



DRAFT NATIONAL PLAN TO END VIOLENCE AGAINST WOMEN AND CHILDREN 2022-2032:

Consultation Feedback

Acknowledgement of Country

Melbourne City Mission and Y-Change acknowledge the traditional custodians of the lands on which we work and note that this document was developed on the lands of the Bunurong, Wurundjeri and Woi Wurrung peoples of the Eastern Kulin Nation.

We pay our respects to Elders past, present and emerging. We acknowledge the culture, dreams, and aspirations of the Aboriginal and Torres Strait Islander people who are the true custodians of the land upon which we live and work.

We recognise that the over-representation of Aboriginal and Torres Strait Islander families, children and young people in the child protection and justice systems, many of whom have experienced family violence, is in part a devastating consequence of colonisation, intergenerational trauma and ongoing experiences of systemic racism.

We pay our respects to the strength and resilience of Aboriginal and Torres Strait Islander peoples and cultures and recognise their unceded sovereignty.

About MCM

Melbourne City Mission (**MCM**) is a community service organisation that provides a range of supports to people who are experiencing different forms of disadvantage across Victoria.

Our vision is to contribute to a fair and just community where people have equal access to opportunities and resources. We work alongside people and communities to provide long-term, sustainable pathways away from disadvantage.

MCM has more than 80 programs which span multiple service systems, including homelessness, disability, early childhood intervention, education and care, health (home-based palliative care), mental health, and education and training. MCM also run the Hester Hornbrook Academy, an independent specialist school providing education and wrap-around supports to some of the most challenging and disengaged young people in Victoria.

Family violence is a common thread that underpins much of our work. There are very limited specialist family violence supports for young people who are victim-survivors of family violence – the default response to young people disclosing family violence in Victoria is to pathway them into the homelessness system.

MCM provides a range of homelessness supports to young people, including:

- *Frontyard Youth Services* provides a range of integrated supports to around 2,500 young people aged 12 to 24 experiencing or at risk of homelessness each year, including support with housing, health, mental health, legal issues, Centrelink, employment and living skills. Frontyard operates the only state-wide specialist access point for young people aged 16-24 seeking to access the homelessness services system, including an 18 bed CBD-based crisis accommodation service supporting over 300 complex young people experiencing rough sleeping.
- Four youth refuge programs across the Northern and Western suburbs of Melbourne which provide

short-term accommodation to over 600 young people each year.

- Youth Foyer Programs that provide intensive case management and fully furnished medium term accommodation to young people for up to 2 years.
- Early intervention programs across Victoria supporting over 594 young people to remain connected to family, school, and their community, and in housing each year.

MCM has implemented a systems-level, whole of organisation approach to trauma-informed healing-oriented care. A 'Healing Oriented Framework' has been developed by MCM to promote the physical, emotional, social, psychological and spiritual health and wellbeing, cultural inclusion and ongoing safety of people in contact with MCM. MCM maintains a holistic view of individuals, families and communities in their ongoing process of healing.

About Y-Change

Berry Street's **Y-Change** initiative¹ is a social and systemic change platform for young people aged 18 to 30 with lived experiences of socioeconomic disadvantage. The team of Lived Experience Consultants work to challenge the thinking and practices of social systems through advocacy and leadership.

Y-Change champions the philosophy of co-production into the design of solutions to social issues. This unique methodology creates a cohort of young people, who deliver an uncommon, professional capability that brings to life the issues and solutions they face through their experiences. Working with young people, Y-Change transforms key decision-making through government initiatives, policy and advocacy campaigns and having access to those who can influence systemic change through inquiries and commissions.

Y-Change focuses on strengthening access to resources and skills to give young people pathways which support better outcomes, along with raising the voices and profile of young people experiencing systematic disadvantage to influence social change. Their model is entirely designed, informed, led and run by those with lived experience.

Introduction

MCM and Y-Change welcome the opportunity to provide feedback on the Draft National Plan to End Violence against Women and Children 2022 – 2032 (**Draft Plan**) and commends the Australian Government on maintaining this important focus. This submission should be read in conjunction with MCM's submission to the National Plan for the Elimination of Violence Against Women and Children (appendix 1).

The increased focus on preventing and responding to gender-based violence across Australia is strongly welcomed, however despite this focus, young people who are experiencing family violence are not recognised as victim-survivors in their own right and have been overlooked by the Draft Plan. Adolescents and young people are largely seen under the Draft Plan for their use of harm and violence and are not referenced in the title of the

¹ Berry Street's Y-Change initiative

www.berrystreet.org.au/what-we-do/young-people/youth-engagement-y-change

Draft Plan.

The gap in responses for young people that have experienced family violence is widely recognised by the family violence sector across Australia and the Draft Plan must properly recognise young people under all the National Pillars, especially the need for specialised and age-appropriate services and housing responses.

Family violence against young people is prevalent in Australia. The Crime Statistics Agency in Victoria reports that in 2020, 14,942 Affected Family Members in a police family incident were aged 15-24. However, family violence amongst young people is under reported, and the actual figure is likely to be much higher.

The impacts of family violence on young people are immense. Young people experiencing family violence have an increased risk of suicide attempts, mental illness, eating disorders, teenage pregnancy, early school leaving and use of violence. They experience disrupted schooling and consequent harm to chances of getting and keeping a job, difficulty making and keeping friends due to the stress and shame of trying to keep the violence secret, and the disruption of moving houses and schools to escape. Young people who experience violence are also more highly represented in the justice system, mental health system and in homelessness services.

If the development of a youth-specific approach is not prioritised in the Draft Plan, young people will continue to fall through the cracks. Without proper support, young victim-survivors of family violence are more likely to end up in the justice system, become further victimised by family violence or go on to perpetrate family violence, thus compromising the potential of the family violence reform.

We appreciate some of our feedback may be more adequately addressed in the subsequent Action Plans and have as best as possible kept feedback limited to naming challenges and needed priorities rather than specific actions.

This submission should also be read in conjunction MCM's [Amplify Report: Turning up the Volume on Young People and Family Violence \(2021\)](#), which has been shaped and guided by the insights of young people with lived experience of family violence (including three of Y-Change's Lived Experience Consultants).

We provide our endorsement of submissions made by Safe and Equal, Safe Steps Family Violence Response Centre and the Victorian Council of Social Services. MCM also recognises the right to self-determination and provides endorsement of submissions made by Aboriginal Community-Controlled Organisations.

Foundation Principle

MCM and Y-Change support the identified Foundation Principles and National Pillars listed in the Draft Plan, particularly the recognition of the importance of diverse lived experience in policy and program development.

We also acknowledge and support the \$1 million recently committed to ensuring that the diverse lived experiences of victim-survivors are informing policies and solutions throughout the lifespan of the Draft Plan. This is a much needed and welcome investment.

However, lived experience needs to do more than inform, and victim-survivor expertise should be central and built in systemically. It also needs to recognise their skills outside of their lived experience that they can and do bring to the table.

The voices of children and young people are still overwhelmingly missing from the family violence narrative. To us, this continues to reflect the lack of inclusion of young people with a lived experience more broadly.

There is a need for the right support mechanisms to ensure young people with a lived experience can be meaningfully partnered with in ways that are safe for them, that prevent re-traumatisation and that ensure they are able to have their voices heard and recommendations acted upon. Young people's experiences must be central in family violence narratives, and made visible to specialist family violence services, in order to support opportunities for young survivor advocates to influence policy development, service planning and practice.

Young People as Victim Survivors in their Own Right

We are pleased that the Draft Plan acknowledges the importance of recognising children as victims of gender-based violence in their own right. However, the Draft Plan largely fails to recognise young people as victim-survivors under each of the four National Pillars.

Throughout the Draft Plan, where children and young people are recognised as experiencing family violence, they are treated as extensions of their parents or caregivers for the purposes of support, including access to safe housing.

It is crucial to recognise children and young people not just as extensions of their parents or caregivers, or 'secondary victims' of family violence, but as victim-survivors in their own right.

Pillar One – Prevention

We are pleased to see a strong commitment to primary prevention with a focus on generational change and the importance of challenging the attitudes and behaviours that underpin violence. We are also pleased that the plan includes targeted primary prevention activities designed by, and tailored for, the specific communities they are intended to support including young people. However, this pillar must go further in recognising structural inequalities and committing to systemic reforms in areas such as social security, fair work and childcare.

It is also critical to acknowledge the drivers of family violence and its policy underpinnings that are contributing to young people's experiences of violence. In addition to the focus areas articulated above and in the Draft Plan, structural issues such as access to income support (e.g. rate of benefit, parental consent and eligibility requirements), agency thresholds, minimum wages and awards based on age, and societal discrimination and attitudes towards young people must be addressed under the prevention pillar.

Pillar Two – Early Intervention

Young people, of all genders, are not recognised as victim-survivors for the purposes of early intervention support. Adolescents and young people are largely seen under this National Pillar for their use of harm and violence including violence in the family setting, in their intimate relationships and for harmful sexual behaviours.

We are pleased that there is a reference to ‘Increased support for young people experiencing or at risk of violence’ but this falls under ‘Support women at points in their life where violence can escalate’, and therefore fails to recognise young victim-survivors of all genders. The need for an intersectional approach to family violence, that recognises that multiple identities and systemic barriers influence experiences, is becoming more embedded in the response system. This is of particular importance when working with young people². In an intimate partner context, violence remains highly gendered. However, with other forms of family violence, it becomes less so. Sexuality, religion, racial discrimination, disability, and age are key drivers of the violence young people experience.³ Further, at times young people also experience gendered violence from a female parent.

The National Pillar also neglects to recognise the need to build the capacity of the services in contact with young people outside of addressing behaviour change. The needs of young people need to be decoupled from those of children for the purposes of early intervention support responses and sectoral and community capacity building. There must be consideration of the developmental needs of children and young people specifically. Youth specialisation (and youth access points and ‘front doors’) must be included in holistic service integration alongside family violence services, child protection services and other family services.

There also needs to be more explicit reference under this pillar (and throughout the entire Draft Plan) that where children and young people are enacting harm in their homes, they are often victim-survivors themselves and may be using violence in defence and or in response to their own trauma⁴. The emerging practice and evidence in this area demonstrates that, more often than not, these young people are also victim-survivors of family violence — yet this is the only way that they become visible in their own right.⁵

Pillar Three – Response

Crisis responses and case management

There is a significant gap in responses specifically for young people experiencing family violence under National Pillar Three. The needs of independent young people as distinct from children must be recognised under this pillar and subsequent program responses developed to ensure access to immediate supports, to ensure their safety.

While not without its challenges, children and young people under the age of 15 can be placed in supported accommodation with the impacted parent or, as a last resort, in out-of-home care (discussed below). They can have their family violence risk managed through the specialist family violence service working with the parent.

² Corrie, T. & Moore, S. (2021), Amplify: Turning Up the Volume on Young People and Family Violence (Research Report), Melbourne City Mission, pp10-11

³ Ibid

⁴ Campbell, E., Richter, J., Howard, J., & Cockburn, H. (2020). The PIPA project: Positive interventions for perpetrators of adolescent violence in the home (AVITH) (Research report, 04/2020). Sydney, NSW: ANROWS.

⁵ Corrie, T. & Moore, S. (2021), Amplify: Turning Up the Volume on Young People and Family Violence (Research Report)

However, most child protection and family services are not designed or resourced to work with young people over 15.⁶ The only service available to these young people are youth and homelessness services, neither of which are designed to manage complex family violence risk.

This service response gap means youth services are managing substantial family violence risk. Critically, in practice there is no specialised, family violence crisis response or case management program for young people that has a focus on their identities as victim-survivors. This is a glaring gap within the current system. This omission has by no means been by design, and all sectors working with these young people do what they can with what they have. However, it highlights that there is need for a better, more systemic response that must be enabled by the Draft Plan.

We are pleased that the Draft Plan states that '[all] services engaging with family, domestic and sexual violence should enhance cross system processes to be more joined up and easier to navigate', however in naming the specific sectors, the youth sector must also be included.

Access to crisis accommodation and housing

We are pleased to see a focus on safe and secure housing, however the Draft Plan must go further in ensuring victim-survivors have access to safe and affordable housing, as a critical foundation of a functioning family violence system.

Intentions outlined under this National Pillar do not go far enough in addressing the drastic needs of people forced into housing crisis by family violence; in particular, the needs of those who are more likely to suffer housing instability need to be addressed, including independent young people.

The Draft Plan includes the intention to expand options for women and children to stay safely in their own home rather than being made to leave as a default. While MCM supports this action, there are many victim-survivors who are unable to remain in their home for social and economic reasons. Among those who are forced to leave are people who experience violence in unstable housing, people who are already experiencing homelessness and those who are not in a position to take on the financial burden of a home on their own.

As a group, young people are more likely to experience financial stress and have fewer accommodation options due to affordability. Young people experiencing violence in the family home are less likely to have the option of remaining in the home while the perpetrator is removed, and are also unlikely to be able take on the financial responsibility of the home they live in. An increase in safe at home options will have a lesser impact on young people, many of whom will require refuge or similar, as well as ongoing housing beyond the immediate crisis.

Enhancing linkages between current housing options and family violence responses is a key factor in providing support, however it does not address the issue of inadequate accommodation options and the supply of social and affordable housing stock. Significant investment is needed to address the gap between those who are forced into homelessness by family violence and the number of available tenancies, particularly for those with a low income. Similarly, support to enter the private housing market can only enable those who are financially able to do so.

⁶ Ibid

MCM supports the Draft Plan's intention to increase the number of housing options for children and young people. However, new solutions are needed where current family violence interventions do not address the needs of young people, across all levels of housing:

Emergency hotel accommodation: Motel, hotel and other brokered accommodation is often used where no refuge or emergency accommodation is available, or where the victim-survivor is not eligible. While this is problematic for many reasons, it has particular safety implications in relation to children and young people. Due to a lack of providers, the accommodation used for this response is often used to broker other people experiencing housing crisis including adults in the homelessness system. This can put those young people who are independent and without accompanying parents at risk of exploitation, particularly those who are vulnerable or new to homelessness.

This accommodation type is not appropriate for young people under 18, but is often used where no other option exists, highlighting the need for an increased number of crisis beds.

Refuge: MCM's Frontyard Youth Services is the only specialist access point for young people aged 16-24 seeking to access the homelessness services system. In Victoria, there are over 20 youth specific refuges providing crisis accommodation to young people up to the age of 25. These refuges are separate from the family violence system and are funded through specialist homelessness services. As generalist services the youth refuge system lacks the specialist knowledge to identify and manage family violence risk, especially at the high-risk end of the violence spectrum. Victorian youth refuges are almost all low security, which poses a serious safety risk to those young women who are in danger or experiencing high risk violence. In general, young people are ineligible for family violence refuge in Victoria.

Emergency accommodation, including refuge and high security accommodation, is a critical response for those at high risk of violence. In Victoria, family violence accommodation is only eligible to those who are at immediate and high risk, leaving victim-survivors who don't meet this threshold to enter the homelessness system. There is insufficient supply of emergency accommodation options to meet demand, which is not acknowledged in the Draft Plan. Further emergency options are needed to be developed, including those for victim-survivors at medium and low risk.

In Victoria, family violence services often automatically refer those under 25 years to generalist youth accommodation providers with no family violence expertise. While this response is intended to provide young people with age-appropriate support, it often fails to adequately manage risk and can put young people in danger. While many family violence refuges are improving responses to infants and children where they are accommodated with their mother, accommodating children can become a barrier where those children are approaching adolescence. Many family violence services are unable or unwilling to house children over 13, and women in family violence refuges are often asked to find alternative accommodation for older children.

The family violence emergency accommodation system (refuge) is also built on a binary understanding of gender, with most refuge options in Victoria only open to women who are victim-survivors. This is increasingly problematic in the context of young people, where victims of parental rather than intimate

partner violence are more likely to be across genders. In youth homelessness programs gender diversity is rapidly increasing, making traditionally gendered services unable to meet all young peoples' needs.

Out-of-home care: For young people under 16, the out-of-home care system is intended to be the 'safety net' however in many jurisdictions, including Victoria, the system is under pressure and under resourced, and can't provide the level of safety, immediacy and support required by young people. Accommodation options provided through out of home care are severely limited, particularly for those at the upper end of the age group.

Typically, a young person over 12 entering the out of home care system will have few options outside group residential care. Research indicates that this care option is a strong indicator of poor life outcomes, and specifically points to poor outcomes in education, employment and economic participation⁷. Those over 16 years who are unable to remain with family are unlikely to be prioritised for a child protections residential placement of any kind.

Longer-term housing: Accommodation programs are also needed beyond the immediate crisis response and could be encapsulated under the fourth National Pillar, Recovery. The system of emergency accommodation is not sustainable without the next stage of stable accommodation to assist in recovery and, for young people, community connection and economic participation. These options need to be integrated with wraparound support to ensure that housing and tenancies are maintained.

A long-term lack of social housing stock is well documented in Australia. Existing social housing options do not meet demand, and those seeking housing due to family violence compete for tenancies with a number of other priority groups. Allocation to social housing in Victoria is managed through a single waiting list, where victim-survivors can often wait years for a tenancy.

Dedicated housing stock is needed and should be addressed in the Draft Plan through measures to increase the supply of social housing for victim-survivors of family violence. Specific housing supply or measures to increase access should be considered for those groups at increased housing risk, including independent young people.

While we appreciate that a Draft Plan cannot articulate a quantum, lack of supply is a key issue that should be articulated.

Pillar Four – Recovery

We are pleased that children and young people's safety and recovery needs are recognised as a specific Focus Area under this National Pillar. We are particularly pleased that the Draft Plan has articulated the specific need for integrated specialist programs for children and young people and the need for holistic responses that focus on repairing the often-undermined mother-child relationship. However, this needs to be met with a resourced system to refer to and currently there are no specialised family violence programs available to support young victim-survivors outside of the Adolescent Family Violence in the Home programs.

⁷ Anglicare Victoria, Understanding differences in the outcomes of children and young people across care types; T. Corrales

The needs of children should also be decoupled from the needs of young people given the differences as outlined above.

Summary of recommendations

Foundation Principle – Diverse Lived Experience of Victim-Survivors are Informing Policies and Solutions

- Lived experience be built in systemically in the development and implementation of the Draft Plan.

Pillar One – Prevention

- Recognise structural inequalities and commit to systemic reforms in areas such as social security, employment, childcare and agency thresholds that underpin violence against women, children and young people.

Pillar Two – Early Intervention

- Young people, of all genders, must be recognised as victim-survivors for the purposes of early intervention support.
- The needs of young people need to be decoupled from those of children for the purposes of early intervention support responses and sectoral and community capacity building.
- Youth specialisation (and youth access points and ‘front doors’) must be included in holistic service integration alongside family violence services, child protection services and other family services.
- There needs to be more explicit reference that where children and young people are enacting harm in their homes, they are often victim-survivors themselves and may be using violence in defence and or in response to their own trauma.

Pillar Three – Response

- The needs of independent young people as distinct from children must be recognised under this pillar and subsequent program responses developed to ensure access to immediate supports, to ensure their safety.
- To enhance cross system processes to be more joined up and easier to navigate, the Youth Sector must also be included in the list of systems referenced.
- Reference be made to housing supply and operational funding as a challenge in supporting victim-survivors to access safe housing, from emergency accommodation to longer term social housing.

Pillar Four – Recovery

- The needs of young people to be decoupled from those of children in relation to their safety and recovery needs (Focus Area 4)