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**Response to SNAICC Discussion Paper:
Our Ways – Strong Ways – Strong
Voices: National Aboriginal and Torres
Strait Islander Family Safety Plan
Engagement**

Southern Aboriginal Corporation

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Step Up... Stand Tall... Walk Together...

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Introduction

Southern Aboriginal Corporation (SAC) welcomes the opportunity to provide a submission to SNAICC on the National Aboriginal and Torres Strait Islander Family Safety Plan (the Family Safety Plan).

SAC is a leading Aboriginal Community Controlled Organisation (ACCO) operating across the Great Southern, Southwest and Wheatbelt regions of Western Australia. SAC offices are located in Albany, Katanning, Bunbury and Narrogin, from which services are delivered to 17 regional and remote locations. SAC supports the unique and evolving needs of our local communities by promoting Noongar social and cultural values and implementing a culturally informed, trauma integrated healing approach.

SAC has a unique understanding of the complex context in which Aboriginal people experience family and domestic violence (FDV); our practice is informed by an awareness of the historic and continued colonial and systemic racism that influences the experience of trauma and violence by Aboriginal people in contemporary society. Per ANROWS research into Aboriginal and Torres Strait Islander healing programs that respond to family violence:

Mainstream literatures... makes the assumption that the factors associated with violence against women in non-Indigenous communities are the same as those in Indigenous communities. For Western, Anglo-Saxon and Anglo-Celtic families, patriarchy is seen to be the precursors for family violence, allowing for dominance of men and male power and the subordination of women, whereas for Aboriginal and Torres Strait Islander families, the precursor for family violence is colonisation.¹

Every day, SAC works with clients who continue to be displaced and discriminated against by the systems that dispossessed Aboriginal people from their land, their culture and their communities at the time of colonisation.

SAC seeks to provide feedback to SNAICC on the Family Safety Plan to inform the national approach to family, domestic and sexual violence, given the importance of facilitating better access to culturally safe, trauma informed and Aboriginal controlled FDV services, including legal assistance, in Western Australia. We have a particular vested interest in promoting improved access to services and achieving progress against the State and Federal Government's respective obligations under the National Agreement on Closing the Gap, National Plan to End Violence Against Women and Children 2022-32 and the Aboriginal and Torres Strait Islander Action Plan 2023-2025 under the National Plan to End Violence Against Women and Children.

¹ Carlson, Day and Farrelly, 'What works? Exploring the literature on Aboriginal and Torres Strait Islander healing programs that respond to family violence', 2021, ANROWS, [4ap5-calrson-et-al-healing-programs-lit-review-1.pdf \(indigenousjustice.gov.au\)](#).

Response to Terms

Question 1: What are the key priorities and actions the Family Safety Plan should focus on to create real and sustainable change for Aboriginal and Torres Strait Islander families?

Australia's first standalone National Plan for Aboriginal and Torres Strait Islander family safety must include practical strategies to change the way that Aboriginal families are supported to stay safe and together, in their own homes. Across Australia, Aboriginal women are 32 times more likely to be hospitalised due to family violence related assaults and are 11 times more likely to die from assault than non-Aboriginal women.² In Western Australia (WA), the incidence of violence experienced by Aboriginal women and children is disproportionately high in comparison to the same types of violence experienced across broader society; of the 154 FDV fatalities in WA between 1 July 2012 and 20 June 2022, 36% (54) were Aboriginal, despite Aboriginal people comprising only 3.5% of the state's population.³

Aboriginal women experiencing family violence are also at greater risk of being victimised by the child protection and justice systems. There is comprehensive evidence to suggest the correlation of FDV victimisation with the threat and actual experience of child removal, and interaction with the criminal justice system. In the Great Southern, South West and Wheatbelt regions of Western Australia, for example, Aboriginal children comprise 57%, 46% and 65% of all children in care, respectively.⁴ In the same regions, SAC has observed a steady increase in Family Violence Prevention Legal Service client numbers over the last decade, totalling a 13-fold increase in the financial years between 2008-09 and 2023-2024. The proportion of clients requiring assistance for family violence restraining order matters and care and protection matters has continued to rise over that period.

While the needs of Aboriginal families are diverse and complex, SAC purports that in a family and domestic violence context, priority policy attention must be paid to the demand for early access to legal assistance for Aboriginal people experiencing or at risk of family and domestic violence. The Aboriginal and Torres Strait Islander Action Plan 2023-2025 under the National Plan to Prevent Violence Against Women and Children recognises that the "legal and justice systems are not well adapted or informed to respond effectively to the interlocking and compounding forms of violence that Aboriginal and Torres Strait Islander women experience."⁵ This is problematic, when research tells us that people experiencing FDV are 10 times more likely than others to experience other legal problems, including a wide range of family, civil and criminal law issues.⁶ Those legal problems are also considered to be more severe with greater adverse impacts on broad life circumstances. The Law and Justice Foundation of NSW, when quantifying the legal and broader life impacts of FDV, determined that:

² Australian Human Rights Commission, 'New report sets the stage for First Nations women to lead response to family and community violence', November 2022, [New report sets the stage for First Nations women to lead response to family and community violence | Australian Human Rights Commission](#).

³ Ombudsman Western Australia, 'Family and Domestic Violence Fatality Review', 2022, [Ombudsman WA Annual Report 2021-22](#).

⁴ Department of Communities, Government of Western Australia, 'Child Protection Activity Performance Information 2022-2023', 2023, [Child Protection Activity Performance Information 2022-23 \(www.wa.gov.au\)](#).

⁵ Department of Social Services, Australian Government, 'Aboriginal and Torres Strait Islander Action Plan 2023-2025: Under the National Plan to End Violence Against Women and Children 2022-2023', 2023, [Aboriginal and Torres Strait Islander Action Plan 2023-2025 \(dss.gov.au\)](#).

⁶ Law and Justice Foundation of New South Wales, 'Quantifying the legal and broader life impacts of domestic and family violence', Justice Issues, June 2019, [Quantifying the legal and broader life impacts of domestic and family violence, Justice Issues paper 32 \(lawfoundation.net.au\)](#).

Experiencing FDV has a compounding effect on legal and human service needs. FDV not only increases the experience of a wide range of other serious legal problems, but also increases the negative impacts of these legal problems on broader life circumstances and reduces the likelihood of resolving these legal problems... FDV and related legal problems require assistance from multiple professional advisers, usually lawyers and health and welfare professionals, to successfully reach resolution.⁷

The report concluded that these realities indicated the need for:

- Free or low-cost legal services that are accessible to disadvantaged people experiencing FDV;
- Comprehensive legal diagnosis to identify all the legal problems accompanying FDV victimisation, including family, civil and criminal law problems;
- Joining up between different types of legal services to address these broad ranging legal problems;
- Joining up between legal services and human services to address the adverse impacts of these legal problems and broad life circumstances; and
- Bi-directional referrals between legal and human services to facilitate streamlined access to wrap-around assistance for the legal and related needs of people experiencing FDV.

In the context of legal and broader social supports for Aboriginal victims of family and domestic violence, the report highlighted the Family Violence Prevention Legal Service (FVPLS) units specifically as providing beneficial supports tailored to the specific needs of Aboriginal people.⁸ Across Australia, the FVPLS units, which are Aboriginal Community Controlled Organisations, provide a uniquely integrated service model to meet the comprehensive needs of Aboriginal people experiencing or at risk of family and domestic violence; they deliver a combination of specialised legal and non-legal services to Aboriginal people to support them to address their holistic needs, beyond the demands of their legal matter. In 2019, a Charles Darwin University evaluation of all the FVPLS units across Australia, including SAC, concluded that FVPLS service strategies and activities actively contribute to reducing costs to the legal, court and child protection systems by:

- Lowering rates of breaches of Family Violence Restraining Orders with resulting reduced consequences for victims and perpetrators;
- Supporting victims to negotiate parenting plans and property settlement out of court settlements in family law matters;
- Supporting extended family members to apply to care for children outside of the court system;
- Increasing the likelihood of perpetrators pleading guilty through support to the victim to be actively engaged in the legal case against the perpetrator and to appear in court;
- Reducing rates of drop-out from legal processes by victims; and
- Supporting more successful prosecutions and more appropriate sentences.⁹

⁷ Law and Justice Foundation of New South Wales, 'Quantifying the legal and broader life impacts of domestic and family violence', Justice Issues, June 2019, [Quantifying the legal and broader life impacts of domestic and family violence, Justice Issues paper 32 \(lawfoundation.net.au\)](https://www.lawfoundation.net.au/quantifying-the-legal-and-broader-life-impacts-of-domestic-and-family-violence-justice-issues-paper-32).

⁸ Law and Justice Foundation of New South Wales, 'Quantifying the legal and broader life impacts of domestic and family violence', Justice Issues, June 2019, [Quantifying the legal and broader life impacts of domestic and family violence, Justice Issues paper 32 \(lawfoundation.net.au\)](https://www.lawfoundation.net.au/quantifying-the-legal-and-broader-life-impacts-of-domestic-and-family-violence-justice-issues-paper-32).

⁹ Attorney General's Department, Australian Government, 'National Legal Assistance Data Standards Manual', July 2021, [National Legal Assistance Data Standards Manual | Attorney-General's Department \(ag.gov.au\)](https://www.ag.gov.au/national-legal-assistance-data-standards-manual).

Despite these conclusions, in the almost two-decades since the SAC FVPLS commenced service delivery, the program has been subject to funding cuts and administrative changes that have negatively impacted the service delivery capacity of the unit. As the primary funding body of the FVPLS program, the National Indigenous Australians Agency has continued to fund the FVPLS units under a model that is not based on legal need or the actual cost of providing services, unlike other legal assistance providers. The Productivity Commission criticised this model in their review of access to justice arrangements and recommended that Commonwealth funding for FVPLS providers be allocated:

According to models that reflect the relative cost of service provision and indicators of need, given their priority clients and areas of law.¹⁰

Across Western Australia, research commissioned by the Department of Justice into legal needs determined that Aboriginal people continue to be disproportionately impacted by key risk factors which contribute to higher levels of need for legal assistance services. The 2022 WA Legal Needs Report, for example, concluded on the topic of unmet need, which it refers to as the ‘statistical inference of need for legal assistance which is not serviced according to observable provider data’, that for every person:

- With a potential need of legal assistance in civil law matters, there were approximately 0.43 weighted services delivered;
- With a potential need of legal assistance in child protection matters, there were approximately 0.0005 weighted services delivered;
- With a potential need of legal assistance in restraining order matters, there were approximately 0.61 weighted services delivered; and
- With a potential need of legal assistance in family law matters, there were approximately 0.24 weighted services delivered.¹¹

The report also noted a higher service-to-need ratio in the Perth Metropolitan and Peel regions compared to regional Western Australia, including the Great Southern, South West and Wheatbelt regions in which SAC operates.

In this context, SAC purports that early access to legal assistance must be a key priority for the Family Safety Plan, underwritten by a tangible financial investment into the FVPLS units to create real and sustainable change for Aboriginal and Torres Strait Islander families. Service delivery to Aboriginal people by Aboriginal Community Controlled Organisations is widely understood to be best practice; ANROWS research into family violence legal and support services for Aboriginal and Torres Strait Islander women reinforces this, concluding that:

The presence of Aboriginal service providers is a critically important attribute for the success of service provider agencies to make initial contact with often highly reluctant victims of violence, and to engage and remain involved with them throughout an often lengthy process of escaping from their partners or other perpetrators and re-

¹⁰ Productivity Commission, ‘Access to Justice Arrangements: Productivity Commission Inquiry Report’, 2014, <https://www.pc.gov.au/inquiries/completed/access-justice/report>.

¹¹ ACIL Allen report to the Department of Justice, Government of Western Australia, ‘Assessment of the Current Legal Needs in Western Australia: Final Report’, 2022, <https://www.wa.gov.au/system/files/2022-12/WA-Legal-Needs-Summary-Report.pdf>.

establishing their lives in safe accommodation, while often facing the challenge of dealing with child protection services to have their children returned.

Failure to have Aboriginal service providers is a major risk factor to both the agency in putting their service at risk of failure and to the victims who, when facing any barriers to availability, access or acceptability of services in any sector, are less likely to seek any support in times of high risk.¹²

Commitments within the Family Safety Plan to actioning the rectification of significant shortfalls in legal assistance funding experienced by the FVPLS sector will enable the FVPLS units to ensure the continuity of best practice, culturally safe, trauma informed and uniquely tailored legal and social services for Aboriginal victims of family and domestic violence, with the objective of reducing their experience and the escalation of violence.

While we acknowledge the recent announcement of a \$3.9 billion funding package by the Federal Government to support front-line legal services amidst national negotiations on the next Access to Justice Partnership, we note that this includes only \$800 million in additional funding, to be shared amongst all four types of legal assistance providers (FVPLS, ATSILS, LACs and CLCs). This likely means only a fraction will be allocated to the FVPLS units, continuing the chronic underfunding of the FVPLS units. We recommend the Family Safety Plan urge investment of State and Federal Government money into the FVPLS units, consistent with their obligation to achieve progress against Target 13 of the National Agreement on Closing the Gap:

- By 2031, the rate of all forms of family violence and abuse against Aboriginal and Torres Strait Islander women and children is reduced at least by 50%, as progress towards zero.

This is also strategically aligned to the Aboriginal and Torres Strait Islander Action Plan 2023-2025 of the National Plan to End Violence Against Women and Children 2022-2032, which identifies access to culturally safe and appropriate legal assistance as a key outcome under its Justice and Equitable Outcomes reform area.¹³

Question 2: If there were no barriers, how would your community address FDSV?

Family Violence Prevention Legal Service

Integrated service delivery models are key to addressing family and domestic violence due to the complexity of social issues that ultimately precede and continue post the escalation of a legal issue. In SAC's experience, clients regularly present with a diversity of mental health, drug and alcohol, homelessness, care and protection and other needs, linked to their experience of the vulnerability and disadvantage associated with intergenerational trauma. That is why the FVPLS model of combining legal assistance with non-legal support to address the holistic needs of clients within the one organisation is critical; by moving beyond crisis responses and implementing supports that address all facets of a clients' life, SAC actively contributes to enabling victims with the resources to improve their family circumstances and ensure safety in their homes.

¹² Australia's National Research Organisation for Women's Safety Limited, 'Improving family violence legal and support services for Aboriginal and Torres Strait Islander women: Research report', 2020, Issue 25, [AT.19.03_Langton_RR-FVsupport-Women.pdf \(anrows-2019.s3.ap-southeast-2.amazonaws.com\)](https://www.anrows-2019.s3.ap-southeast-2.amazonaws.com/AT.19.03_Langton_RR-FVsupport-Women.pdf).

¹³ Department of Social Services, Australian Government, 'Aboriginal and Torres Strait Islander Action Plan 2023-2025', August 2023, <https://www.dss.gov.au/the-national-plan-to-end-violence-against-women-and-children/aboriginal-and-torres-strait-islander-action-plan-2023-2025>.

If, therefore, there were no funding barriers, SAC would continue to address FDV through the delivery of best practice, culturally safe, client centred, accessible and effective integrated services via the provision of an expanded FVPLS program. As a priority, SAC is seeking to:

- Extend service provision of its FVPLS into the Peel region, which FVPLS program data indicates that 12.9% of the service's clients have at some point been located in over the last 2 years. The region is currently only serviced through an outreach model by the Perth Metro based FVPLS unit, and otherwise services available are not Aboriginal Community Controlled Organisations nor specialists in the provision of legal assistance in family law, care and protection, criminal injuries and family violence restraining order matters for Aboriginal victims of family and domestic violence.
- Ensure the continuity of 2.0 FTE solicitor roles servicing the South West and Wheatbelt regions. Funding for the roles is due to cease on 30 June 2025, at which the FVPLS unit will be down from 5 to 3 lawyers and would experience the loss of an Indigenous lawyer.
- Introduce at least 1.0 FTE Social Worker in both the Katanning and Narrogin offices to address the significant pressure imposed on the single staff members in those respective offices, who are currently the only available ongoing source of face-to-face contact for clients. Staff are regularly required to provide support to clients beyond the scope of the funding of their role, including social work and counselling supports, and do so in the context of small towns with decades long histories of family feuding.
- Introduce at least 1.0 FTE Financial Counsellor to work across the FVPLS program, to enable SAC to increase capacity to provide integrated family violence services for victims by minimising the need for referral to external, mainstream agencies for financial counselling. In a family and domestic violence context, the lack of culturally safe service delivery options for Aboriginal victims of FDV only further entrenches their disadvantage and heightens risk of ongoing victimisation; Financial Counselling Australia suggests that financial counsellors in mainstream organisations struggle to support victims of FDV due to their inability to provide only short-term fixes that do not comprehensively address client needs, let alone provide cultural safety for Aboriginal people.
- Introduce at least 1.0 FTE Senior Counsellor with the expertise and qualifications to provide oversight of and deliver counselling services direct to client, to empower clients to have improved social and emotional wellbeing.

We recommend the Family Safety Plan commit governments to working with the FVPLS sector to adequately address their funding needs, to ensure the continuity of best practice, legal and broader integrated services specifically tailored to the needs of Aboriginal victims of family and domestic violence.

Men's Program

In Western Australia, the Department of Communities' Aboriginal Family Safety Strategy sets out a cross-government initiative for addressing family violence impacting Aboriginal women, children, families and communities. Focus Area 2 of the Strategy – Recognise and Support Men and Boys – indicates the appetite from the State Government for targeted programs designed to support men, boys and fathers to build strong communities and safe families.¹⁴ At a national level, the 2024-2025 Federal Budget continued support for men's health with \$6.1 million allocated to Men's Sheds and \$2.1 million for training health professionals to better engage and treat men, including for mental and

¹⁴ Department of Communities, Government of Western Australia, 'Aboriginal Family Safety Strategy: 2022-2032', <https://www.wa.gov.au/system/files/2022-12/Aboriginal-Family-Safety-Strategy.pdf>.

physical health issues. Similar to WA's Aboriginal Family Safety Strategy, the Aboriginal and Torres Strait Islander Action Plan 2023-2025 of the National Plan to End Violence Against Women and Children includes a number of activities targeted specifically towards men. This includes:

- Establishment of Aboriginal Men's Wellness Centres with programs including prosocial interventions, cultural healing, education on respectful relationships, healthy parenting, mentoring, living skills and alcohol and drug abuse;
- Expansion of community-based culturally informed men's prevention and perpetrator accountability programs; and
- Establishment of an Aboriginal and Torres Strait Islander Men's Advisory Body.¹⁵

Collectively, these policy frameworks and funding commitments represent a tangible interest from all relevant Governments in dedicated men's programs to build the social, emotional and physical health and wellbeing of men. If there were no funding barriers, SAC would seek to continue to address FDV in its specific service delivery regions of the Great Southern, South West and Wheatbelt areas of Western Australia, through the expansion of its Moorditj Men's Program. The program was delivered across the Noongar Wagyl Kaip and Southern region, designed to build the social and emotional health and wellbeing of Noongar men by:

- Providing an opportunity for diversionary activities, skills acquisition and the achievement of productive outcomes including future training and employment;
- Providing opportunities for health promotion and illness prevention;
- Addressing risk of suicide and mental health issues through connection strategies aimed to achieve increased sense of belonging and resilience;
- Addressing the misuse of alcohol and other substances;
- Promotion of safety factors within the home and community, developing a community free from fear and acts of violence; and
- Increasing levels of support for victims of violence.

SAC entered a partnership with Aboriginal Koort Kaarl Service Inc. to facilitate the pilot program, which successfully saw the employment of 1.0 FTE Men's Support Worker based in Katanning. In the October-November 2023 period alone, the Support Worker engaged with over 60 Aboriginal men through yarning sessions and individual consultations. Overwhelmingly, the pilot program identified community need for more programs and supports specifically for men, which SAC is now not in the position to service given that the project funding was time limited. We therefore recommend that the Family Safety Plan impose obligations on governments to work with service providers across the family violence sector to identify opportunities to grow existing programs that have already demonstrated success in building stronger, safer families.

Question 3: What does culturally appropriate and holistic service provision look and feel like?

The provision of truly culturally appropriate and holistic services for Aboriginal people in a family and domestic violence context requires flexibility in service delivery to be responsive and tailored to the unique and complex needs of victims. Per SAC's models of Cultural Integrity and Cultural Capability, culturally safe, trauma informed and integrated service delivery requires service providers to consider:

¹⁵ Department of Social Services, Australian Government, 'Aboriginal and Torres Strait Islander Plan 2023-2025: Under the National Plan to End Violence Against Women and Children 2022-2032', https://www.dss.gov.au/sites/default/files/documents/10_2023/dedicated-action-plan.pdf.

- The suitability of programs to the target cohort;
- Promotion of self-determined decision making by clients;
- How to make sure the right people with the appropriate expertise are involved;
- The resources required to ensure a culturally safe environment; and
- Their capability to meet the respective needs of the target cohort.

Cultural capability must be achieved through an authentic approach to continuous learning and a holistic approach to service delivery, as follows:

- Cultural Security: respecting the legitimate cultural rights, values, beliefs and expectations of Aboriginal people;
- Cultural Awareness: able and willing to recognise cultural differences, awareness of culture and customs, and acceptance of cultural differences;
- Cultural sensitivity: considering cultural background and experiences respecting Aboriginal culture and knowledge, and being sensitive to the fact that customs can be uniquely individual;
- Cultural competency: demonstrating sufficient levels of knowledge, skills and attitudes leading to a result of empowerment in others and self; and
- Cultural safety: understanding of the required systemic changes to implementing a holistic approach to service delivery and engagement, removing barriers to service delivery and engagement, and person-centred service delivery and engagement where evaluation leads to behavioural changes to meet the individuals' needs.¹⁶

In the context of delivery of legal and non-legal support services to Aboriginal people experiencing or at risk of family and domestic violence, the FVPLS units are best practice examples of the provision of culturally appropriate and holistic services uniquely tailored to the needs of victims and their families. We recommend the Family Safety Plan commit governments to working with the FVPLS sector to adequately address their funding needs, to ensure the continuity of best practice, culturally safe, holistic legal and broader integrated services specifically tailored to the needs of Aboriginal victims of family and domestic violence.

Question 4: How can governments and mainstream services best support Aboriginal and Torres Strait Islander people (including workforce and clients), services and solutions?

In the context of legal assistance for Aboriginal victims of family and domestic violence, governments and mainstream services can best support Aboriginal and Torres Strait Islander people, services and solutions by transitioning delivery of services for Aboriginal people from mainstream organisations to Aboriginal controlled legal services. Transformational change, aligned to government, organisation and institutional obligations under the National Agreement on Closing the Gap, must be reflected in the Family Safety Plan through actions for government and government funded mainstream legal services to partner with the FVPLS units to:

- a. Develop legal assistance transition strategies to guide transition of legal services for Aboriginal victims of family and domestic violence to the FVPLS units;
- b. Develop governance structures for monitoring and evaluating service delivery to Aboriginal people which are led by Aboriginal people with expertise in the services being delivered and who have strong connections to the communities being serviced;

¹⁶ Southern Aboriginal Corporation, *'Cultural Capability Model'*, 2022.

- c. Demonstrate how they have pursued appropriately remunerated partnerships with Aboriginal controlled legal services to support Aboriginal client's access to cultural safety if the mainstream service is best placed to deliver services;
- d. Demonstrate how they will achieve cultural safety for and be appropriately responsive to the needs of Aboriginal people; and
- e. Demonstrate how they will prove those achievements prior to and after receipt of funding, such as in Grant Guidelines, governance, monitoring, accountability and evaluation frameworks.

Per the above responses, these actions must be complemented by tangible financial investments into the FVPLS units, as the best placed service providers to meet the unique and complex needs of Aboriginal victims of family and domestic violence. The Family Safety Plan must put pressure on governments to work in more effective partnership with the FVPLS sector to develop a funding model and funding allocations that reflect the actual cost of providing a comprehensive suite of legal and non-legal services for Aboriginal victims of family and domestic violence. Assessments of localised need alongside comprehensive and comparable data on the costs and benefits of delivering legal services should inform decisions about long-term resourcing requirements. We note and endorse the comments of Community Legal WA regarding government obligations to work in partnership with Aboriginal Community Controlled Organisations:

It is essential that government funding and procurement contracts and processes recognise and give life to a shared understanding of the strength, expertise and right to self-determination by Aboriginal and Torres Strait Islander communities.¹⁷

Question 5: How should the service system respond to the intersectional needs of Aboriginal and Torres Strait Islander people and communities?

The tendency for governments to take a siloed approach to funding service delivery is a significant barrier to the capability of service providers to effectively respond to the intersectional needs of Aboriginal people experiencing or at risk of family and domestic violence. SAC, for example, has historically struggled with the State Government's approach to funding in Western Australia, whereby the Department of Justice purports that the FVPLS units are family violence providers and so must seek funding support from the Department of Communities, while the Department of Communities argues that SAC is a legal assistance provider and so should seek funding support from the Department of Justice. This is despite the SAC FVPLS providing best practice, integrated legal and comprehensive social supports to victims of violence. The current administration of funding by Government Departments, therefore, is inconsistent with the objective of integrated service delivery to respond to the intersectional needs of Aboriginal people, which traverse the justice, child protection, health, mental health, education and other sectors.

In this context, we recommend the Family Safety Plan commit governments to working with service providers to comprehensively assess their integrated service delivery capabilities and develop funding models accordingly, to enable the drawing of funding from across sectors to support the provision of services within single service providers that address the intersectional needs of clients. Where possible, the provision of integrated services by single service providers is critical to mitigating the risk

¹⁷ Community Legal Western Australia, 'Submission to the Independent Review of the National Legal Assistance Partnership 2020-2025', October 2023, [Response 590124586 to Submissions to the National Legal Assistance Partnership 2020-2025 \(NLAP\) review - Attorney-General's Department - Citizen Space \(ag.gov.au\)](#).

of re-traumatising clients by requiring them to tell and re-tell their stories to different service providers.