention family support services.
- Addressing harmful behaviours by children and young people.
- Enhancing perpetrator accountability.
- Addressing misidentification of perpetrators.

We note that some of the above points are tangentially dealt with in some of the commitments, for example:

- *Build on what we know works in early intervention; and*
- *Partner with stakeholders to determine effectively early intervention initiatives for men, including young men, displaying coercive control or violence.*

However, we recommend that each of these areas be focus areas in their own right with specific, further actions attached. The action items in the National Plan are a good starting point in this regard.

We support ACON's recommendations in relation to the DFV Plan that:

- A commitment be made in this pillar to fund LGBTIQ+ specialist organisations and community groups to support LGBTIQ+ people at risk of or experiencing DFV.
- Action be taken to support service providers to identify and respond to risk when they are working with the user of violence. Additionally, we recommend actions that support community members and the private sector (such as employers) to identify DFV and provide an appropriate initial response, including referral to specialist services.

Response

We consulted with DVNSW in relation to the response pillar and warmly welcome all of the commitments and focus areas of this pillar on the DFV Plan including:

- The commitment to focusing on greater access to referrals and coordinated support and case management including:
 - Expanding access to case management services across the sector
 - Reviewing and mapping the availability of DFV case management.
 - Expanding the Staying Home Leaving Violence program.
 - Expanding case management of WDV CAS and LSS.
- The commitment to focusing on improving the effectiveness of integrated, cross-agency responses.
- The commitment to mapping and understanding existing services and gaps for diverse victim-survivors across NSW.

- Reviewing information sharing provisions.
- The commitment to focusing on improving housing supports.
- The commitment to focusing on the diverse needs of victim-survivors including strengthening supports for Aboriginal and Torres Strait Islander women in custody who have experienced DFV.
- The commitment to supporting children and young people in their own right, and in particular, improving the integration between the DFV and child protection systems.

However we do have a number of comments about this pillar and recommendations to strengthen the work that is already being done:

- We need to ensure that each commitment is accompanied by strong actions, targets and funding. In particular, it is unclear whether some of these commitments comprise new funding or are just a repeat of previous commitments already announced (for example, the commitment to expand Core and Cluster).
- The outcomes of the reviews and maps of service gaps need to be accompanied by a commitment to remedying those gaps within the period of the DFV Plan.
- Any new risk assessment tools or amendments to the DVSAT need to be accompanied by commitments to robust training of frontline workers in administering the new risk assessment tools.
- The commitments to increasing availability of housing should be accompanied by specific commitments to increase the housing stock. In addition, we are concerned that not all priority populations are addressed.
- The commitments to addressing the diverse needs of victim-survivors aren't addressed for all priority populations. In particular, women in custody and those exiting custody, older women, young people, people in regional, rural and remote areas, all LGBTQIA+ people, women from migrant and refugee backgrounds and Aboriginal and Torres Strait Islander women more generally (though warmly welcome the commitment to addressing Aboriginal and Torres Strait Islander women in custody).
- The commitment to ensuring responses to children and young people in their own right should also include a commitment to working with the Federal Government to improve the family law system in particular, ensuring that federal family law orders do not override final state and territory-based orders for the protection of persons from family, domestic and sexual violence.
- The commitment to improving justice responses to DFV should:
 - Commit to providing hearing support for victim-survivors of DFV rather than committing to a trial only.
 - Include a commitment to universal access to AVL facilities in all courts and tribunals.
 - Ensure any commitment to implementing law reform is also co-designed with the sector and with survivors with lived experience (ie. reforms to coercive control).

- The commitment to supporting the development of Men's Behaviour Change Programs (MBCs) should ensure that funding is only provided to MBCs that are evidence-based, evaluated and meet minimum standards. Victim advocate participation should be central to all MBCs funded under the DFV strategy.

We note more generally that the response pillar could be strengthened in a number of critical ways.

Firstly, the response pillar could include more specific commitments to strengthening specialist service responses to DFV. Specifically, we recommend that the DFV Plan commit to:

- Introducing a minimum of 5-year funding contracts for specialist services.
- Expanded funding for Women's Refuges (Specialist Homelessness Services)
- Expanded funding for Women's Domestic Violence Court Advocacy Services
- Expanded funding for NSW Women's Health Centres
- Expanded funding for Specialist Women's Legal Services, including funding for the Women's Legal Service NSW, Wirringa Baiya, the Legal Education and Advice in Prison Program, the Seniors Rights Centre, Community Legal Centres, Family Violence Prevention Legal Services, and the Aboriginal Legal Service to expand their domestic and family violence, family law and care and protection work
- Expanded funding for Staying Home Leaving Violence Program
- Expanded funding for intersectional approaches for marginalised priority groups (Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse, regional, rural, and remote, people with disability, older women and younger women, LGBTIQ+)
- Expanded funding for NSW Financial Abuse Service.
- Expanded funding for Men's Behaviour Change Programs.
- Expanded funding to ensure all specialist sexual, domestic, and family violence services are sufficiently funded to cover indexation including matching annual increases to the Consumer Price Index (CPI) and staff award increases.⁴

Secondly, we suggest that the DFV Plan include commitments to improving police responses to DFV. In this regard, we refer to the NSW Audit Office Review into Police Responses to Domestic and Family Violence and recommend that the DFV Plan specifically commit to implementing all of the recommendations of that review. We are particularly concerned that there is no focus in the new plan on police training (in particular in relation to addressing misidentification issues). We recommend that the DFV Plan commit to:

⁴ NSW Women's Alliance, *Action to End Gendered Violence: A Safe State for New South Wales* (Report, August 2022), <https://uploads-ssl.webflow.com/62df981bc453640022be6a2d/63032785a71b1d93e901981d_Full%20Platform%20-%20Action%20to%20End%20Gendered%20Violence.pdf>.

- Training NSW Police officers to respond appropriately and consistently to domestic and family violence including:
 - Providing trauma-informed responses.
 - Appropriately identifying domestic and family violence.
 - Actioning breaches of Apprehended Violence Orders (AVOs) and monitor progress.
 - Correctly identifying the person who is the predominant aggressor of domestic and family violence and the person most in need of protection and monitor progress.
 - Cultural safety and working with priority populations.
 - Managing burnout, compassion fatigue and vicarious trauma.⁵

It is noted that Full Stop Australia has already developed and implemented training and resources to support frontline responses to sexual, domestic and family violence, including the following:

- Respectful Workplaces Training – equipping workplaces to better prevent and respond gender-based discrimination, bullying, harassment, and violence.
- Workplace Responses to Domestic and Family Violence – equipping workplaces to better support their employees impacted by domestic and family violence.
- Responding with Compassion – equipping individuals and organisations to respond to disclosures using a trauma informed approach.
- Ethical Leadership in Action – applying a gendered lens to workplace leadership.
- Policy development and review – supporting organisational excellence in preventing and responding to sexual assault, sexual harassment and domestic violence.
- Preventing and Responding to Violence, Abuse and Neglect in Aged-Care and Disability Settings – equipping aged-care and disability services and frontline staff to better prevent and respond to gender-based violence.
- Professional services – help with self care for professionals working in the field of trauma.
- Professional services for psychologists and counsellors – providing professionals with knowledge and skills to respond to vicarious trauma through supervision and debriefing services.
- Understanding and Responding to Complex Trauma – designed and developed for counsellors working alongside clients with complex trauma as a result of sexual, domestic or family violence.
- Vicarious Trauma Training – for psychologists, counsellors and frontline workers, providing them with knowledge and skills to respond to vicarious trauma.
- Vicarious Trauma Management – Comprehensive vicarious trauma management solutions for employers.

⁵ NSW Women's Alliance, 2022.

Thirdly, we note that this pillar does not include any commitments on improving or strengthening financial and other supports for victim-survivors. In this regard, we note that there is currently a review of the Victims Rights and Supports Act 2013. This review is ongoing, however we note the recommendations of the [Joint Position Statement on the case for removing the requirement to separately prove injury in NSW Victims Support applications](#) and the Joint Submission on the Victims Rights and Support Act.⁶ We strongly encourage the DFV Plan to consider adopting the recommendations made in these submissions. As a matter of urgency and priority, we suggest that at minimum, the DFV Plan commitment to removing the requirement to separately prove injury.

Recovery

The impacts of sexual, domestic and family violence and complex trauma are far-reaching for both the victim-survivor and the community. Complex trauma can result from multiple, repeated forms of sexual, domestic and family violence causing complex traumatic health problems and psychosocial challenges. Complex trauma is commonly associated with a wide range of psychiatric diagnoses and misdiagnoses, functional impairments, and an array of educational, vocational, relational and other health problems.⁷ Depressive and anxiety disorders, and suicide and self-harm, are among the top ten leading causes of the overall burden in women aged 18-44 years.⁸ A large part of this is attributed to the complex trauma impacts of sexual, domestic and family violence. Moreover, women who have experienced violence in childhood are three times more likely to experience violence by a partner compared to those not abused as children.⁹ The compounding effect of intergenerational trauma in this regard often remains unaddressed and overlooked.¹⁰ Short and long term mental health consequences associated with complex trauma can continue to persist throughout the person's life after the incident and after the violence has stopped.¹¹ Moreover, people impacted by complex trauma are often in frequent contact with police and other crisis services and are regularly hospitalised as a result of additional experiences of family, domestic and sexual violence and the associated trauma impacts.¹²

⁶ Letter provided to 11 July 2022 Mr Stephen Bray, Director Civil Justice, Vulnerable Communities & Inclusion Department of Communities and Justice on behalf of 37 signatories.

⁷ ANROWS, *Violence against Women and Mental Health*, (ANROWS Insights, 2020), <<https://20ian81kynqg38bl3l3eh8bf-wpengine.netdna-ssl.com/wp-content/uploads/2020/07/VAW-MH-Synthesis-ANROWS-Insights.pdf>>.

⁸ Australian Institute of Health and Welfare, *Family Domestic and Sexual Violence in Australia: Continuing the National Story* (Report, 2019), <<https://www.aihw.gov.au/getmedia/b0037b2d-a651-4abf-9f7b-00a85e3de528/aihw-fdv3-FDSV-in-Australia-2019.pdf.aspx?inline=true>>.

⁹ ANROWS, 2020.

¹⁰ Ibid.

¹¹ ANROWS, *Constructions of Complex Trauma and Implications for Women's Wellbeing and Safety from Violence: Key Findings and Future Directions* (Report, 2020), <<https://20ian81kynqg38bl3l3eh8bf-wpengine.netdna-ssl.com/wp-content/uploads/2020/07/VAW-MH-Synthesis-ANROWS-Insights.pdf>>.

¹² Ibid.

Survivors of domestic and family violence don't just need crisis support, they need support to recover, rebuild and re-engage. And this support is strongest when it is led by those with lived experience and involves opportunities for connection and community. Isolation and reduced opportunities are the hallmarks of an abusive relationship. Even after the incident or after escaping violence, the health and social consequences of traumatic experiences can prevent one from living their full life. In our extensive experience providing clinical services to survivors of sexual, domestic and family violence, we know that survivors are in need a gateway where they can access a range of supports, resources, networks and opportunities to empower them rebuild connection, community, and financial freedom.

The kinds of opportunities and experiences that survivors need include opportunities for socialising, sharing ideas and resources, meeting with a careers advisor or a mentor, accessing child care or respite services, engaging with education and training as well as employment and entrepreneurial opportunities, financial planning, investment or retirement advice, family law advice, advocacy, and medium to long term trauma specialist counselling.

There is no one centralised location for victim-survivors of family, domestic and sexual violence and their supporters to access the tools, resources, and supports they need to manage the impacts of their traumatic experiences, and to recover and re-build connections with family, community, study and work. Whilst there has been recent investment in a number of local integrated trauma recovery pathways, there is currently no coordinated violence and abuse trauma recovery model.

We support the focus areas and commitments outlined in the draft DFV Plan. In particular, we warmly welcome the draft DFV Plans focus on:

- *Ensuring victim-survivors are well supported by trauma-informed services that enable longer term recovery; and*
- *Empowering communities to support victim-survivors healing and long-term recovery.*

However we recommend that this pillar be strengthened in a number of ways. Firstly, we recommend that the DFV Plan include and specifically reference the work of NGO and community based organisations who already work to enable longer-term recovery. Secondly, we recommend that the DFV Plan consider how recovery can be provided more holistically (ie. recovery should extend beyond physical and psychological to include social and economic recovery). Thirdly, we recommend that actions be taken to:

- Fund sexual, domestic, and family violence trauma recovery services as an essential component in a victim-survivor's healing. This would include a commitment to the development of a state-wide hub and information gateway to access trauma recovery services, networks and opportunities to support victim-survivors to recover, re-engage and reconnect socially and economically.

- Develop localised trauma specialist care coordination units within each of the 10 Primary Health Networks across NSW as a primary referral pathway for GPs and other mental and allied health professionals supporting patients or clients impacted by sexual, domestic, and family violence in need of coordinated multidisciplinary supports to heal and recover from the trauma impacts of their experiences.¹³

System Enablers

Strengthen coordination and collaboration

We warmly welcome all of the commitments outlined in this focus area, and make the following comments:

- We recommend that this focus area include a commitment to:
 - A DFV Lived Expertise Advisory Group to the NSW Government representing a diversity of ages, backgrounds and life experiences to embed lived expertise policy advice into the work of government. **A separate Lived Experience Advisory Group to the NSW Government should be established for people with lived experience of sexual violence in a range of settings.** Please see FSA's submission on the draft SV Plan.
 - A robust and effective whole-of-government risk assessment and management framework, including comprehensive best-practice training for the service sector, including police.
 - Reform and expand membership of the NSW Domestic and Family Violence and Sexual Assault Council to include additional non-government organisation representatives from the sexual, domestic, and family violence sectors and lived expertise representatives.¹⁴
- We suggest that the commitment to identifying opportunities to expand the reach of consultation must be implemented **now** and that much more consultation needs to be done prior to the finalisation of the DFV Plan. In particular, we also refer to the calls by the sector to increase the length and scope of the consultation on the Crimes Legislation Amendment (Coercive Control) Bill 2022.¹⁵
- We need to see more detail in relation to what information would be shared and for what exact purposes. See our comments in relation to evidence and data collection below.

¹³ NSW Women's Alliance, 2022.

¹⁴Ibid.

¹⁵Tamsin Rose, 'Rushed NSW coercive control laws could discriminate against minorities, experts say', *The Guardian* (online, 22 July 2022) <<https://www.theguardian.com/society/2022/jul/22/rushed-consultation-for-nsw-coercive-control-laws-could-result-in-flawed-legislation-experts-say>>.

- We need to see more detail in relation to integrated commissioning models. Full Stop Australia in particular wishes to see the establishment of an integrated commissioning model in relation to trauma recovery (see our comments above in the recovery section).
- **We are concerned that there is no equivalent governance mechanism in place to provide strategic direction for reforms to the SV service system as there is with the NSW DFV Reforms Delivery Board, which is comprised of senior executives from NSW human services and central Government agencies.**
- We are concerned that the Women’s Safety Commission will be included as part of the Executive Director, Women, Family and Community Safety role, as a joint responsibility. We submit that the Women’s Safety Commissioner must be independent from the Government for transparency and accountability reasons. The Commissioner must also be adequately funded and supported to conduct their work.

Build workforce capacity

We warmly welcome the commitment in the draft DFV Plan to build workforce capacity and all of the commitments underneath. In particular, we support the commitment to undertaking a workforce census to better understand the DFV sector and adjacent sectors and the development of a 10 year industry plan.

We make the following comments:

- Any workforce census must include frontline sexual violence services as “adjacent sectors”. **We are highly concerned the draft SV Plan contains no corresponding commitment to workforce development. Please see our submission on the draft SV Plan.**
- The commitment to building the capacity and cultural capability of specialist DFV and mainstream services must also include a commitment to assisting specialist and mainstream services to respond to sexual violence in the context of DFV.
- The commitment to enhancement and capacity building must also include organisations who work with children and young people, older women and people with a disability.
- We recommend that this focus area include a commitment to:
 - Supporting and equipping the DFV sector and frontline workers on how to respond to complex trauma and vicarious trauma management.
 - Introducing lived experience pathways to employment as specialist DFV workers.¹⁶
- We recommend that the 10-year DFV Data Strategy also include cross-agency data in all NSW Government settings including (but not limited to) health, police and education. We recommend that the NSW Government also work with the Federal Government to share and integrate data in the strategy across Federal Government settings including aged care,

¹⁶ NSW Women’s Alliance, 2022.

Centrelink and Medicare. **We are highly concerned that the draft SV Plan contains no corresponding commitment.**

Enhanced knowledge and evidenced-based best practice

We strongly support the draft DFV Plan's commitment to obtaining evidence (i.e. data) to inform its work and in particular to working with ANROWS. We also strongly support the development of a 10-year data strategy to guide the data collection, performance monitoring and reporting of NSW DFV Programs. However there is a lack of detail in the draft DFV Plan about how this is going to be achieved (i.e. what exact data is going to be collected and most importantly, how this data is going to be used).

We strongly support the draft DFV Plan's commitment to:

- collecting data in the points outlined at page 31;
- ensuring all new and existing programs and initiatives are evaluated;
- supporting service providers to improve the collection of data and reporting; and
- the co-design of quality standards for NSW DFV services.

Service providers (in particular NGO service providers) need to be resourced effectively to collect data and to report. Any commitment to supporting service providers must be accompanied by adequate funding for organisations to carry out this work.

Again, FSA remains highly concerned that these actions and commitments are not being made in the draft SV Plan.

We know that data collection will be a prominent feature of the National Plan and that the National Plan is still being finalised. However, the NSW Government has the ability to start making specific commitments to the collection, analysis and publication of data squarely within its purview now - in particular in portfolios such as health and justice. There are significant amounts of useful data that could be collected and analysed by way of example, data relating to hospital presentations for SDFV incidents. Any new data collected should be collected, analysed and reported on in trauma-informed and culturally appropriate ways and by those with expertise in this area.